

Local Plan 2040

# Preferred Options Consultation Report

**Regulation 18 Part 1**  
May 2023



**Oxford City Council**  
**Local Plan 2040 Preferred Options**  
**(Regulation 18 Part 1)**  
**CONSULTATION REPORT**  
**May 2023**

## Contents page

1. Introduction .....	4
2. Local Plan Timeline .....	4
2.1 Issues Consultation (June-September 2021) .....	4
2.2 Preferred Options consultation (Part 1) (Autumn 2022) (results summarised in this report)5	
2.3 Preferred Options consultation (Part 2) (Winter/Spring 2023) .....	5
2.4 Proposed Submission consultation (programmed for Autumn 2023).....	5
2.5 Examination (expected during 2024).....	6
3. Preferred Options consultation process .....	6
3.1 Who was consulted? .....	6
3.2 Consultation materials .....	6
3.3 Consultation methods.....	7
3.4 Structure of this report .....	8
4. Responses to Consultation Questionnaire.....	9
4.1 Responses to Consultation Questionnaire.....	9
5. Summary of In-depth Consultation responses .....	26
5.1 Policy Options Set S1 to S3 .....	26
5.2 Policy Options Set H1 to H16 .....	41
5.3 Policy Options Set E1 to E9 .....	65
5.4 Policy Options Set G1 to G10 .....	79
5.5 Policy Options Set R1 to R8.....	102
5.6 Policy Options Set DH1 to DH15 .....	117
5.7 Policy Options Set C1 to C10.....	146
5.8 Sites Allocation Policy Options.....	158
5.9 Sustainability Appraisal.....	205
5.10 Other Evidence Base Studies .....	210
Appendix 1: Statutory Consultees .....	218
Appendix 2: additional local groups and organisations contacted directly.....	219
Appendix 3: Performance of Social Media Campaigns .....	223

# 1. Introduction

The Oxford Local Plan 2040 will set out how we want the city to look and feel. It will guide new development to the right locations while protecting and improving the environment and people's quality of life. It will help deliver the new homes, businesses, jobs, shops and infrastructure needed to support the growth of Oxford over the next 20 years and it will be used in determining planning applications and to guide investment decisions across the city.

This Consultation Statement sets out how Oxford City Council undertook consultation on its Oxford Local Plan 2040 Preferred Options document between October 3<sup>rd</sup> 2022 and November 14<sup>th</sup> 2022. This consultation stage was the Regulation 18 Part 1 consultation, and followed the requirements of Regulation 18 of the Town and County Planning (Local Planning) (England) Regulations 2012. The consultation was also carried out in accordance with the commitments in Oxford City Council's Statement of Community Involvement in Planning, which sets out how we will involve the community in the planning process.

This consultation statement covers:

- (i) Which bodies and persons were invited to make representation under Regulation 18
- (ii) How those bodies and persons were invited to make such representations,
- (iii) A summary of the main issues raised by those representations, and
- (iv) How we intend to address the main issues in the Local Plan.

This Consultation Statement addresses the Part 1 consultation only, we will publish a further Consultation Statement after we consult on the Housing Numbers (Regulation 18 Part 2) in Winter/Spring 2023). When we consult on the draft Local Plan in Autumn 2023 (Regulation 19: Proposed Submission Draft Local Plan)we will publish the Consultation Statement again, updated to show how we have addressed the main issues raised in the Preferred Options consultation in the draft Local Plan.

One of the main principles of the planning system is that local communities and stakeholders should be involved from the outset in the preparation of planning policy documents. The following are the main stages of consultation on the Oxford Local Plan 2040.

## 2. Local Plan Timeline

### 2.1 Issues Consultation (June-September 2021)

Preparatory work on the Local Plan began in November 2020. Officers began to meet with a range of stakeholders and interest groups to commence conversations on the project. This has included neighbouring districts, Oxfordshire County Council and others.

An Issues consultation was held in the summer of 2021, with the aim of involving as many people as possible early in the process of producing a new Local Plan. This stage is not a statutory stage of consultation; it is in addition to the formal requirements (see below). This additional stage was incorporated into the project timetable because it was felt that early engagement, before any policy approaches are drafted, allows people the best opportunity to shape the plan as it develops. The



City Council was also keen to involve those who might not normally engage with planning. Restrictions relating to the Covid-19 pandemic were still in place, which limited opportunities to meet people out and about at events, to hold workshops for example. Therefore, social media was particularly important. We arranged door-to-door delivery of an eye-catching leaflet with easy to digest infographics and a questionnaire that could be returned using Freepost. A summary report for the Issues Consultation has been published and is available to view online:

[Consultation Report for Local Plan 2040 Issues Stage.](#)

## **2.2 Preferred Options consultation (Part 1) (Autumn 2022) (results summarised in this report)**

The consultation period, which ran from 3rd October to 14th November 2022, was to specifically gain people's views on the Preferred Options document. As with the Issues consultation, the aim was to reach as many people as possible, and a wide range of groups across the city including those who might not normally engage with planning. A leaflet questionnaire was distributed to all households and businesses through the city which could be returned using Freepost. Unfortunately, some of the questionnaires were delayed due to postal distribution problems. An extension of time until the first week of January 2023 was arranged to enable the return of completed questionnaires. A number of 'drop in' sessions were organised at various locations across the city, attended by officers of the Planning Policy team. A social media and bus advertising campaign was also arranged to promote the consultation. Comments could also be submitted via a detailed questionnaire on the Council's consultation portal or in writing via email or letter.

The outcomes from this stage of consultation, as summarised in this document, will help the City Council to prepare the Proposed Submission Draft Local Plan.

## **2.3 Preferred Options consultation (Part 2) (Winter/Spring 2023)**

This follow-up, focussed consultation period will run from 13<sup>th</sup> February to 27<sup>th</sup> March and is a technical consultation that will focus specifically on the Local Plan housing need. Those who responded to the Part 1 consultation (and consented to be contacted with further updates will be notified. The consultation will be advertised on social media and there will be opportunity for people to get involved through a structured online questionnaire that will be available on the Council's Consultation Portal. As with the Reg 18 Part 1 consultation, notification of the consultation will be sent to statutory consultees, those on the Council's online consultation database with an interest in planning and regeneration, various local groups and organisations that are likely to be interested.

## **2.4 Proposed Submission consultation (programmed for Autumn 2023)**

Following the analysis of comments on the Preferred Options Document (Reg 18 Part 1) and the Local Plan 2040 Housing Need (Reg 18 Part 2), we will draft a Proposed Submission Document and consult people for a further 6 weeks. Comments must be received in writing (or by email) as they will be submitted to the Secretary of State.

## 2.5 Examination (expected during 2024)

Following the Proposed Submission consultation, there is an opportunity to make minor changes to the Local Plan in response to the comments made, before the document, the supporting evidence base and comments received are submitted to the Secretary of State. An independent examination is then carried out. Those who have made comments to the Proposed Submission Document have the right to ask the Inspector to be heard in person at the examination. The Inspector will provide a Report concluding if the plan is found sound. If the plan is found sound, any changes recommended by the Inspector are made and the plan will be taken to Full Council to formally adopt it.

## 3. Preferred Options consultation process

### 3.1 Who was consulted?

The City Council conducted an extensive 6 week long consultation exercise between October and November 2022 to publicise the project and engage the Oxford community in the Preferred Options Stage of the plan making process. The Preferred Options consultation aimed to involve residents, workers, employers, students and visitors to Oxford as well as stakeholders and service providers. An extension of time was provided for responses until January 2023 to mitigate an issue with the postal delivery of some of the questionnaires.

The Preferred Options consultation aimed to involve the whole city by delivering a questionnaire door-to-door across the city (approximately 46 000 properties). Letters were sent to various organisations and individuals, which included the statutory stakeholders and a wide range of interest groups, developers and agents.

Direct contact with the following individuals or organisations was made either by email or letter:

- Door-to-door delivery across the city (approximately 46 000 households)
- Statutory consultees (42 statutory) (see **Appendix 1**)
- Those on the City Council's online consultation database with an interest in Planning and Regeneration
- Additional local groups and organisations who were likely to be interested (250) (see **Appendix 2**)
- Respondents from the First Steps Consultation who wished to be kept informed of further stages in the Local Plan process (250)

### 3.2 Consultation materials

At this stage in the Local Plan project the material that was published was focussed on presenting the preferred policy options, and providing the evidence base that had led to the development of the policy options and to the preferences for those options. The consultation focussed on asking consultees whether they agreed with the Council's preferences for the policy options. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind:

For people with 5-10 minutes to get involved:

- Leaflet (equivalent 2 sides of A3) with basic information, a simple ‘Strongly Agree – Strongly Disagree’ questionnaire and some space for additional written comments with a freepost reply
- Online questionnaire based on the 3 themes of the consultation
- Social media posts including links to 3 short surveys on specific themes to supplement consultation responses. Comments could also be left in relation to the posts.

For stakeholders and those with more interest/time:

- Local Plan Preferred Options Document
- Draft Sustainability Appraisal
- Background Papers
- Green Belt Study
- Structured online questionnaire (on the Council’s Consultation Portal) to comment on Preferred Options Document (in addition to option of submitting written feedback on the council website, by email or by post)

The materials described above were available:

- On the Council’s website
- In 7 local libraries and the central library
- On request
- In addition to being delivered to every household in the city, the leaflet was made available:
  - In 7 local libraries and the central library
  - In 30 community or leisure centre locations across the city

### 3.3 Consultation methods

#### 3.3.1 Promotion of the consultation period/Publicity

The Preferred Options Consultation was publicised through the following channels:

- Publication of an updated Local Development Scheme (LDS) in June 2022; Attendance at local groups and forums: Oxford Strategic Partnership, Talk of the Town and the Inclusive Transport and Movement Group;
- Notifying those on the City Council’s online consultation database (all those interested in planning or other relevant topics- 400+);
- Notifying statutory consultees and Duty to Cooperate bodies;
- Notifying residents groups and amenity groups;
- Notifying all primary and secondary schools within the Oxford City administrative boundary (and surrounding areas including Botley, Kennington and Kidlington);
- Publishing information on our webpage (including introductory videos);
- The City Council’s social media channels (Facebook and Twitter including paid adverts on Facebook);
- A press release
- Posters distributed to all community noticeboards in the city
- A bus advertisement campaign inside Oxford Bus Company buses during the first four weeks of the consultation; and
- Briefing to Local members

### 3.3.2 Consultation events and meetings

The Preferred Options document was approved by Cabinet on 14<sup>th</sup> September 2022. Before that meeting it was considered at Scrutiny Committee on 12<sup>th</sup> June.

Drop-in events were held at the following times and venues. These were widely advertised through the posters displayed on all community notice boards, as well as on our website, on electronic adverts inside Oxford Bus Company buses and mentioned at meetings held before and during the consultation.

<b>Tuesday, 4<sup>th</sup> October 2022</b>	Barton Neighbourhood Centre, 2-4pm	<b>Tuesday, 25<sup>th</sup> October</b>	Oxford City Football Club, Marsh Lane 5.30pm - 7.30pm
<b>Friday, 7<sup>th</sup> October</b>	Westgate 12-2pm	<b>Friday, 28<sup>th</sup> October</b>	Gloucester Green Market – not a stall but a stand with leaflets
<b>Saturday, 8<sup>th</sup> October</b>	Oxford v Wycombe, Kassam Stadium, 1-3pm	<b>Saturday, 29<sup>th</sup> October</b>	Cuttislowe Parkrun 8.30 - 10.30am
<b>Monday, 10<sup>th</sup> October</b>	St Mary and St Nicholas Church, Littlemore coffee and singing morning 11am – 12pm	<b>Tuesday, 1<sup>st</sup> November</b>	Lidl, Watlington Road, 12-2pm
<b>Wednesday, 12<sup>th</sup> October</b>	Blackbird Leys Community Centre 2-4pm	<b>Wednesday, 2<sup>nd</sup> November</b>	Sainsbury's Heyford Hill, 11am - 1pm
<b>Tuesday, 18<sup>th</sup> October</b>	Rose Hill Community Centre 2-4pm	<b>Thursday, 3<sup>rd</sup> November</b>	EMBS Community College, 12-12.45pm
<b>Thursday, 20<sup>th</sup> October</b>	Tesco Superstore, Blackbird Leys, 11am - 1pm	<b>Friday, 4<sup>th</sup> November</b>	Templars Square shopping Centre, 11am - 1pm
<b>Sunday, 23<sup>rd</sup> October</b>	South Oxford Farmers Market, New Hinksey 10am –12pm	<b>Tuesday, 8<sup>th</sup> November</b>	Oxfordshire County Library, Westgate (Main Foyer) 12-2pm
<b>Monday, 24<sup>th</sup> October</b>	Ferry Leisure Centre, 12- 2pm	<b>Thursday, 10<sup>th</sup> November 2022</b>	Rose Hill Junior Youth Club, Rose Hill Community Centre, 5.30-7pm

### 3.4 Structure of this report

The report comprises of summaries and analysis of the responses to the consultation questionnaires with supporting appendices. In the main body of the report, the outcomes from the 2 sets of questionnaires are addressed separately in two sections - Section 4 covers the responses from the shorter questionnaire (leaflet consultation) and Section 5 covers the responses from the in-depth questionnaire (inclusive of responses submitted via the online consultation portal and email).

Supplementary information is contained in the appendices from Section 6 onwards, including the list of statutory bodies consulted, local community and amenity groups that were contacted directly, and a summary of outcomes from the various social media campaigns related to the consultation.

## 4. Responses to Consultation Questionnaire

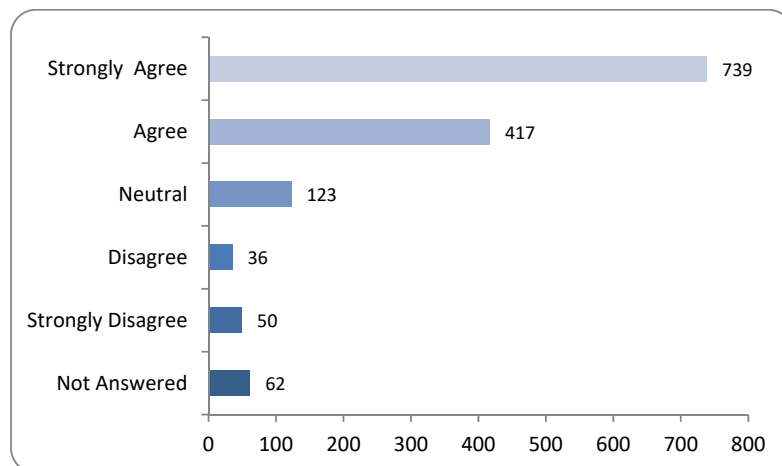
### 4.1 Responses to Consultation Questionnaire

The postal leaflets and online questionnaire are both based on the same set of questions, and so both sets of responses have been collated and analysed together. A total of 1427 combined responses were received over the consultation period.

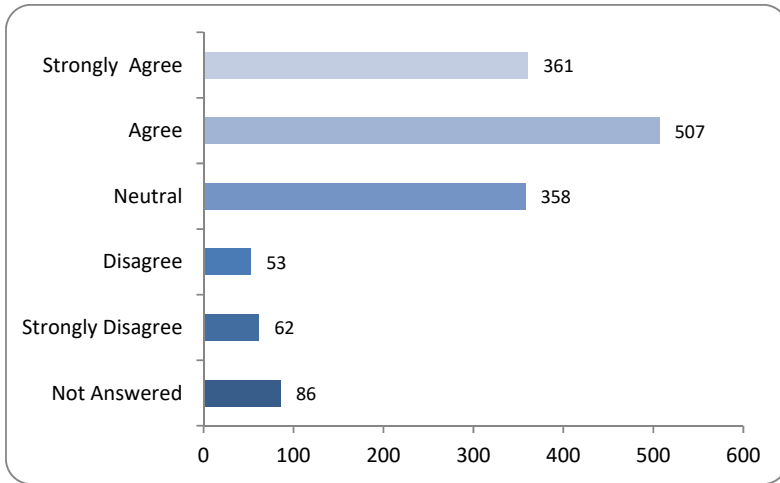
#### 4.1.1 Graphs of responses

The graphs in the following sections show the numbers of respondents in strong agreement, agreement, disagreement, strong disagreement or neutral stances with the statements under each heading.

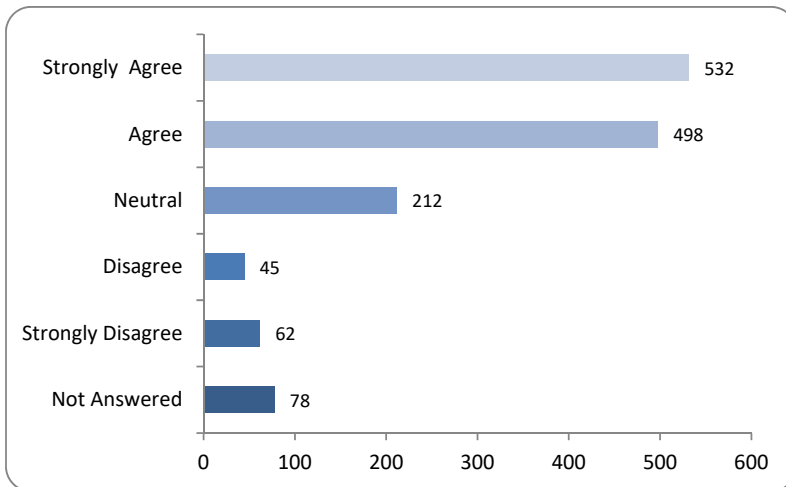
#### Should we continue to protect community, cultural and social facilities and set out criteria for new ones?



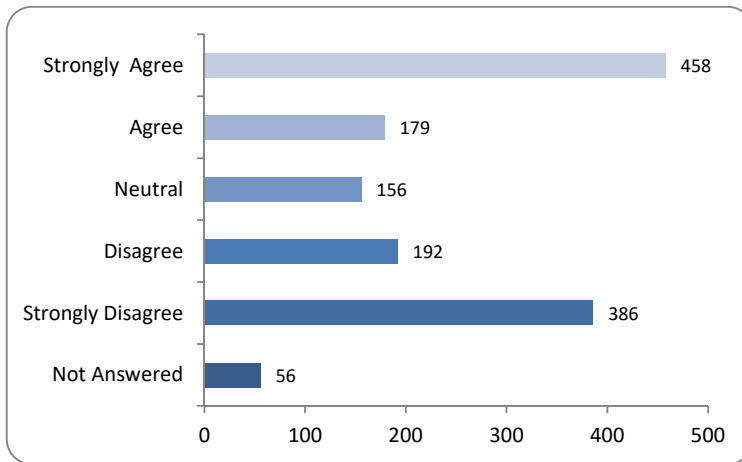
**Should we set out guidance for our District and Local Centres?**



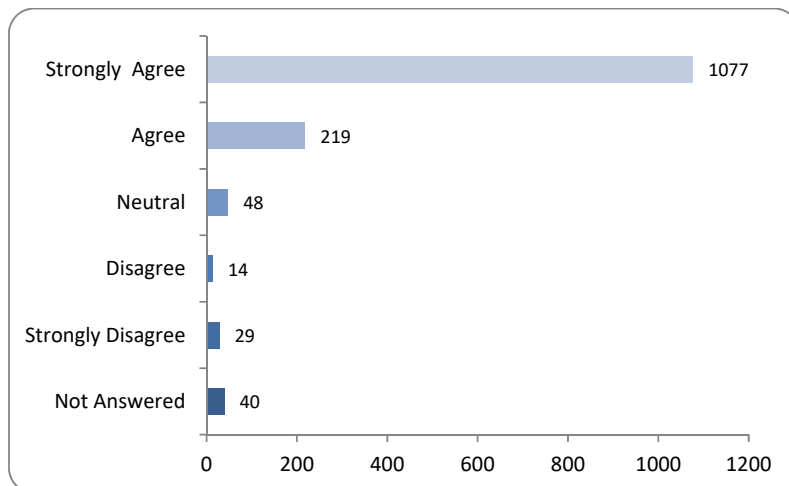
**Should we continue to promote the use of a design checklist, to improve the design, layout and architecture of new developments?**



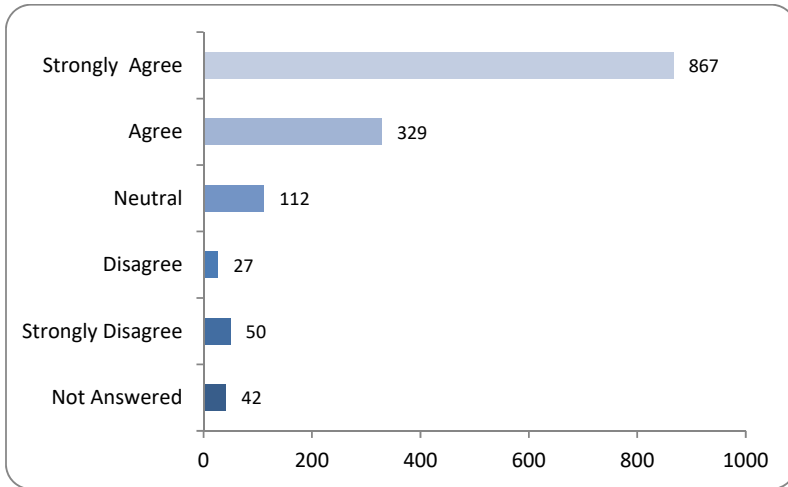
**Should we continue to prioritise travel by active and sustainable modes (walking and cycling) and discourage private car travel, by seeking to reduce public parking and parking in new developments (residential and non-residential)?**



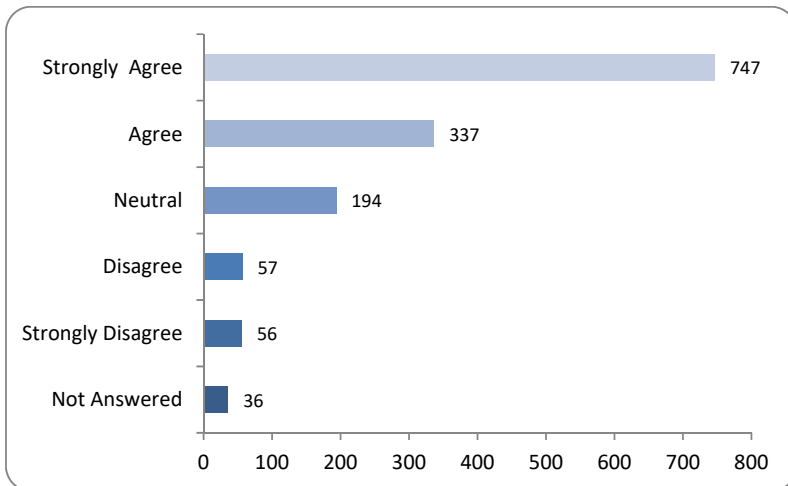
**Should we continue to protect a network of green spaces, including ecological sites, because of their value for health and wellbeing, biodiversity etc.?**



**Should we require greening of sites by requiring developments to include green features such as additional planting or green roofs?**

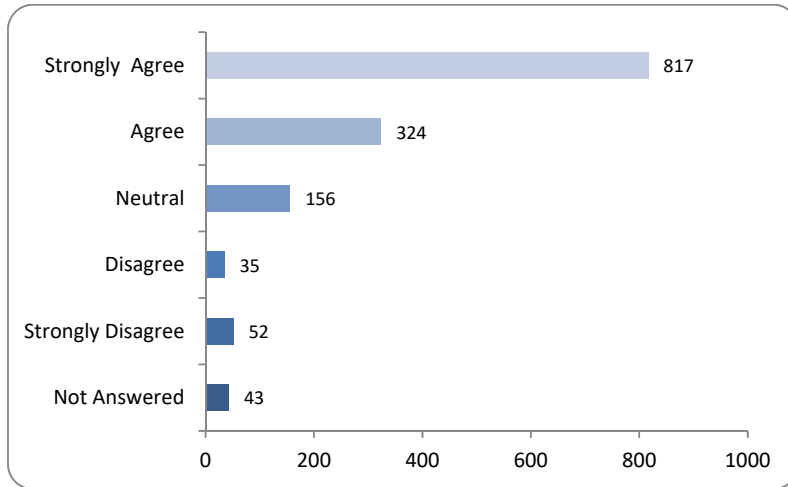


**Should we require new developments to include features to support wildlife such as bird and bat boxes?**

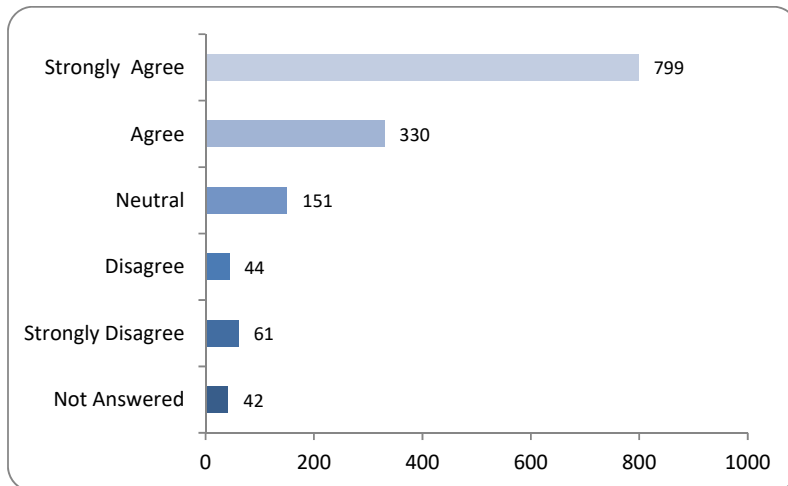




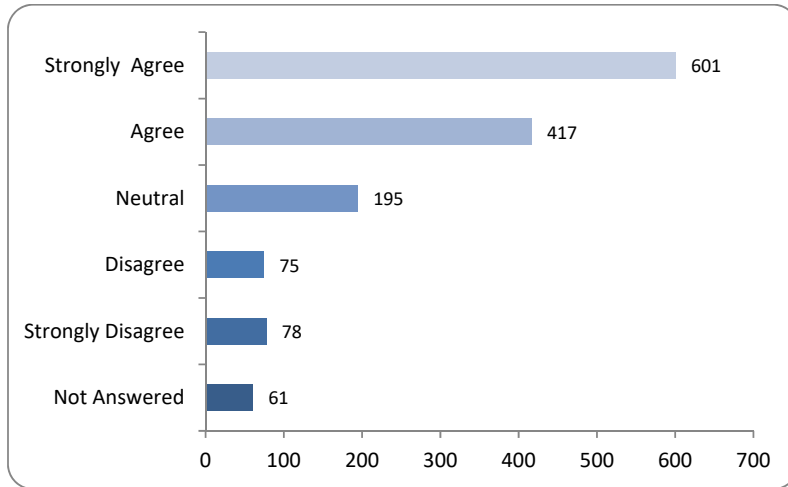
**Should we support the use of retrofitting (the addition of new features to an existing building) to reduce carbon emissions?**



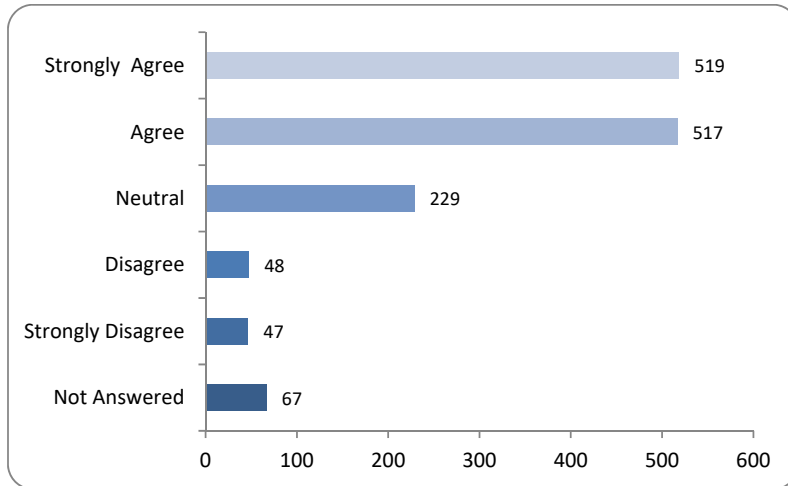
**Should we require planning applications to show how developments will be resilient to climate change?**



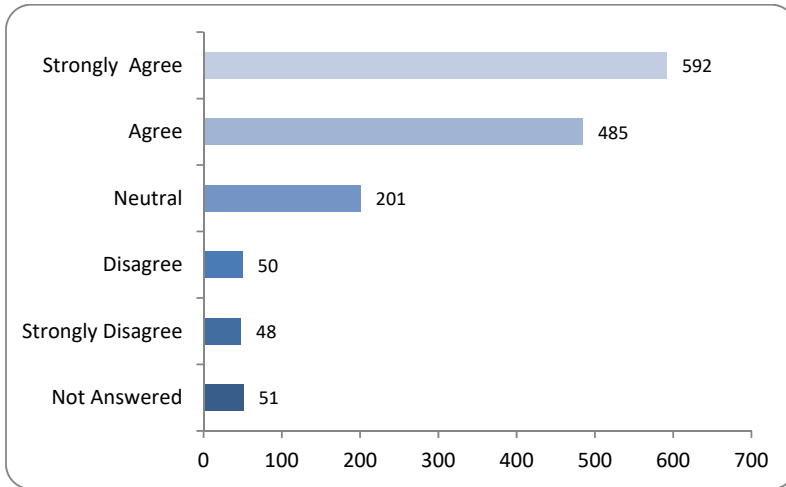
**Should we focus new development away from areas of flood risk but allow redevelopment of sites at risk from flooding where it will improve the current situation?**



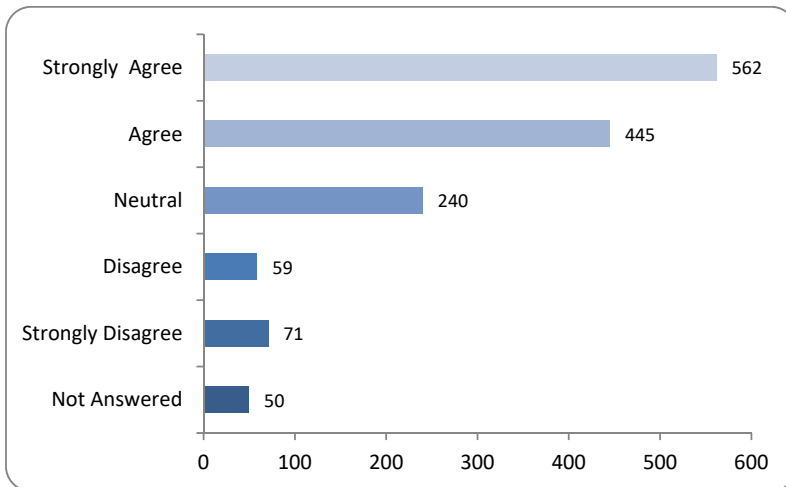
**Should we continue to encourage intensification and regeneration of employment sites that are already important to supporting the local and national economy?**



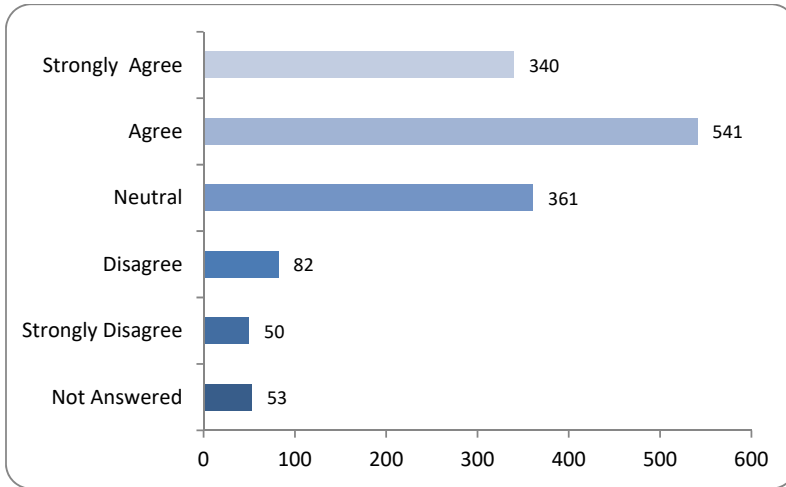
**Should we require major development projects to provide training and employment opportunities for local people?**



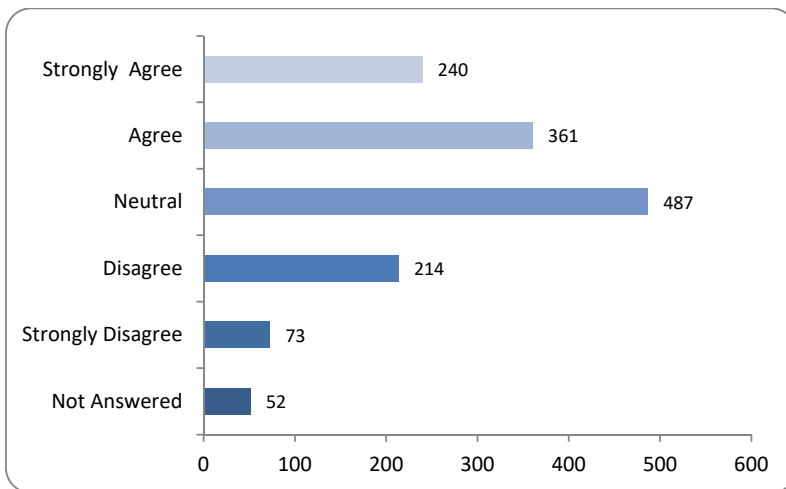
**Should we introduce a policy requirement for affordable workspaces (e.g. offering lower rent options) to be delivered as a percentage of all large commercial developments (affordable workspaces)?**



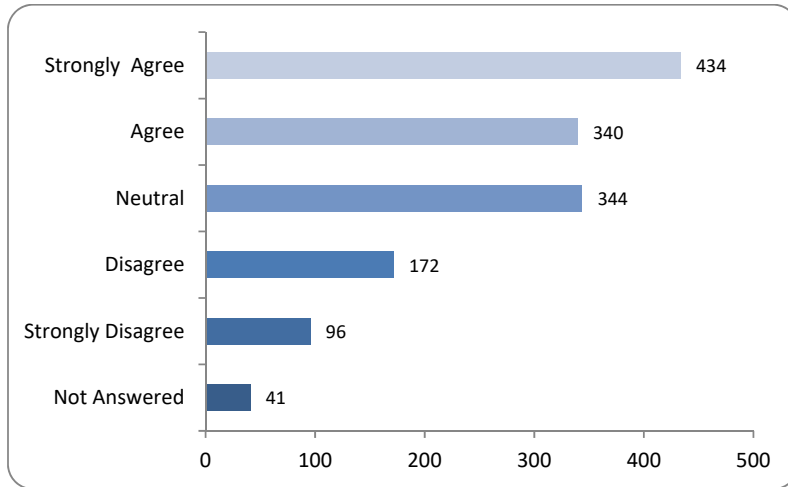
**Should we allow an element of housing to be introduced on existing employment sites?**



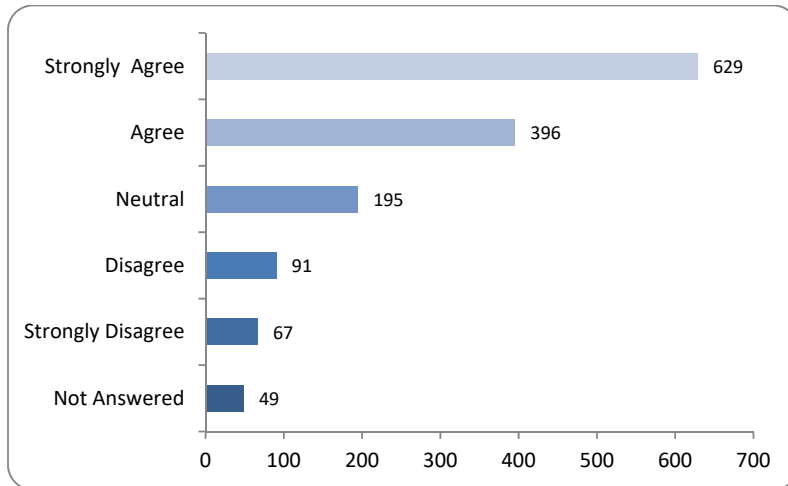
**Should we continue to meet as much of our housing need as possible by prioritising housing over employment where the space is available?**



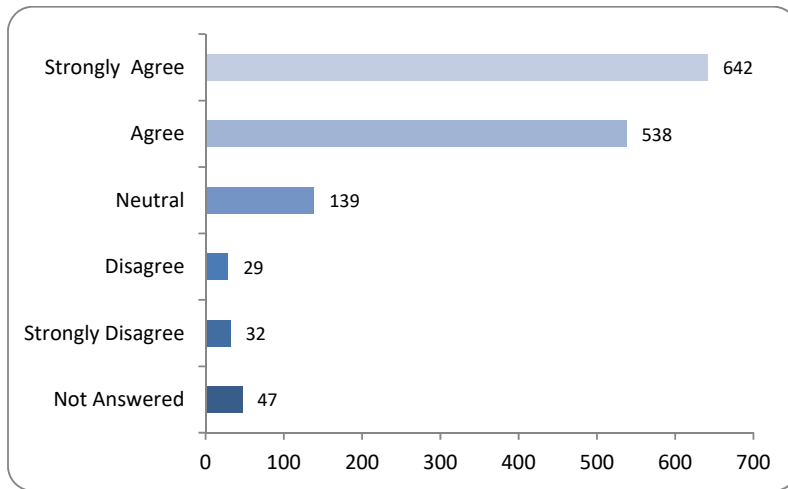
**Should we continue to prioritise the delivery of affordable housing that people can rent (e.g. social rent) over affordable housing that people can buy (e.g. Shared ownership or First Homes)?**



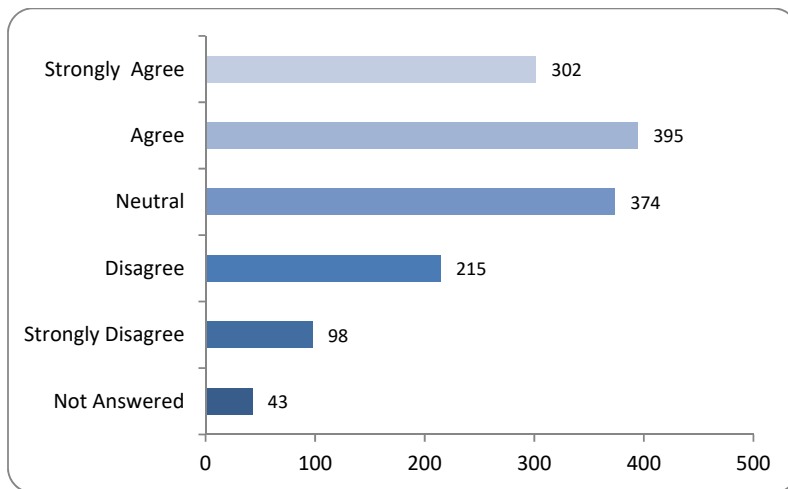
**Should we continue to prioritise affordable housing as the main community benefit from new developments, so that developers are required to provide as much as possible?**



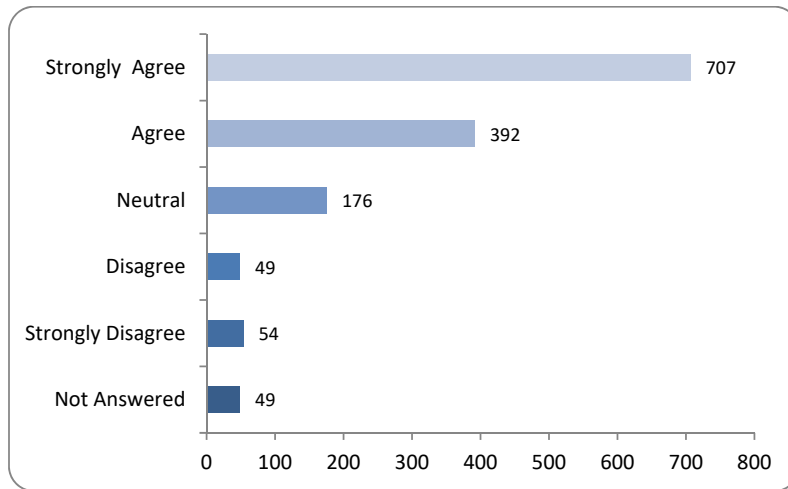
**Should we continue to deliver a mix of dwelling sizes (number of bedrooms) and types (housing for specialist needs, accessible homes) for different people's needs?**



**Should we prioritise smaller houses or flats, in order to provide more homes overall?**



**Should we continue to require Health Impact Assessments for all major new developments, to show how they are supporting healthy communities and tackling health inequalities?**



**4.1.2 Infrastructure Gaps**

Responders were asked to describe what they considered to be infrastructure gaps that would hinder development in their local area. Relevant comments have been summarised and grouped according to the various themes that have emerged from the answers. Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. Where applicable, we have shown the number of comments received under each topic to indicate the level of interest.

## General Comments on Infrastructure

Summarised Comments	Tally
Improved bus system/transport system more reliable/frequent/extend services	109
Make cycling safer / focus on cycling with cycle lanes / better segregation	81
Not everyone can cycle, elderly and disabled and carers must be considered	59
No more LTNs, bus filters etc.	60
Public transport should be cheaper/free	27
Traffic needs addressing	27
Dentist/doctors/pharmacy provision is low	29
The 15 minute concept can't work for all areas-where not enough GPs, dentists, leisure facilities, schools and supermarkets, cinemas and post offices	24
Public transport needs to improve the 15 minute concept can work	21
Need more electric car charging points for cars-	20
LNTs are making traffic worse/moving traffic and pollution to ring road	18
People need their cars for work, everyday tasks, especially for outside of city	15
Increase parking (e.g. for hospitals and, vulnerable people)	15
Need more creative / direct bus routes to key locations	16
Need more covered bike storage	12
People will be trapped if they can't travel more than 15 mins	11
Mend lanes, pavements and roads (consider drainage)	18
Out of touch / listen more (City and County Council)	8
Need more affordable homes	8
Protect trees, woodland and green spaces important for mental health and well being	8
Need a tram system	7
Join bus companies together	7
Protect pedestrians and cyclists	7
LTNs should be more nuanced	6
Support car shares	6
Cycling is not practical e.g. with children / carrying heavy objects	6
Protect existing green spaces	6
Protect the green belt	6
Improve community centres	6
Need more opportunities and facilities for young people	6
Littlemore is overlooked in terms of infrastructure and resources.	6
Leading questions	5
Reduce parking	5
Water/ water pressure and sewage systems are inadequate - leading to localised flooding	5



Summarised Comments	Tally
15 minute concept too ambitious /not thought out / unrealistic	8
Would be impossible to travel into Oxford from outside without a car	4
Support LTNs / reduction in car use	4
Make park and ride free	4
Westgate traffic causes issues for public transport	4
Safe integration of scooters	4
need more street lighting	4
High speed internet	4
No development on the floodplain	4
Not all shops and facilities are 15 min walk for everyone	4
Better schools in Littlemore are needed	4
Better schools needed across the city	4
Poor transport infrastructure in Iffley Village and Old Marston	4
Please remove Bertie Park (site A) from the preferred options"	4

#### Site/Location specific comments

Summarised Comments	Number of responses
Dentist/doctors/pharmacy provision is low (Littlemore, West Oxford)	24
Old Marston has poor public transport links	7
Littlemore is overlooked in terms of infrastructure and resources.	6
Water/ water pressure and sewage systems are inadequate - leading to localised flooding	5
Old Marston needs a GP/dentists	5
Better schools needed across the city	4
Poor transport infrastructure in Iffley Village and Old Marston	4
Please remove Bertie Park (site A) from the preferred options	4
Poor transport infrastructure in Iffley Village and Old Marston	4
Cycle infrastructure linking Eynsham / Farmoor/ Botley is needed	1
Green Road roundabout is a nightmare	1
GP surgery in Wolvercote	1
Need an LTN in Elms Drive in Old Marston	1
Joined bus route from Summertown to Oxford rail station	1
Need a pedestrian crossing on Green Road - very dangerous and needs to sorted	1
Need a new local GP in Oxford.	1
Viaducts would help with roundabout traffic	1
Jericho and waterside have no public transport	1
Iffley Meadow should be maintained	1
Mill Lane lack of shops	1

Summarised Comments	Number of responses
Pipe Bridge shows no sign of repair	1
No LTNs at Headington are causing traffic issues and not helping cycling	1
Developments in Old Marston won't make it a 15 minute neighbourhood, roads in Old Marston are too narrow.	1
Dangerous to cycle along the Cowley Road - Botley and Iffley Road are good	1
Barton needs better public transport or it could become car only.	1
Area near Bertie Park has limited amenities and bad smell.	1
Headington requires better access to the north via bus.	1

#### 4.1.3 Additional Comments

The questionnaires had a section allowing inputs for comments on topics chosen by the responders. These have been summarised and grouped according to the various themes that have emerged from the answers. Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. Where applicable, we have shown the number of comments received under each topic to indicate the level of interest. To aid broader comparison with the other consultation responses, these have been presented as categories under the 6 overarching themes under which the preferred options have been developed.

#### Healthy Inclusive City

Housing/Housing Need	
Summarised Comments	Number of respondents
Prioritise housing on brownfield sites	15
Prioritise affordable housing.	12
Support high rise/ density buildings	7
Need more one bed properties for couples and singles. HMO's need regulation.	7
No more student housing	7
Decrease the number of landlords/second homeowners for private rental residences.	8
Lower rent for all.	6
Build less / there are too many homes	5
More housing needed	5
The term affordable is not truly affordable	4
Affordable housing for key workers	4
Put affordable housing on vacant central sites (replacing empty shops)	4
Need for more social housing / support	4
Private rents need to be capped	4
Officer Responses	
Agreed it is important that affordable housing is affordable to those in greatest housing need, and policies can aim to ensure this, and also that a range of types are available, e.g. for key workers also. The planning system is unable to cap private rents. HMOs are regulated. Attempts will be made to maximise delivery of housing, especially affordable housing. Student accommodation is restricted to certain locations currently and we will review the level of need for it and how it can best be accommodated.	

## Prosperous City

<b>New/Existing Employment Sites; Employment Opportunities</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Don't let colleges/University rule /get their own way.	6
Shops and businesses are closing down and moving away	4
Can't get jobs with decent salaries near our city	4
<b>Officer Response</b>	
The planning system is unable to prevent shops from closing, but it can try to protect local centres and facilities from being lost. Planning permissions are granted on the basis of proposals and not landowners.	

## Green Biodiverse City

<b>Existing Green Spaces</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Nature is a top priority - protect it	16
Stop building on the green belt	14
Protect green belt	11
Need to preserve green spaces that already exist.	5
Prioritise biodiversity - trees, hedgerows, wildflowers and variety of native species.	5
Plant more trees	5
Are the council getting involved with and sorting pollution in the Thames	5
Green spaces are needed for mental health and recreation	4
<b>Officer Responses</b>	
The importance to people of green spaces is evident and will be a consideration in developing policies to protect our green spaces and features.	

## Resources + Carbon

<b>Climate Change</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Need stronger commitment to mitigating damage which could result from climate change	5
The environment and climate change should be your first concern.	5
<b>Energy</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
All buildings should be energy efficient/self sufficient	13
More EV charging points / infrastructure / invest in energy saving tech	8
Solar panels should be included	4
All new developments should be carbon neutral/zero and include SUDs measures and EV charging points, insulation etc.	4
<b>Officer Responses</b>	
We will investigate what is feasible in new developments in terms of carbon efficiency and attempt to draft policies to achieve that.	

<b>Flooding</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Do not build on flood plains	20
Don't encroach onto land at risk of flooding	12
Building on flood plains is too risky	4
<b>Officer Responses</b>	
A Strategic Flood Risk Assessment has been commissioned to help define areas of flood risk and develop the appropriate response to the flood plains in Oxford. A balance needs to be struck between preventing loss of flood storage areas and ensuring areas that are already developed can be	

### Strong Communities

<b>Transport/Movement</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Do not support traffic control measures (LTNs, ZEZ, bus gates, filters)	60
Plans for traffic control measures are not inclusive for people with mobility issues - elderly and disabled	38
Traffic and noise need addressing	36
Make cycling safer (separate lanes) - Traffic measures make it more dangerous	23
Support traffic control measures (LTNs, ZEZ, bus gates, filters)	16
Enforce current transport methods (cycling) and schemes (ZEZ)	14
Public transport (bus services and trams) need to improve before changes are implemented	11
Businesses and livelihoods depend on cars	10
Disabled parking needs prioritising and better management, particularly in the centre	9
Areas are cut off but people need to move people between different zones	6
Parking is essential	10
<b>Officer Responses</b>	
Many of these responses relate to a County Council consultation on LTNs and traffic filters that took place around the same time. There was some concern (especially on social media) that the effect of those proposals was that people would be restricted to their local area of the city; this was not the intention but a misinterpretation which the County Council has clarified. The Local Plan sets parking levels, and we will be reviewing what is needed (including disabled parking) and what the appropriate parking standards are.	

<b>Active/Sustainable Travel</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Public transport needs investment to be more affordable and frequent for 15 minute concept to work	56
Improve transport links (cycle and bus routes) around city, not just to centre	17
Mend pavements and cycle lanes	5
<b>Officer Responses</b>	
Agreed that the better the public transport and particularly walking and cycling routes are, the more easily people will be able to access services easily, close to their home, and without needing to drive. Opportunities to help enhance provision may be limited through the local plan process, but we will look at all possible opportunities to enable improvements through the planning process. Many of these comments relate to the highways network and transport strategy. The County Council is the highways authority, not the city council, and is responsible for these matters.	

<b>Community/Cultural Facilities</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Safer community facilities and training for young people, especially girls	7
Improved litter and bin management (underground bins)	4
<b>Officer Responses</b>	
Comments noted	

#### 4.1.4 Other Comments

<b>General</b>	
<b>Comment</b>	<b>Number of responses</b>
Out of touch / listen more (City and County Council)	8
Leading questions	5
<b>Officer responses</b>	
The questions were not intended to be leading, but we hope they did enable people to put across their thoughts, which will help to shape the consultation.	

## 5. Summary of In-depth Consultation responses

The questionnaire was designed to allow respondents to leave in-depth comments on each set of preferred policy options, the supporting documents and overall evidence base. Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. A number of representations were made separately by email, and these have also been collated as part of the summary.

### 5.1 Policy Options Set S1 to S3

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
Introduction	0.1			Not clear what the starting date for the Plan 2040 is	2	The Plan should reference development on boundary of Oxford especially Kidlington & Botley to avoid duplicating services (15 min neighbourhoods)		OCC - the OLP should be consistent with the Oxfordshire strategic vision and evidence base from OP2050	2		
				Plan end date should be 20 years post-adoption as this would give greater certainty in plan-making across Oxfordshire and allow for a comprehensive strategic approach to delivery of Oxford's unmet housing needs.		SODC/VWHDC - the strategic vision must mention affordable housing and how it is to respond to the challenge of delivery.	2	It would be better to have a transport, connectivity and infrastructure referenced in the vision and objectives not just an add-on in chap 8. What about reference to CPZs we must work closely to deliver infrastructure - county	1		
				Is OLP2040 consistent with the strategic vision for Oxfordshire, and other strategies/ plans e.g., county transport plan (COTS,) good growth, etc.? How does OLP2040 respond to agreed ambitions of Good Growth, strategic vision etc.		Disappointment that the OLP Preferred Options document makes no reference to our Summertown Neighbourhood Plan (NP). Therefore the key issues of concern, set out in our NP concerned with housing (affordable, small-units & elderly), protect green spaces, protect character of area, need for new community centre and health centre, and place-making are not taken into account in the planning of the city. As such the PO document is unsuitable for consultation with the community.	1				
				To what extent will OLP2040 implement/ deliver the LIS? What extent of employment growth does this imply and what are the implications for other matters?		Concerned that quantity & spatial distribution of proposed development is not clear.	1				
				Are there any draft policies/ options/ strategic options from the Oxfordshire 2050 plan that meet the city's requirements but also those of neighbouring districts?		Wolvercote residents concerned about affordable housing & green spaces as set out in Neighbourhood Plan.	1				
				Previous consultations e.g., Oxfordshire Plan 2050 should be acknowledged in the OLP2040 and by other districts.		Need for greater acknowledgement of changing working patterns and its consequent impacts such as less demand for work parking spaces and less need for office space					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
				A lot of issues covered, which is welcomed, on a wide range of topics however it must be overwhelming for the majority of people who are being asked to make a reasoned contribution to the future of their city.		No policies on foul sewerage, water quality, hedgerows & solar panels.	1				
				Disappointing at lack of acknowledgement of neighbourhood plans, which are made by people with an understanding of the needs and characteristics of their areas.		Process: New Marston (South) Residents Assoc, strong reservations about PO consultation process. Consider documents fail to fully explain the options & implications of policy options. Not all residents received leaflet, which is poorly designed. Main PO Document not suitable for public to understand.	1				
				15-minute neighbourhood concept needs to include or make reference to, the work of transport groups to show how this relates to getting about more widely throughout the city. Document also needs to set out how essential workers will commute on a clean rapid transport system and how citizens will be able to move about the city in a safe, well-maintained public realm.		Content: Question value of LP 2040 given aim for substantial housing and employment growth for Oxford, which is incompatible with global economic crisis and challenges of Climate Emergency. Partial mitigation measures are an insufficient response to growth which will add to circle of environmental decline.	1				
						Difficult to see how Local Plan can proceed in the absence of a strategic plan for the County or an agreement with Districts on amount and location of development. Plan should not rely on Districts meeting some of city's housing and employment needs.	1				
						Do not accept that City should be pursuing economic growth, in context of climate change & biodiversity emergencies, water supply & sewerage issues, need to level up opportunities and backdrop of Brexit and cost of living crisis.	1				
Where we are SWOT: Natural Environment	1.1-1.2			The SWOT analysis should include OU and OBUs contribution to POS and sport facilities and consider POS coming forward as part of planned developments around the edge of the city and access to open countryside.	1						
Built Environment				The historic estate of OU should also be considered as a Threat which requires active management and leadership through the OLP owing to the net zero carbon commitments from the OU and colleges. The innovative way sites have been developed is an opportunity.	1						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
				<b>Historic England:</b> suggest the LP is more explicit about the multi-faceted contribution of the colleges in shaping the identity of the city. The network of related historic buildings in such a concentrated area has a major impact, which is not fully recognised in this section.							
Community, culture and living		Lack of capacity in the city to meet housing needs is a key threat.		The presence of OU/OBU and their cultural contribution e.g. museums, should be highlighted as a strength. As should the universities meeting their targets to house the majority of students. Development beyond city boundaries to address unmet need is a major opportunity for the city.	1	The affordability of housing should be added as a weakness, also an analysis of transport and movement related issues including private car use, public transport patronage					
Economy				Constrained land supply should be included as a threat as it could constrain the growth of the knowledge economy in 21st C. The OU contributed £15 billion to national economy <a href="https://www.ox.ac.uk/research/recognition/economic-impact">https://www.ox.ac.uk/research/recognition/economic-impact</a> The SWOT analysis should align with the OES (p 7)	1						
Economy	bullet points			Bullet point list should include Tourism as a strength	2						
				<b>Historic England</b> recommend that Oxford's heritage is mentioned in any such section on opportunities. Currently the Preferred Options insufficiently acknowledge the contribution made by the city's heritage to its local economy. They point to evidence available on their website relating to heritage counts and set out that there is scope to consider this in local context in more detail.							
Vision	1.3 -1.5	Support: The Plan has more merit than previous one and broadly supported, but concerns about scale of economic and housing ambition.	1	<b>OU Development:</b> Support aspiration to be net zero by 2040 but needs better definitions as 76% emissions from existing buildings. Costs need considering in full as does balance between heritage and environment.	1	Do not agree with growth-led vision driven by City Council and Oxford Colleges. Likely to increase housing beyond city boundary, increase house prices, and damage biodiversity. Likely to result in significant urban pressures. This approach is opposite of what is needed to address the various emergencies (e.g., climate) that have been declared.		Plan should give more prominence to contributions of Universities. Allowing housing on campus and academic sites will detract from their role.	1		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
		Support: PO presents significant improvement on current LP, includes more ambitious responses to climate change, nature and recognition of wider health / well-being benefits.	2	Reference the Oxfordshire Strategic Vision by the FOP setting out ambition for the county and will set long-term, strategic economic infrastructure and environmental priorities. Needs more emphasis on design quality	1	An alternate vision is to ensure that we maintain full employment for people who already live in the county while preserving the countryside and only building those homes and new business premises that really need to be there and ensuring supporting infrastructure is put in place to cope with limited growth.					
						Three key strands of the plan should be 1. Addressing our climate/ nature emergencies; 2. Addressing unaffordable housing - no evidence that simply building more homes will reduce prices; and 3. Levelling up - no reason for spin-off industries associated with the university to be located close to it. E.g., R&D for Nissan takes place in Japan with manufacturing in UK. Same approach could be for Oxford. Spin-offs could be located elsewhere.					
		Support: for vision particularly 15 min. neighbourhood concept.	1								
						The Plan needs to address the imbalance between housing and jobs in Oxford and the associated problems with in-commuting.	1				
	1.31-1.33			Support over-arching threads, providing the 15 min concept does not result in a failure to invest in good public transport and cycle routes.	1						
	Figure 1.1			Add reference to improving sustainable transport	1						
				<b>Historic England:</b> suggest the figure currently implies that historic environment contributes only to the environmental and social pillars of sustainable development. This fails to recognise the economic dimension. Assuming Figure is carried forward into the OLP, the simplest way to address this they suggest would be to delete the headings in capital letters replacing the current text simply with Theme 1, Theme 2 and so on. The current approach over-simplifies the breadth of the six themes.							
Objectives & Strategy	1.7			Healthy & Inclusive city - more emphasis on need for higher density of development and efficient use of land.	1						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
	1.8	Plan needs to include flexible and realistic housing policies. City Council needs to work with neighbouring authorities to provide required housing.									
	1.10	May be more appropriate for smaller dwellings to be delivered in city and district centres at higher densities.				Other sites are suitable for high density developments other than CC and DCs - each site should be looking to maximise density	1				
	1.12-1.13					Need for greater acknowledgement of changing working patterns and its consequent impacts such as less demand for work parking spaces and less need for office space	1				
Green Biodiverse City				Clear target for BNG and should reference 10% minimum	1						
	Fig 1-2	Support	1	Plan should show key sites outside city boundary including Botley and Kidlington look beyond boundaries to ensure policies are effective	2						
				Oxford North: part near Canalside incorrectly shown as R & D site, should be residential as approved. Additional area next to Joe Whit's lane shown incorrectly.	1						
	1.19	Agree with para ensure appropriate densities and high quality design	3								
	1.27			Although 15/20 mins neighbourhood is a good theme must consider green field sites on city boundaries which may reduce its effectiveness as a concepts	1						
				Intent to improve connectivity and reduce need to travel is understood but question the value of this concept as an 'overarching thread'. Shouldn't be implemented at expense of recognition of Oxford being a global player in education and R&D.							
Overarching Threads	1.32 & 1.34	support for objectives / golden-threads on climate change and 15 min city, but impossible to be achieved if jobs are in Oxford whilst people live outside in surrounding towns	2								

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
		Support for all 3 golden-threads, climate change, reducing inequalities (affordable housing) and 15 min city	1	15 min neighbourhoods must consider needs of the elderly who cannot walk or cycle.	1	The 15 minute city concept should not be used to justify development in the GB					
		Support for 15 min city concept, which takes a sustainable approach to travel & support both LTN's and better cycling provision.	1	OCC - transport policies need to be clearer to ensure consistency with county policies	1						
	1.37	Support for statement that sets out significant need for housing and employment and limited land means it should be prioritised	1	City must prioritise housing on any site that becomes available	2	Objectives need to link with principles of Transport & Connectivity Plan (OCC) which seek to reduce need to travel. Addressing imbalance between jobs and housing would then reduce the need to travel.	2				
				Support 15 min city which must complement delivery of sustainable transport links to support city also thin beyond boundary as many residents may commute out to Harwell/Begbroke		PO needs to be more flexible lead by market forces general locations for uses should be mapped on key diagram and ensure compliance with para 23 NPPF and policy delete		15 min city fails to address access issues for people outside city			
Vision	Figure 1.1	Support however apparent conflict between heritage and climate change themes.	2								
		support vision in particular focus on environment and creating a healthy and inclusive city									
Objectives & Strategy	1.6 - 1.30	It is vital that the strategy of the Plan and policies supports the vision welcome 15 minute neighbourhoods and initiatives which promote the most efficient use of land and delivering a healthy and inclusive city.	3	The Plan should give more prominence to the OU & OBU as significantly contribute to environmental, heritage, culture, leisure, employment opportunities	1	Object to the scale / ambition for economic growth and the adverse impact on climate change, green spaces and wildlife. This ambition also increases the demand for housing.		Correct disconnect between draft objectives and evidence by explicitly stating support for growth of both OU and OBU; resolve shortage of land by promoting compact living and intensification of and have positive management of the historic environment to reach net zero.			
		support first objective - A healthy and inclusive city to live in	2	More emphasis in the Plan on safety, crime and road safety to support more vulnerable residents also increase emphasis on equality of outcomes and improved educational opportunities for all.	1						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
	para 1.10	Agree there are different site and area contexts.	2	Welcome a greater emphasis on safety in this document.		Disagree that only city centre and district centres are suitable for high density developments. Making efficient use of land in the City is a key policy aim. Each site should be looking to maximise density within the context of the surrounding area.	2				
	Figure 1.2	Welcome recognition that Arc Oxford is a Key economic site.		It would be useful for the plan to show the key sites outside of the City boundary, especially those at Botley and Kidlington as these may influence policy thinking. The Plan must look beyond its boundaries to ensure policies are effective	3						
	Para 1.19	Agree that land is a limited resource in the City and must be used wisely and at high but appropriate densities and with high quality design.	3								
	Paras 1.23 - 1.25			<b>Historic England:</b> These paras do not fully capture the essence & significance of Oxford's heritage, and the relationship between its heritage and the people who live, work and pass through the city - though acknowledge this may not be aim.							
	Para 1.27	Agree that a 15/20 min walking distance is a useful measure to focus development in such zones. Need to consider centres beyond the City Boundary so avoid duplicating uses.	2	Given the lack of large scale greenfield development within the City boundaries the use of the 15/20 min concept may have limited benefit for the Local Plan?	2						
				Supportive of this but acknowledge v aspirational, if Rose Hill parade and Oval are seen as local centres they should be improved. Support Kassam and SP being a DC which will serve BBL and Grenoble Road development.	1						
	para 1.29	Strongly supports the need to ensure the City retains its attraction for the tourist market									

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
	Theme 6 - heritage-related objectives			<b>Historic England</b> comment that current wording of the heritage-related objectives in the 6th theme is insufficiently broad to recognise the potential of the city's heritage - fails to acknowledge potential for heritage's contribution to the local economy and the economic pillar of sustainable development. Suggest further thought is given to broadening the second objective of this theme. Also, in terms of specific changes, suggest reference to valued and important heritage being 'conserved and enhanced' to align with the language in the NPPF. Alternative wording suggested: "Valued and important heritage is conserved and enhanced, not only to protect key assets but also to shape future development"							
Overarching Threads	1.31-1.34	<b>Natural England:</b> Support overarching threads, particularly commitment to reduce impacts of climate change. Guiding development towards sustainable solutions and assessing impacts of proposed land change is fundamental to achieving aims. Flag the use of BNG metric 3.1 and Environmental Benefits from Nature tools at this stage of plan as ways to appraise impacts of proposed policies/allocations. Advise that as much evidence is gathered as possible to assess current assets in area, opportunities and threats.				15 minute neighbourhoods are secondary to the protection of the Oxford Green Belt - vital to ensuring the continuing sustainability of the whole City and its surrounding settlements.					
		General support for the three overarching themes (climate change, decrease in inequalities and 15 minute City).	2	County & City need to agree common terminology around 15/20 minute neighbourhood.	1	We question the usefulness of the 15 minute City concept in Oxford? some areas such as Marston and Barton are further than 15 mins from DCs list of principles relies upon other policies.	3				
		Support the need to improve cycle and pedestrian facilities across the City and beyond; protect/provide green infrastructure and protect/provide community assets as set out in Fig 1-4.	2								
		<b>Historic England</b> support the threads interweaving throughout the plan.									



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
	Fig 1.5			Wolvercote NF Area is not shown as part of 15 min neighbourhood area. Five-Mile Drive and far east area has no access to buses. Policy through S106 agreements to require developers to contribute to bus services.							
Strategic policy options	1.35 -1.37			In the absence of O P 2050 evidence base all Oxon LPAS need to work together to support policies in plan and discuss how to establish robust evidence base	2	There needs to be homes in Oxford not more jobs so that the LTCP vision to reduce 1 in 4 car trips by 2030 and deliver net zero transport and travel can be achieved, current proposals would do the opposite.	2				
<b>Strategic policy options: Directing new development to the right location</b>	S1	Support various aspects of this policy including: - a sustainable, healthy and inclusive city; - car-free developments; - high quality public realm; - directing locations for growth for specific land uses (e.g. R&D in city centre).	4	The Plan does not go far enough to protect academic sites from alternative uses, the core mission of OU/OBUs and operational estates must be acknowledged and protected in OLP2040.	1	Policy should be more explicit about making best use of its scarce land as well additional policy clarification emphasising the importance of HE to the City and retaining and developing existing higher education sites: particularly campuses and colleges, which provide a cluster of services, should be highlighted.	1	There needs to be more homes in Oxford rather than jobs to reduce travel so get the right balance between jobs and homes. West End has true potential to be a housing area	2	Need to have a change in direction. Away from growth and towards protecting the natural environment. Risk of irreparable damage to Oxford's natural environment.	
	S1	Welcome approach of achieving 15 min city with facilities and development clustered in centres accessible by PT, walking and cycling	2	General support for notion of directing development to the right locations. However given the acknowledged limited opportunities for development in the city, question whether this is such a guiding principle for new development.	2	Suggest policy is deleted as unnecessary.  Question whether the Local Plan should only focus development that attracts people to be located at existing hubs that are well served by public transport?  Policy is overly restrictive and does not enable market forces to be effectively realised.	2	many of the disadvantaged areas of Littlemore are not within 400m of facilities or regular 15 min bus service v difficult for disabled and elderly to walk 400 m.			
		Direct development to location that reduces carbon emissions	2	Support idea of overarching policy but it should not impede ability to deliver sites outside of designated areas or on GB land	5	Best route to more housing is intensification we must protect our green spaces and the environment	1				
		Support given to principles of policy approach towards strengthening existing district centres.		Reference to R&D should be expanded to include business space as well to ensure economic ecosystem aims are fully supported.		Spatial strategy should encourage housing on commercial sites and retail sites. Housing should be prioritised.	4				
		Support PO	16	New local plan should continue to support the delivery of economic growth/ job creation in the city centre as the key location to deliver a vibrant Innovation District that supports the city's economic ecosystem focussed in the West End.		More detail need in policy as to how net zero is to be achieved particularly use of EUI calculations. More development will make reaching net zero difficult for all of Oxfordshire authorities.	2				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
				OCC- The Reg 19 Plan should include all county strategies and update info on all changes in Oxford including Vision Zero , transport should feature more strongly, and LTCP policies	1	Need to consider development outside city and how it relates to existing areas. How will strategic sites outside the city boundary relate with existing services and facilities? Will Barton provide facilities for Land North of Bayswater Brook for example? Plan should address this.					
				Generally support 15-minute city concept but it should not override the importance placed on the Green Belt, which is vital to ensuring continued sustainability of Oxford and surrounding settlements. The need for facilities should not override the need for green spaces, which should be protected some specific sites with allocations referred to as needing to remain green- Bertie Place, Ruskin Field. Needs should not be pushed into Green Belt of the surrounding area.	9	A number of comments were opposed to the idea of 15 minute cities because of coverage in the press, social media etc. that has conflated the concept with the County Council's consultation on traffic filters (and Low Traffic Neighbourhoods) and they are opposed to the perceived idea that they will need permits to leave their zones, or they do not like the idea of traffic filters or LTNs.	24				
				Support intention to strengthen local hubs to achieve 15-minute neighbourhood with clustered facilities. What are essential facilities? How can gaps be filled? Is there sufficient footfall to support commercial enterprises at each hub?		Council should encourage conversion of empty offices in city centre to flats let at affordable rents above commercial premises. Should promote higher density housing in the city than in surrounding villages.					
				Car use will still be essential for older, less mobile, those outside Oxford, trades people, those needing to carry heavy and bulky goods; including access to facilities/green spaces	6	Cars are needed, e.g. for hospital workers and the city has a responsibility to support the working of the hospitals.	1				
				Support principle of 15 min city - emphasise importance of allowing supporting ancillary uses at ARC Oxford as part of creating a vibrant location, with nearby facilities in accessible walking distance.		<b>Historic England:</b> objection on the basis that this does not mention sustainable development and suggest it is referenced. The need for ensuring balance is acknowledged and they suggest reference to Sustainable Development could help to ensure that this is met, and that the environmental sensitivities of a location are taken into account. They also raise the query as to whether policy S1 and S5 might be usefully combined.					
				Too much housing has been built without infrastructure and we need more services within walking distance. Infrastructure is needed to make this work.	1	Concern about dividing the city further					
				For this to work better bus services are needed- between different parts of the city (not just to centre), more frequent to some areas, more reliable, better connections.	5	Need to consider impacts of restrictions on cars in city pushing traffic onto ring road and causing congestion					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
	Figure 1 - 5			Future policy should also show the areas that are within a 15 min walking/cycling radius to the centre as areas just outside a 15 min walk are still accessible/ sustainable locations where development should be encouraged.	2	Should provide new housing only within boundaries. No additional housing outside the city's boundary.					
Defined district centre, city centre and local centres	Para 1.38-139			Several comments were made about areas that do not have this accessibility and/or should be considered as district/local centres, including Littlemore, Rose Hill, Lye Valley, parts of South Hinksey, Kennington (not in the city).	7						
Approach to greenfield sites	Para 1.40										
<b>Strategic policy option set 2: approach to greenfield sites</b>	<b>S2 PO assess all greenfield sites and set out reasons for protection</b>	The Universities support an evidence-led approach having regard to the scarcity of land within the City and the emergence of new opportunities for recreation and biodiversity around the City boundary.	2	Right to maximise delivery on PDL but where housing and employment needs cannot be met on such sites, consideration must be given to development on appropriate green field sites such as Allotments. Council notes there are limited opportunities for PDL dev. in Oxford but a high level of housing and employment need. Simply waiting for PDL sites to be delivered before delivering green field sites will just delay the council providing housing. This would significantly impact the 5yhls and potentially the HDT results.	1	Opposed to further review of the Green Belt, city should restrict housing growth to its own boundaries.	23	support Option B - Alternative Option protecting open spaces/ biodiversity important, plenty of employment/jobs/shops, irreplaceable, needed for mental health, opportunities to retrofit existing should be taken, don't want to add to traffic congestion.	56		
		<b>Natural England:</b> preferred option is a) - look forward to providing comment when further detail on greenbelt review is available. Fully support approach of directing development away from greenbelt and policies to maximise efficient use of brownfield sites.		welcome flexibility offered through option a) given need for development in city , consider a hybrid approach less distinction between brownfield and greenfield encourages use of both where most appropriate	2	The PO is unclear there needs to be reasons developed for green field protection, which is not supported.	1	Should seek to capitalise on GB as a resource for local residents, seeking to enhance and recognising the role it plays in people's mental health and well-being.			
		support preferred option - agree not all greenfield/Green Belt sites should have blanket protection and should be considered for development where appropriate	7	Underlying assumption that growth is an aim for the city. It would be healthy if the Plan recognised that many people disagree with this.		No need to review the GB again. Districts should not have to release more GB land. Not a lot of GB left within city boundary. Concerned about further GB release within Oxford city.				Do not support Option B - Could result in a potential delay in bringing forward greenfield sites.	1
		Support	15	<b>Morrell Family Trust:</b> Support a brownfield first principle for development as set out in national policy but suggests that even when development is maximised on such sites, as it should be, there will remain a need for green field sites to compliment the plan strategy and deliverability of development.	2	There should be no further loss of Green Spaces crucial within the calculated rain water catchment of the LV SSSI and LWS fens, any green areas within fen catchment are essential infrastructure as linked to hydrogeology of fen and such areas need full Catchment protection from development. Groundwater pollution is a serious issue in LV	1	Concentrate building on brownfield land and re-use for housing all redundant retail buildings in city centre plus build on car parks. GF sites must be protected: land to west of Hill Farm and Mill lane essential green buffers, carbon stores and part of the groundwater supply system		Support for option b is premature - SODC/VWHDC has not discussed unmet need with city so cannot make assumptions.	2



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
		Homes are needed so should review.	4	<b>Oxford Local Nature Partnership:</b> Whilst PO rightly commits to assessing all greenfield sites and sets out reasons for their protection, it is not clear whether, having assessed a site as not currently performing sufficient functions to make it worthy of protection, sites will be assessed for their <i>potential to be improved</i> . All sites have potential for enhancement, those within recovery zones of the NRN should be protected for their potential value in increasing habitat connectivity and contributing to the NR. Equally there could be other sites capable of providing greater ecosystem services, this should be considered rather than automatically assuming they are suitable for development.		Protect green belt and greenfield land/ Greenfield sites should not be built on-economy/jobs should go elsewhere for levelling up.	20				
				Ok, but when developed must lead to improvements elsewhere.	2	Doubt expressed that Oxford's true housing need justifies building on greenbelt/greenfields in or around city	11				
				Hospitals or schools should be the only things allowed on greenfield sites.		Too much of a carte blanche for developer.					
						Oxford housing need should be met within city boundaries on brownfield, not on surrounding green belt beyond Oxford	8				
						Particular concern about loss of greenbelt/green field in specific areas, e.g. between Begbroke and Yarnton, Kidlington.	3				
						Sports facilities in green belt should be protected					
						<b>Historic England</b> object, flag that text currently doesn't mention archaeological remains - unclear if potential for these remains are being considered in assessment of greenfield sites. Should be clarified and made explicit/included. Flag that, Alternative option (b) refers to allowing development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites. This approach is unlikely to be justified & could also have heritage impacts. It would be better to ensure archaeological remains are given due consideration in the preferred option. Also note the proposal for review of green belt - flag that LP2036 inc acknowledgement of green belt offering protection for historic setting of city and that it must be protected where it is important in this aim - they assume and look forward to same approach being taken for new LP.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
						Should never develop on flood zones.					
				A combination of option A and B is required. The Local Plan should assess sites in a hierarchical approach, starting with brownfield ones and then looking at greenfield. Setting out which greenfield sites should be protected will be key.	2	Don't build on GB. ONS shows slowing in UK population from 9.6% to 3.2% until 2030				A hierarchy would not be appropriate, better to plan proactively and look comprehensively at all opportunities considering there is insufficient land to meet all needs.	2
<b>Delivery and infrastructure strategic policy option S3</b>	<b>S3 infrastructure considerations in new development to be set out</b>	A general policy seeking appropriate infrastructure to support development is supported.	11	The potential additional cost of redeveloping brownfield sites (e.g. in terms of demolition, contamination etc.) vs greenfield should be considered and be reflected in any viability policy to incentivise brownfield land to come forward.	3	Concern that infrastructure provision could come under pressure if growth objectives are not reviewed.					
	S3	Local energy planning is required to ensure that there is sufficient grid capacity for development to draw down electricity to deliver full electrification.		Like other Council's in Oxfordshire an SPD dealing with Developer Contributions would be useful to ensure consistency and transparency as to the Council's expectations.	4	Should come from council tax and not be charged to developers.					
		Support		Emphasise the importance of timing and phasing of supporting infrastructure delivery	1	Don't understand option/jargon used.					
				Local communities should be involved in CIL so it is not taken over by narrow interest groups.		CIL payments corrupted.					
				Don't use planning obligations to overrule common sense.	1	Too much red tape.					
				Infrastructure should include- bus routes, active transport, improved footpaths, green/walking networks, street trees, dance, warehousing and logistics, shops and amenities.	10	There should simply be no planning permission if there is not enough infrastructure. Need to sort out current issues.	6				
				All infrastructure must be necessary as there are impacts on the environment.	2	Must be careful not to make developments unviable.	2				
				Support policy where viability considerations taken into account but that do not lead to viability negotiations on a site-by-site basis.	2	Infrastructure is lacking because the university own land and they don't want to provide.	2				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
	S3 (and R6)			<b>Thames Water:</b> support the bespoke policy approach, but consider that there needs to be a separate policy to cover both water quality, wastewater infrastructure and water supply infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the network are delivered alongside development could result in adverse impacts from sewer flooding; pollution of land and water courses; and/or low water pressure. Important not to under estimate the time required to deliver necessary infrastructure (e.g. local upgrades around 18 months and Sewage Treatment & Water Treatment Works upgrades 3-5 years). <i>See their submission for recommended policy wording and supporting text for a water supply/wastewater infrastructure policy.</i>		Option will take away from social housing and green infrastructure, both of which should be from general funds, leaving the developer to pay for other infrastructure.					
				Generally agree. Civic Society launched a campaign for the introduction of land value capture.		This hasn't worked in the past so assume it will not in the future- not enough healthcare, education. Need healthcare funding.					
<b>Viability considerations strategic policy option S4</b>	S4 Policies in the plan to be drafted in context of plan wide viability	Support approach	13	Important that Council considers viability of OLP2040 policies	2	No viability assessment is needed as scope is set out in Government guidance only reason to have it if major changes in houses prices	2				
				Having a clear policy that sets out a cascade to various measures is useful to ensure development is delivered in the face of the changing economic circumstances being faced currently and likely to be faced over the plan period. The policy must take a flexible approach as it can't predict all eventualities.	2	Approach not clear, too vague, jargon, what is an open-book exercise.	6				
				Broader wording needed to allow developers and the Council necessary flexibility to present a case for viability and maximise the opportunities for development to progress.		Approach won't be effective at delivering affordable housing. If affordable housing not viable, don't approve scheme.	8				
				In cases where viability is an issue, LPA needs to be flexible about which priorities are to be met. There may be instances where the city's need for homes will only be met if other requirements are relaxed rather than the no. of affordable units delivered.		All housing should be affordable/50% rented and the rest not for profit. Affordable housing is not affordable.	7				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
				Potential for viability to have impact on net zero aspirations.	2	Comments that it was ok to relax some but not other parts of the policy, i.e. not ok to relax carbon, not ok to relax affordable housing, car free should be prioritised.	9				
				Viability statements submitted with planning applications should be reviewed by a 3rd party to avoid delays		Allows developers too much profit.	4				
				ensure support for future bus services is referenced and rail improvements, recognise value of Redbridge HWRC, consider car use and safety issues	1	Just a means for developers to by-pass critical safeguards of social and environmental concerns. Worry about loopholes.	25				
				objects to options that allow developers opportunity to relax planning contributions and affordable housing		Low parking restricts employment options, ability of employers to attract good staff, cars needed for social care etc., cars just clog streets if no parking.	9				
				Needs to specify a rigorous, transparent means of testing. Developers putting in viability assessments should fund independent checks of accuracy and credibility. Open book should be open to public to comment. Needs to be as rigorous as possible, firm and clear.	3						
				In addition to consideration of site specific circumstances, give regard to difference between residential and non-residential schemes.							
				"Affordability" needs redefining. Affordable housing is a priority for the future economy of Oxford.							
				There should be a limit to how many developments can go through this process.	2						
				Viability arguments are often used by developers having overpaid for the land. Requirement to provide necessary infrastructure for a site should be mandatory for applicants. The NPPF seems to support viability assessments based on land values set by precedent, rather than residual valuation after planning policies have been complied with.							
Presumption in favour of sustainable development	S5 Presumption in favour of sustainable development	Support the approach	13			Policy approach simply duplicates NPPF. Not required/not worth saying as should be implicit to all developments.	4				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
						Historic England object, state that the text currently does not mention other elements of the Development Plan e.g. minerals and waste plans. Suggest referring to the Development Plan rather than solely the Local Plan and NPs, and to refer to national policy rather than only the NPPF. Also query if this policy could be combined with policy S1.					
						Hold up development until issues resolved.					
						Too arbitrary and difficult to measure/gives Council too much discretion. Should be part of building regulations/if policies are out of date review, don't ignore. Should not by pass normal considerations.	12				
						Bias towards sustainability will ignore other legitimate concerns. Welfare and other things are a higher priority and should not be overridden.	3				
						Related ecological emergency. No development is sustainable, especially on greenfield. Presumption should be in favour of protecting green sites.	6				
						Need to define sustainable development.	4				
						The NPPF has not led to sustainable development.	2				

## 5.2 Policy Options Set H1 to H16

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
Introduction and wider context				Lack of evidence around housing need makes it difficult to comment on options yet	2	Support principles but reality in Littlemore v different, residents' health much poorer than other parts of the city	1	Banbury and CDC has taken enough unmet need for Oxford and requiring the surrounding DCs to take all the unmet need is not sustainable in the medium long terms	2		
				Housing affordability crisis is being escalated by City Council's plans for massive employment growth. This will increase demand for homes and houses prices and further strains on infrastructure.				Introduce more flats above offices and shops to reduce the need for building on green field sites	1		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Instead of focussing on new housing sites, need to improve the existing stock, unlock landbanks and re-purpose other use classes.							
	Figure 2.2			Figure 2-2 should show Littlemore as an area of deprivation 2021 census indicates parts of Littlemore are in the highest 20% of areas of deprivation in England.		Need to balance housing delivery and the damage to the natural environment.	2				
				Significant housing delivery could be achieved by redeveloping existing employment sites for housing.		Housing need should be calculated using standard method and most up to date census data and ONS population forecasts and consider working patterns and economic factors. OLP2036 used out of date pop figures which exaggerated need, no exceptional circumstances exist to justify further inflation of the figures or how they are calculated.	2				
The Housing need and housing requirement intro paras/general		The Universities support the principle that exceptional circumstances justify an alternative approach to calculating housing need, given the importance of the City and the Region to the national economy, the transformational strategy put forward in the LEP's Local Industrial Strategy and the lack of affordable housing, we consider a departure from the Standard Method is justified and urge all Oxfordshire authorities to move quickly in resolving how that need will be met across the different Local Authority boundaries.	1			OCC - need more clarity in this doc as to how unmet need will be addressed.	2	Ox City should accommodate all its own needs for housing	2		
	para 2.5	We agree that there are clear economic circumstances that justify using an alternative method to calculate housing need in Oxford and Oxfordshire. This approach should continue. To rely on the Standard Method will significantly impact on the economic success of Oxford and Oxfordshire.	5	Set out what the figure using SM would be and how that compares to other Oxfordshire LPAs	1	Retail loss will continue and will soon provide numerous sites for housing		Get a better understanding of the demand for housing and ensure most efficient use of land in the city	1		
				Going beyond SM will simply result in more unmet need for neighbouring authorities as Oxford's housing requirement is proposed to be constrained by a capacity-based target.	2						
				Unmet need for previous plan (OLP2036) is currently allocated in neighbouring Local Plans, but will the districts keep the allocations in their emerging plans?		New housing will put increased strain on local services/infrastructure which is unable to cope.	11				
				Population figure are not discussed and neither is the location of commerce, business and enterprise, under the wider issue of "levelling-up".		The scale of housing proposed will result in increased congestion on our roads, detracting from the city centre which is a tourist attraction	2	Need to build affordable homes for first time buyers	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
<b>H1The Housing need and housing requirement</b>	<b>Preferred Option - a) Set a capacity-based/constraint-based housing requirement</b>	Support - housing requirement must be based on sound evidence and ensure policies bring forward sites to meet a range of housing needs.	3	Unmet need must be identified and form the basis of discussions with neighbouring Districts as to where that unmet need can be met.	2	Scale of housing appears significantly above standard method, should be lower. Oxford should provide for its own need within its boundaries	12	Option B should be the preferred option, higher housing no they should increase densities and use land more efficiently, rather than off-loading to neighbouring authorities/increasing commuting	5		
		Oxford must meet its identified housing need. May result in requirement being lower than identified need, with the surplus being delivered within the surrounding districts. Must deliver as much housing as possible.	4	Broadly support PO but policy should have a "fall-back" position allowing for higher density development in the case that neighbouring authorities are unable to meet any shortfall in identified need.	3	Whichever option selected the impact on the SRN must be considered - people in the services sectors cannot afford the time, childcare, transport costs of commuting to Oxford	2	The HDT is not used to inform the soundness of a new plan, has every effort been made to reduce, some policy preferences expressed in consultation document may be compounding the poor supply.	1		
		support capacity-based target/the preferred option	15	Standard Method should be the starting-point, but sites available may be limited. City Council should however do everything possible to identify sites that can deliver the quantity of housing required, including employment growth sites.	4	Options are flawed. Need additional option which looks at a lower figure (than SM) due to over-delivery anticipated to 2031 and declared emergencies (climate etc.) and constraints on delivery in city.	9	A hybrid option should be included which recognises the extent of identified housing need for Oxford, commit to meeting its need and set out level of unmet need to be accommodated elsewhere	1		
		a capacity-based approach may provide confidence to neighbouring authorities and residents that a thorough assessment of capacity has been undertaken, and all sites have been assessed on an equal basis	1	Support option a: But consider Council should do all it can to meet its own housing need. This should include encouraging denser development, taller buildings where appropriate, making better use of land supporting climate-proofed housing. Neighbouring Districts however also should play a role in helping city meet its housing need through development close to the city boundaries.	4	All employment sites in the city should be released for housing and not protected, no more GB should be sacrificed to meet Oxford's unmet need, Oxford should do more to meet its own unmet need. There is not sufficient infrastructure to meet the planned housing to 2036 across the county. Neighbouring districts (e.g. CDC) cannot accommodate any more housing for Oxford.	32	The housing strategy for Oxfordshire should be dispersed nationwide OU should invest in areas where there is a need for work and job and land available.	1		
				Must explore all opportunities to deliver housing in the city, before seeking to deliver outside. Includes prioritising sites for housing rather than employment, maximising densities, and exploring alternative uses for existing sites (e.g., Botley Road)	1	Already providing more homes than needed. No more homes needed to 2040.	4	If more homes are needed then more should be built. Housing should meet need not arbitrary targets or a statistical model. Support requirement based on identified need.	7		
				Must take into account climate, biodiversity, health emergencies, democratic wishes, flood plain, Green Belt, and over-delivery in some areas in relation to Growth Deal. may even be lower than SM figure	7	it is not the number of homes but the kind of homes, smaller dwellings are required, or particular types of homes	2	should be willing to embrace expansion of the city	1		
				Proposed version of option (a) is too weak, & therefore unacceptable in its present form, should provide guidance on how housing capacity within the city can be maximised.	1	9000 homes will lead to sprawl	1	housing need should be the driver but limited to capacity especially not impinging on green belt and not exceeding transport infrastructure	1		
				Why has the requirement decreased from 10,884 in OLP2036 to 9,147 dwellings in OLP2040?	1	How is there room for 9000 more homes without building on greenfield sites?	1	before building new homes, should return HMOs to single use, and incentivise conversion of redundant offices/commercial, and free up long term empty homes	3		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				support a capacity based target but not the specified number of dwellings	8	Strongly object to the target approach because it allows for 'flexibility' over other policy commitments in the plan e.g. protection of green belt or green infrastructure. The level of development sought is at odds with addressing the climate emergency. Methodology is also questionable eg erroneous ratio applied for average student occupancy rate.	1	Lack of evidence to justify that Oxford cannot accommodate even the lowest possible housing need. Have you tested building over above and around private and public car parks? How many additional moorings could be accommodated? How many homes could be added to industrial estates and science parks on empty sites and disused buildings? How many homes can be added above shops or empty shops?	3		
				Councils needs to 'leave no stone unturned' in finding housing sites in the city (including a re-examination of employment sites to identify those suitable for housing) and should not extend to higher targets based on the city's 'policy on' choice of seeking significant growth	3	insufficient data to be able to set a target	1	with current developments and birth rates falling we might not even need new housing in future	1		
				Does the PO have detrimental impacts on housing affordability?	1			should not just assume that growth of city and population is good	1		
				Support PO but all new homes should be affordable	1			option b is more realistic and takes into account lives of those who live here	1		
				Please clarify if the housing requirement for citizens or students?	1			Reassess housing need in line with changes to people's working/housing patterns since COVID. Growth plans don't feel realistic post pandemic. the LIS and other national policy changes can no longer be considered up to date	1		
				housing requirement should be flexible, reviewed every 5 years	1			in light of the climate emergency, biodiversity protection and biodiversity growth should be prioritised	1		
				should prioritise council, social and affordable homes for people living in Oxford now rather than commercial or university interests	1			Do not accept the assumptions in methodology. development should be the absolute lowest possible figure necessary to address genuine housing need not forecasts	3		
				Need to also consider housing needs of older people in the calculations	1			Need a better balance between jobs and homes, and no further encroachment into green belt. e.g. Oxford North does not give primacy to homes	2		
				set a constraint based target that can be met within boundaries	1			need to explore more alternative options e.g. moving employment and higher education out of Oxford City to other parts of county, to reduce housing need in city	1		
				Infrastructure capacity should be the first consideration, then sites available, and then set a capacity figure.	1			the evidence base for unmet need to be met in neighbouring districts needs reviewing and updating	1		
								housing need calculations are not justified / flawed	3		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
Housing Need	para 2.5					Ox City cannot solely make determination about housing need required to serve all communities in Oxon and cannot build on the GB to solve the problem. Recognise the need to limit growth	2				
H2 Housing need for the plan period	<b>No Preferred Option -</b> <b>a) Define Housing Need using the Standard Method</b> <b>OR b) Define Housing need using based on need calculated by seeking to achieve and support economic growth</b>	Support option B	27	Concerned that some Oxfordshire authorities will limit their support for the established growth agenda.	2	Scale of housing need should be lower than standard method / below SM needs to be considered	7	If Oxford is to meet its significant AH need it will result in the displacement of large numbers of new homes resulting in increased affordability and congestion and commuting into Oxford	1		
		support Option A	21	Support Standard Method as starting-point, but sites available may be limited. City Council should do everything possible to identify sites that can deliver quantity of housing required, including on employment growth sites. No assumptions should be made that neighbouring councils are able to deliver unmet need.	2	No exceptional circumstances exist to justify further inflation of the figures or how they are calculated, City council must explain the impact that any factors not captured by standard method. No evidence to support a departure from the standard method. The GD money has not been released so risk that infrastructure will not be delivered and no housing needs assessment has been undertaken.	4	continued expansion of the population is unsustainable, should focus instead on families having fewer children	1		
		Don't know enough/understand to decide between them	4	As unmet housing need "met" until 2031. Another 9 years' worth of unmet housing need will need to be met with support from surrounding districts. Using 2014 SHMA as a base, future unmet need could be in the range 6,600 - 10,300 homes.	1	Option B is undeliverable & perpetuates idea that economic growth is the way to affordability.	1	should be no economic growth in the SE	1		
		SM already includes a 40% uplift for AH. don't push up numbers to meet arbitrary growth ambitions, especially when no capacity in city	6	Option A (SM) but with flexibility e.g. to take into account labour shortages after Brexit, economic downturn etc.	4	Housing need should be set at the lowest possible to meet genuine need. There are 'exceptional circumstances' for using a figure below standard method. meet need only rather than trying to bring growth	5	economic growth cannot be the long term goal for the city	2		
				Growth Deal exists until 2031, this plan stretches 9 years beyond that date. No reason to suggest that GD should extend. Housing required to meet GD is already covered in existing commitments which will see Oxfordshire delivering new homes well above identified need for the next decade.	1	Consider that below SM calculations can be justified by "exceptional circumstances" such as the city's tightly constrained administrative boundary, and other physical constraints (flooding etc.). Also, districts have already committed to meeting a very high amount of city's unmet need and should not be asked to provide more housing for Oxford city.	1	should focus on cheap housing to help bring prices down (purchase and rent)	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Housing need is incidental as provision is fixed by availability of sites. Calculating the need or requirement only affects the number of homes which adjacent authorities provide under Duty to Cooperate.	1	should not assume that growth in physical size and population is good	1	Neither option - A is arbitrary, B is for developers.	1		
				Lack of enthusiasm from neighbouring authorities could lead the way to increasing densities in the city.	1	Don't support housing need based on affordable housing need or employment need because previous estimates have been grossly exaggerated.	1	housing provision should respond to housing demand not planning assumptions about projected growth	1		
				set housing need in relation to quality of life and affordability for low waged workers, not with aim of supporting economic growth	1	LIS predates Covid, Brexit and Levelling up agenda so can no longer be considered up to date evidence	8	housing need should be based on evidence about incomes	3		
				priority should be given to meeting AH in full/support meeting AH needs (option B)	3	question approach of taking economic growth as a given		Need "transformational adaptation" not growth based on economic growth	2		
				better to work to a higher housing requirement (B) with the opportunity provided by growth deal/HIF to deliver infrastructure (preferably up front)	1	not just about housing numbers - need a more integrated approach to sustainable development	1	Neither - A doesn't always reflect need. B doesn't include all those economically inactive.	1		
				B is better but take into account capacity and don't pursue economic growth at all costs	1	housing growth should not be based on proposed economic growth, growth should be curtailed - oxford does not have capacity	2	Don't need more housing as workforce all move out and tourism is reducing	1		
				SM does not sufficiently capture scale of housing need in city and complexity of the situation	1	SM does not sufficiently address AH / AH should be a key factor in housing numbers	4	build communities rather than building on community spaces or causing over-crowding	1		
						plans for economic growth are not justifiable	1	climate emergency - just provide housing needed but not increase economic growth	3		
						SM does not capture the unusual mix of medium term students and key workers and lecturers/researchers. no allowance for this in SM	1	should be an independent calculation of housing need not one set by city	1		
								set housing growth rate relative to economic growth - constraining rate of housing growth to outpace demand growth, to compensate for existing unmet need	1		
								should only build for current population and review every 10years	1		
								neither option as neither is within city's ability to meet	1		
	para 2.6					No discussion about unmet need have been had with SODC prior to commissioning the study, we remain open to engaging with the City on methodology.	2				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
Delivering AH	para 2.7					The development in Littlemore skews this mixed and balanced communities concepts. Approach needs to be city wide to include affluent areas.	1				
H3 Affordable Housing - Overall Requirement	<b>No Preferred Option -</b> <b>a)</b> Prioritise aff housing, similar split <b>Or b)</b> No first homes <b>Or c)</b> Maximise affordable housing overall rather than focussing on Social Rented <b>OR d)</b> maximise Social rented <b>OR e)</b> do not maximise affordable housing requirements <b>OR f)</b> no policy	support Option A	29	Policy option to be subject to viability testing, cascade approach useful	3	Littlemore has received no CIL from all the AH and schemes in Littlemore, we have taken enough development.	1	Support Option B, examples of other authorities which are constrained and unaffordable not considering FHs (Camden and Brighton & Hove	2	first homes and shared ownership are some options but what about many other innovative solutions from community groups including cooperatives and products like mutual ownership where people buy equity share based on income rather than value of home	1
		Support Option A but level/mix of affordable housing should be determined on a site by site basis & defined at time of planning app. Consider that First Homes approach should be flexible and agree with comment that First Homes do not help those in greatest housing need.	1	Issues around grant funding where Homes England – the key funder of affordable homes – do not fund “policy compliant” homes so the policy does not necessarily help to maximise additional subsidy.	1	Need to deliver socially rented homes. Housing register measures poverty affecting families and should not be used as evidence to build new houses unless developments include a sizeable amount of social housing.	1	Do not include a policy requiring AH. Any new development will increase the housing stock, thereby increasing affordability of all housing. focus on quality of housing not quantity	1	Do not support options: Do not feel that building First Homes or intermediate forms of AH should be a priority, given high need for social rent. New alternative proposal: given Government support for F Homes suggested amendment 75% social rent & 25% F Homes, affordable rent or shared ownership.	1
		Support option F	4	Delivery of First Homes has a number of issues. It can reduce the number of "genuinely affordable homes"; sidelines shared-ownership and fails to add same value to a scheme. Support Option B	1	Option A unlikely to be viable. Need to delivery truly affordable homes.	1	make sure developers stick to the agreed delivery	3	Is AH really affordable - needs to be cheaper to buy or rent in oxford	2
		Support option B	12	OXPlace has provided a detailed technical Appendix about viability concerns in relation to First Homes. See Appendix in relevant Folder.	1	Families on housing register are unable to buy market housing. What they need is social housing.	1	we need social responsibility to become intrinsic to housing policy and delivery	1	Many young professionals e.g. nurses have to rent but would like to buy. is it possible for example to require people to live in a house x years to prevent buy-to-lets?	1

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
		Support option C	3	Will need robust justification if Council chooses not to pursue First Homes as it is a national policy requirement.	1	Private/shared ownership should not be prioritised.	4	Oxford should move to ONLY allow affordable housing and ban building of new large single family homes (there are enough and we don't have room).	1	these options skew the market and penalise the middle classes	1
		Both A & B sound reasonable	10	OCC - AH should be for a range of needs including kinship foster carers	1	prioritise social rent	10	Design housing for particular needs - not just affordable but for older people, young families etc.	1	creating mixed and balanced communities should be the guiding principle, with emphasis given to affordable housing	1
		Support option D		Given increased costs and other requirements, no scope to increase AH requirement.	1	larger proportion of First Homes and smaller proportion of social rent	1	Only AH should be built for next 5-10yrs. buyers on open market can find anywhere in Oxfordshire.	1	prioritise homes for NHS staff	1
				Maximise availability of AH, and secondly maximise SR. First homes are lower priority	1	Options E & F not acceptable	3	Move to 100% very low cost housing via council purchase of housing, use of empty homes, and other acquisitions from lower end of quality in rented sector. Car-park based apartment blocks. Work with 3rd sector to deliver eg housing cooperatives, housing associations, specialist charities.	2	Can city council provide social housing themselves without worrying the housing market/investors?	1
				Option A but is 50% going to be economically feasible?	1	target should be 50% of which 75% for rent	1	Both rented and affordable first homes are needed.	1		
				A and B sensible but need flexibility to respond to housing demand	1	first homes policy is ridiculous	1	encourage more HMOs	1		
				90% social rent/10% intermediate	1	is 50% really deliverable?	1	stigma of social rented, how can this be managed	1		
				C - there are many people in oxford on reasonable salary who cannot get on the housing ladder, need more intermediate housing	2			Should set variable AH targets eg in lower value areas	1		
				all new housing should be affordable	5			difficult to comment without housing needs or viability studies	1		
				A - should include more first homes and shared ownership	2			Specialist housing e.g. older people should be exempt from first homes and starter homes (not appropriate to mix those in schemes for older people with communal facilities, communal living etc.)	1		
				Option B but raise the overall target eg 75% of planned developments	4			homes must be genuinely affordable by reference to incomes and interest rates	1		
				Support (a) maximise social rent but do not support First Time homes	1						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
Housing need H4 student contributions	Preferred Option - a) Seek financial contribution from student accommodation for affordable housing	Support A	31	Essential that exceptions in current policy are maintained (i.e. no contributions on existing/proposed campus sites etc.)	4	it is not appropriate to require affordable housing contributions on university academic sites which would not reasonably be brought forward for market or affordable housing.	4	Support either option C or D. Imposing additional costs on PBSA deters landowners providing more student accommodation. Can result in an increase in student HMOs	1	financial contributions is a good thing but also a perverse incentive against other council commitments (climate crisis) by encouraging development in order to extract development cash	1
		Support option B in combination with option A / sequential approach i.e., on-site where possible otherwise supported by a financial contribution.	5	Allow student accommodation to be delivered without a contribution where the institution has demonstrated that the accommodation in question is required to meet a specified need.	1	Proposed policy does not include the exemption for campus schemes as OLP2036 H2. Without this it will add unreasonable financial burdens to providing student accom. in campus developments which will make schemes unviable. Exception must be maintained is OLP2040 is to be deliverable.	2	put a levy on all new developments not just students	1	Need bespoke accommodation for entire student and junior health workers population - for those sites should be no other contribution apart from local physical infrastructure	1
		Support option B	11	Contributions from Student accommodation could dis-incentivise building PBSA. This could result in more students taking up housing places in the general housing market.	2	Question appropriateness of a requirement for affordable housing from student acc. PBSA can help to alleviate pressures on housing market. Given existing and proposed policies which restrict locations for PBSA, PBSA highly unlikely to take up land which could be used for general housing.	2	Support Option D	5	student housing should be prohibited on any greenfield sites or on green belt	2
		Support option C - its important the universities provide student accommodation and are not penalised for this. Reduces need to house in private accommodation etc.	1	If contributions to affordable housing are required from residential development, it is necessary for a requirement on student housing too. However concerned about viability consequences. Viability implications must be tested and understood	2	financial contributions will dis-incentivise institutions from developing their own accommodation	3	don't support C or D	3	all accommodation on site to be rented to both students and non-students - shared spaces (kitchens etc.) like NYC apartment blocks	1
		option A for designated sites, Option B for non-designated sites	1	Where PBSA is delivered on institution owned land, often no profit-motive and build quality often higher than speculative PBSA.	1	smaller colleges have less viability	2	No new student accommodation, already too much	1	Where is "elsewhere". if student accommodation means displacement of residents out of the city then does funding get transferred to other councils?	1
				Where colleges build PBSA, there is a desire to integrate new buildings with existing historic fabric of city. Determining land value capture equitably is more difficult when viewed over a longer time horizon (e.g. over 100yrs) and when there are higher build costs due to wishing to create newly built heritage for the city.	1	The University and Colleges should not be penalised, for reducing competition for other land in the city by releasing their own land and resources which can help reduce land values and speed up the promotion of sites to meet more general housing need, through land value capture.	1	colleges need to be part of the solution - expansion of colleges makes it harder for people that work there to be able to live within reasonable commute	1	levy the colleges with larger financial reserves (>£20m) to support new student housing	1
				Only a small number of sites (outside of university- owned/ controlled) where student housing likely to compete with market housing. Lots of positives about delivery of PBSA including reducing pressures on housing in city. Any contributions applied should not be punitive.	1	Further student housing, which in itself puts pressure on available land, should not be seen as a way of funding AH.	1	If developers are asked to subsidise social housing, they'll build lower quality so they can squeeze out profit still.	1		
				No discussion about potential impacts on affordable housing delivery of rising costs for the building industry, slow completion rates in all districts etc.	1	If AH contributions are required for student acc it should only be imposed on net increase in units	1	Support option B: since option 'a' assumes a suitable site for provision is available elsewhere, rarely the case.	1		
				need assessment of how much student accommodation is needed	1			if ask for AH on site you may get fewer student developments	1		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				support A could even lower threshold to 25 or even 15 rooms / 10 self-contained units	1			universities should provide their own students accommodation	4		
				financial contribution for delivery within same area (but not onsite)	1			Bespoke student accommodation releases other housing so should be enabled not restricted	1		
<b>Housing need H5 employer-linked</b>	<b>Preferred Option - a)</b> Allow employer-linked affordable housing on certain sites	OU is currently working to deliver new developments that will accommodate staff. Both Universities support the Preferred Option (a), subject to the detail of the Policy coming forward.	2	Option A provides for employers of key organisations in the City to help address affordable housing issues, which is generally supported subject to seeing the detail.	2	Potential risks to employees such as housing attached to work could distort employer/employee relationship non-transparently e.g. could encourage lower wages or corruption or dodgy employment rights, wary of linking security of tenure to conditions of employment.	5			Object to not including a policy	1
		A policy that allows key employers to provide affordable housing is positive, will help stimulate development and support emerging policies on reducing the need to travel	1	It may be good to widen the scope of this policy to other employers beyond the OU and Hospital Trust	2	attractive for a few but no benefit to others	1				
		Support Option a has the potential to minimise travel and carbon emissions.	4	But require approach to be actively encouraged rather than just permitted.	1	too much micromanagement, should not be any employer linkage	1				
		Support Option A	36	Support Option a, but another option exists which is to include a criteria-based policy.	1	The Council should consider a policy approach that allows for employer linked housing where a need can be demonstrated, and said employer agrees to retain those homes in perpetuity.	1	Support Option B: although option 'a' works well for sites like hospitals, concern that policy will be used to avoid providing AH. Employees should be obliged to live in employer provided housing, so that they are not left at a disadvantage after leaving a job which provides housing.	1		
		Will be very useful for key workers	1	Issue about double counting since Employer-linked AH is considered to be a proxy for AH.	1	Support B (no policy)	5	BMW request that any proposals to identify the MINI Plant under H5 are considered by BMW	1		
		Given the anticipated growth of short-term research employment in the City this would enable a more mobile workforce	1	Potential for a college 'internal' housing market, with certain rents being charged at different levels (social, discount and full). Such employer-linked AH could then be rented via means-testing.	1	Employees should be more independent of work when off duty	1				
		Employer-linked encourages loyalty and ability to train and retain staff	1	Scope too broad, it should only apply on mainstream hospital sites eg JR	1	Tied housing means residents wouldn't be able to leave their job for fear of losing their housing. Leverage other pressure points to encourage landowners to bring forward developments	2				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
		Nurses and teachers need homes	1	How would you keep track of rent compared to salary, to prevent employers exploiting the policy?	1	It is the employers duty to employ and the council's duty to provide accommodation/facilitate development for others to build houses. the policy would detract employers from locating in Oxford.	1				
		Vital that the hospitals and universities provide more housing	1	Good idea - it means that parts of the University that don't have students (so not captured by H4) also have to contribute to the housing solutions	1	If a company wants to provide accommodation (e.g. nurses accommodation) they already do that, how does this policy help. If forcing employers to provide, it may risk them relocating elsewhere	1				
		Support option A, some of the College's holdings in East Oxford may have potential to accommodate such development	1	Such sites should be car free too	1	Why should the council decide to help employees of specific organisations? this should be solely for the organisations concerned	1				
				Good idea but how applicable is it	1	Housing should not be linked to a particular employer. land-owning employers should seek to increase the general stock of housing across Oxford	1				
				Need permanent safeguards against properties being exchanged at open market values, to avoid profiteering	1	Tied accommodation owned by Aston University was later sold off as they got more from selling the land than from employee rents. this is likely to happen in Oxford	1				
				Support for key organisations to Oxford e.g. university, schools, hospitals, but not for corporate employers	1	Employees should be free to live where they wish. this policy would herd people into one locality and eventually trap them into living onsite due to affordability	1				
				We should support the principle of homes for NHS staff/key workers	1	This panders to the university to allow green belt development	1				
				rent needs to be truly affordable i.e. 50% of market rate	1	The universities and hospital trusts have sold residential land and property which could have accommodated staff and students. if those institutions wish to bring forward land for development they should contribute to general needs affordable housing, this policy would undermine social housing delivery as it gives a loophole	1				
				Should also proactively encourage the conversion of parking at the Headington hospitals and brownfield land, but not greenfield land	1	Employers should be required to demonstrate why the site would not be suitable for general market/affordable housing and has to be employer-linked. It would be inappropriate if, for example, the universities sought to use policy to subsidise wage bills at the cost of access to housing for the wider community and exclusion of a more diverse community as the sites this concerns are held by such a limited number of institutions	1				
				Equal importance should also be given to housing essential workers like cleaners with fewer qualifications	1	policy will not work in our society	1				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.	
H6 Mix of Housing Sizes	<p><b>No Preferred Option -</b></p> <p><b>a)</b> Set a mix of housing types for affordable only</p> <p><b>Or b)</b> Set a mix for both market and affordable</p> <p><b>Or c)</b> Do not specify a mix of unit sizes but require 2 or 3 unit types in all proposals over a certain threshold</p> <p><b>Or d)</b> Focus on mix of affordable housing types which is responsive to housing list</p> <p><b>Or e)</b> No Policy</p>	Support option A	11	The provision of AH should respond to the site context in terms of the location and type of scheme.	5	setting a mix on smaller or complex sites is problematic and could have perverse consequences e.g. Jericho Canalside	1					
		Support option B	14	Housing register must be taken into account when deciding on the mix for a development	4	A mix of sizes makes sense but units need to become smaller to accommodate more people. Large need for high quality small studio flats for singles, small one bed flats for couples, and 2/3 bed flats for families only. anything beyond 3 bed should be an exception for large families	1					
		Support Option C	6	Suggest a requirement for larger housing sites to be tenure blind.	2	Why is D detrimental? reduces risk of developing affordable/social rent homes which residents don't qualify for because need a different number of bedrooms	2					
		Support Option D	5	A carefully drafted policy could set out reasonable expectations for the size of both market and AH whilst avoiding being too prescriptive	1	too much micromanagement - focus should be on 15min neighbourhood, transport and sustainability	1					
		Support option e - no mix policy.	8	Staff housing proposals will need own mix	1	Oxford benefits from incoming wealth, with which comes a requirement for a small number of large houses. surely this should continue along with expansion of social housing	1					



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
				Need to understand this policy in context of other policies (e.g., First Homes and parking policy)	1	not option C	1				
				A but a mix should be mandated in highest density areas	1	Most existing terraced or semi-detached homes do not have mixed number of bedrooms, and those streets work fine. Why change?	1				
				mix of A & B	3	Risk of this policy becoming too complex and difficult to implement	1				
				If homes are to be of different sizes, need architecture to reflect this to maintain quality	1	developments should be terraced, dense, but with retained and created hedgerows and tree cover	1				
				specialist forms of housing are unable to accommodate a mix of unit types in 'in block'	1	have more smaller units and few large (4+ bed) units	1				
				mix of B & C	1	Many people, especially those on short term contracts, will feature on the housing register so its not a good indicator of need. Better to concentrate on the needs of early career professionals and key worker demand (use demographics and letting agency enquiries).	1				
				B, but on sites of 25+	1						
	2.12					Statement that Oxford can never meet its full housing need are <b>ambiguous, premature and unambitious</b>	1				
H7 Loss of Family Dwellings	Preferred Option a) Resist net loss of family dwellings except for specific reasons	Support A	27	Support 'a' but with option 'c' to restrict unlicensed/unregulated short-stay accommodation (Airbnb)	6			Support B	5	object to D	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
		support A & B	1	If PBSA is to be expanded theoretically this releases dwelling which are licensed HMOs. this would add to the stock of housing for families	1	micromanagement, too hard to implement such a policy	1	Subdivision can allow for more efficient use of homes but shouldn't be allowed to Airbnb's.	1		
				Generally support keeping family homes	1	treat on case by case, some family homes might meet housing needs better if converted to flats	1	Why is B detrimental? tourism is important in Oxford and for peripatetic university and hospital staff, so why resist Airbnb	2		
						family dwellings should be preferred over institutional use (e.g. university or school institutions in north oxford)	1	why is B detrimental - short lets destroy communities and push up rents/house prices	5		
				A&B - retain family homes more near schools, with other areas (e.g. city centre) sub-divisions more acceptable	1	A has no teeth	1	Support C	13		
				amount of family homes should be based on need	1	A could be too inflexible	1	B could prevent a useful conversion of very large north oxford houses into flats	1		
				if ancillary accommodation is needed, such as nursery places, it should not result in loss of family housing stock	1	why resist subdivision - it can help meet housing need without more environmentally damaging building work.	2	short-term lets means tenants do not have responsibility to neighbours	1		
				H8 will deal with concerns about HMOs and short term lets	1	as a single person, why should families always be prioritised	1	Shortlets need to be better regulated and contribute to community costs e.g. could we tax Airbnb's differently, or regulate e.g. check fire safety like other BnB's?	3		
				Sub-division can split homes into more affordable units. Families are often smaller now.	1	Airbnb takes homes out of the rental market	1	Support D - Let market decide / have no restrictions on splitting, subdivisions, short lets etc.	4		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
				demand for HMOs, single bed houses etc. is best met by custom-built development (not subdivision) so resist subdivision	1	windfall large family plots can help deliver higher density housing in sustainable locations, be careful not to hinder brownfield development	1	HMO linked to provision of student accommodation - PBSA releases HMOs	3		
				just resisting net loss assumes there is an adequate supply of family homes at the moment	1	why resist subdivision - lots of homes built in 1930s/1970s could be subdivided to house 2 or more families	1	subdivisions are often done badly on the cheap rather than promote neighbourhoods, and often not big enough for WfH	1		
						Airbnb fulfils a demand which supports the economy and allows competition with hotels	1	support B or C	1		
H8 Houses in Multiple Occupation (HMOs)	Preferred Option - a) Prevent additional HMOs in an area by only allowing a certain percentage of HMOs within street frontage (currently 20%)	HMOs are an important element of housing choice and, whilst the Universities support Preferred Option (a) in light of the successful delivery of PBSA, scenario may change cf OUs comment H10)	1	Ensure policies consider parking stress and impacts on street parking	1	limit total number of HMOs	1	No need to control the loss of dwellings. Instances of such a loss are likely to be low. Current policy has had unintended consequences on several schemes. Other policies in the plan will control changes of use in certain locations.	2		
		HMOs are a necessary part of the housing provision in Oxford, given availability and cost of market housing.	2	PO should be strengthened by reducing the maximum proportion of HMO's allowed within a frontage from 20% to 5% or 10%.	1	what's wrong with HMOs, sometimes its the only viable option for people	1	Support Option D - No Policy HMO's provide an important role in the City in meeting housing need in a highly efficient and regulated manner. Other aspects of HMO's e.g. bin, car parking and cycle stores etc. can be controlled via the Development Management role.	2		
		Support option A	36	LTNs make it hard for families to live in central location because of lack of parking for tradespeople & visitors, so likely to be sold off and divided into HMOs	1	clustering minimises disturbance	1	Support D - no restriction	8		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
		Concentration of HMOs brings lack of community, avoid clustering. healthy communities need mix and balance, and stability	7	Support A&B combination	8	each application for an HMO should be based on own merits and local consultation	1	Support C	2		
		HMOs help meet demand without depleting sites	1	HMOs should not be concentrated too much, but more central locations allow for a higher % as tend to be more densely populated and with young people and students	1	HMOs drive up house prices due to the multiple rent income generated beyond affordability for families	1	Support B	9		
		HMOs are a necessary part of housing provision in Oxford due to availability and cost. essential to the local economy	2	HMOs are fine if balanced with family housing and longer term residents	1	HMOs tend to request additional parking per property, often over-ruled at appeal if council refuses, this is contrary to the plan trying to reduce traffic	1	in option B what would 'appropriate locations be'. HMOs should be restricted in family neighbourhoods	1		
		the current 20% limit should be retained	10	Limit to 10% of frontages. if there is enough affordable/social housing, enough PBSA, then less HMOs needed and the market will return them to single use	1	many students have happily lived within and benefitted from experience of life in local community	1				
				have varying thresholds depending on location	1	limit HMOs to a few areas	1				
				option A but define specific reasons and ensure community groups are part of decision making	1	purpose built HMOs in appropriate locations are better than ad hoc provision	1				
				Split into professional HMOs and student HMOs. student HMOs should be very limited if at all.	1						
				A but reduce the % to lower than the current 20%	1	stop allowing HMOs in residential areas	1				
				need a whole range of criteria, not just one metric of 20%. e.g. number existing, character of area, traffic	1						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
H9 location student accommodation	Preferred Option - a) Restrict locations where new student accommodation would be allowed to: existing campuses, existing student accommodation, city and district centres	Support and as car free must be in sustainable locations, enforced by a CPZ	1	No distinction made between undergraduate and graduate accommodation.	2	Too limiting, other locations should be considered as for visitor accommodation.	2	Support wider Option B - to include arterial roads. This would place student accommodation in locations with good accessibility while avoiding main residential neighbourhoods.	3		
		Support option A	39	Widen policy wording to make clear that student accommodation is also supported on <i>proposed</i> campus sites		May limit graduate accommodation from coming forward in suitable locations.		Support option c (including from OU/OBU), evaluate proposals on a case-by-case basis using criteria set out in OLP.	10		
				Restricting the location of PBSA should not be done to the detriment of providing previously agreed identified need of student accommodation.	1	The University and Colleges should not be penalised, for reducing competition for other land in the city by releasing their own land and resources which can help reduce land values and speed up the promotion of sites to meet more general housing need, through land value capture.		Support relaxation of policy through options B or C as this would allow delivery of student accommodation of a range of suitable sites and acknowledge limitations on land availability in Oxford	2	Do not support option D which would significantly constrain delivery of PBSA	1
				support continuation of existing policy approach which allows PBSA on sites 'adjacent' to existing campuses and includes support for allocated sites for PBSA	2	The university and students are assets. Don't mind students. They should have freedom to live where they like. No restrictions.	7	Support Option C to ensure OUS can expand and not constrained	1		
				Important that this policy does not become more restrictive than existing.	2	Focus should be on social rented housing.		Arterial roads as a sustainable location for student accommodation development should be identified.			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Where colleges build PBSA, there is a desire to integrate new buildings with existing historic fabric of city. Determining land value capture equitably is more difficult when viewed over a longer time horizon (e.g. over 100yrs) and when there are higher build costs due to wishing to create newly built heritage for the city.		No expansion. Fear creeping institutionalisation. Have enough student accommodation already.	3	Support no parking. The alternative option to restrict locations to existing campus sites, student accommodation sites is preferable.			
				Policy should be drafted more flexibly to enable discretion in respect of such sites where local amenities and facilities are nearby and where Stud Acc would not result in harmful amenity impacts to the character of residential neighbourhoods.				Restrict to campus only so don't lose amenity elsewhere.	9		
				new student housing should not be delivered on sites which could deliver affordable homes.							
				More PBSA has the potential to release existing houses (e.g., student HMOs) for use by families and workers in the city.							
				Graduates have different accommodation needs, especially postgrads.							
				Must be enough bike parking and sustainable travel access	2						
				Concern about design and need for expert design panel expressed.	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Policies on student housing need to recognise that there are a large number of academic institutions which are NOT the two universities and about which there seems to be little knowledge of student numbers.							
H10 Student Accommodation and New Academic Facilities	Preferred Option - a) set thresholds for university students living outside of university provided accommodation and prevent expansion of academic facilities if threshold is breached. and b) Only permit new academic facilities that will facilitate growth in student numbers if it can be demonstrated how students will be accommodated.	Support a/b/a+b	3/13/2019	Council must make it easier for universities and colleges to provide student accommodation. Policy ok as long as it doesn't harm top universities.	2	not clear what is intended from Preferred Approach. Moreover, the Preferred Approach does not allow for future changes in the size and shape of the Universities, nor does it establish if there will be sufficient sites or capacity to allow the Universities to grow and support the knowledge economy as the Plan intends. H4 impact on viability is also not assessed.	1				
				Agree but make it strict so that only 3rd years and post-grads can live out.		Promote student developments outside the city at transport hubs.					
				Extend so university has to show how new workers will be accommodated and travel without cars.		Limiting accommodation for students is potentially discriminatory due to age.					



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alternative options/rejected option	No.
				Whilst a long standing approach it has failed because it has not been monitored properly-exacerbated as more part time and distance students. Policy should be around the % of the needs in purpose built student accommodation.							
				Decide local rules with community groups.							
				Broadly support preferred option a) and b) providing the Council considers making policies relating to the location of new PBSA more flexible.		It is difficult to clearly identify if a new building is to support expansion or to support existing activity. The new test will introduce uncertainty into all planning applications if the purpose of the building is disputed. The test fails to meet the tests of soundness.	1	Universities support expanded scope of this option and include sites adjacent to existing campuses included.	1		
				Ostensibly good but needs thought as don't want to separate town and gown.		If a cap is needed policy H9 must be more flexible more discussion needed.	1	Support option c (no policy) - if policy to be included more dialogue is needed.	1		
				Support PO: but would also like to see this expanded to include language schools/schools/international colleges as well as Universities, given their recent expansion.	3	Danger of universities dominating too much.	1				
H11 Managing New Student Accommodation	Preferred Option - a) restrict occupation of new student accommodation to full-time students on courses of one academic year or more and b) Require a management regime to be agreed	General support part a/b	22 /8	Broadly supports preferred option subject to removal of requirement for a management plan in relation to other occupiers (outside of term time). And criteria around car parking (dealt with by other policies).	3	Unis and students an asset and should not be restricted. Don't have management restrictions council can't manage them anyway).	4	Need more detail before supporting N.B. some students require transport for placements	1		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
		PO b) will prevent speculative building of student accommodation.	1	No good reason for students to bring cars into city. Term-time vehicle data must surely show this.				More details needed	1		
		Support subject to reviewing detail of the policy- car free schemes need to be enforced by implementation of CPZ.	2	Support PO: but would like to see developers encouraged to include car provision in student accommodation.	1						
				Universities should accommodate all their students - should not be allowed to profit from developing greenfield sites that are not necessary							
				part time and those on shorter courses should not have restrictions on living in student accommodation/more flexibility needed for part time/remote students/outside of term time (to maximise use/reduce Airbnb	5						
				Also ensure short term accommodation for university staff is provided.							
				Do not agree there should be parking restrictions (too restrictive/they just clog streets).	4						
H12 Gypsy and Traveller Accommodation	Preferred Option - a) Do not allocated sites and include a criteria-based policy	Support PO	13	Technical evidence to be prepared to identify future need within the city				Support Option B: clear need for a site for gypsy & traveller accommodation, to better meet their needs & manage unauthorised incursions. Needs to be discussed with surrounding districts. We should be searching for sites as they won't just come forward	3		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Depends on what groups want and need. It's important these groups don't feel ostracised.	2			Existing sites should be expanded and maintained (improve existing Redbridge site)			
H13 Residential Moorings	Preferred Option - a) Do not allocated sites and include a criteria-based policy	support PO	13	policy needs to be consistent with Canal and River Trust.		Should just be allowing all moorings, letting people live on the water.		Support Option B: Many people wish to live on Oxford's waterways for cultural / affordable reasons. More opportunities should be provided.	29		
		Canal and River Trust agree with approach that doesn't allocate sites.		Needs to be in combination with b.							
				Ok, but m sites should have- facilities., biodiversity, well managed sites, only boats in good condition.	4						
				Need to co-operate with neighbouring authorities to increase the number of moorings.							
H14 Elderly Persons and Specialist Housing	Preferred Option a) Include a supportive Criteria-based policy	Support Option A	37	Support encouragement for provision but leave up to the market to decide locations		Leave to market to decide location	1	Support provision of AH on larger sites to meet specialist housing need.		Option C could be detrimental to delivery if reliant on revenue funding first being secured.	
		The part ensuring quality is very important.	3	Support principle of mixed / balanced communities but difficult to comment until need has been identified. Some people may however have specialist needs best met in non-mixed settings.	1	Disgusted by ageist tone of the policies, with their clear bias towards the elderly, who are statistically the richest.		OLP provides opportunity to identify a specific site for older person's accommodation in some form	1	Alt option c on elderly person's accommodation and other specialist housing needs, implies the city Council imposing policy on large strategic sites outside the city. Please remove.	2

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Ok as long as people aren't forced into a community with people they don't relate to. . People should be able to stay in their own homes, with fast adaptations until they need nursing care. Fibre broadband to avoid isolation.	2	Don't do anything. People should be able to stay in their own homes. The market should decide.	3	It's clear there will be an increase in this group of the population so should require specialist accommodation.	1		
				Incorporate parts of b/c too.	3						
				support option a with a more positive approach to include the amount of older people's housing needed within policy alongside a commitment to meet those needs. By recognising need and monitoring supply it would aid decision-makers and make plan more effective		Restrict elderly accommodation as there's enough new should be for singles, couples, families.					
H15: Self Build & Custom House Building	<b>Preferred Option - a)</b> Require a proportion of housing on large sites to be self-build plots	Support	14	suggest the 12-month sales period is reduced as it is possible that certain thresholds of development may be completed sooner (e.g., a builder may have completed a 50-home development within 12 months and therefore wish to be off site).	2	Concerned that there will be delivery difficulties on some sites.		The Universities support a flexible approach to self-build housing. Not be suitable for all development types. Employer-linked housing sites, should not be required to provide self-build plots available.	1		
		Support but unsure whether it is viable in the city.		Interface with other policies needs careful consideration. Suggest a demonstration project is undertaken to work out what really works.		A need for self-build homes should not automatically lead to a requirement. Rather should encourage their provision.		Support <b>option C</b> a criteria based policy which support the approach but does not require custom or self builds	12		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
				Support PO: but would like to see more larger sites for self-build coming forward. The smaller sites limit options.	1	As so many sites in Oxford are small it would be more effective to complement this approach with small site allocations could be combined with Option C	1	Support Option B or specific site allocation	1		
				Need to have a robust understanding of supply. In some areas, sufficient plots come forward on windfall sites, in which case a supportive policy is required.		There is no reason to support self-build at all/only good if it's for co-operatives	4				
				Self-build register should be up-to-date. Potential to over-estimate demand.		Not good if lowers density. Could instead adapt flats for shared ownership or have o/s Oxford.	2				
				need to consider feasibility of all sites delivering self-build. Suggest that flatted development is excluded from self-build requirement.							
				Delivery of self-build plots can be difficult, including practical difficulties such as Health and Safety.							
				There are not enough opportunities for self-build.							
				must have the same requirements general	2						
				support aspects of PO, in particular re-marketing of unsold plots							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement with alt options/rejected option	No.
H16: Community-Led Housing	Preferred Option - a) Generally supportive policy. No specific requirements	Support PO	17	Community-led housing is vulnerable to viability arguments.		Do not support preferred Option. Not possible to deliver community-led housing through traditional methods. Does not appear to be proper understanding of this type of housing and the benefits it can bring.		Support Option C: providing officers ensure no abuse of policy. It could support greater densities / feasibility, and support communal facilities. Promotes sustainable living.	1	Option d) while positive, does not go far enough. Need to require provision of community-led housing.	
				Need to consider potential for community-led housing on City Council land.		There should be no policy or requirement. No need, not a priority.	5	support option b) as best way to deliver. Suitable site size thresholds will be the key to ensure delivery success. Would support requirement for all sites not just large.	10		
				no relaxation of standards or requirements of any housing type. Community-led housing must deliver the same standards as all other housing.	3			Preferred Option should be a combination of options b) and c) however do not support that encouraged delivery of 'sub-standard' homes.			
								In favour of relaxing requirements	7		

### 5.3 Policy Options Set E1 to E9

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
Intro paras and wider context along with any other comments				Plan period should be clearly set out in the LP2040, uncertain when the starting point is. Important in understanding how housing and employment needs will be delivered.	2	Lack of evidence about employment needs makes it difficult to respond in full but OUD concerned by prioritising housing over employment as its a key strand of OLP vision	2	WODC - support for employment sites being more sustainable outside of Oxford as would reduce congestion and travel - we would like to discuss options for accommodating employment needs with you. Policies in the plan should consider the mitigation of impacts arising from development of sites on the boundaries, early consultation is needed, S106 agreements should be used to ensure appropriate infrastructure is secured.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				Significant demand for employment land in Oxford and Oxon. Current lack of supply in Oxford as demand increases and buildings are adapted to new uses.		In light of unmet demand concerned by approach to prioritise housing at expense of employment, given importance of encouraging new occupier to the wider economy of Oxford.  Oxford North capable of accommodating a significantly higher level of employment floorspace by making more efficient use of land and including areas of land that sit outside of the planning permission boundary.		The economic ambitions of the council should be scaled back and residential housing should only be built on brownfield land, offices and commercial space should be used for housing.	
						Strongly disagree with unrealistically high figures in the Interim ELNA report (Lichfield's). Question the conclusion that the business-as-usual approach is the right approach for the LP to follow, employment projections too high. Does not take account of COVID, and the high proportion of office and R&D workers that work from home, which requires less floorspace needed.			
E1: Employment strategy	Preferred Option - a) Attempt to meet employment needs, but prioritise other uses, in particular housing, rather than employment, even if employment needs cannot be met in full.	Seeking to meet Oxford's employment need is vital to the local economy to meet market demand where it is generated, otherwise businesses will go elsewhere and possibly draw other existing businesses with them.  Important to retain employment uses in the city and seek to increase to meet the identified need especially if the housing figure is enhanced to maximise economic growth.	9	It is important to support the intensification and expansion of existing prime employment sites in and around the City, these can also be prime buildings and not just Category 1 or 2 employment areas.	3	PO favours housing over employment too much. Needs to be more balanced. Employment land is very important aspect of city and local economy.	1	Support Option B whereby employment-generating uses are supported throughout the city	4
		support preferred option from a transport and climate action perspective want to encourage less travel, supportive of 20 m neighbourhood approach	2	Oxford's contribution to the national economy seem to be constrained by a) recruitment difficulty owing to high cost of housing and availability of suitable premises. a balanced strategy is needed.	2	It is not appropriate to adopt a 'Business as Usual' scenario when considering the Oxford Economic Strategy and the Local Industrial Strategy. More ambition will be needed to fulfil the potential of the region and to ensure the region remains competitive internationally in key sectors. Not only will this mean discussions with neighbouring authorities about unmet employment need, but existing and proposed employment sites will need protected from competing uses. This is distinct from where mixed use neighbourhoods are purposely being encouraged, but not at the expense of strategically important employment space.		Support an approach that further examines the need for employment numbers, and space in the city. If needs cannot be met through allocated sites the 'windfall sites' in the city and discussions with neighbouring authorities must find solutions.	
		Support PO, the Local PPlan 2040 has an important role to play in meeting local housing need, but this should be balanced against the need to protect and sustain Oxford's knowledge & innovation sector. But clear need for more R & D space and innovation districts which are important to the national and global economy, Oxford needs to make its contribution.	1	It would be good to accommodate live/work models, with an emphasis on living close to where you work. Not just home working.	1	<b>Oxford Health NHS Foundation Trust:</b> Whilst a balance between employment and housing is acknowledged, it should not operate to the extent that Oxford's economic potential is compromised.	1	Support option D rely on national and other local plan policies.	1



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		support option a, which would prioritise housing over employment provision	33	Any solution must be met within Oxford's boundary and not on green belt land.	1	Both options have downsides. Option A is potentially unsustainable and could increase the need to travel. Also has potential to reduce potential for organic growth of universities/ colleges. Whereas Option B lacks a proper monitoring framework.		OUS states if the City is to meet the terms of the Industrial Strategy and Oxford Economic Strategy, more opportunities for employment-generating uses will need to be found, this will require discussions with neighbouring authorities, but there needs to be an appropriate and evidenced balance struck in terms of provision.	1
		Support option A, particularly support housing in spaces above City centre shops.	1	Support PO but consider that no further new employment sites should be proposed, as this creates more demand for housing.	1	Retain existing sources of employment & link to future housing needs. But do not encourage urban sprawl, growth or new growth / generating businesses.	1	<b>Logicon:</b> support option 'c' which seeks to apply protection to employment sites including warehouses & light industrial sites. Important to preserve a broad employment base, which is a strength of Oxford's economy.	1
		Supportive of policy, but needs greater support from schools & other community areas. The larger sites are generally chosen for vast land but are soem distance from amenities.	1	Important to consider difficulties faced by employers in recruiting and retaining staff. Balance therefore needs to favour housing provision over employment.	1	Do you need a policy as have E2 & E4	1	OUS support the principle of intensification but it cannot be at the expense of sacrificing the employment base unless provisions for such employment is made or there is a qualitative improvement in employment reprovision.	
		Housing could be on employment sites providing people are not tied to jobs.	1	But question meaning of 'attempt to meet employment needs', already plenty of jobs for people living in city. Intensification of employment sites could add to housing need. City Council should encourage redevelopment of existing employment sites into housing.	3	Not clear why there should be a change from OLP2036 which emphasises 'a strong need to protect existing employment sites' despite competing demands for land, esp. for housing. Both options should take account of international status of Oxford, otherwise there is a risk of underestimating demand for suitable employment land and the importance of this to the prosperous city.		Important to deliver housing but its delivery should not frustrate delivery of critical employment growth in the city centre on prime employment sites.	1
		Historic England support prioritisation of an inclusive economy, encourage explicit mention and consideration of the heritage sector and that LP should be proactive in identifying/exploring how it might help heritage sector recover. Also support need for ESP plans and encourage recognition of the role that traditional skills and the wider heritage sectoras one aspect of such plans.	1	Support this option to allow housing but wish to see a thorough assessment of all employment sites to explore development potential for housing on all or part of employment sites.	1	Need more housing in the city. Too little development has taken place on employment sites in the last five years. Employment need exaggerated previously (see CDWA rep for details). Some employment land could be redesignated for housing without impacting available space. Numerous sites including Business Park, Science Park, Osney Mead/ Oxpens and Oxford North could all deliver this.	5	Support option 'c' broad employment base	6
						<b>ARC Oxford</b> disagrees with principle of PO - must continue to promote employment generating dev. in city and invest in sustainable transport solutions to ensure access to employment opp. by means other than private car. ARC Oxford does however support employment land review to re-evaluate sites if required (see ARC response on Policy E2 also)		<b>BMW</b> support option 'c', provide a broad employment base and protect a wide range of employment-generating uses, including warehousing and small industrial uses as well as Mini Plant Oxford and Science Park.	1
						Oxford will have difficulties attracting a workforce with restrictions on travel & high house prices. Greater democratic freedoms needed.	2	Support option c	1



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						opportunities for employment should not be restricted		Alternative option: focus on Oxford providing a broad employment base, protecting a wide range of employment-generating uses, including those that do not make efficient use of land such as warehouse sites & small light-industries as well as major sites, Mini Plant & Science Park.	2
						Oxford cannot sustain current employment growth, it should be directed to other centres.	1	Support alternative option c: particularly the importance of protecting manufacturing uses	1
						City Council should work with BMW more closely given anti-car approach	1	Need an approach that seeks to return underused office & commercial properties to housing stock	1
						University provides many employment opportunities but housing for employees is lacking and should be a priority.	1		
						Important issues but don't see how the Plan can push against market-driven forces.	1		
						Do not understand, there are two alternatives proposed but should only be one.	1		
						Employment needs can be met through remote working, using less land. Employment growth should occur slowly, using existing buildings & facilities and not on greenfield sites. Promote more barriers to private car & restrict parking.	1		
						Public transport is key. Difficult to commute to work outside city by public transport.	1		
						Build whole communities not small congested areas.	1		
						If employment makes city unliveable, then shouldn't add new sites. What is lacking is employment for less skilled people in deprived area of Oxford. The jobs for tradespeople, delivery riders & creative artists need to be supported by skills development. Many will work from home or away from City centre.	1		
						UBS does not agree that housing should be prioritised at the expense of strategically important employment sites. Critical mass of employment sites important to delivery of Innovation Districts. City centre key location for knowledge economy uses.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						Disagree, the plans for massive job growth will ruin city and its surroundings.	1		
						Slightly absurd to consider the Council can create any kind of employment other than for itself.	1		
E2: Making Best Use of Existing Employment Sites	<b>Preferred Option - a)</b> Seek to meet employment needs on Category 1 and 2 sites, which are named in the plan. Where Cat 3 sites become available, allow their loss to other uses (including housing) <b>and b)</b> no new employment-generating uses outside of existing sites (i.e., no loss of housing sites to employment uses)	Support loss of category 3 employment sites to housing.	6	Policy should also seek expansion of existing employment sites and not simply within the current boundaries.	1	Concern about the scale / ambition of economic growth	1	Plan should provide a positive policy framework which allows key sites to deliver viable employment led growth. The need to present a justification over loss of any existing uses, which may be sought for protection as part of wider Local Plan policies, should be resisted.	
		support option A - important to retain as much employment use as possible, and seek increase to meet identified need. If housing need is however greater than employment need then support the loss of Cat 3 sites	9	Need to ensure that no negative impact on plan objectives through loss of lower value employment sites which could result in small businesses being forced out of Oxford.	3	The yield of homes under current policy has been meagre and maintaining this approach may not be flexible enough to respond to changes in market conditions. Document states the Oxford is the most sustainable location for jobs but it conflicts with the need for home these policies will result in more jobs in the city and people having to travel in which is unsustainable.	2	Support option c, which would provide maximum flexibility in terms of identifying land for housing.	12
		<b>Logico:</b> support option A, important to protect Cat 1 sites, such as the Mini Plant / Unipart given their contribution to national and regional economy.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Support for local businesses critical. City centre retail should be re-let and Botley Rd developed for Affordable housing. Concern about LTN's and bus gates.	1	Support option 'c' which allows jobs in Mini Plant but also for small businesses	1
		<b>ARC Oxford</b> support and has undertaken studies that confirm potential for intensification, modernisation and regeneration of some of its plots		Support the PO but need to show how the Plan will meet employment need. (OUs cf response to E1	1	<b>ARC Oxford</b> does not think Option C would work, need to retain categories of employment sites to assist with creation of complexes as ARC Oxford.		Support option 'd'	1

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		<b>Oxford Health NHS Found:</b> Support Option A, since the exceptional strength of Oxford's economy, in life sciences means the city should seek to optimise its potential and contribute to the national and international economy.	1	Support PO but must include a requirement to provide housing on site where possible for Hospitals & Universities.	1	The PO does not allow the flexibility to build housing on low-density retail sites.	1	Alternative option: do not categorise sites. Instead provide protection for by Use Class, focusing on protecting locally important (B2) employment sites to ensure a broad economy. Do not try to prevent loss of Class E, except in District centres through frontage policy. Class E is very broad and now allows c/u to residential.	
		Support PO a & b	6	Support: but complete loss of Cat.3 sites should be considered desirable.	2	Do not understand, there are two alternatives proposed but should only be one.	1		
		<b>BMW</b> support both option 'a' and 'b' and the focus on the importance of Cat.1 sites and not allowing their loss.		Request that 234 Botley Rd (New Barclay House) is categorised as an Category 1 employment site		housing should always be prioritised over other uses	1		
		Support option b	3	Request that Botley Rd Retail Park is categorised as an Category 1 employment site - given increasing significance of this location for new employment uses.		there are limited options & no vacancies in South East.	1		
		Support PO subject to 100% renewable energy and policy approach to phase out private car parking and promote more sustainable travel modes.	2	Support option A but to be effective policy needs to be supported by other policies in the plan. <b>Oxford Science Park</b> concerned that without a co-ordinated approach to infrastructure investment in the south of the city, this policy would not be effective. Further evidence needed on why use Class B8 is excluded from policy option A, and extent to how this complies with PPG.		<b>UBS</b> supports general aspirations but questions ability to meet all employment needs through intensification/redevelopment of Cat1 & 2 sites only. These sites should however be protected solely for employment uses.	1		
		Support option 'a' given potential regeneration benefits to poorer areas of city.	1			Already large influx of employment into city, better to build housing on housing sites			
		Support Option A, but needs to be supported by comprehensive survey of property / space available, resulting from more staff working from home. Focus should be on R & D / Lif Sciences & key sectors of Oxford's economy, but allowing for diversity.	1						
E3: Allowing housing on existing employment sites	a. Allow an element of housing delivery on existing employment sites	Support option A - but policy duplicates part of E2, therefore is a standalone policy needed?	2	Support flexible approach to providing housing on employment sites.	1	When a site is only academic e.g. OU science area housing would not be appropriate	1	<b>BMW</b> support option 'b' since housing on Mini Plant Oxford is not appropriate.	1
		support option 'a' because of the priorities given to the delivery of housing	25	PO does not allow for housing on former retail sites	1	This approach in OLP 2036 has yielded limited housing	1	<b>Logicor</b> support alternative option 'b' concerned about potential loss of employment sites to housing, important to ensure firms can continue to contribute to the economy.	1

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		Support PO. Locating housing close to jobs can bring benefits for local services.	3	Support 1a but question meaning of 'attempt to meet employment needs', already plenty of jobs for people in city. City Council should encourage redevelopment of existing employment sites into housing.	1	where are these sites when employment sites are functioning	1	Support option B	1
		Support option 'a'	12	There could be scope for allowing some housing on employment sites provided it supports the economic function.		<b>UBS:</b> opposed to blanket approach to allow housing on all employment sites. Plan should protect all cat1 and 2 sites solely for employment.	1	Support option b City Council should work to retain integrity & availability of employment sites	5
		Support Option 'a' plus desire for more mixed-use developments with shops / offices on GF with residential above.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	<b>Oxford Health NHS Found:</b> Disagree, need to optimise development on existing sites particularly hospitals. Collaboration between hospitals, Universities and commerce defines the exceptional contribution that Oxford can make to national economy.	1	Policy approach should not leave commercial property vacant but use them for housing.	1
		Support option 'a' given potential regeneration benefits to poorer areas of city and benefit 15 min city concept.	1	Support PO providing there is an assessment of the impact of his housing on existing residential areas.	1	OUs object policy should not be applied in a compulsory fashion to non	1		
		Support, consider residential should be built at Science & Business Parks, with accommodation above buildings.	1	Build housing above employment sites, so not losing employment. Housing above Mini Plant car park an idea.	1	OUs state this would be distinct from a specific mixed use objective for a site, agreed with a landowner.	1		
		Support mix of residential and commercial uses	1	Focus for residential should be on empty employment sites and vacant sites. Others left alone.	1	Hope small shops won't be priced out by housing.			
		Support PO subject to 100% renewable energy and policy approach to phase out private car parking and promote more sustainable travel modes.	1	Support but consider the three Headington Hospitals have large amounts of car parking that should be used for employer-linked housing. Any other spare land not used for employment should be used for housing.	1	opportunities for employment should not be restricted	1		
						Policy approach appears to support conversion of offices and commercial properties to residential	1		
E4: Location of new employment uses	<b>Preferred Option - a)</b> Support new employment uses through intensification and modernisation of existing sites <b>and b)</b> Do not allow new employment	Support Option A as the most appropriate places to intensify and modernise to provide new and additional employment space	13	Add in OU Collegiate sites to list		Need evidence if this policy is to be effective. Changes to UCO is a weakness not sufficiently recognised. Some employment sites might be better for housing.	1	OUS objects to this policy	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
	generating uses outside of existing sites								
		Support Option A intensification and modernisation play an important role in regenerating areas of the city and making more efficient use of land. Support Botley Road Retail Park to help meet R & D need in the future.	1	Intensification of use must be accompanied by housing where ever possible. No disincentive for Universities and Hospitals to continue expanding, which have resulted in considerable infrastructure costs, which do not necessarily benefit wider community.	1	Release employment sites for affordable housing.	1	Support option D	1
		Approach would retain a geographic focus of employment uses in existing centres and employment locations. May provide capacity for much of the employment space needed without requiring additional land which could be used for other purposes. One potential departure from this could be any development opportunities at the new rail station.	1	Until unmet employment and housing need are known these options should be considered	1	Not enough detail provided	1	Support option 'c'	3
		Support PO subject to walking & cycling provision made & limits on private car use.	1	Support Option A - but q. whether policy is required in addition to E1 - could it be instead of E1?	2	No intensification of sites, already heavily built, hospitals	1		
		support option b	2	Take opportunities to improve transport links	3	Loss of housing land for new employment creation should be strongly resisted.	1		
		Support both a & b, option b considered crucial	6	Policy should also allow expansion of existing employment sites	1	Do not support office / R&D in the West End or Oxpens	1		
		<b>BMW</b> support option 'a'	1	Innovation clusters must include arts buildings & organisations, to reflect the collaborative approach to research between the arts and science.	1	The lease of land and businesses is essential for economy but come at a cost of losing land for housing.	1		
		UBS supports Preferred Option focusing on optimising output and value of key employment sites. Greater flexibility could be allowed on other less valuable sites.		These policies should be set in the context of traffic filters into the city & site-specific characteristics. Intensification of employment uses along Botley Road / Osney in the absence of lower parking levels will compromise sustainable & active travel aims. Strategic sites such as Osney Mead Estate should be considered as mixed-use allocations with residential and retail together with employment.	1	<b>Historic England</b> object, flag that text needs to acknowledge intensification may be constrained in some locations - e.g. where it leads to unacceptable harm to historic env.			
		Support Preferred option both 'a' and 'b'	3	Any solution must be met within Oxford's boundary and not on green belt land.	1	No new employment sites or intensification / modernisation of existing sites should be allowed, unless employer can show no extra car journeys are generated. No parking to be allowed, with employees needing to use public transport or active travel, funding sought for new segregated cycle lanes.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		<b>Logicor:</b> support Preferred Option (a & b) intensification of existing brownfield sites offers most sustainable approach to development.	1	If sites are intensified then need to improve access to and from sites, such as JR2 now impossible by car	1	Housing needs should be prioritised over employment needs.	1		
ES: Warehousing and storage uses	<b>Preferred Option - a)</b> New B8 uses on sites not already in the lawful use only allowed where use is essential to the operation of a Category 1 site <b>and b)</b> introduce a specific exemption to Option A to enable a pilot of freight consolidation	<b>Natural England</b> pref option a in comb with option c. With regard to pilot of freight consolidation - would be happy to provide further comment on this policy when detail is provided regarding the possible locations of the centres and any potential impacts on designated sites		OUS support all employment needs being met.	1	Do not understand terminology B8 or Cat 1?	1	Support option 'c' & progressively reduce B8 sites. Promote freight cargo options. Develop B8 sites for housing and develop network of walking and cycling routes & limit private car parking	1
		Support both a & b. Option b needed for freight consolidation, net-zero, air quality & cycle safety	10	Support option but there is also need to recognise need for B8 uses.	2	Property is at a premium & investments massively oversubscribed.	1	Support option 'c'	4
		<b>ARC Oxford</b> agree with a and b but might not be case on other employment sites and a general presumption against B8 uses should not be resisted whether they are not detrimental (option c).		Support option A but if more traffic on SRN this must be modelled with a worst case scenario in terms of trip rates.	1	Reasoning & options ignore the accelerated transition from shopping to deliveries. Deliveries to homes reduce the need for a car.	1	Support option 'c' but prioritise use of warehousing sites for housing.	
		support PO a	3	In exceptional or essential circumstances (to be defined), sites may be designated as lawful use.		<b>Logicor:</b> question preferred approach. Options supporting text refers to reducing inequalities, policy approach should therefore encourage flexibility & diversity. B8 uses have a key role to play in ensuring mixed & viable industrial sites. Seek re-wording on policy that does not automatically exclude B8 uses, particularly Cat 1 sites and allow for modernisation / regeneration and expansion of B8 uses.	1	Support Option E	1
		<b>BMW</b> support option 'a'	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Let market decide. Change of use from B8 to other uses should be allowed, regulation not required.	1	Don't know	1
		Support option b	2	Support option 'a' but with the proviso that a requirement should be added to consider the impact of new B8 uses on traffic & environment.	1	Would not support Freight consolidation centre on green-field sites.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		Support option 'a' recognised that Oxford has delivery needs within its boundaries but may ultimately require freight consolidation hub to manage these needs and to promote active travel.	1			Release warehouse sites for affordable housing.	1		
		Support Preferred option but will require City to work actively with neighbouring authorities to help meet logistic / warehousing need for Oxford.	1			Impossible to respond to incomprehensible set of proposals.	1		
		Support PO but need to ensure that it fits in with sustainable transport options.	1						
		Support option b on freight consolidation although need several sites across the city.	2						
	Page 74 - Para 3.20	Reference to the Oxford Living Wage, this is not a planning matter, doesn't need to be controlled by the LP	3						
E6: Employment and Skills Plans	<b>Preferred Option - a)</b> Introduce a policy requiring applicants to submit an Employment and Skills Plan	Support requirement for Employment and Skills Plans. Such plans have significant positive impacts on the local economy and will contribute to reducing inequalities through additional training and support.	28	Suggest that careful and enforceable details are established to make sure promises given at planning stage are delivered for the benefit of the city.	1	Do not encourage or require an ESP	2	Facilitating green skills centres can increase skills in green technologies.	1
		Support option 'a' but alongside skills development with a focus on Blackbird & Greater Leys to help reduce poverty.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Loophole for developers	1	<b>BMW:</b> support option 'b' to encourage CEP's	
		Supportive of PO but need to ensure that you create educational partnerships with University & Colleges. This will benefit employee and employer alike by offering transferable skills / qualifications.	1	Support PO but could go even further	1	Ambitious plans that never help those intended, which talk up reasons for development.	1	<b>Logicor:</b> support option 'b' to encourage CEP's, PO overly restrictive.	
		<b>UBS</b> supports aspiration for providing affordable workspace but consider it should be encouraged rather than made mandatory. If policy does make it essential it should be subject to viability testing.	1	Suggest a TAN is produced that includes a template, criteria and best practice examples		more red tape / bureaucracy	2	support option b	5



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		<b>Historic England</b> support prioritisation of an inclusive economy, encourage explicit mention and consideration of the heritage sector and that LP should be proactive in identifying/exploring how it might help heritage sector recover. Also support need for ESP plans and encourage recognition of the role that traditional skills and the wider heritage sector as one aspect of such plans.		More consideration should be given to the sort of jobs created that are sustainable. Greater need for retrofitters rather than builders.	1	unfeasible and likely to be ineffective	1	Support option c	4
		Support PO - especially in areas of low educational attainment i.e. Littlemore		More details as to scale and type of employment requiring an E & S Plan	1				
				Depending on policy wording - could be more difficult for R&D development that draws on a wide range of skills. Further evidence required on how a mandatory planning requirement would be justified and relevant to companies in R&D sector given increase in companies developing their own Environmental, Social and Governance (ESG) strategies.					
				This policy may be encouraged rather than enforced. The affordability of land will be important so as to enable employers to seriously consider their commitment to the local employment market.					
				Too easy for employers to comply with letter of policy but not spirit.	1				
E7: Affordable Workspaces	<b>Preferred Option - a)</b> Introduce policy requirement for affordable workspaces to be delivered as a percentage of all large commercial development <b>OR b)</b> Encourage employers to deliver affordable workspaces <b>OR c)</b> Do not incorporate affordable workspaces concept into plan	support option a	18	Support option a but not on greenfield sites & promote live-work uses on car parks and industrial / science sites.	1	Option A not supported - the imposition of a % for all large commercial dev. in Use Class E would significantly reduce flexibility/ ability to ensure optimal uses at the most appropriate sites.			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		Support option a: it would secure maximum affordable workspaces, but LA should be prepared to refuse applications. Mechanism for delivery not clear, needs further policy development. Similar approach should be applied to retail units to make them more affordable, to encourage independents.	1	Encouraging an element of Affordable workspaces may not be appropriate on all sites and could have an adverse impact on delivery.		Affordable work space is a thing of the past as people are working from home	1		
		Support option 'a', together with a clear mechanism & viability evidence so that policy approach can be promoted.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	more red tape	1		
		support option b	9	There should be greater use of currently redundant spaces for affordable workspace.	1	More definition is needed as to what this is	2		
		Support option C	1	This requirement should be delivered through site allocations/masterplans	1	Must be market-led. Should not set percentage on large schemes. Could be affected by viability. Encouragement will maintain a market-led and flexible approach.	3		
		Support option C - a policy requiring affordable workspaces as a % of all large commercial developments would not be appropriate to a science park location where individual dev. need to be seen as part of a wider ecosystem.	1	Affordable workspace not solely to do with size of space provided but the interplay other factors. Some of which sit outside of planning controls.		Do not encourage or incorporate concept of affordable work space.	2		
		<b>Logicor</b> consider options 'b' & 'c' to be the most appropriate approach. There needs to be a balance between policy compliance & viability. More nuanced approach required which recognises employment site categorisation, together with an understanding of the environmental and economic considerations.	1	Important that quantum of affordable workspace a development should consider is always subject to a viability assessment, plus consideration is given to appropriateness of uses being able to accommodate affordable space due to layout and neighbouring occupiers. Also important that the policy does not specify a specific stage when the affordable workspace should be delivered, this could compromise scheme viability esp. for schemes that are to be delivered in phases.	2	Council's should subsidise art spaces to be 'inclusive' and provide opportunities for all to add to culture of Oxford.	1		
		support - such an approach would likely secure the most affordable workspace and help facilitate an inclusive and diverse economy	2	Defining 'affordability' is challenging, flexibility is key, co-working space, licenses not leases and business support.		Unnecessary complication, focus should be on housing and environment.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
E8: Short-stay accommodation (new)	<b>No Preferred Option -</b> <b>a)</b> Allow new sites for holiday and other short-stay accommodation in the city and district centres and on main arterial roads <b>OR b)</b> Allow new short stay accommodation in city and district centres only <b>OR c)</b> Support new accommodation anywhere in Oxford <b>OR d)</b> resist new short-stay accommodation anywhere in the city <b>OR e)</b> No Policy	Support option A	16	Arterial roads as a sustainable location for visitor accommodation development should be identified. Need tight parking policies to control parking on street.	2	If housing is a priority for Oxford no short stay acc should be allowed	1	Requires research into city's tourist capacity to be able to give an informed opinion.	1
		Support option 'a', but feel it would be hard to sustain if bus gates are introduced.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Additional policy required for developments of more than 10 units for holiday & short-stay accommodation a financial contribution should be sought for affordable housing.	1		
		Support a & b but exclude Airbnb's	2	Short-stay let's should be licensed.	1	City has enough short-stay accommodation, focus should be on local residents. But any further need should go to P & R's	1		
		Support more short-stay accommodation in principle, in combination with a reduction in taxation of Airbnb's. Support tourist tax on hotel bedrooms.	1			New developments should be on allocated sites only	1		
		Support option 'a' and to a limited extent with the aspirations of option 'b'. Coach parks should be located next to P & Rides. City centre hotels should provide small transport vehicles for guests. New accommodation encouraged in City centre, rather than outskirts of Oxford.	1			Oxford too crowded. Benefits of tourism do not outweigh the negative impacts of increased traffic, pollution & crowding.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		Support 'a' which controls short-stay accommodation but does not resist it.	1			Support short-stay accommodation only on allocated sites	1		
		Support Option b	6			Oxford has lost too many amenities in City centre to hotels, loss of Boswells. Other beneficial uses should be found	1		
		Support option c- this would encourage improvements of peripheral neighbourhoods & make more amenities viable	1			Needs to be a presumption visitors will come to Oxford by public transport. So sites need to have easy access to Central Oxford by bus. Hotels with parking only supported on or near ring road.	1		
		Support option 'c' but need more cheap B& B accommodation.	1			Ban / restrict Airbnb's	6		
		support Option c - short-stay accommodation anywhere	2			Turning large long-term empty homes into short-stay accommodation would be acceptable, but not building more hotels at the expense of affordable housing	1		
		Support option d	6			Hotels are good for tourism & housing those unable to access property that results in expensive costs.	1		
		Support option 'd', given priority for housing consider new short-stay accommodation should not be allowed since the land could be used to meet housing need.	1			There has been a lot of new hotels being built in Oxford, why is there a need for more.	1		
		Support option d as it is important to control the loss of residential properties.	10			Disagree, not clear that there should be a policy, why is existing framework not sufficient?	1		
		Support option d: hotel rooms already increased significantly in recent years. Concern about potential damage to housing rental market from Airbnb & guest-houses. Option b on non-residential sites would provide a sustainable approach.	2						
		Support option E	2						
E9: Short-stay accommodation (existing)	<b>Preferred Option a)</b> Do not include a policy protecting existing short-stay accommodation in the city	support PO	9	A degree of flexibility is required to enable delivery of other plan priorities. Ensure parking is controlled	2	Not sure of meaning	1	Letting the market decide could have a detrimental impact on tourism across the county	1

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
		<b>Historic England</b> encourage Council to strengthen evidence base on heritage tourism i.e. helping to identify the contribution made by the city's heritage to the tourism (domestic and international)		Any solution must be met within Oxford's boundary and not on green belt land.	1	Do not expand short-term accommodation	3	Reject PO but support option b which aligns with vision of encouraging tourists to remain in Oxford to contribute to local economy. Level of need must be established and policy reflect it. Suggest introducing tourist tax to be used to mitigate environmental impact & promote better wages for those working in tourism sector.	3		
						Problem with Airbnb's	1	Support alternative option 'b'	6		
						Short-stay accommodation consequence of broken families, deprivation and refugees	1	Support alternative option 'b' but with a requirement to promote a range of accommodation and a sustainability requirement.			
Tourism general comments						Ban Airbnb unless in spare room of house.	1	Support option B, but only to protect existing accommodation.	1		
						New short-stay accommodation means more jobs & less space for housing.	1	There should be a policy protecting existing short-stay accommodation, while not allowing expansion of existing short-stay accommodation; to ensure potential residential land is not developed on.	1		
								Protect existing short-stay accommodation, visitors important to local economy	1		

## 5.4 Policy Options Set G1 to G10

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
<b>Intro paras and wider context along with any other comments</b>		support defining G & B infrastructure network	3	Which spaces are under threat, most spaces are in floodplain +/- GB and thus protected, policies should respond to context and also consider sites beyond the city boundary that support policy objectives.		The OLP lacks vision to tackle climate change and support BNG which should be 20%					
				No opportunity to designate a local green space (as per NPPF) or to comment on performance of current net gain policies.		The plan should ensure there is appropriate protection for SSSIs, LWS and SLINCs a SPG should be written to safeguard these crucial water supplies					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
		County - city internal officers must engage with County officers in drafting policies.		Support for ambitious policies, which improve on policies in previous Local Plan. Particularly welcome greening urban area & ensuring greater access to nature for all. Concern however about exemptions, which may allow developers to circumvent these good policies. But chapter does appear to be focused on mitigating impact of climate change, rather than measures to prevent it.	1						
						Any additional restriction should be based on quantifiable benefits and national policy standards, not opinion.	4				
	Para 4.28	strong support for this to support those living in poverty	1								
				No specific mention of hedgerows in the policy, needs to be rectified.	2						
	Fig 4.1	Plan limited to Oxford boundary and does not appear to take account of access to green spaces on the edge of the City. This may have resulted in a skewing of the outputs. Account should be taken of accessibility to land outside city boundary.	3								
	Fig 4.2 -4.3	Figure 4-2 (Options Paper) and Figure 14 (OCC Green Infrastructure Study 2022) incorrectly show Headington House as green space although it is almost invisible, and omits Ruskin Field (Site 463) which has high amenity and green corridor value. There are multiple errors in the entire study which presents no details as to its methodology or how it reached its conclusions, it is not fit for purpose and must be given a competent company to do correctly.				The GI Network (Fig 4.2/4.3) shown bears no resemblance to reality. The only green space allocation should be via a site allocation in a Local Plan and this should be wholly exceptional.					
		The GI Network (Fig 4.2/4.3) shown bears no resemblance to reality. The only green space allocation should be via a site allocation in a Local Plan and this should be wholly exceptional.		Involvement in the LNP will help to radically enhance nature in the city and its positive impact on climate	1						
	Paras 4.1 - 4.6			<b>Historic England</b> feel there is a risk that focus is too narrow and could miss opportunities for natural env and historic env to be considered together. Feel that historic env considerations in GI section are lacking. Para 4.6 mentions constraints but does not mention registered parks and gardens, HE emphasises need to consider connections holistically.		The figure 4-4 showing sites of ecological importance on the GIS 2020 is laughable, bearing no resemblance to reality.					



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
G1: Protection of GI network and green features	<b>Preferred Option -</b> a) Identify network of green and blue infrastructure for protection, informed by the GI study b) In addition to the network, have a series of separate policy protections based on different types of greenspaces. <b>and c)</b> only allow loss of trees, hedgerows, woodlands where it is clearly justified	Support preferred options	34	<b>Natural England</b> Consider that all the identified green spaces, and others which may not have been identified, will have importance for a variety of reasons and recommend policy supports the protection of all existing open space typologies regardless of if they are part of the network or not, particularly due to the tightly constrained nature of the City and the difficulty in creating new green space. Should ensure allocations do not conflict with protected GI or at least ensure that sites retain network and offer betterment. The GI strategy can identify where funding is needed for targeted improvements e.g. biodiversity and reducing inequalities in access to GI. Plan should avoid building on open space of public value as outlined in para 97 of NPPF.		County - we recommend policy approach most effective in protecting and enhancing GI, also consider how connections between POS can be added to the network, e.g. tree lined streets, watercourses, PROW. PO should be a, b and c. It is essential that playing fields are protected.		1 c) OU object to option not positively prepared. Include potential to improve tree planting			
		<b>The Woodland Trust</b> supports the preferred options A, B and C above. Having a defined network of green and blue infrastructure sites is vital to understanding and delivering nature recovery across Oxford and into surrounding districts. Within this network, it is important to define and protect biodiversity sites, natural greenspace, and in particular as identified in option C, woods and trees. Oxford City and the county of Oxfordshire have some of the lowest tree canopy cover in the South East, yet increasing canopy cover has been identified by the UK Committee on Climate Change as essential.		It is best to define open spaces individually rather than apply a blanket GI approach. Clarify which sites are under threat which don't have protection.	3	Blanket approach too onerous and would prevent delivery of affordable sustainable homes.		Support e) which either defers to national policy or provides a very specific look at individual cases.	5	No to Option D	
		support option a	2	<b>Natural England</b> suggest that consideration be given to extending the policy to include features included in the proposed protected GI network and any priority/irreplaceable habitats within the plan area, for example Urban Mosaic Habitat		There is a policy omission – the Local Plan needs a specific new policy on hedgerows. Specific mention and targets relating to hedgerows should be added in, with both protection for existing hedgerows but also commitment to the creation of new hedgerows.	5				
		Support option c	16	Preferred option “a+b+c” sounds reasonable, but the green/blue network is very narrowly defined in the Local Plan 2036 and excludes many important green areas such as the Barton Triangle and Ruskin Fields, and other areas worthy of protection. It is also contradicted by the greenbelt/field policy (Policy Set S2) above.		Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.					



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
		Support option B	3	<b>Oxford LNP</b> state that it appears that the proposed Green Infrastructure Network corresponds well to the draft NRN mapping. Suggests further analysis of any differences which might result in minor adjustments to this network to ensure closer alignment, resulting in a more coherent strategic environment and delivery of further additional benefits.		We draw attention also to Oxfordshire Treescapes Our Land, Our Future report which says that meeting the 40% increase recommended by the CCC means: "Increasing the proportion of the county's field boundaries that are hedged from 47% to 66%, giving us 18,200 kilometres of hedges compared to the current 13,000 kilometres".					
		<b>Environment Agency</b> support combination of a, b and c but feel that option b should more strongly reflect protection of rivers/streams and their riparian corridors including guidance for developers, expectations on ecological buffers, long-term management plans and opportunities for de-culverting. Examples of recently adopted policies elsewhere provided for illustration - see their detailed response for more info. Under option c, they propose adding 'rivers and stream corridors' to policy wording not granting proposals that involve their loss (alongside ancient woodland/ancient/veteran trees).		<b>Oxford Preservation Trust (OPT)</b> would support preferred Option b to ensure that green spaces and the infrastructure are strongly protected. Option a does not provide a clear definition of what constitutes a 'green space' and so option b would provide more clarity and detailed guidance. The purposes and roles of different types of green space vary, and their nuances would not be picked up by an overarching general policy. For example the purposes of the Green Belt are different to the purposes of an allotment.	1	<b>Historic England</b> object, want new OLP to continue current approach recognising historic sites form part of city's GI network. Flag that use of term 'designated' sites needs to be careful not to cause confusion (e.g. could be various reasons for designation - environmental or historic). Repeat emphasis of need for holistic approach, reference to loss of hedgerows/trees does not currently reference historic environment for example.					
				Policy should favour community governance of amenities of at least certain types of green space	1	Preferred options but not c). Enact a City wide Tree Preservation SP Guidance for all trees over 6 feet in height. Strong constraint on avoidable cutting back of such trees, with consent required from the Council when specific conditions are met eg any actual risk to the public; actual existing blocking of footpath or road; only outside the nesting season unless conditions are considered to be exceptional; fines for any evidence of deliberate tree damage to secure removal, which should be substantial to deter others, etc.					
				On new developments, developers should be required to plant hedgerows and hedgerow trees around the borders and be obliged to protect and maintain them for at least the first five years.	2	Broadly supportive, but why is the Council not inviting respondents to identify sites for identification and protection as Local Green Space					
				would welcome bespoke policy on hedgerows setting out increases of 40% by 2050	2	But the Green Infrastructure papers for the Local Plan 2040 are inadequate because they fail to identify sites that should be included. In the Old Headington area, Ruskin Fields and the JR site should be included. There are no doubt similar areas in other parts of the city.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
	Other	<p><b>Natural England</b> have flagged the requirements of NPPF around need for strategic approach, and have also flagged the new Green Infrastructure Framework which is being launched in Jan 2023 and should be used to help inform LP along with the local data and tools.</p> <p>They welcome the continued high level of inclusion of Green Infrastructure considerations throughout the Local Plan 2040 consultation and supplementary documents, and the recognition of its importance in achieving the overarching aspirations of the Local Plan 2040. Also welcome the production of the Green Infrastructure Study 2022 and the identification of a potential green infrastructure network for the city.</p> <p>Also encourage management and maintenance arrangements for existing and new GI to be built into the GI strategy.</p>		<p><b>Green Party:</b> Generally support PO, but concern that option a allows "poor quality spaces" to be built on. Appears to contradict para.4.8 &amp; option b, which would see spaces afforded different weights. More clarity &amp; detail needed.</p>	1	<p>There is, however, a policy omission to this option. In addition to the protection of trees, woodland and hedgerows there also needs to be consideration given to the protection of important freshwater habitats and minimising detrimental impacts on waterways.</p>	4				
				<p>Need to protect green spaces in the city. Council has an obligation to consult with the local community about these spaces, but has not done so. Green spaces are important for residents and are being lost at an alarming rate. Contradicts the Council's claim that they are seeking to protect important green spaces.</p>	5	<p>Safeguarding of the natural environment, its wildlife habitats and preserving local green spaces is very important to many people. No overall strategy for preserving habitats and enabling connectivity through wildlife corridors. Decision-makers do not seem to be listening to these concerns.</p>	7				
				<p>Under preferred option b waterspaces should be included. Any emerging policy should recognise the different issues and constraints relating to canals and rivers and recognise them as multi-functional GI spaces. Any policy should be written with the agreement and cooperation of the Canal &amp; River Trust and Environment Agency and recognise that different types of waterway may have different requirements.</p>		<p>Consider the protection of green and blue infrastructure is not secure in new Local Plan 2040 approach. Need /provision of housing appears to override all other considerations such as flooding and Climate Change.</p>	1				
G2: Provision of new GI features	Preferred Option - a) Require green and blue infrastructure features on all new development	<p>support preferred option and maximise opportunities for innovation - green roofs/walls et</p>	27	<p>Option A is most flexible approach. Most sites in city are constrained. An onerous standard for open space may render constrained sites incapable of delivery. Account should be taken of ability to access open space within a reasonable walking distance of the sites. Flexibility is key to the success of this policy.</p>	6	<p>Concerned that PO would be very complex and difficult to understand/ manage by both developers and planners.</p>		<p>Support Option b) because some smaller developments have significant issues with viability and other constraints.</p>	2	<p>do not support option d</p>	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
		<b>Woodland trust</b> - Support the preferred option and would strengthen with requirements for a) a target % for tree canopy cover, as a minimum on larger/less urban sites. We commend the exemplary Canopy Cover SPD adopted by the former Wycombe District (now part of Buckinghamshire Council). b) access to natural greenspace including standards for woodland access. The Woodland Trust has produced a model Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: – That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. – That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.		It is not clear from the consultation document how much urban greening would be required through the use of the Urban Greening Factor, whether this would area specific, or how it would relate to the 10% Biodiversity Net Gain (BNG) required by the Environment Act.	2	Potential administrative burdens on applicants through overlapping policy areas and potential viability concerns.		Support Option B - inclusion of principles enables requirements to be flexible	1	Do have a policy but no strong opinions on which	
		<b>Environment Agency</b> support option a highlighting that tailored requirements would enable considerations on specific sites in relation to topics like re-naturalisation of river/stream banks; buffer zones to promote connectivity between green spaces and rivers; re-connecting rivers with flood plains and creating wetland habitats. Also state that rivers and streams should be included in the Defra biodiversity metric where relevant and a baseline should be created through an appropriate river corridor survey. 10% net gain should be achieved in each of the unit types.		Not possible to state preference as further detail required. For example what percentage of green space etc.	3	Long-term maintenance required wouldn't match limited value for biodiversity and access by residents.	1	Support option b - larger developments potentially offer the biggest opportunities for achieving new, worthwhile open space in the city - ensuring these are captured with a requirement for a specific level of open space helps contribute to new open space provision.	2		
				Necessary to establish a suitable measurement baseline. Risk of 'double-provision', without careful management, which could impact viability.	2	Option C not flexible enough ( as PPG17) to maximise GI and open space in Oxford		Support preferred option, but alternative might also work			
				<b>Oxford LNP</b> strongly supports the approach to prioritising areas that could benefit from green infrastructure. This rounded and equitable approach addresses areas most at need, and where most benefit could be delivered in terms of health and wellbeing.	1	<b>CBRE on behalf of Redevco</b> do not support Option A because it requires GI and BI to be specifically quantified against targets not accounting for site constraints and making the most of opportunities. Option A may prevent the optimum GI and BI to be put forward, missing site specific opportunities because of stringent requirements		Prefer Option 4: Do not include a policy for providing new green infrastructure, defer to national policy/standards.	3		
				<b>Green Party:</b> Generally support PO, however like to see further details on how decisions about appropriate amount of blue/green spaces are made & about "bespoke tools".	3	A Hotel or business would not want any green space for example		Open space requirements should be required on sites over a certain size. To avoid hindering the redevelopment of previously developed land we consider public open space should not be required on sites of under 0.5ha in urban areas.		We request that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places.	
				Need to take account of existing under-provision in certain parts of city	2			Support option c - but why considered detrimental			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
				<b>Historic England</b> are looking to ensure that new GI also takes account of and integrates positively with the local historic environment. Flag that the provision of new GI needs to be sensitive to place. Careful consideration and planning are needed to ensure that any targets do not result in unintended consequences - e.g. avoid wrong tree in wrong place.	1						
				<b>ARC Oxford</b> consider option a to be too subjective - flexibility needed for site specific circumstances. Policy also not clear as to the level of urban greening that would be required through use of UGF plus whether it would be area or use specific plus how it would relate to the 10% BNG. Plus without knowing the level of greening that may be required on site its difficult to now how it may impact on development viability.							
				Oxfordshire/ Oxford has some of the lowest levels of tree canopy cover in the South East. Woodland Trust supports the CCC's recommendation of an increase in UK woodland cover from its current 13% of land area to 19% by 2050. LP should set a target for tree canopy cover – to include retention on new development, replacement where appropriate and new provision. More information in the Trust's 2020 publication The Emergency Tree Plan.							
	<b>Preferred Option - a)</b> Incorporate use of an Urban Greening Factor (UGF) into policy <b>and b)</b> define mandatory areas of application	support option a	6	<b>Natural England</b> support use of an UGF but would suggest this is applied across all non-householder applications within the City to provide greater clarity for developers/ applicants and a consistency of documentation required with an application. Suggest it could be tailored to provide greater recognition of certain features.		UGF not required on all sites. Small sites should be encouraged (not required) to use UGF to inform design.		Amount of green space in a development should be best dealt with during application process. Not appropriate or useful to use the UGF tool on most sites in Oxford. It does not take account of those sites that are already have significant amounts of green on them. No policy is required.	3	do not support option d	
G3: Provision of new GI features – Urban Greening Factor		Support option a but don' think this should be limited to a selection of sites/ areas (option b).	8	Introduction of a new policy tool needs to be easily understandable. Option B seems appropriate.	2	Inappropriate to use where specific provision has been agreed as part of an application. Instead UG should be a result of site surveys, and resultant landscaping and greenspaces provision.		Support option D	2		
		Support preferred options	9	<b>Oxford LNP</b> supports the requirement for new green infrastructure (GI) features in all new developments, and agrees it is right to use guides for their design. They flag Building with Nature as a framework of standards for good GI (reasoning in their response) and suggest that it serves as a supplementary requirement for developments, as a way of achieving the Urban Greening Factor.	1	the exemptions to the UGF requirement are "vague" and specified only by example in the "preferred option	2	Option C - UGF tool should be mandatory everywhere	9		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
		Support option b		<b>Green Party:</b> Support PO but like to see lower socio-economic areas used for UGF tool, given they have less access to green space in city.	1	Urban Greening requirements should be required on sites over a certain size. To avoid hindering the redevelopment of previously developed land we consider public open space should not be required on sites of under 0.5ha in urban areas.	2				
				See <b>ARC Oxford</b> comments for G2.							
		<b>Woodland Trust</b> Strongly support the preferred option for an Urban Greening Factor and happy to advise on its component factors. We commend the CAVAT tool as one way to assess the value of existing mature trees and the potential contribution of new tree planting.		<b>BMW</b> support the idea of the UGF but advise that the City Council carefully consider the strengths and weaknesses associated with the policy and ensure that it would add value to future proposals and developments when compared with the existing policy.  The City Council should engage with BMW should they identify the MINI Plant and its surrounds as suggested in Preferred Option b.		The working and terms need better explaining	2				
				The implementation of such a policy would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. Many areas would benefit from urban greening, as evinced by the current Broad Street project.	1						
				<b>Environment Agency</b> are concerned about lack of condition grading in UGF, which could lead to inappropriate greening, particularly around watercourses causing overshadowing, with potential negatives for ecology and conflict with BNG requirements. Might be able to support option a if a requirement to balance the needs of both people and wildlife so that additional greening ensured additional biodiversity value including for watercourses and their corridors.							
	<b>Preferred Option - a)</b> Set out a hierarchy for how 10% net gain should be delivered, particularly where on-site net gain is not possible	Option A is the best way to progress, that allows for delivery on constrained sites that may not be able to provide on-site.	7	This should be tested through the viability assessment of the plan to ascertain if it can relate to all sites or only those over a certain threshold.	4	unable to fully support 10% requirement. Consider that net gain should be a minimum of 20% across all developments. Although Ox City constrained consider development of a habitat bank to deliver off site BNG.	6	support option c - no need for local policy.	5		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.	
G4: Delivering mandatory net gains in biodiversity in Oxford		<b>Natural England</b> pref option a - welcome the inclusion of mandatory 10% BNG within policy and encourage ambition in delivering in excess of the minimum where possible. Flag that LP's approach should be compliant with the mitigation hierarchy set out in NPPF as well as other guidance (doesn't apply to irreplaceable habitat, approach to European sites should be dealt with separately to BNG provision). Recognise reference to Local Nature Recovery Strategies and flag that these will be key mechanism for planning and local delivery of Nature Recovery Network in future. Flag the work on draft Nature Recovery Network Map by Oxfordshire.		Supportive of clear guidance for how to meet 10% BNG (including support for off-site measures where on-site is not achievable). Do not support exceeding mandatory levels.	3	You can't offload to other local authorities, just as you would not want others to offload onto you.		Strongly support option b, Oxford should be aiming for well above minimum biodiversity gain.	23	certian sites may not be able to achieve more than 10%		
		<b>Environment Agency</b> support option a and ask that policies also support requirement of the metric to achieve minimum 10% net gain in habitat, hedgerow and rivers and stream units when appropriate as directed in the guidance. Would support a policy that encourages as much net gain as possible onsite with remainder as locally as possible.		Council seems to take what developers are telling them at face value. Not clear if any resource is being allocated to reviewing BNG/UGF calculations put forward through legislation.	3			None of these options are acceptable, needs re-drafting. Minimum 10% (option c) where possible should be higher 20% as option b.	2	Why is option B considered detrimental	4	
		Support option A	12	Support option a (PO) but because BNG is a legal requirement no need to duplicate through local policy. Also no need to go beyond 10% in policy. Any additional BNG should be discretionary for developers if they see fit.	5	Is there scope to consider a higher % in parts of city or where sites have been taken forward outside of the city to meet unmet housing need.	2	Should set a minimum of 30% overall net gain through onsite mitigation and enhancement if then off set	2			
				Suggest wording included in final policy to ensure that all habitat retained, enhanced or created (whether on or off-site) is retained in perpetuity (i.e., for at least 125 yrs). Otherwise net gain is only temporary and over time will lead to a loss of biodiversity.	1	<b>Oxford LNP</b> supports (b) the alternate approach (considered detrimental) within this option set, rather than the preferred option. Consider 10% set out by DEFRA as the absolute minimum necessary to ensure confidence that a new loss in biodiversity would be avoided. As part of the OP2050 work, the Biodiversity Advisory Group, which is now an OLNP subgroup, secured support for a 20% net gain policy; Similarly, the Oxfordshire Leadership Group of the Ox-Cam Arc also agreed adopting a level of 20% net gain for planning decisions. Further, there is precedent within Oxfordshire of the Planning Inspector approving a development with 25% net gain for Salt Cross. Also flag the City Council's own discourse around 'ecological emergency' and therefore 10% net gain represents a lack of ambition and policy should require 20% Biodiversity net gain instead. They are currently collating further evidence to support targets in excess of 10% - see submission for more details.	1					
				<b>BMW</b> support Preferred Option. However, BMW recommend that careful consideration is given to how this would work on brownfield sites that are in manufacturing use.								

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
				<b>Historic England</b> would not support alternatives, but policy option needs to take account of historic environment. Offsite solutions could have harm for archaeology if presence of remains not considered. Also text does not currently detail type of blue infrastructure being considered.							
	Other			<b>Natural England</b> advise mapping biodiversity assets and opportunity areas to ensure compliance with national policy and to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain. Should refer to Conservation Target Areas and draft Oxfordshire Nature Recovery Map as well as proposed GI network in city.							
				<b>Green Party:</b> Generally support PO, policy is aimed in right direction, but too many "get out" options for developers. Concerned about "off-setting" both inside & outside city boundaries, could undermine aim of potential biodiversity net gain. Mitigation hierarchy required, & "off-setting" avoided.	1						
	<b>Preferred Option - a)</b> Include policy that seeks to ensure applicants identify/ assess/protect any existing habitat of value on a site. <b>and b)</b> Set out prescriptive requirements to secure biodiversity features on site.	<b>Natural England</b> pref is option a in comb with option b - welcome the proposed requirement for applicants to identify protected habitats as part of development proposals and the use of checklists to secure enhancements on site with prescriptive requirements	1	Require the good management of any biodiversity features on the site	1	Consider the scale of economic growth and level of housing development could adversely impact on ability to protect and enhance biodiversity.	1	As there is a requirement for biodiversity surveys and BNG on sites, protection of important elements on any site will be highlighted. As such we do not see a need for this policy. If required, some encouraging wording (rather than a requirement) should be added to G4.	4		
G5: Protecting and enhancing onsite biodiversity in Oxford		Green Party: support PO, checklist is a good idea, encourages developers to be ambitious & imaginative. Support options a + b together.	1	support option b (prescriptive requirements)	1						



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
		Support a	3	<p>BMW support Preferred Option a (in combination with c):            "a. Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site".            "c. Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/or how much/or the standard of those measures. Could potentially be supported by updated TAN".</p> <p>In order to be effective, planning policy should be flexible with its biodiversity requirements. Preferred Option B would invariably fail to account for site-specific features and will subsequently result in inappropriate 'tick-box' mitigation.</p>	1	<p>There is no such thing as a general ecological enhancement if you are referring to the natural environment; it is all dependent on habitat and biodiversity.            Note, as above, that</p> <ul style="list-style-type: none"> <li>• 2.4.15 The best way to preserve biodiversity and habitats is not to build on good sites, or to threaten them with excessive building or traffic near them.</li> <li>• 2.5.6 The net-gain system, though mandatory, is not fit for purpose, as the BIODIVERSITY METRICS system currently operates to the detriment of biodiversity through its failure to move beyond habitat indicators. As an example of the critique of biodiversity indicator assessment, see, for example, Sobkowiak, 'The making of imperfect indicators for biodiversity: A case study of UK biodiversity performance measurement', 2022.</li> </ul>					
		Support B	5	Suggested measures, particularly porous driveways unless article 4 directions are brought in to restrict permitted development which allows up to 50% to be built on without even entering the Planning System.	2	The issue with all of these options is that developer surveys for sites is limited and often only takes place one, often during parts of the year when species are not visible. Species often get missed. A more realistic and comprehensive approach is required.					
		Support preferred options	20			the 'points list' approach and the references to bird and bat boxes, does not inspire confidence that the City Council understands where the points of failure are and is moving to address or eliminate them.					
	<b>c) Alternative option in combination with a</b> Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/ or how much/or the standard of those measures. Could	<b>ARC Oxford</b> support option C with A - option C would allow greater consideration of site specific circumstances	7			some broad overlap with the approach to BNG. Do not support full prescriptive policy but rather support flexible approach. Support maximising onsite biodiversity as far as possible. Checklist and TAN useful.		OUS support this option more flexibility in achieving target of 20%BNG			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
		potentially be supported by updated TAN.									
		<b>Environment Agency</b> support option a in combination with c in relation to rivers and streams. Would be happy to support Council in identifying biodiversity features which might be beneficial for rivers/streams, but caution that a prescriptive list could be difficult as huge variation in what might be appropriate for different water courses. Where potential dev impacts a watercourse, the river and its corridor are likely to have most potential for biodiversity and should be priority in terms of enhancement.									
	d) Alternative option in combination with a  e) option do not include policy	a) in conjunction with b)	5					support option e no policy needed	8		
		<b>Natural England</b> pref is option A, but understand that further work to review, define and clarify network of ecological sites in city is ongoing. Flag that policy should clearly distinguish between international, national and local sites and that these should be identified on proposals map in context of allocations and policies for development. Designated sites should be protected, with appropriate mitigation and enhancement commensurate with their designation and Natural England are happy to comment when further details are available		Local sites require protection. national sites are protected through other legislation/ NPPF etc.	3			option 6		Option D preferred incorporating 10% net gain integral provision for biodiversity should be prohibited unless the site for redevelopment (a) re-uses existing structures (b) has no current provision.	
	4.24			I strongly support Option A but particularly draw attention to section 4.24 "hierarchy of ecological sites, from the internationally and nationally important Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSIs) to more locally valuable designations, such as Local Wildlife Sites, Oxford City Wildlife Sites <sup>8</sup> and Local Nature Reserves. The ecological sites not only form an integral part of the wider green infrastructure network but are valuable in themselves for the role they play in supporting our flora and fauna and should be protected from development which could compromise their special features". This applies as much as, or perhaps even more so, in the green areas of other Councils surrounding Oxford, and the City needs to take particular cognizance of these when attempting to site new housing developments where it would impact upon such sites.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.	
G6: Protecting Oxford's ecological network	Preferred option A - Include a policy which protects the city's network of national and local designated sites from development.	Support as it protects SAC, SSSIs	4	Oxford LNP support Option A, but recommend widening the definition of the ecological network within this policy set to include the core and recovery zones of the draft NRN map. Agree that it is appropriate to ensure the level of protection is proportionate to the level of ecological interest but would hope that consideration is given to offering a certain level of protection to the recovery zone areas of the draft NRN map which provide significant opportunity for biodiversity enhancement. Consider that the Oxford LP should include clear policies with respect to how the Oxfordshire NRN will influence development.	3	The Lye Valley SSSI has not been protected from development, depending as it does on water percolation through limestone to create unusual conditions suited to rare fenland plants, also insects, amphibians etc. The Warren Crescent development is very likely to reduce water flow through limestone into this area. Attempts by Friends of Lye Valley to have a Special Planning Guidance for the entire water catchment have yet to yield results, despite preparation of a relevant document and discussion with council officers. Permeable frontages on homes are needed to manage water flows more effectively; this approach may well be valuable in many parts of the City given low quality maintenance of drainage by the water industry, and the 75% cut in Environment Agency funding since 2010. However, we need to look forward to 2040 with more restoration of valuable sites including Oxford's distressed peatlands, forming a rewilding approach which requires a Special Planning Guidance for the City to engage with all relevant bodies and the public.		Option B - National standard	2			
		support Preferred option	26	Broadly support preferred option but consider that text on local sites could be stronger. Core Strategy placed a high level of protection on Local Sites and that should continue in this plan. Also wildlife corridors need to be protected in the same way that locally designated biodiversity sites.	5	This has been covered in over policies						
		Environment Agency support option a and flag that the inclusion of rivers and streams within this policy would be beneficial because of vital role in connecting sites. Also support additional protection for non-designated sites which are managed for/or have a high biodiversity value.		Historic England flag that supporting text of this policy has opportunity to acknowledge that effective decision-making on land use and in planning decisions depends on considering the natural and historic environment in an integrated way - e.g. taking into account archaeological considerations in sites known for natural beauty.		As well as protecting existing sites, new sites should be designated and existing sites expanded to maximise environmental protection across the county.						
				Suggest addition to list in PO (option a) - "loss of ecological connectivity" ensure reference is made to connectivity. Working about hierarchy should change to the importance of the development that dictates whether an immitigable impact is accepted. Avoid, mitigate, compensate. If the development is of local importance it cannot go ahead if mitigated impact has significant impact on site of regional/international importance	2	Too many developments have been permitted that allow run off into the Lye Valley.						
		Green Party: support PO	1	ARC Oxford suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.		The wording about the hierarchy needs to be changed- it's not the level of protection that varies but the importance of the development that dictates whether an immitigable impact is accepted.	1					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
	4.1			Extreme intense rainfall events beyond that predicted years ago is now happening and Oxford must prepare for the worst case scenario in terms of flooding due to the city's vulnerable situation next to a network of watercourses, flood risk sites such as Bertie Place and Park Farm Meadows should not be allocated for housing - there should be no building on even marginal floodplain.	1						
Climate resilience intro paras	4.26	<b>Historic England</b> acknowledge and agree Oxford's main risk from future climate change is primarily flooding and overheating. Flag concern about maladaptation of traditional buildings, which should be avoided - e.g. through poorly considered flood-proofing. Also feel that overheating risk focus is too much on new developments, should be broader to consider urban heat island - LP should consider overheating more widely.									
		<b>Natural England</b> preference is Option (a) in combination with (b), (c), (d) and (e) or (f). Support of the proposed policy to prevent culverting of open watercourses and discourages the use of functional floodplain for certain types of built development. However, would support the approach described in this policy regarding the built footprint of development if it can be demonstrated that risk of flooding is demonstrably decreased.		The PO should considered surface water and ground water flooding.		OUS object - no need for a policy	1			County - Support for 20% BNG if viable.	1
	4.30					<b>Environment Agency</b> strongly advise that development is not located within the 1% AEP plus an appropriate allowance for climate change. Where this is not possible, would expect the Sequential Test, and where appropriate the Exception Test, to be completed for any allocated sites located within Flood Zones 2 and 3 as part of an updated Level 2 SFRA. They are also uncomfortable with sentence: <i>But there are decisions to be taken as to what levels of risk we as a city are happy to accommodate</i> and whilst they appreciate that city is facing development pressures, flag the need for SFRA to provide evidence on whether works are required in flood risk areas and if needed, ways to manage this. Flag the NPPF wording about some existing development being unsustainable in long-term and need for seeking opportunities to relocate development in future.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No .	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No .	Comments in disagreement with the preferred options	No .	Comments in support of an alternative or rejected option	No .	Comment in disagreement with alternative/ rejected options	No.
	4.31					<p><b>Environment Agency</b> are concerned about implications of suggestion there may be occasions where development in flood zone 3b might be acceptable such as brownfield areas, particularly in absence of up-to-date SFRA. Feel that clarity should be provided on what is proposed to be included in emerging Local Plan. In addition, appropriateness of the existing local policy should be explored in local plan review, taking into account housing need alongside increases in flood risk due to climate change and the increased starting point for defining Flood Zone 3b from 5% to 3.3% annual exceedance probability (AEP). Ideally, when a site in Flood Zone 3b is redeveloped, would recommend that flood risk is reduced through appropriate design measures (e.g. raising floors). Would be strongly against (and would object in principle) to increasing number of dwelling in FZ3b - so not supportive of allowing increases in built footprint in FZ3b which they would also object to.</p>					
	4.32			<p><b>Environment Agency</b> pleased to see acknowledgement of OFAS, though would be useful to note that Oxford City Council are part of the 'partnership' to show support for the scheme. Future iterations of the Local Plan as it develops should reflect updates on the scheme as it moves through planning process.</p>							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
G7: Flood risk and Flood Risk Assessments (FRAs)	Preferred Option - a) Reiterate national policy and set out requirements for when an FRA will be required and b) set out key principles for extensions in FZ3b and c) Prevent self-contained basement flats in areas at risk from fluvial flooding. and d) Prevent culverting of open watercourses and e) allow limited scope for redevelopment within FZ3b (no increase in built footprint) or f) allow limited scope for redevelopment within FZ3b (no restriction in built footprint)	Support option a - it is essential to protect the city from flooding. essential to re-iterate national policy and set out requirements for FRA	3	Council should not be allowing development in FZ3a or 3b without developers securing a net reduction (e.g. 10%) to overall flood risk.	4	Stop building in flood zones	7	Prefer to keep all greenfield sites protected - I would prefer the Alternative option which outlines protecting greenfield sites. However, I would add that water compatible uses and essential infrastructure works could be carried out as this seems appropriate! Just no more building like we saw by the University by the rail station.		Reconsidered the Oxford Flood Scheme	
		a,b,c,d) with f) preferred.	5	Policies should be used to diversify surface drainage channels for benefit of upstream storage, e.g., lower reaches of Boundary Brook could be restored/ remodelled to a naturalistic channel.	4	There have been many houses built on flood plains in Oxford recently		No need for a policy which simply repeats national policy. options consider different aspects of flood risk which could be picked up on a case-by-case basis through site-specific FRA and mitigation plan.	4		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
		Prefer option c	1	<b>Thames Water</b> flag the NPPF requirements of sequential approach and that considerations need to include flooding from sewers. Flag that flood risk sustainability objectives should accept that water and sewerage infrastructure development (or upgrades) may be necessary in flood risk areas. Policies should make reference to sewer flooding and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. Also reiterate importance or reducing quantity of surface water entering the sewerage system (e.g. through SuDS) in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. <i>Thames Water have suggested some wording for a policy in relation to surface water - see submission.</i>	4	Manage water flows upstream to mitigate flood risks and development in city should contribute to these measures.	2				
		<b>Green Party:</b> support PO	5	<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.	1	Preferred, but suggested measures, particularly porous driveways are ineffective unless article 4 directions are brought in to restrict permitted development which allows up to 50% to be built on without even entering the Planning System, cumulatively this is a very large area converted to hard standing (rooves etc.)	2	More mandatory use of semi-permeable surfacing, where possible, would at least help alleviate the situation. Discourage removal of front garden vegetation for car parking, which increases run-off and decreases carbon capture.			
		Support A to D	3	Support refer to County standards and guidance for surface water drainage		There is growing evidence and concern that climate breakdown is bringing high intensity rainfall and flash flooding that needs to be modelled to update the Flood Zone system.	1				
		Support option e	3	Option e (in combination with a, b, c and d): Allow only water compatible uses and essential infrastructure in undeveloped flood zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within zone 3b, with high standard of mitigation, where built footprint of a site is not increased and where risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposal would conflict with safe access and egress requirements, it would be refused.	3						
		Support F - most flexible	3	SuDs reduce run off but if they are not maintained then they are ineffective. Re-greening of previous hard surfacing across city should be a priority of the plan to compensate loss of green fields from development.	1						



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
		<b>Environment Agency</b> support options a, c, d, and aspects of e and g (but not b and f). Regarding option a, agree national policy should not be repeated but very supportive of additional clarification being provided on how flood risk in Oxford is to be managed. Suggest a number of topics for policy to cover including requirements for FRAs, Sequential/Exception tests, sequential approach on sites, approach to functional flood plain, need to assess impacts of climate change for lifetime of dev, how developers should manage/adapt to flood risk, any other considerations from new SFRA and any plans for flood risk infrastructure. Option c - very supportive due to danger from flooding of basement flats. Option d - very supportive as it is in line with EA position statements. Concur that option h should not be pursued as a local policy provides opportunity to address flood risk and climate adaptation in local context.		<b>Environment Agency</b> support options a, c, d, and aspects of e and g (but not b and f). Option e, whilst supportive of some of this and welcome that footprint should not be increased, evidence should be provided via SFRA to support this policy. SFRA should explore whether safe access can ever be achieved in FZ3b. Would also be opposed to increasing vulnerability of the site or increasing number of units as would put more people at risk of flooding. Clarification should be provided on how Council would measure that 'risk is demonstrably decreased'. Option G - would be supportive if it is demonstrated all development can be built in FZ 1 and 2 only. Again need for new SFRA and flood risk sequential test to demonstrate if this is possible. Would not support development in brownfield Flood Zone 3b over greenfield Flood Zone 3a as the flood risk to occupants would be higher and any increases in flood risk elsewhere would be worse. Would be preferable to remove Flood Zone 3b existing footprint and relocate development into Flood Zone 3a.		<b>Environment Agency</b> support options a, c, d, and aspects of e and g (but not b and f). Regarding option b, more clarity on whether this is in relation to permitted development or not is needed. If only in relation to householder minor development, they do not think option is appropriate as cumulative impact of multiple extensions in Flood Zone 3b would result in a loss of floodplain storage in areas likely to experience more frequent flooding, leading to increases in flood risk, potentially in residential areas. Option not supported by evidence, in line with NPPF and is unlikely to be deliverable as mitigation for loss of floodplain storage is unlikely to be possible. Current policy R3 sets out no increases in built footprint and they support this approach. Also, strongly opposed to option f as there should be no increase in built footprint within FZ3b. No evidence (up-to-date SFRA) to support the req for development in FZ3b, this would increase number of people in highest flood risk and be difficult to compensate in terms of lost floodplain storage. Feel option is contrary to NPPF, not deliverable or justified and would be unsound if included in Local Plan.					
<b>G8: Sustainable Drainage Systems (SuDS)</b>	<b>Preferred Option a) Require SuDS on all new developments (including minors) and b) Require Foul and Surface Water Drainage Strategy on all development over certain thresholds.</b>	<b>Natural England</b> fully support the requirement for SuDS on all new development and recommend that SuDS are linked up wherever possible (including with other greenspace) to achieve greater benefits. Also advise considering whether developments could be supported and encouraged to replace existing (older) surface drainage systems with sustainable urban drainage systems (SuDS)		Include requirement for SuDS in allocation policies (as OLP2036). SuDs are always feasible, parameters should be provided to encourage a SuDS Management Train to identify a minimum number of different SuDs measures that water must flow through before discharging to an existing watercourse to ensure water quality is managed.	5	hierarchy style approach to SuDS design needs defining		Rely on national planning policy and LLFA guidance for planning applications.	4	A assessment of cumulative loss of green/garden and replacement with hard standing (housing etc.) must be undertaken as part of this Local Plan.	
		<b>Environment Agency</b> support option a and flag that where SuDS features are biodiversity enhancing, they will contribute to biodiversity net gains.		<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.		Consider drainage requirements for peat system in Lye Valley	1	Proposed policies fall short on foul sewerage issues. Policy should require foul water to be separated from surface water on development sites. Should include separate policy on foul sewerage.	2		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comment in disagreement with alternative/ rejected options	No.
		Support preferred option	17	<b>Thames Water</b> advocate an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits	1	While options a and b are good, these should not be allowed to justify allowing development which infringes option set G6.		Soak-aways for new housing, and offer assistance to unblock or add soak-aways on 100+yr old properties.	1		
		support option A	6	Require sewage connections for dishwashers and washing machines as these are plumbed into surface water drains and has a detrimental impacts on stream water quality and ecology.	2	Thresholds set out in B enable developers to avoid requirements by ensuring that their developments fall just under the relevant size threshold.		Support option C	5		
		Support option B	2	Option A should include requirements for the level of wildlife benefits expected from SuDS schemes, including details of these requirements.	2						
				<p>BMW support Preferred Option a.</p> <p>In terms of Option b, it is unclear in the policy options and the evidence base where the '7,200sqm' figure was derived from. Further, planning policy should not include guidance for developments – this is more appropriate to include in an SPD.</p> <p>Planning policy should be distinct from the validation requirements. The local validation checklist should set out when a Foul and Surface Water Drainage Strategy is needed, and policy should only include the locally-specific flood risk mitigation requirements that are not previously covered in national policy.</p>							
				Green Party: support a + b together, further details needed to define "feasibility".	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
G9: Groundwater flows and sensitive sites	<b>Preferred Option - a)</b> Require assessment of impacts on ground/ surface-water flows where a development is in proximity of a protected/ sensitive site <b>and b)</b> Include a bespoke policy for the Lye Valley to consider the impact of development upon the hydrogeology of the Lye Valley SSSI	Support protection of groundwater to ensure Lye Valley's habitat is protected	8	Suggest that a bespoke policy is included for lowland fens as there are a number within and around the city. Of particular note in the city is Lye Valley and Rivermead Nature Park. Lye Valley is very rare. Susceptible to development also trampling and increases in dog-fouling and air pollution and changes to the grazing regime. Fens need protection through local plan policy or SPD	5	We fail to see why only two protected / sensitive sites are mentioned in the policy. NM(S)RA is highly protective of New Marston Meadows and its SSSI / SLINC. WE would like to see all the protected and sensitive sites named in the policy including NMM.				Do not support alternative options	
		<b>Green Party:</b> strongly support this policy	2								
		Support preferred options	14								
		Support B	11								
		Support option A	3	The Lye Valley is a key biodiversity and carbon storage site through the naturally formed peat deposits. This site is at risk and is currently emitting CO2 as the site is drying out. There are many other important sites in addition to the Lye Valley. All of Oxford peat sites need to be assessed and use an integrated catchment approach to preserve these sites		<b>Historic England</b> object and ask if archaeology has been considered. Flag that para 4.37 focuses on ecological sites, but that water levels can also impact historic sites which LP should acknowledge. There are sites within city likely to contain archaeology that will be sensitive to groundwater levels.					
	Other	<b>Natural England</b> would welcome early engagement on the policy approach with regards to development within the hydrological catchment of the Lye Valley SSSI. Flag that this SSSI is particularly vulnerable to hydrological changes due to the urbanised nature of its catchment and development pressure in the area. They are currently seeking to better understand the boundaries and functioning of this catchment and look forward to continuing our partnership approach with the Council to best shape this study so that it can inform planning policy to help protect the SSSI.		Suggest that NRN policy approach set out now defunct Oxfordshire 2050 Plan is incorporated into Oxford City Local Plan in particular the Core and Recovery Zones should be taken forward. Suggest taking forward PO from OP2050 which commits to							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
		<b>Environment Agency</b> support options a and b as they afford best level of protection to the SSSI and other sites. Unclear why Lye Valley has been mentioned only, also unclear who will carry out the hydrogeological risk assessment mentioned in option b - will EA be consulted? Are many applications expected within the Lye Valley that would be affected by requirement for additional hydrogeological appraisal?		Support a note impacts on designated sites via hydrological changes are not always related to development in close proximity. Oxford Meadows SAC refer to previous groundwater studies including HRAs of previous LPs and OFAS. Policy should require assessment of impacts on ground and surface water flows. Support Option B - consult County LLFA when Lye V study available.							
G10: Resilient design and construction	<b>Preferred Option - a)</b> Set out a discrete adaptation/ resilience policy, whilst continuing to address risks in other policies where relevant <b>b)</b> Require major developments to achieve certification against a recognised sustainability assessment	support PO	24	If major schemes are required to comply with standards, there should be flexibility for alternatives (e.g., Oxford University Sustainability Guide, WELL standard, etc.)		plan should include a policy on resilience		Most of options likely to be addressed by other policies and/ or building regs. No need for plan to duplicate.	6		
		Support a	6	Can all types of building be required to have solar fitted at construction	1	to be effective an early engagement and outreach is required particularly for domestic applications or permitted development		ARC Oxford - option C most effective - whilst recognised as important is likely to result in unnecessary duplication of policies, with many covered by other policy options.	1		
		Support option b	3	Support objectives of policy but some aspects may be better covered through existing assessment mechanisms (e.g., building regs).				suggest option d is reconsidered as building regs now require assessment of climate resilience (Part O, Overheating systems)	2		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comment in disagreement with alternative/ rejected options	No.
		<p><b>Environment Agency</b> would support option a and welcome that flood resistance/resilience measures are mentioned - would recommend finished floor levels are including here - usually recommend setting FFLs 300mm above the 1% AEP plus an appropriate allowance for climate change flood level, this should be discussed in new SFRA. In relation to option d, flag it is important that Local Plan actively raises awareness of impacts of climate change (as set out in PPG). Recommend specific climate change policy which addresses climate change concerns to be included in Local Plan as well as policies to ensure all development contributes to mitigation and adaptation to climate change.</p>									
	Water efficiency element of G10	<p><b>Thames Water</b> have flagged that Oxford is within a water stress area and consider that the 110 lppd water efficiency target as set out in Building Regs needs to continue to be applied, this should be implemented through a condition attached as standard to all planning approvals for new residential. They highlight that BR allow for demonstrating that the target has been achieved in two ways (calculation method and fittings approach) - they consider 'fitting approach' to be the more reliable. They set out some recommended wording for the Local Plan that specifies the 110 target and that this is met using 'fittings approach' - see their submission for more detail.</p>		<p>need to ensure no duplication with other policies here. A full review of PO document needed ahead of next consultation stage.</p>				<p>Support Option C No need for another policy on this issue. Suggest that impacts of climate change are sufficiently dealt with elsewhere in the plan.</p>			
				<p><b>Green Party:</b> Support PO but would like Council to specify a 'certifying body'. Reference should be made to nature-based adaptations like street trees &amp; green roofs.</p>	1			<p>Support option D</p>	2		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No .	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No .	Comments in disagreement with the preferred options	No .	Comments in support of an alternative or rejected option	No .	Comment in disagreement with alternative/ rejected options	No.
		<p><b>Historic England</b> support and flag that they have published a range of resources (see their submission) which Council is encouraged to use and refer to in LP.</p>						<p>BMW support the following Alternative Option:  “Address climate risks as theme purely through other policies, e.g. design flood risk, green infrastructure. No requirement for specific policy addressing issue”.</p> <p>This policy should only be added in the event that it cannot be included in other topic-specific policies.</p> <p>Also, policy should ensure there are no overlaps with national Building Regulations (e.g. water conservation).</p>			
				<p><b>Natural England</b> flag that the LP should give appropriate weight to the roles performed by the area’s <u>soils</u> and value them as finite resource underpinning wellbeing/prosperity. Development decisions should take account of impact on soils. LP should safeguard long term capability of best and most versatile agricultural land.</p> <p>Also advise that protection and enhancement of <u>valued landscapes</u> is included as an issue to be addressed by the plan; need to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development.</p> <p>Also <u>access and Rights of Way</u>, whilst linked to GI, advises that the Plan should specifically include policies to ensure protection and enhancement of public rights of way and the Thames Path National Trail. LP should recognise value of rights of way and access to the natural environment, seek to link existing RoW and provide new access opportunities.</p>							
Other comments				<p><b>Green Party:</b> would also like to see policies to designate new sites to be part of Green Infrastructure network in parts of city with less green / blue sites; enabling parklets; restricting the paving over of front gardens &amp; non-permeable surfaces.</p>							



## 5.5 Policy Options Set R1 to R8

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
	<b>Fig 5.1 Infographic on carbon emissions in Oxford</b>			Also encourage a bottom up approach by residents, esp. regarding unregulated energy also need education and encouragement to get residents buy in.	1	There should be a new policy on the protection of peat and carbon storage in sites with city or land owned by city council. OCC has declared a climate emergency and this should be reflected in policy. A layer of peat only 30 cm deep can contain more carbon than a tropical rainforest of same area. Within city limits (JW) calculate 16.31 ha of peat in spring fens.	2				
Intro paras and wider context along with any other comments	Fig 5.2	Support proposed energy hierarchy	1	Climate change should be given higher priority in planning and design. Document fails to give convincing arguments for the use of Design Codes, which together with local knowledge could bring together the aspirations of residents and deliver a responsive built environment.							
				Reference should be made to loss of hedgerows from development and need for planting in new development.							
				Significant improvements on existing policies. Fully support policies on retrofitting listed buildings. But concern about "get outs". Consider focus should be on emerging new developments having very low emissions rather than just mitigating impacts. Para.5.8-5.9 consider Local Plan should refer to definition used in City Council motion which refers to UK Green Building Council, which includes embedded carbon to replace 'operationally net zero'.	1						
	Para 5.4	Explore policy options for reducing transport emissions such as adopting more sustainable/active travel choices		Building fabric must be designed to standard of ultra-low energy demand, to achieve this energy budgets must be set , unregulated energy must be considered, thermal comfort and risk of overheating must be assessed.							
				<b>Historic England</b> welcome acknowledgement of the importance of the built environment to carbon emissions							



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
R1: Net zero buildings in operation	Options - a) Mandate net zero operational regulated energy from adoption of the Plan OR b) Mandate net zero total operational (regulated and unregulated) energy from adoption of the Plan OR c) Mandate 'net zero ready' buildings in line with the definitions set out in the Future Homes/Buildings Standard OR d) Accept offsetting of unmitigated carbon emissions associated with operational energy use OR e) No local policy on net zero carbon	Support options a and b.	12	This policy should be tested via the whole plan viability assessment as it has large implications for developments.	4	Do not support option b (regulated and unregulated) as difficult to measure unregulated contribution once operational.		d) support this option as offsetting will be needed owing to challenges presented by historic buildings of OU	1	Maximise all resi and commercial roof space before new solar farms around Oxford are permitted.	
		support option a	1	Policy should be flexible to adapt to changing technology over the plan period, costs, Building Regulations and availability of equipment/suppliers etc.	6	Do not support option d as it could add significant cost to development proposals. May also be difficult to identify projects to deliver identified carbon savings. Would need viability testing.		Option C to be zero carbon ready most appropriate - hard to model unregulated energy and not always possible to include on-site renewables, esp. on historic buildings or adjacent to them.	2	Option: Specify design in accordance with energy hierarchy principles. Mandate net zero operational regulated energy from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as the primary calculation.	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		General principle of option b supported but narrative considered onerous, policy should seek to maximise on site generation in envelop of what is considered feasible/ viable, incl. potential carbon offsetting payment.		Clear benefit in standardising approach to sustainable design and construction to meet Governments net zero 2050 ambition.		Do not support options a) or b) as these would add significant undue complexity to the planning process in Oxford.		Support options c or d. Options a) or b) which suggest mandating net zero operational development unlikely to be deliverable	2	Don't accept offsetting.	3
		Option c of being 'zero carbon ready' is likely to be the most appropriate - policy has significant implications for R&D buildings. e.g. Solar panels on listed buildings.	3	Significant cost implications of building to Passivhaus standards. Where sustainability benefits are elevated significantly this should be offset against any land value capture to encourage building to the highest environmental standards.		Net zero is too rigid		Support option a. Agree EUI is a more realistic comparison. Support moving to non-fossil fuel heating. Also support introduction of Option D (offsetting) for difficult sites.		Reject final option (no net zero option)	2
		option 1 only	6	Concerns about introduction of unregulated operational energy as difficult to monitor once home is occupied.		Too many more economically pressing issues at this time to allow this.		Support option a (regulated only).		Permit no fossil fuel use.	2
		a b and c are good	3	OCC advocates that achieving net zero carbon policy should consider the whole life carbon performance	1	Against the zero carbon policy options we need sustainable energy sources.		support option b	2		
		Would prefer option b to cover both regulated and non-regulated energy use when existing buildings are repurposed, renovated or extended.		Support option a: options a, b & c represent marked improvement on ex. LP policies. Welcome recognition that percentage changes are meaningless. But consider reference should be made to "fabric first" approach, vital to building net zero homes. Homes should be built which only need minimal heating, being well built and insulated.	1	A policy that helps residents and domestic applications be engaged and educated early on in the pre app process.		Support option e as it does not add additionally financial or commercial burden on delivery of homes.	2		
		Support option B	3	<b>Historic England</b> support ambitious approach to addressing climate change - however LP needs to be clear on when this applies to conversions/extensions - 'where appropriate' wording needs to be defined in as much detail as possible. Also support embedding energy hierarchy principles, subject to suitable retrofitting policy. Flag that approach regarding renewables needs more explicit articulation, including policy for how these should be brought forward. If it is assumed that policy will likely result in increased uptake of solar PV, LP needs to be clear on its strategic approach to this type of development. Wording indicates aversion to solar PV on roofs in CAs/near LBs, might, in effect, rule out a lot of the city. Also flag that occupant behaviour can influence regulated energy, as well as unregulated but this is not mentioned.				Support e - carbon issues should be one for national legislation.	9		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		No new buildings unless carbon neutral.		Should also consider a bespoke renewable energy policy encouraging renewable energy schemes in urban areas as opposed to on greenfield sites e.g., farmland being used for solar panels as opposed to food growing. Need to require renewable energy on residential, commercial and consider a bespoke policy on this topic would be a useful addition (See CPRE response for full details)				Option d - Accept offsetting of unmitigated carbon emissions associated with operational energy use as a last resort, where measures to reduce carbon on site have been exhausted and with strict principles for how/when this would be accepted.	1		
				Generally supportive. Strongly support for a retro fitting. Unable to support prevention of fossil fuel heating until a national policy is in place for an affordable, safe, secure system.	2			Option: Accept offsetting of unmitigated carbon emissions associated with operational energy use as a last resort, where measures to reduce carbon on site have been exhausted and with strict principles for how/when this would be accepted.			
				Caveat that for some R&D work where gas is required.				Support option c			
				New buildings should be zero carbon when the infrastructure is ready							
				ARC Oxford notes the cited complexity options a and b would place on planning process in Oxford, without ability to monitor or assess against a policy it cannot be considered effective or deliverable.							
				The Government are creating strong guidelines for this. If Council does get involved it should be addressed appropriately and in detail at the statutory phase of delivery.							
				Premature to ban fossil fuels before acceptable alternatives are available. Need greater capacity as a nation.	3						
				Option: Specify design in accordance with energy hierarchy principles. Mandate 'net zero ready' buildings in line with the definitions set out in the Future Homes/Buildings Standard. Measure compliance with submission of SAP/SBEM calculations demonstrating carbon reduction over notional buildings prescribed in Building Regulations. Permit no fossil fuel use.							
				Encourage net zero unregulated energy through sufficient on-site renewables to meet total operational energy needs and for this to be demonstrated via Energy Use Intensity calculations.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
R2: Embodied carbon	<b>Preferred Option - a)</b> Include high level principles for limiting embodied carbon <b>and b)</b> set more specific requirements for major development	OUs support but policy wording must consider the OUs historic estate. Consider drafting an SPD in place of TAN	1	Any approach must align with updated Building Regs/ National Policy.	5	Having a requirement for major development to undertake a measurement of embodied carbon during construction goes beyond what is required to make development acceptable in planning terms.	2	Support option c	6		
		Support option a which sets out high level principles.	18	Option B is the most appropriate approach but the assessment of embodied carbon is time consuming and expensive and needs specialist officers to interpret the findings.	4	Not a top priority for us	1	Embodies carbon should be minimised, target set and lifecycle modelling carried to to assess it, align with LETI Embodied Carbon Primer	1		
		support PO with option B	8	b) Recognise that carbon reduction can be achieved by existing or other proposed investments across the OU estate.	1			Should be national policy Some old houses' energy efficiency level is really low and quite hard and expensive for individuals to improve it. Government should provide certain guidance and support to improve it if you want to retain existing buildings.	2		
		Support option A but various existing guidance docs already published and should review whether needed in TAN. In relation to demolition, policy should recognise inherent limitations of retrofit options e.g. retail does not convert well into workplace/ resi accommodation	2	Having a degree of flexibility in the assessment process is key.	3						
		Support option B	2	Should be considered as a part of an overall consideration of sustainable design and construction techniques.	2						
		Support option B and C		Embodied carbon should be addressed nationally rather than through local standards.							
		support option a - use existing buildings	6	Flexibility should be allowed with regard to the demolition of buildings. It should be allowed where there are significant benefits from doing so (e.g., building cannot be re-purposed).							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		Retain buildings where possible		Any policy on embodied carbon should encourage the use of more sustainable construction methods rather than further burdening developers to measure amounts of embodied carbon.							
		Development on areas with high peat content such as the Upper Lye Valley to the immediate west of The Slade, Ruskin Fields and other lowlands would release stored CO2 – this needs to be incorporated in the policy. It hard to see how the policy can be effective without clear metrics.		RE: embodied carbon target, it is important that the LPA understands how this is likely to interface with the choice of materials etc., on developments.							
		Support PO	1	Support option b however suggest that site size threshold should be 750 homes as it will add significant technical and commercial burden on smaller developments. Assessment should be provided at reserved matters (not outline) and it is necessary that appropriate skills are at the council in order to ensure applications are dealt with in a timely manner.							
				<b>Historic England</b> support preferred option, but would welcome stronger wording than 'where possible' - clarity also needed on factors that determine where this might be possible.							
				The combination of high level principles and technical advice note feels a little thin in terms of operationalization of this aim. there should be targets, incentives and KPIs associated with the measurement and minimisation of embodied carbon in construction. if it is to work, it can't just be woolly policy that has no teeth							
		Support in principle		Carefully worded policy needed to ensure it does not hamper the redevelopment of existing buildings on brownfield sites. Therefore, the wording ' <i>retaining buildings where possible</i> ' is an important flexibility that should be kept within any future policy.	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
				<p>As such we would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can justified by the council. The viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment.</p> <p>Recommendation:</p> <p>Ensure the policy is properly assessed within the forthcoming viability assessment that must also include a proper assessment of viability of older person’s housing.</p>							
		Support option a	1								
R3: Retrofitting existing buildings including heritage assets	<p><b>Preferred Option - a)</b> Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets <b>and b)</b> set out that carbon reduction measures for heritage assets etc. will be considered as benefits that outweigh harm</p>	OU supportive of retrofitting but note the need for careful balance between heritage and retrofitting.	2	Key issue. Encouragement could have greatest impact on green agenda of plan.	2	Its key that existing buildings including heritage assets are retrofitted.		support option c - no local policy	2		
		support PO	13	Useful to have a positive policy approach. It should be a 'presumption in favour' style policy.	1	Do not support Option A - aware of poor recent practices resulting from retrofit of existing buildings e.g. office to resi results in low quality housing		Support retrofit and off setting this could secure funding to deliver mitigation measures such as retrofitting of existing buildings.	1		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		Support option B	5	The Plan could simply rely on national policy and the normal heritage policies, but Option A would clearly set out a clear marker.	2	Option B (part of PO) is an interesting approach but the assessment of benefit and harm will vary depending on the value and setting of the heritage assets. As such we would question the overall benefit of this approach.	2	Leave heritage sites alone	3		
		Support option a	5	Retrofitting listed buildings presents significant challenge in responding to climate emergency and should be referenced in doc.	3	Option C is not supported - its appropriate to have a clear policy addressing retrofitting/ heritage assets.				OU and other rejects option c	2
		Support PO A & B	11	Sometimes its not always viable to retrofit existing buildings - sufficient flexibility should be incorporated into the policy where buildings are proposed to be retrofitted/ refurbished for planning app's.							
				<b>Historic England</b> support po, subject to additional criterion along lines of - <i>where an understanding of the buildings existing fabric and condition has been demonstrated, and the materials/measures are shown to be demonstrably appropriate, particularly in reference to heritage assets and/or traditionally constructed buildings</i> - again flag a range of material they have published which Council can make use of.							
Efficient use of land	para 5.16			Needs stronger emphasis on the policy density delivered in a way best suits the site and surrounding area							
				Added to this should be a preference in favour of council, community and area-led efforts to develop municipal and/or area-level carbon reduction and energy-generation/efficiency measures (e.g. municipal heat-pump or heat-exchange systems).							
				Should not be mandatory							
				This could have very negative consequences on Oxford's listed buildings.	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
				a) and b) but raises question of how enforcement will occur when properties are being fully refurbished. Ideally, this should require planning permission and clear guidance to those involved about standards and requirements. If not, makeovers will continue to suit the owner rather than addressing Climate, ecological or indeed human needs for the long term. If the Council still has just 2 planning enforcement officers, how is this going to be done?							
				Support option A even if in the conservation area							
				Other more pressing economic issues at this time.							
R4: Efficient use of land	<b>Preferred Option - a)</b> Have a policy requiring that development proposals make the best use of site capacity <b>and b)</b> have minimum density requirements for city and district centres only.	Option A is the most appropriate approach. Minimum density targets could be indicated in the text to the policy.	12	Promoting density in OU and colleges should be included in policy	1	support option c (minimum density requirements)	8			Support an assessment of compatibility with the surrounding area.	
		Support Options a and b. add wording best use of site capacity	11	need to review how this interfaces with design guidance on heights to ensure density aspirations are not compromised		Cap densities where possible / no minimum densities	4				
		Support option A but clarify what is not an efficient use of land.	2	Logicor wish to stress to the Council that achieving appropriate densities cannot be applied to all land use types. Whilst it is understood that the Council is seeking to deliver higher residential and employment densities to try and combat housing and employment land shortfalls, it is not considered that applying density requirements to industrial proposals is an appropriate or justified approach.							
		Support option a and b but suggest policy should support seeking to optimise floorspaces on site as this will minimise the potential of future unplanned greenbelt release	3	Support option a in combination with option c, which would apply minimum density requirements across the whole city, for various types of location.		Generic densities could be tricky	1				
		Support option A & C - The plan should spell out the benefits of higher density developments.	8	PO document doesn't set out densities. Suggest target density should be between 70-100dph / what are the densities going to be?	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		Support PO	6	Don't make retrofit mandatory, people will retrofit if energy prices remain sky high.							
		Support option B	1	Support option A but it needs to explicitly state that sites in city/ district centres are the most sustainable locations to make efficient use of land							
		Support option A	3	Consider HMOs as part of this use of this policy.							
		Agree with PO but avoid inflexibility	1	The term 'best use' is too vague and could be manipulated.							
				Consultation with the local community should be considered before intensifying certain areas.							
				Only with explicit and enforced restrictions on building height. Existing height restrictions have not been enforced in relation to some recent developments.	4						
				Be a explicit as possible as to where and when building height can be either built or rebuilt above the existing norms for that region of the city, so as to encourage densification.	1						
				Efficient use of land must include zoning of car parks for conversion to housing - either completely, or building around/above such sites. The area of surface car parks in Oxford is immense - see for example BMW and Unipart - and offers space for employer related homes - and as part of conversion of industrial areas to meeting the primary social need of people in Oxford for housing they can actually afford.							
				In general, support the principle of making best use of existing developed sites, but this should be aligned with the requirements for green infrastructure and biodiversity net gain. In particular, there should be a policy presumption for the retention of existing mature trees and hedgerows on site.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
R5: Air Quality Assessments and standards	<b>Preferred Option - a)</b> Air Quality Assessments (AQAs) will be required for all major developments, or any other development considered to have a potentially significant impact on air quality. <b>and b)</b> Require all new major development within the city's AQMA to comply with local air quality standards	Support option a in combination with b	4	If a policy is necessary it should cover mitigation. Air quality assessments must acknowledge the greening of the vehicle fleet and buildings over time. There is potentially limited impact individual buildings can do to go beyond current limits in a wider area.	2	Littlemore seems to be missing from map R4 for levels of NO2 pollution data requires updating.		Producing an AQA is a requirement of the validation checklist for all major applications in any event. Is a policy necessary as well?	3		
		Support PO	21	Consider outside of the boundary too.	1	Don't overburden developers	2	All development should comply with NICE's Air Pollution standards.	2		
		<b>Historic England</b> broadly support this approach.		Policy should consider all elements of pollution that come on site i.e. for transport and deliveries.		Do not include a policy about air quality assessments but rely on other regulatory regimes.	4	Limit building to improve air quality within the city	1		
	Other	<b>Natural England</b> expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional emissions as a result of increased traffic generation, which can be damaging to the natural environment. Flag the importance of traffic projections to assess impacts from roads. They consider that the designated sites at risk from local impacts are those <u>within 200m</u> of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification - refer to their national guidance.		Need to find balance between this policy and more requirements within a planning application. If new requirements are introduced, important that approach to monitor and enforce is understood by all.				BMW support the following Alternative Option: "Do not include a policy about air quality assessments but rely on other regulatory regimes".  Planning policy should be distinct from the validation requirements. The local validation checklist should set out when an AQA is needed, and policy should only include the locally-specific air quality mitigation requirements that are not previously covered in national policy.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		Support option A	3	Air quality in the city is below acceptable standards in several areas. Policy should include options to make more rapid improvements to air quality, e.g., more monitoring and encouragement of more school streets.							
		Support option B	3	Support PO a but reserve comments on whether it is viable in combination with option b							
		Support A with combination of B	2	Note that LTNs currently lead to build up of poor air quality in certain areas.							
				As well as trying to achieve national air quality objectives, Oxford should consider the much more stringent WHO guidelines on air pollution. The ultimate goal should not be legal compliance, but improving the health and wellbeing of residents.							
		Support B with the combination of A	2	Links to an increased reduction in transport and therefore carbon.	3						
				Please include a PM 2.5m standard included and have the extra emissions that traffic generated and resultant the traffic congestion considered. Pm 2.5 pollution, recent research show, is a major killer for example being the main cause of lung cancer for non-smokers (the 8th most common cancer for non-smokers).	3						
R6: Water Quality	a. Set out a policy approach that incorporates issues around water quality into policies about managing the impacts of development, as well as requiring measures to limit water use	<b>Natural England</b> prefer option a. State that the Local Plan should be based on an up to date evidence base on the water environment and the LPA must have regard to the relevant River Basin Management Plans using it to inform the development proposed in LP. Also state that the LP should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.		Littlemore is suffering from lack of maintenance of pipes and systems resulting in flooding and loss of water supply	1	do not support option a		support option b - bespoke water quality policy	19		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		support PO	22	See comments against S3 for <b>Thames Water</b> . They will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development - but need to be aware of potentially long timescales. Developers can determine costs for new connections from TW website, and recommend early engagement with them on any application to determine: demand for water supply and network infrastructure both on and off site; that demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and that surface water drainage requirements and flood risk of the development both on and off site and can it be met.		<b>Environment Agency</b> support option b and consider it important to have a bespoke policy for water quality. Flag the pressures on the water environment from development and risk to meeting WFD objectives, achieving sufficient bathing water status and increasing instances/volumes of storm overflows. Specific policy should flag importance of water quality and commitments to not allow development where there is insufficient capacity in Sewage Treatment Works. Flag that Oxford treatment works is site of high concern in terms of performance and that any additional flows will pose environmental risk. Would like to see commitment between Council and Thames Water to ensure Oxford STW is resilient to future demand and get work underway to resolve current problems before new dev occurs.		Need more details on what the bespoke policy would be			
		<b>Historic England</b> broadly support this approach.		<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.							
		Due to the need to consider both water quality and quantity early engagement with the Canal & River Trust's Utilities team should be promoted if discharge to the Oxford Canal is an option as part of a SuDs scheme. Any new discharge will be subject to a commercial agreement.		Grey water should be used to flush lavatories in all new buildings / water re use in new builds is crucial	3	New Marston has an antiquated sewerage system, which already suffers from overflow with heavy rainfall. Needs a new sewerage system to deal with present problems and future growth expectations. Important not only for both public health and green and blue infrastructure reasons.	1				
		There is no policy option here. The impetus should be to separate all foul and rainwater drainage in the city and to permit no combined systems ever. Don't forget sewage.	2	Press Thames Water about water quality and water loss	4						
		Agree with Preferred option in principle but SUDS require maintenance so it is not clear how this would be effective – This needs to be more stringent for the catchment of the Lye Valley specifically and other sensitive areas, not just one Oxford policy.									
		Add in (resilient design and construction) and measures to capture surface water runoff and clean this via introduction of Sustainable Drainage Systems (SuDs).									



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
R7: Land Quality	<b>Preferred Option - a)</b> Include a policy approach that requires the submission of details of investigations of any site suspected to be contaminated and details of remedial measures which must then be carried out.	Support	24	Support PO: but would like to see the ability of land to sequester carbon assessed under this policy as a factor in whether land should be developed.	1			Support alternative option which is rely on national policy	3		
		These policies should be taken into an updated Jericho Canalside SPD.		<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.		<b>Historic England</b> object, note that there may be archaeological dimension to this policy (particularly industrial archaeological remains), which should be included in the LP. Also, Oxford includes peat resources which could be encountered - these have natural env and historic env benefits (good at preserving archaeology as well as carbon). These considerations need to be factored in.					
		This must also include analysis for peat, calcareous strata and groundwater and surface flows.									
		<b>Environment Agency</b> support option a because it gives more confidence that there will be some site investigation works done on suspected sites in cases where the EA is not involved - the EA may not be a consultee on all sites within city based on their internal consultation criteria.									
R8: Amenity and environmental health impacts of development	<b>Preferred Option - a)</b> Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc.	support PO	31	No mention of how plan proposes to protect "dark skies" in the countryside. Need to include a policy to minimise light pollution from new developments and reduce existing light pollution and protect dark sky areas such as South Park.				All developments should comply with NICE's guidelines on Physical activity - walking and cycling.	3		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments against an alternative option	No.
		These measures are essential and need to be enforced. Amenities in Littlemore are sparse and have not been improved by developments	1	<b>Thames Water</b> support policy approach a. but highlight that this should also include odour impacts: <i>Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations. They flag that the new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187. They set out specific recommendations for where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station and whether an odour impact assessment (to establish any impacts on new residents' amenity) is required as part of planning app - see their response for more info.</i>				Support national policy	4		
other		NM(S)RA applauds the intention of the policy but draws attention to the growth strategy in a city with a Victorian sewerage system where Marston has a long history of sewage flooding on its streets and footpaths. The policy makes no sense to Marston folk where expansion of the city without a new sewerage network (or measures to reduce surface / ground water entry into the sewers) means even more frequent overspill of filth onto public spaces in our neighbourhood and into watercourses and rivers.		Additional policies: on the impact of the Conservation Area on attempts to decarbonise buildings; and a localised energy grid with localised generation, like Project LEO	1						
		However there is no mention of protection of the "dark skies" in the countryside which surrounds the city.  There should be both a policy to minimise light pollution on new development but also to reduce existing light pollution, to protect existing dark sky areas and to identify additional areas of importance.	5	Should be additional specific policies on Foul Sewerage and Noise Pollution.	1						
		Would extend the policy to add that there should be no unacceptable impacts on the natural environment.	1	<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.							
		Must include increased emissions and traffic.		Add into policy need to minimise light pollution and support dark skies	1						
				Oxford must remain a family-friendly city, which means active measures to limit impacts on amenity from noise, dust, fumes etc.	1						

## 5.6 Policy Options Set DH1 to DH15

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
Intro paras and wider context along with any other comments				Any design guidance checklists or documents need to consider the standardised visual impact against a range of increasing carbon reduction requirements from Planning/ Building Control.		National Grid - To ensure that Design Policies remain consistent with national policy include in policy the following " taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."		Arterial roads should have much higher density housing to provide visual improvement to the city from every direction. OLP should be more proactive to encourage this aim for four storey villas and blocks of housing and student accommodation - proactive policy need to encourage four storeys and increased densification. If areas' character is weak new development should seek to improve it.			
				Important that any guidance shows and balance between heritage and sustainability constraints. Existing guidance should be re-assessed.		More reference to design and heritage of Littlemore should be included especially in relation to St John Henry Newman. Concerned about the dereliction of the historic Littlemore Priory site	1				
				Strongly support the protection of Oxford's heritage assets and 'dreaming spires', but consider policies risk limiting affordable housing & social housing in new developments by affecting viability of projects. Policies should focus on support for intensification, relieving pressure on areas of flooding, Green Belt & urban sprawl. Developers need to focus on delivering a built environment that is affordable and sustainable.	1						
	6.1 and 6.3 (and UD & heritage BP)			Some v desirable goals that must apply across the whole of the city including Littlemore.	1	<b>Historic England</b> feel that the approach outlined does not fully recognise the potential of the city's heritage and fails to acknowledge the potential for heritage's contribution to the local economy/economic pillar of SD. POs do not address heritage at risk, and do not appear to make case for heritage role in regeneration. Also 'heritage and archaeology' heading implies archaeology is additional to heritage, 'historic environment' is a better heading. The Urban Design & Heritage BP also risks unclear/unhelpful terminology, in places, reference to 'historic environment' would often suffice.					
	Figures 6-1, 6-2			Text resolution poor on keys	1						
	6.11					<b>Historic England</b> flag that in reference to 'heritage assets or conservation areas', Conservation Areas are a type of heritage asset. May be simplest to amend the example to listed buildings i.e. '... to the presence of heritage assets such as listed buildings					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
	6.20 - 6.28			Outdoor space in Littlemore v important to residents' wellbeing, further building would be detrimental to residents and we welcome the HIA to ensure all developments are assessed to ensure they are healthy Littlemore Priory is of great historic importance and has been allowed to deteriorate it should be on the list of historic assets.	1						
DH1: Principles of high quality design of buildings	<b>Preferred Option - a)</b> Expand and strengthen the current checklist.	Link relevant TNAs to checklist, make more effective use of IT to improve application process	1	This should apply to all developments, not just majors.	1			Option D is the best way forward especially given the increased emphasis on this in the NPPF, The National Model Design Code and Design Guide. There is no need to list out the criteria to cover but refer to National Guidance.	4		
		support option a	32	Any new approach should be introduced in a way that involves stakeholder consultation.				Support option B	2		
				Design guide should include a significant element of design for biodiversity		Policies not adequate: Policy should include a requirement for Passivhaus or equivalent standards to be met. Other elements of design, inclusivity, sustainability & active travel need to be considered. Checklist should include retrofitting of an existing building against a new one.	1				
				<b>Historic England</b> support po and framing the elements covered by the current checklist as more akin to expectations. Support option to expand/strengthen, flag it will be important to make suitable connections in the text to how those other elements consider heritage/support positive heritage strategy, whilst taking care to avoid repetition.		Planning policies need to be careful not to over burden applications with additional requirements when high quality design can already be achieved and demonstrated through existing mechanisms.					
				Expanded checklist could include detailed air quality and noise monitoring data and an inclusivity test for claims made about facilities for pedestrians and cyclists (8-80 age group, non-standard bikes, wheelchair and mobility aids)							
				Work of Design Review Panel should be more transparent and involve more/ improved consultation with local organisations/ local communities.							
				Suggest some measure of flexibility as there is a general wariness of the danger of Design Guides in the hands of architects and developers.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p>The <b>Canal and Riverside Trust</b> recognise that development adjacent to some types of spaces (specifically waterspaces) may need a different design approach. The Trust promote the need for good waterside design and new development should;</p> <p>positively address the water integrate the towing path and open up access to the water link waterside space and the waterspace use the waterspace itself incorporate access and other improvements engage with and tease out the qualities and benefits of being by water reflect the scale of the local waterway corridor to the wider neighbourhood"</p>							
				Nature-based design: Think/plan a development's green infrastructure first.							
				<p><b>BMW</b> support the Preferred Option. Design Checklist or Questions should include hierarchy of design priorities and consider various scales (major/minor) and types (residential/commercial) of development. However, BMW would question whether the proposed checklist will be more effective than the existing questions in securing good design."</p>							
				"It is important to design for disability, as the population is getting older and there are parts of Oxford with many sick and disabled people. But householder developments should be exempted, as few can afford architects to do the required design work. It might be worth setting up a design education for tradesmen programme."							
				Support preferred option and this request that this checklist should include concepts around beauty. Please incorporate the findings of the UK Govt's Building Better, Building Beautifully Commission ( <a href="https://www.gov.uk/government/groups/building-better-building-beautiful-commission#reports">https://www.gov.uk/government/groups/building-better-building-beautiful-commission#reports</a> ), particularly the Living with Beauty report.	3						
				The expanded and strengthened checklist should be incorporated in the updated Jericho Canalside SPD. The policies should also emphasise Design Review and the use of the Design Review Panel in addressing significant strategic sites where design considerations are especially important. This again emphasises the role of the updated SPD in addressing consideration of St Barnabas Church (Grade I Listed), the Jericho Conservation Area and the heritage of the Oxford Canal.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p>"UBS acknowledges the importance of high quality design of buildings but would maintain that any checklist should not be overly prescriptive so as to unduly restrict or constrain development and innovation.</p> <p>It reserves its right to comment on any expanded checklist but suggests that the current approach of setting out a series of questions for developers and assessors to consider is sufficient for defining what good design is. This would subsequently be further assessed through the submission of any planning application.</p>							
				Do not exempt householder applications from the change of use checklist.							
				<p>The checklist should emphasize that the quality standards required may be met by alternative routes of the developer's choosing. The checklist should have sustainability high on the agenda (see previous comments on Passivhaus and BREEM.</p> <p>The City Council should also make provision for a list of buildings that are not listed but which are nevertheless notable buildings of local interest, chosen and listed for their architectural and/or historical interest. It should be a checklist requirement that the local interest list is taken into account in any development.</p>							
				Exclude 3rd paragraph. In order to achieve Climate goals, houses being rebuilt internally should be required to follow a detailed checklist of measures for sustainable retrofitting. This may require a SPG to ensure this is part of the planning system. Since the Council says 76% of carbon emissions are from buildings, then it should behave as though it intends to reach its own goals for the City. However, 2040 is too far away.							
				Design guides should include provision for natural as well as built environment features, including street trees and urban greening. This should include guidance on the appropriate location, planting and species choices for urban trees, based on the principle of the right tree in the right place.							
				Like idea but concerned about value of it when implemented				Reference NMDC and DG in policy or text	1		



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
DH2: Specific design guidance for areas	Preferred Option - a) Develop design guidance/codes specific to an area or type of development, e.g., areas of the city that are particularly sensitive and/or where significant change expected.	Support PO	19	Design guidance for certain areas is supported but these should be via SPD's in the same way as that for the West End and Osney Mead SPD. There is no need for this to be set out in policy in addition.	3	OUS object such an approach unnecessary, geographical proximity is not the same as strategic connectivity and interaction lacks clarity		support option B - option A is too onerous and does not take into consideration existing national policy/guidance	2		
				Note county design guidance	1						
				More efficient for council to specify expectations for particular sites, e.g., discourage housing development close to railway linked to London to avoid new housing being used for commuters.							
				Develop design guidance/codes specific to an area or type of development... The work of the Design Review Panels should be more transparent and involve more/better consultation with local organizations and communities. Rather than council officers coming up with location-specific design guides, help and encourage local people to come up with their own codes (a simplified aspect of a neighbourhood plan).							
				Include policy encouraging substantial new developments to design neighbourhood access in a way that encourages active travel -- for example, reserving the shortest or quickest access routes for car-free modes.		Jericho Canalside SPD addresses an area which is clearly 'particularly sensitive and/or where significant change is expected'. SPD's roles include providing additional detail which cannot be included in the Local Plan. It has been demonstrated that updating the Canalside SPD is not onerous and will not require extensive officer time. The community has expressed its clear expectations many times. Having an updated SPD places clear and robust planning requirements on the landowner rather than leaving it to the market to determine planning and public infrastructure priorities.					
				Historic England support po, flag that undertaking a heritage assessment in some cases will help inform guidance, identifying assets that may be impacted by development and significant features. Look forward to engaging with development of relevant SPDs/design guides as appropriate.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
DH3: View Cones and High Buildings	Preferred Option - a) Continue to define Historic Core Area (1,200m radius of Carfax) b) Continue to refer to High Buildings TAN11 and c) Continue to define view cones	OUS support tied and tested approach	2	If the City is to face some of the challenges given limited land then more flexibility on height is needed, whilst seeking to protect the key views of Oxford which is a heritage asset.	3	Figure 6-4 should be move to align with policy		Using the TAN in combination with Option C is the most appropriate approach.	3	Option c contrary to national guidance as it doesn't allow for balancing exercise. Object to d & e options for same reason	1
		Support options A, B and C	3	Policy needs to be elaborated and further defined to enable developments to justify where the 18.2m datum may be breached and opportunities to deliver some bulk without negatively impacting the skyline.	2	The policy sounds reasonable but Marston has bad experience of officer and member 'flexibility' in application of / protection of view cones and implementation of past measures for heritage asset protection.		Option E would best protect views across the city	2	UBS would strongly oppose the introduction of a policy containing an absolute height limit. Such a blanket approach would not align with the requirement to optimise the use of individual sites by allowing a technical assessment of suitability.	
		Support of preferred options	16	LPA needs to seek an appropriate balance between preserving heritage and delivery of affordable homes.	1			"Option E will better protect the views across the central conservation area. The view cones are too limited to be effective, they only cover the very central towers and spires- Magdalen Tower is not included.  The 1.2 km and the Central Conservation Area are not the only areas of Oxford with an important skyline. There are important church spires in the North Oxford/Jericho conservation areas too.  The context of the central conservation area from the viewpoints (outside the City) are important too- the relation to farmland and the hills in particular."		Do not include a policy relating to view cones or high buildings.  Spires visibility should not prevail on providing sufficient number of dwelling, even if this means building high buildings.	
				Support PO's with additions: policy needs to support necessary intensification to deliver built environment, to support 15 min city, improve social housing and avoid building on greenfield sites. Although policy approach is supportive further guidance to developers for development on strategic sites together with scope for appropriate additions to skyline would be beneficial.	1			Respect viewing cones and don't break them for expediency (Blavatnik)			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p><b>Historic England</b> support emphasising care needed with tall buildings and continuation of preferred policy approach to defining 1200m area around Carfax Tower. But also encourage the addition of policy option e, to include in the policy details about what is expected in retaining the significance of views out from key points in the central conservation area, specifying some key (publicly accessible) viewing places (St Mary's Tower, Carfax Tower, St George's Tower and the Castle Mound). Welcome statement about identified view cones not representing exhaustive list (encourage policy consideration along lines of 'there may be other significant views'). Point to GPA2 and GPA3 as a reference to go into the LP txt to help users fully appreciate impacts of setting. Also emphasis that tall buildings TAN could be strengthened (suggestions in submission).</p>				Support of alternative options - D, E, G	16		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				Suggest a more relaxed approach to view cones and high buildings. Rigid restrictions would exclude innovative and exciting architecture creating uniformity.				<p>"Oxford Preservation Trust (OPT) consider that taking elements from preferred options a, b c and e would result in a policy that best protects and preserves the sensitive skyline of the city and its landscape setting.</p> <p>OPT would note that it is important to recognise within the policy, or supporting text, that the 10 views as defined by the view cones, are not the definitive, and only views, and that others exist beyond these and that these views need equal consideration and protection.</p> <p>Any site where views of the skyline, or landscape setting are available, and/or there is public access should be protected by the policy text. Viewpoints can occur from ground level, up to elevated positions upon the top of buildings, or from the landscape setting.</p> <p>The foreground of views is also something referred to within the TAN and this should be reflected within the Policy text.</p> <p>No reference appears to be made to the overall 'character' of the view. Whilst the skyline is acknowledged as being sensitive, the wider foreground/setting also contributes to the overall experience of a view - these should also be protected under the relevant policy framework.</p> <p>OPT agree with the options for Policy approach e, and feel an element of this should be included within the final policy text for the final proposed policy relating to building heights and view cones. It is disappointing to see that one of the potential negatives for policy approach e is that ""additional resources that might not be available"". OPT consider that the views are so significant that resources should be found for the additional work - as this investment will help with the consideration of applications going forward.</p> <p>The use of 3-D modelling should also be encouraged - as this helps with a full assessment and understanding of proposals.</p> <p>In conclusion OPT would support a policy that incorporates elements of options a, b, c &amp; e.</p> <p>OPT would also note that the plan shown at Figure 6-4 is not clear, and that reference needs to be made that these views are not an exhaustive list, and that other views do also exist."</p>			
				Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area.....							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				I note that in the past the council has agreed development which actually interferes with the view cone, so the plan should be very specific as to what heights are appropriate at what elevation. The council must also make this non-negotiable so that developers must abide by the plans. (The Oxford Brookes developments at John Garne Way should not have been permitted to the extent that they have been.)							
DH4: Public Art	Preferred Option - a) Develop a distinct public art policy, with requirement for provision from qualifying proposals			Either option would work. Having certainty over public art provision is useful.	3	Consider suggested 20 home threshold could be difficult on smaller more challenging schemes.	1	Support option b as it would allow a more tailored approach.	4		
				Support PO with addition: policy should support scope for using public art budgets for bespoke designs/or functional pieces in new developments, to include fencing, seating, shelters or enhanced surface design. Artists should engagement both existing & new communities.		I am neutral on this. Public Art can be attractive, but in my experience some of it has been commissioned just to fill in space, sometimes not very successfully, where there isn't a lot of space spare. And, instead of being an artistic focal point becomes just another meeting point ("I'll see you at the X ...") without being otherwise appreciated. Public art also needs to be looked after, and funding will need to be allocated for that, too.		Support option c - don't require provision but set out the role public art can play in the design of public spaces.			
				<b>Historic England</b> provisionally support and welcome development of distinct public art policy, but flag it is vital such art is sensitive to its surroundings, which should be reflected in the approach to policy wording and the supporting text. Encourage reference to community engagement in the delivery of this policy, to enable commissions to respond to local opinion and be strengthened by local support.		We remind the Council of the role of viability assessments as stated in the PPG (Paragraph: 002 Reference ID: 10-002-20190509).  Requirements for public art should therefore be incorporated into the Whole Plan Viability Assessment.		Option C preferred. Reason: the quality of art procured in the past does not enhance the local environment. It is better to put the money into good urban design and architecture.			
				Public art is a policy that would benefit from local consultation and involvement. This is just the sort of policy that would benefit from a clause about local involvement.		Public art should not be required. Provision of green space and biodiversity is of far more benefit to health and wellbeing of residents than public art and developers should be encouraged to provide accordingly.		Support of option B	5		
						Too much red tape; and too likely to result in poor quality public structures, usually rusting away. Instead, develop a scheme with the University (e.g. Ashmolean and Ruskin) to promote and fund (with levies on developers) art of strong artistic quality and coherence.		Support option C	8		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
						Public art should be at discretion of builders and architects		I do not believe Oxford Council should be involved in detailed policy decisions regarding distinctive public art - the beauty and appreciation of any particular artistic piece is anyway largely down to individual taste. NPPF requirements are adequate			
DH5: Bin and Bike Stores and external servicing features	Preferred Option - a) Require that bike and bin stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs...	Comments made in support of the preferred option	34	The PO reads as guidance, stronger focus needed on wider cycle parking facilities, including town centres and mobility hubs.	1			Not sure stand-alone policy is required. Include references within design policy if needed.	3		
		In residential areas, particularly those with HMOs, bins and bikes frequently litter/block pavements and are a hazard to pedestrians. Additionally, they are a blight on the streetscape. Developers/landlords must be required to provide appropriate storage and some form of checking exists to ensure enforcement.		Need to accommodate non-standard cycle designs such as trailers, tricycles and mobility vehicles. Security of e-bikes is a concern due to high cost of bikes and batteries.							
				Option A supported in principle but add that any specific requirements for bin/ bikes stores and servicing should include flexibility and not overly rigid to allow for specific site design considerations							
				Secure cycle storage is important for a number of reasons - it supports low/ zero carbon agenda as encourages cycling and can help with blighting of street-scene from too many bicycles/ bins on the pavements.							
				<b>Historic England</b> provisionally support, again flag it is vital this takes account of the historic environment to ensure that the design is suitable and in keeping with its surroundings. They note that (potential) impacts on the historic environment are not made explicit at this stage.							



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				Many cities in the Netherlands allow residents to dispose of household waste in underground containers, using a pass. This saves a lot of space and stops pavements and front gardens from becoming clogged up with endless wheelie bins. I'd encourage the city council to explore this moving forwards							
				The policy should require a practical design that doesn't detract from the street scene. Recent permission for conversion of dwellings to large HMOs have required large, unsightly roofed structures for the storage of wheelie bins on the property frontage (they are then rarely used and become dilapidated). Wheelie bins do not need a roof covering.							
				Option a should be applied to city council owned garages, especially "requiring fire safe spaces with adequate electric supply for charging" which is not the case in Blackbird Leys.							
				When considering bin stores, please apply the learnings and recommendations from the "Bin-Lorry Effect" paper: <a href="https://www.createstreets.com/wp-content/uploads/2021/01/The-bin-lorry-effect-2.pdf">https://www.createstreets.com/wp-content/uploads/2021/01/The-bin-lorry-effect-2.pdf</a>							
				Bike racks and storage need to be at least doubled to cope with present demand. If you intend to encourage more people to cycle they will have to increase further. Use existing derelict commercial properties for cycle storage.							
DH6: Bicycle parking design standards	<b>Preferred Option - a)</b> Require high levels of secure bicycle parking <b>and b)</b> Set some more specific requirements fro type of bike parking for residential developments and workplaces	Support PO	3	Cycle parking requirements should be flexible and take account of nearby provision. Having a cascade to review provision at various stages of the development process providing a base amount at the start and increase as needed would be more efficient than over provision to begin with. Include a cascade in policy	4	Cycle parking standards already set by the County Council. No need to duplicate/ undermine these.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<b>TWO and ONV</b> support provision of cycle parking standard needs to take account of the occupation of buildings, location and cycling demand rather than based on volumetric criteria. E.g. the Life Science Market often has low occupancy levels per sqm compared to office uses. Applying a rigid metric based on sq m will result in excessive amounts of parking for such uses, leading to street clutter and unnecessary cost.		Do not go beyond current standards. No justification from further increases.					
		Support PO	38	Ensure access is considered need space between aisles	1	Cycle infrastructure should not be considered as afterthought in design					
				Should point more strongly to internal storage options as default provision. External storage sheds/ bikes are prone to break-ins and can be an unsafe environment for vulnerable cyclist.		Visitor cycle parking needed on every street for carers/visitors when they visit.					
				<b>Historic England</b> acknowledge the need to consider impact on the historic environment in the design and location of bike parking.							
				Principle of options A and B supported but cycle parking for different use classes to be reviewed to ensure no over provision of cycle parking							
				If we are to encourage more cycling then more cycle parking is needed.							
				And have them be accessible, no bike stands in which bikes are floating front wheel above back wheel, but standing on the ground.							
				Also require that lower quality, visitor bike parking is added to new developments. This does not need to be indoors but does need to offer space for a variety of bicycles.							
				I would like to point out that bike rack like these ( <a href="https://blog.sportsystemscanada.com/hs-fs/hub/319534/file-740645069-jpg/bike_rack-1.jpg#keepProtocol">https://blog.sportsystemscanada.com/hs-fs/hub/319534/file-740645069-jpg/bike_rack-1.jpg#keepProtocol</a> ) can park a lot more bikes than the bike racks often used throughout the city.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				Preferred Option b (in combination with a). But is 1 space per 5 staff enough? Are we expecting the other 4 to be either walking or travelling by public transport. Based on my limited experience of working in offices in various locations around the city, a 1 in 2 would be a better target.							
				Extend option b to include space for mobility scooters as well different kinds of bicycle.  Also motorcycles are ignored in DH6 and DH7. We should encourage the use of them instead of cars to reduce congestion (particularly electric mopeds, scooters and motorcycles). Space to put chain up cargo bikes would also be enough space to chain up motorcycles.							
				Please change all references to "bicycle parking" to "cycle parking", in conjunction with supporting tricycles, trailers, cargo cycles, etc.  Please ensure that developments provide dropped kerbs for easy movement of cycles between the road and the storage provided. There are some people who can't easily lift their cycles up a kerb to access parking: disabled people with adapted cycles, older people with heavy e-bikes or tricycles, parents or carers with tandems or trailers, tradespeople with heavy loads in cargo bikes, and so forth.							
				Racking should be accessible by all (i.e. not awkward vertical racks which require upper body strength to use)							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p>Please change references to "bicycle parking" to "cycle parking" to include all types of cycles such as tricycles, trailers, cargo bikes, disability-adapted bikes etc.</p> <p>Please ensure that developments provide for easy movement of cycles between the road and storage, as some people can't easily lift the cycles up a kerb to access parking, such as disabled people with adapted cycles, older people with heavy e-bikes or tricycles, parents or carers with tandems or trailers and tradespeople with heavy loads in cargo bikes.</p> <p>Please also include requirements that cycle parking is:</p> <ul style="list-style-type: none"> <li>- undercover</li> <li>- well lit</li> <li>- physically secure</li> <li>- CCTV protected</li> <li>- ensures personal safety in its positioning and design with particular consideration for the needs of women, e.g. not out of view in a hidden area and doesn't create a 'trap'</li> <li>- more conveniently placed than car parking, e.g. closer to the main building and quicker and easier to get to</li> </ul> <p>I think 1 cycle parking space per 5 staff is woefully inadequate and should instead provide for a much higher % of staff, e.g. 75% minimum.</p>							
				<p>Please refer to Oxfordshire County Council's New Parking Standards policy on cycle parking. These are outlined in 4.11 here - <a href="https://mycouncil.oxfordshire.gov.uk/document/s/s62491/CA_OCT1822R10%20Annex%201%20-%20Draft%20Vehicular%20and%20Cycle%20Parking%20Standards.pdf">https://mycouncil.oxfordshire.gov.uk/document/s/s62491/CA_OCT1822R10%20Annex%201%20-%20Draft%20Vehicular%20and%20Cycle%20Parking%20Standards.pdf</a> :</p> <p>Also support the provision of e-bikes, trailers, cargo bikes etc.</p>							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p><b>Planning Bureau:</b> The option for the policy approach looks to require high levels of secure bicycle parking (e.g. at least 1 space per bedroom, 1 space per 5 staff) either indoors or external for residential and non-residential schemes to achieve best design outcomes.</p> <p>Older Persons housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Were an older person likely to cycle on a regular basis it would be unlikely they would require extra care accommodation.</p> <p>A survey of 242 McCarthy Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments.</p> <p>Whilst we can understand the rationale behind encouraging cycling in the general population and that cycling is probably a preferred means of transport especially for young students in Oxford, we consider that a requirement for cycle spaces in all residential schemes including in specialist older persons' housing to be inappropriate and unnecessary. A McCarthy Stone retirement scheme has within it an internal mobility scooter store for use by residents which is a far more relevant requirement and in the handful of instances that a resident has used a bicycle it can be stored securely in this area.</p> <p>We consider that cycle parking requirements of 1 space per bedroom for older persons' housing would constitute overprovision in our experience and cycle parking should be limited to staff and visitors accordingly for the policy to be effective and justified.</p> <p>Recommendation: That the Council's considers the car and cycle parking requirements of specialist older persons' housing on a case-by-case basis or provides an exemption within policy for cycle parking for older person's schemes."</p>							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				I support the "downward pressure upon public car parking provision city wide" and the encouragement of alternative modes of transport. But there needs to be more recognition that cycling will not be appropriate for great numbers of people. I support Option A in combination with Option B. I appreciate that the regulation of buses is outside the powers of the City Council, but the City should push for greater regulation and co-ordination. We need frequency of appropriately sized buses, according to times of day and public demand. At present there is far too much overlap of competing services within the City Centre, which results in roads like the High Street being dominated by an excessive number of buses.							
DH7: Motor vehicle parking design standard	<b>Preferred Option - a)</b> Seek car free residential development across the city, subject to accessibility criteria for public transport and local shops. Seek low car developments in locations not suitable for car free. <b>and b)</b> Do not allow any additional parking on non-residential sites	Support, refer to County parking standards	2	A mix of car free and low car developments dependant on accessibility to public transport/alternative means would be most appropriate.	3	Totally car free developments are not inclusive as many people require vehicles for work purposes and such a policy would discriminate against such people.	3	Need a clear uncomplicated policy in the OLP and ensure compliance with County standards. Still need the parking TAN non resi parking requires a standard which is simple and restrictive. Provision should be made for car shares.			
		Support preferred option	2	If the council can demonstrate economic benefits, and viability of car-free development then a criteria-based approach to car-free development may be appropriate (where it would be permissible to provide parking!)		Given the proposed Zero Emissions Zone and greening of the vehicle fleet it is wrong to say that allowing cars will lead to noise and air pollution increases. Should be factored into Air Quality policy.	3	"Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments.  At the moment (and probably for a long time) Oxford is unable to provide affordable and effective public transport for all needs. In many cases a car is the only way people have to get where they need to go in reasonable time. Unless a capillary tram/underground network is provided this is unlikely to happen. Buses are not a good alternative to cars, and not everybody can ride a bike safely."			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
		a) and b). Plus recognition that the rise in SUV use has added to greenhouse gas emissions, parking spaces needed and the protrusion of vehicles from frontages into pavements throughout the City. Car parking standards should not accommodate SUVs or indeed Vans. They should be in multi storey car parks, on properties with existing adequate space and in marked parking bays at a premium rate of payment compared to existing CPZ charges. Such bays can only exist where road space permits, requiring planning permission. Similarly, car parking charges for SUVs and Vans should be far, far more than for normal sized cars.		Noticing reduction in value of properties without parking and likely difficulties in selling properties (particularly shared ownership).		Is there an alternative approach in which developments begin as low-car and have a strategy for how they could be converted to car-free over time as infrastructure measures are completed/ delivered?		Strongly support 7c, consider starting-point should be an expectation for car-free development in Oxford.	2		
		Broadly supportive of policy direction, provided it does not discriminate against low income and/or low mobility households and small businesses		Policy approach needs to be equitable so that specific groups can have access to parking.		<b>Oxford Science Park object</b> - none of the options would support role and function of the science park. Unrealistic to expect globally significant companies to remain in Oxford if their employees are unable to access their place of work. Science Park encourages EV charging. Further evidence needed if Plan adopts any of proposed policy approaches for employment sites.		Option C is not appropriate and is not supported.			
		Support plans for zero emissions/car reduction		How car clubs will work on a longer term basis in the context of private developments needs to be understood.		This set of policy options only deals with cars. It does not cover buses, vans or motorcycles.  On vans, we have many tradespeople living in the Leys and Barton. They need to be able to park their vans.  Motorcycles are a good way to reduce congestion for those who need to get someone quickly or travel outside Oxford. There use in deliveries reduces the need to own a car to drive to supermarkets (a car club will do). So there should be more motorcycle parking places.		Option D can only be successful when applied in context of a coordinated public transport and accessibility strategy.			
				Support PO but controlled parking zone should cover whole of city.	1	UBS would oppose the introduction of a policy which requires all development to be car free. Some development will need to include some car parking and to impose a blanket policy position would act as a barrier to the realisation of development, the ability for the City to attract certain occupiers and potentially limit the success of other policy objectives (such as Innovation Districts).  A measured framework of enhancements to public and sustainable modes as well as reduced private parking will help to continue to achieve modal shift over time.		Prefer option: Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments. Residents should be allowed to have cars!			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				Policy should include a criteria-based approach where car free development may be appropriate and also set out where it would be permissible to provide parking for cars.				Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments.  The automobile is not expiring any time soon as a primary mode of transport for the majority of residents (especially those with a commute or with a large family). OCC need to acknowledge this, before they impose punitive regulations on future residents. Imagining Oxford without cars--given its geographical location and the need to access its satellite towns and villages--is like imagining London without the underground network.			
				Will require continuation of adoption of CPZs. Concerned that re-wording of existing policy may lead to opportunity to dilute intention of car-free ambition.				There is a possibility of building with future reductions in car ownership in mind. E.g. car parks positioned in such a way/configuration that they could be used for building housing in future when they become redundant.			
				<b>Historic England</b> acknowledge the need to consider impact on the historic environment in the design and location of motor vehicle parking.							
				Support but needs an effective PT system	1						
				Option A generally supported but policy approach should allow flexibility to meet needs of varying site locations and varying housing types.							
				Option B generally supported but should be reviewed to ensure does not impact on viability or operational requirements of non resi sites	1						
				Support option A only	1						
				Consider the installation of a tram in Abingdon Road. Or beside the train track using the present rail from Cowley works beside the Kassam stadium. A plan to reduce the traffic on Abingdon should be brought forward							
				Preferred option favoured. However, this should not be at the expense of losing important green space around dwellings. The policy should require a defined amount of open amenity space in all new developments, and minimum space standards for private outdoor space.							
				Jericho Canalside should be car-free and is accessible by pedestrian and cycle modes, with bus services within 15 minutes walk.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				Let's remove as much on-street parking provision - essentially vehicle storage - as possible. This will have the knock-on effect of providing better cycling and walking provisions as there won't be vehicles using up both road and pavement space. This would require off-street parking provisions but this has been achieved in other places where on-street parking is illegal (e.g. Tokyo).							
				Support option B but in context of <b>ARC Oxford</b> and wider South AOF, CBL extension is fundamental to delivering a reduction in car parking. In absence of investments and initiatives, there may be continued reliance on the private car. Council should therefore be accommodating of transitional arrangements until such time that the benefits of PT improvements are realised.							
DH8: Privacy, daylight and sunlight	<b>Preferred Option - a)</b> Extend the policy to also include expectations for daylight, privacy and sunlight for new non-residential buildings	Support option A	14	Any new approach should have regard to 2022 Building Regs.	1	No need for new policy	3	Maintain policy for residential developments only (option b). Commercial developments would need to demonstrate appropriate levels of light at the design stage and can tolerate lower levels of light dependant on use.	3	Consider drone uptake for deliveries	
		BMW support Preferred Option, noting that typical industrial units do not achieve the building heights that would compromise residents' privacy or daylight. In such instances where this would occur, an assessment of impacts will be prepared and submitted with any planning application.  As such, 'non-residential buildings' should exclude manufacturing and warehousing (as proposed).		Extend policy to include expectations for daylight	1			<b>Planning Bureau:</b> The preferred option looks to extend the existing policy approach – policy H14 of the adopted Oxford City Local Plan to include non-residential buildings. However, the council also need to be mindful of part O (Overheating) of the building regulations and how overheating is balanced alongside daylight and sunlight.  <b>Recommendation:</b> It is recommended that option C is taken forward 'Do not include a policy on privacy, daylight or sunlight for any type of development'. This is because this area is now covered via Part O of the building regulations and the plan should not seek to amend or go beyond the building regulations.			
				Enforcement should be well resourced so planning controls are not meaningless	1			Planning consents should take light into account as before			
				Add a constraint that prevents overshadowing of commercial premises to a degree that necessitates the continuous use of artificial light.	1						
				I'd also like to see consideration of protection of starlight and night spaces. Not all animals appreciate bright lights all night. This includes humans.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				Support PO but not clear why it doesn't include residential developments.	1						
DH9: Internal space standards for residential development	<b>Preferred Option - a)</b> Apply Nationally Described Space Standards. In flatted schemes, require communal areas to be designed to enable neighbours to meet and interact.	Support preferred option A	28	Agreed, providing this meets the "Secure by Design" principle and does not create spaces used for criminal or antisocial activity.		Do not include a policy on internal space standards. Communal spaces that you have to walk through to access your flat are good if they work, but sometimes they don't and can be frightening.					
		I agree with the preferred option - with the proviso that if the space standards become smaller the council should be free to set more generous standards.		<b>Historic England</b> highlight the importance of protecting heritage significance, when considering making any changes to historic buildings.		We would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509).  Recommendation: Introducing all flatted development to deliver communal areas etc. must not be so inflexible that it deems sites unviable and any future policy needs to ensure it does not affect viability to make sure it is consistent with NPPF/PPG and can be justified by the council. Therefore the policy should not go beyond the Nationally Described Space Standards.					
				But please don't fit all those content into a small land. You need to provide which standard is compulsory first.		Some bespoke accommodation does not require good internal space standards, for example short term stays by specialists in accommodation.					
DH10: Outdoor amenity space	<b>Preferred Option - a)</b> Include an outdoor amenity space requirement for all residential units, with size standards.	Support preferred option A.	31	Do not extend to non-residential schemes.	2	Do not set requirements	2	Support Option b - broad principles but no size requirement.	3		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
		Providing this meets the "Secure by Design" principle and does not create spaces used for criminal or antisocial activity.		Support PO but concerned it could be over descriptive & affect viability of plans, with social housing being cut. Therefore support minimum requirements with flexibility built in, such as for flats.	1	What we found during the pandemic is the importance of access to nature, areas we can walk through - rather than small gardens. Setting minimum on site space requirements might interfere with that. Options b + c would not.		BMW support the following Alternative Option: "Do not set requirements for non-residential amenity space".  In terms of the alternative options, securing accessible communal outdoor amenity space in larger non-residential developments is feasible in certain instances but would be met with challenges of delivering tranquil / private spaces with unrestricted access to goods and services.			
		The corollary of this is that outdoor amenity space must be properly maintained and managed, attractive and safe. Much might be achieved if there were the possibility of residents themselves becoming involved in gardening and planting schemes, to introduce greater variety and to give a particularity of place, rather than all such spaces being subject to similar straitjacket patterns of municipal planting.		Policy should include requirements regarding the biodiversity and GI expectations of that amenity space.							
		Support but care in execution and application of the policy is required to ensure that spaces defined for biodiversity and/or net gain are not denuded by amenity usage		Pref option. Plus: Retain greenfield sites as part of amenity for all, with biodiversity additions where physically possible. Re-create greenfield from industrial wastelands, to ensure amenity for new homes.							
		<p><b>Woodland Trust:</b> "Support the principle of setting standards for outside amenity space and this should include standards for access to green space including natural greenspace.</p> <p>Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:</p> <ul style="list-style-type: none"> <li>- Of at least two hectares in size, no more than 300m (five minutes' walk) from home.</li> <li>- At least one accessible 20-hectare site within 2km of home.</li> <li>- One accessible 100-hectare site within 5km of home.</li> <li>- One accessible 500-hectare site within 10km of home.</li> <li>- A minimum of one hectare of statutory local nature reserves per 1,000 people.</li> </ul> <p>The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:</p> <ul style="list-style-type: none"> <li>- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes." </li></ul>									



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
DH11: Accessible and adaptable home	<b>Preferred Option - a)</b> Seek to ensure that a % of affordable homes and market homes are constructed to accessible and adaptable homes standards <b>and b)</b> Introduce specific exceptions to the requirement	Support option b) being introduced alongside option a)	10	Support policy but must remain flexible to take account of likely demand on any scheme, viability and practicality of delivery. As pointed out provision of lifts may not be feasible or viable in some schemes.	4			Support of alternative option	4		
		Support and OCC welcome a discussion about adult social care	1	support exceptions as set out option b)				<p><b>Planning Bureau:</b> Preferred Option A 'seeks to ensure that a % of affordable homes and market homes (dependent on needs, viability and practicality but currently 100% affordable and 15% market) are constructed to accessible and adaptable homes standards set out in Part M4(2) and M4(3) of the Building Regulations. For M4(3) for Social Rent these should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation'. Option B seeks to introduce some exceptions such as lifts for smaller blocks of flats that may deem the site unviable. Option C identifies having specific policy and to rely on NPPF requirements or National Design Guide as template. Summary paragraphs 6.22 identifies that 'Providing opportunities for residents to maintain their independence is very important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs.'</p> <p>The council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy</p>			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
								<p>framework in line with the proposed policy Set H14: 'Elderly persons' accommodation and other specialist housing needs' will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing</p> <p>We would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). M4 2 and 3 Housing has a cost implication and may serve to reduce the number of apartments that can be provided further reducing viability</p> <p>Recommendation: Option B that seeks to introduce some exceptions should be chosen as the preferred option. This should include an exception for older people's housing to ensure that the policy does not institutionalise an older person's scheme. The draft policy must not be so inflexible that it deems sites unviable and therefore would be inconsistent with NPPF/PPG.</p>			
		I strongly believe in the desirability of older people and people who develop special needs being able to remain in their homes as long as they wish to do so, provided that there are properly supportive services and communities around them.	1	Part M(2) to become mandatory standard. - no need to refer to this standard in local policy. Council will need to justify amount of M(3) homes required.							
				Support option A - policy wording should include the approach noted with respect to feasibility based on site specific circumstances.	1						
				I agree with the preferred options. But this needn't be aggressively pitched as an alternative for some houses only: handrails on stairs, level floors, toilet and bathing facilities on each level, etc. are all practical features, and people who are young who don't usually require adaptations might at times require them (for example following a broken leg or ankle) and are of course helpful as one ages.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p>We would respectfully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>The costs for housing to being built to Part M4(2) and M4(3) should be appropriately allowed for in the Whole Plan Viability Assessment.</p>							
				Pref options but exclude market requirement as City needs 100% very low cost homes.							
DH12: Healthy Design/Health Impact Assessments (HIAs)	Preferred Option - a) Require an HIA for all developments over a certain size	Maintain current policy for HIA's over a set size of development.	6	Consider all the requirements for validation this is another burden	2	<p><b>Churchill Retirement Living Ltd:</b> "Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.</p> <p>The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.</p> <p>Notwithstanding this, the questions within Health Impact Assessment toolkits are overwhelmingly geared towards strategic housing sites and have little relevance to smaller developments. We would encourage HIA's to be limited to sites over 100units or in excess of 1ha."</p>		support option c - no need to produce HIA	5		
		We request that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places.		Support option A - size should equate to 'All Major Planning applications'.		<p><b>Planning Bureau:</b> The council should note that there is a common misconception that older persons housing places an additional burden on healthcare infrastructure and therefore if preferred option A is chosen any screening or checklist introduced should recognise this and/or the threshold for screening of such housing should be set much higher (say 75 units). There is much evidence to support this such as from the Homes for Later Living report, September 2019 which identifies that 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year'.</p> <p>Recommendation: If preferred option A is chosen the policy sets a higher threshold for older person's housing or the policy should recognise that older person's housing reduces the financial burden on healthcare.</p>		Support option b - consider HIA should include an assessment of the standard of provision of biodiversity and GI outcomes of the development as these are important in delivering a healthy living environment.	10		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
				<p><b>Historic England</b> have undertaken research showing that the interaction with heritage or the historic environment can be a positive factor in supporting individual and community wellbeing. They highlight more information in a link to their Wellbeing and Heritage Strategy (see submission).</p>							
				Suggest area by area HIA for existing communities based on poorer health conditions in some parts of Oxford, needing interventions.							
				City should do better at prioritising vulnerable communities.							
				Depends on size - suggest any development over 3 dwellings							
Intro paragraphs to heritage section of chapter	Heading and paras 6.26, 6.27, 6.28			<p><b>Historic England</b> flag heading would be simpler as 'the historic environment' to better encapsulate archaeological remains as heritage asset.</p> <p>3rd sentence of 6.26 does not make sense, but agree with the point about a high proportion of highly graded assets in city as it seems to be trying to say. Also feel archaeology is treated as a 'throw away' line and merits its own para with more nuanced language.</p> <p>Para 6.27 - should say heritage assets not historic assets - to better align with NPPF. Refers to background paper but feel it is weak on detailing protection for heritage in national policy - but applaud reference to historic features being viewed as a strength. Welcome the text highlighting the importance of maintenance of historic buildings and the need for them to respond (in a sensitive manner) to the changing needs of their occupants.</p> <p>Para 6.28 - need to correct wording - archaeological remains are type of heritage asset.</p>							
	Paras 6.31 and 6.32			<p><b>Historic England</b> flag that precision in terminology is needed throughout, references to archaeology, but this is study of remains, should say archaeological remains. Section also fails to adequately set out the basic principles that drive the policy approach in this regard.</p> <p>Also, wording in paragraph 6.31 could imply that harm to remains is inevitable. To align with NPPF, the plan needs to support the avoidance of harm in the first instance. Flag guidance in new Advice Note (see submission for a summary which includes a hierarchy to guide approach to considering suitability of allocations and ways development could take place).</p>							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
	Overarching comment			<p><b>Historic England</b> also note the number of conservation area appraisals that were done over ten years ago and may merit review, and absence of conservation area management plans. It would appear that further work is needed to satisfy section 71 of the Planning (Listed Building and Conservation Areas) Act 1990. They look forward to learning more about the Council's plans in this regard.</p>							
DH13: Designated Heritage Assets	<p><b>Preferred Option - a)</b> Include a policy relating to designated assets that reflects the NPPF, that sets out how impacts on designated heritage assets will be assessed</p>	Support PO	20	Tension between historic/ heritage assets and wider objectives (e.g., net zero carbon).		No justification for a more onerous policy over and above the NPPF approach. Any Oxford specific detailing will be reflected in the Heritage Assessment so no need to specify in a policy.	2	A policy that reflects the advice in the NPPF is appropriate. (Option B)	3		
						<p><b>Historic England</b> object, feel that a more powerful policy approach would be to develop a set of bespoke policies for each type of asset that sets out the approach tailored to specifics of each heritage asset (including one for registered parks and gardens). This should provide opportunity to recognise specific characteristics/features for which they are protected, as well as set out the differences in decision-making approaches required (in line with NPPF) in considering different grades of asset and ensuring that those assets of greatest significance are afforded the most protection. All the policies should include Oxford-specific detail - for example, they are not clear why option b does/could not include Oxford-specific detail - encourage combination of options a &amp; b. Potential positives of option b do not follow or relate to policy option. Policy option C is not supported or appropriate.</p>					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
DH14: Local Heritage Assets	Preferred Option - a) Include policy requiring development to consider heritage assets of local importance. Policy would include criteria for assessing whether an asset has locally important heritage interest.	Support PO	6	Such policy would add clarity and highlight the importance of local assets and ensuring something of their significance is reflected in new proposals.		Existing process works well - need clarity about criteria for OU to form a view	1	All heritage assets have protection under other legislation and the requirements in the NPPF. There is no need for a further policy on local heritage assets. Support Option B	3		
						<p><b>Historic England</b> object (comment applies to para 6.30 too), whilst they welcome inclusion of policy on assets that are of local importance, more clarity is needed on policy approach to non-designated heritage assets. Feel there is an in-built dissonance when equating NDHAs with those on the local heritage list (the OHAR).</p> <p>Encourage text to set out commitment, preferably in policy, to review and update the OHAR. Also flag that NDHAs can include buildings, monuments, sites, places, areas or landscapes, which should be made clear in the LP, so that it is not limited only to 'buildings and structures' - and highlight that not all NDHAs may be on the OHAR. They do not support option b or feel it appropriate.</p>					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
DH15: Archaeology	<p><b>Preferred Option -</b></p> <p><b>a)</b> Continue to define the City Centre Archaeological Area</p> <p><b>b)</b> require a holistic management plan for key historic college owned and occupied sites with this area.</p> <p><b>c)</b> require sufficient information to define character, significance and extent of suspected features or deposits</p> <p><b>d)</b> only support development proposals where harm to such deposits/features can be eliminated/mitigated</p>	OUs support this approach	2	Support PO: however consider policy could benefit from being expanded by option 'e' or blanket policy beyond historic city centre.	1	Option B (part of PO) is too onerous and would be too costly and time-consuming, particularly for OU Colleges.	3	Do not think policy is required. If policy is required. It should be based around Option C (review and record) only.	2		
								Support option c as sets out from the start of the process what is expected from developers.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No	Comments in disagreement with the preferred options	No	Comments in support of an alternative or rejected option	No	Comments against alt or rejected options	No
		Support option A		<p><b>Historic England</b> support elements of po - however there are elements they do not (and do not align with NPPF). Broadly support the continued use of a City Centre Archaeological Area, but emphasise the point (also identified in the option's analysis) that there is potential for archaeological deposits across the city - text accompanying ref to CCAA needs to specify this. Also, suggest combining options a and c - unnecessarily complex to separate. Reference is needed to the need for field evaluation where appropriate - at present the bar is set notably lower than that prescribed by paragraph 194 of the NPPF by requiring a DBA only if initial assessment suggests it is relevant, whereas paragraph 194 requires a DBA for all applications on sites which include or have the potential to include assets with archaeological interest. Also, whilst they welcome the thrust underlying a holistic management plan as outlined in option b, they are unclear on how this would be triggered. More information is needed on the thinking behind and implementation of this criterion for us to comment in detail. Decisions should take into account the constrained nature of the city centre and acknowledge the pressure to 'build down. May be value in requiring holistic management plan for other large sites too (not just college sites). Careful thought needed that could support decision-making that could inform masterplanning of significant sites, especially in the location of basements.</p> <p>Policy option d does not currently consider the level of significance of the remains. Should the Council propose a separate policy on scheduled monuments and NDHAs of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, this could support clearer language in a policy related to archaeological remains. Suggestions for improvement to DH4 LP2036 policy given (see submission). They do not regard options e or f as appropriate.</p>				Support options c & D	1		

## 5.7 Policy Options Set C1 to C10

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
Intro paras and wider context along with any other comments		Support approach need to find common language between county and city 15/20 min neighbourhoods.		Littlemore is poorly served in terms of amenities and facilities, particularly primary health care. It is poorly connected, limited amenities, green infrastructure and has poor educational attainment	3					
		Support concept as long as these are contained in the city boundaries and not in the Green Belt.	1							
				Choice of district and local centres will be affected by future changes in transport such as the opening of the Cowley Branch line which would make Greater Leys near the Kassam Stadium and may enable other areas to become local hubs such as Littlemore.	2					
				Approach neglects areas such as Littlemore, Rose Hill, Risinghurst and Barton which are already disadvantaged with a lack of infrastructure and amenities. Levelling up is required.	3					
		Support approach but needed dedicated cycle and pedestrian routes needs additional infrastructure and repair of existing e.g. tow path		Includes positive policies but misses opportunities to empower community groups to give greater agency over community spaces. There are no policies on how users will be consulted which is important.	1	No further hubs are needed, the city has enough and they should be allowed to develop naturally.				
				Wolvercote does not fall within 15 min walk to facilities, therefore policy needs to stress importance of bus services to this area.						
				For the 15 minute city principle to work, excellent affordable public transport to each hub should be accessible, with each centre being able to provide for a broad range of needs including grocery, retail, and healthcare provision.	2					
							Do not understand why the 15 minute walking areas are larger for district centres than local centres. The centre and not the edge of the community should be taking as the defining criterion which will show that transport opportunities are not feasible.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
				New Marston RA support and welcome the concept of 15 min neighbourhood, but consider it cannot be applied to Marston at present. No surgery, dental practice, supermarket / general store, and limited leisure facilities. Will require significant infrastructure investment, how will this be achieved? Emerging local traffic / transportation policies, together with reduced bus services will make concept even harder to deliver and mean Marston will be less equal than other neighbourhoods.	3					
				Poor provision for young people in deprived areas of Oxford - need youth centre for Blackbird Leys (and Greater Leys and Littlemore).						
	Figure 7.1					Map difficult to interpret - several areas of Littlemore are not within a district centre. Littlemore should be a local centre with facilities to match this. Encourage more shops as a priority.				
						Not in support of district centres which restricts free movement around the city and segregates the people of Oxford. Those that live on the border of the proposed neighbourhoods cannot access the centre of these by 15 minutes via car. The schools cannot cater for the catchment area and parents may wish for their child to go elsewhere - further than 15 minutes away.	5			
						The proposed bus gates will imprison the less mobile people in their own area and cause ongoing oppression well beyond 2040 as well as increase congestion and CO2 emissions.	2			
						Local communities should have more say in how their communities are developed – not the remit of the Council	1			
				Concerned about the redevelopment of Templar's Square Shopping Centre, which if gentrified, will undermine the ability of people on a modest income to live in Oxford. Will also have a knock-on effect on the employers who rely on such workers.	1					
				Just concentrate on improving the city centre. Allow short term parking to help tradesmen and markets as not everyone can shop using cargo bikes.	1					
				Essential that all planning policies enable flexibility. Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation, it should be accepted that a facility is not needed/ viable for its current use and policies within the Plan must support the principle of alternative uses for NHS land and property.	1					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option	
<b>C1: Focusing town centre uses in our district centres</b>	Preferred Option - a) (Define the district centres as on the map) b) (Define local centres) and c) (sequential approach)	Support location for student accommodation	3	Uses in District and Local Centres should be protected, but market forces affecting areas also need to be considered. A positive proactive policy is encourage and not be overly prescriptive. Also note owing to the changes to UCO other measures are needed for policy to be effective.	3	Introduce a hub at Kassam/Science Park area to support housing in these areas also ensure Grenoble Road development is well linked to city and footpaths developed	2	Approach is set out in NPPF. No policy required.	3	b) Student accommodation should be allowed in district centres as within walking distance of some campuses and colleges. c) student accommodation should be excluded from sequential test	2
								Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.	4		
		Support PO	12	The concept of 15-minute neighbourhoods is supported. Housing development should not be excluded from local centres as it can help to enable facilities to be provided.	5						
		Support PO, particularly support 'c', which discourages out of town retail sites.	3	Need hubs o/s ring road, to help areas deprivation and limit travel in. Consider new centre around Kassam/Science Park to support area and GRoad development. Help the currently disparate areas work together. link hub with suburbs and into South with bus and tunnel/crossing	2						
		Support option (a)	6								
		<b>Historic England</b> acknowledge the contribution made by heritage to the character of a place and look forward to this contribution being acknowledged as appropriate in the emerging OLP regarding the city's district centres.		Should encourage better concentration of local facilities within 15 minute walk/ cycle and encourage shift to active travel.							
				Policy would be stronger if it identified gaps in provision at each centre and took measures such as rate relief to encourage take-up.	2						
		Support concentration of amenities in centres/ satellites to support 15 minute city principles. Town centres may need to be expanded to implement this.	3								
		Support the explicit support for all Use Class E classes, incl. offices in District Centres and a policy that sets out a sequential approach for new town centre uses.		Option A - would be beneficial for a cross reference to be made to Templars Square/ Cowley Centre site designation to link acceptable uses and reinforce 15 min city concept. Offices and R and D uses should be added to list of acceptable uses and mixed development should be allowed unless there are significant problems with them.	4	<b>CBRE on behalf of Redevco</b> - Do not consider there is a need for design guidance for Cowley Centre, which comprises Templar's Square, Templars Shopping Park and properties along Between Towns Rd. Templars Square likely to be only element that is redeveloped in the Plan period and is within one ownership.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
				Option A – General reduction in car parking required to achieve a 15 minute city. Hotels are traffic generation hubs and should not be located in district centres – more B&Bs should be provided to increase quality stays in Oxford.	1					
				Require any new development to include a master plan and a physical model in the community hub centre to enable more to comment.	1					
				Support Preferred Option but there should be some control of new retail that consists of souvenir shops selling unsustainably produced goods that detract from the quality of retail experience that a city like Oxford should be promoting.	1					
				Option b – Increase pedestrianisation and make cycle paths wide enough for cargo bikes	1					
				Option b – Other areas such as Wolvercote, Cutteslowe, Lye Valley, Risingshurst, Woodfarm, Littlemore, Donnington, New Hinksey and Marston need to be added to ensure that they have the facilities needed by local residents within a 15 minute walk.	3					
				Option c – Should contain more criteria to restrict duplication of the same type of facilities, e.g. Cowley Road has a considerable concentration of restaurants and takeaways.	1					
<b>C2: Active frontage</b>	<b>Preferred Option - a) (Designate frontages in city and district centres) and b) (set criteria for what is expected)</b>			A positive proactive policy is encourage and not be overly prescriptive. Also note owing to the changes to UCO other measures are needed for policy to be effective.	1	Do not restrict the conversion of empty commercial properties to housing.	4	Support Option D as not always possible to secure mortgages for properties above commercial units.		
		Support PO	16	More definitions are needed as to what is a community facility.			1	Support Option D - object to having active frontages policy. Should be left to the market or the local communities to determine.	7	
		<b>Historic England</b> broadly support the preferred option (and para 7.6) and would welcome reference to the contribution made by historic shop fronts to the character of a place or street.		Option A supported but clarification sought on what comprises 'a high proportion' of class E units at Ground floor in terms of active frontage, in light of various uses permitted in Class E. Clarification to also acknowledge inclusion of entrances to upper floors and fire escapes.				Support option c	1	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
				More control of frontage designs to present some sense of cohesion and integration (without a uniform approach) could enhance the attractiveness of the centres. The public realm and retail element of the city centre especially are of poor quality, especially given the city's heritage and tourist value.	3					
				Interesting window displays, planters etc. can add vibrancy and individuality to shop fronts.	1					
				Tradition view of 'active' frontages should be replaced with 'positive' frontages acknowledging that different types of frontages can have different impacts and functions dependent on location. Criteria for assessing impacts of development proposals should therefore be less prescriptive and on a site-specific basis.	1					
				Support use class E on ground floor in city and district centres. Residential on upper floors can help bring back vibrancy to centres. Force persistently empty units to be retrofitted for housing.	5					
				Should also be restrictions on advertising hoardings, especially where these do not promote vibrancy and footfall.	1					
				Support policies that lead to a mixed land use in centres, with fewer fast-food shops	2					
				Too interested in shops that will attract visitors rather than residents. Owners should be fined monthly and charged rates until they rent it out or sell it.	1					
C3: Protection and alteration of existing local community assets	<b>Preferred Option - a)</b> (Protect local community assets against loss) <b>and b)</b> (set out criteria for alteration and expansion)	Important that these assets are kept and developed for the mental wellbeing of everybody.	3			Could policies C3-C10 be merged into fewer policies?	1	Support Option C - houses, shops and restaurants are more needed than swimming pools or tennis courts.	3	
				Approach recognises importance of local community assets. These should be protected from loss.		The exceptions in option a are worrying. Possible for those who control a site to restrict use of it or make it less attractive so that fewer people use it, justifying its abolition on the basis that there is no need for it. Recent example is what has happened with the Blackbird Leys Community Centre.	1			
		Support PO	14	Link assets to transport	1	Who decides if there is no longer a need? Concerned that the Council is not equipped or resourced to challenge or vet viability assessments submitted by developers.	2			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
				Allotments, and other green informal areas and recreational spaces should be included as community assets in need of protection.	4					
		<b>Historic England</b> flag that there is a potential link between community assets and the OHAR i.e. protecting historic buildings as non-designated heritage assets.		Planning policies should actively support the strategic plans of local health commissioners and new health facilities to meet the needs of the population should be supported.  Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use. Policies within the Local Plan must support the principle of alternative uses for NHS land and property.	1	Reject the part of Option b) which suggests that units being 'lost to housing' is a problem. There are a lot of duplications of certain types of businesses such as restaurants, cafes and a lot of empty shops and homes in need of sustainable retrofits for housing.	1			
		Support (a) - resist their loss	15	Historic pubs should have specific protection for that sole use.	1					
				Look at assets on a case-by-case basis. Some assets such as the Hinksey swimming pool are well utilised and should be protected. Others such as the South Oxford bowling club are not used and could have a preferential alternative use such as a new park for children.	1					
				Some of the intended facilities will not fit into a 15 minute neighbourhood. What is the list of essential requirements of such a neighbourhood and has the use of space been modelled to check whether this is feasible?	1					
C4: Provision of new local community assets	<b>Preferred Option - a)</b> (General support for provision of new local community assets) <b>and b)</b> (seek community use agreements)			support active travel by ensuring cycle maintenance/ repair facilities are within range of all communities in city.				academy trusts may not be set up to have community uses on their facilities.		
		Support PO	19	General support for new local community assets in the city. They should be accessible by private vehicles as well as not all residents can walk or cycle. The presence of community assets can support positive health and wellbeing benefits.	2	Should still be able to use the other assets and not just those in each area. People don't just live in their 15 minute walking area, they live in Oxford and enjoy all of Oxford's communities. Some things are too niche to have access to them in every local area – not all sports can be played in all places etc.	1	Prefer option c – do not have a policy	4	
		Prefer option a	6	Support (a), but needs additional text to cover those areas outside 15 min neighbourhood area, such as Wolvercote. In areas within a 15 min neighbourhood area, where new development provides a community asset then financial contribution should be sought to subsidise an asset in area nearby but outside 15 min area.	4					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
		Prefer option b	2	Policy needs to be more specific. For example, with planned intensification in the West of the City, reserving areas for such provision is needed along with mechanisms to ensure they are delivered.	2					
				Where community assets are to be provided in mixed use schemes through private sector development, it is essential that the Council clearly articulates the assets required and the priorities and balance of other uses, or the community elements will be crowded out because of development pressures.	1					
C5: Protection and alteration of existing learning and non-residential institutions	Preferred Option - a) (protect existing learning and non-residential institutions against loss) and b) (set out criteria for alternation and expansion)	Support PO:	13	PO a & B - is it intended to include or exclude C2 institutions?	1	Criteria supporting the loss of such facilities to facilitate investment elsewhere should be included.	1	Refer to national legislation about the disposal of school playing fields - see County comments for process	1	
		Historic England broadly support the preferred option, subject to suitable consideration of the historic environment.		Resist loss of existing facilities in particular there is a need to protect libraries	5	Don't make kids only go to school in the 15 min zones - you will segregate them too much and cause animosity	1			
				There are already enough places of worship. Protect other community facilities.	4	To preserve the workforce in state schools close to the city, need to ensure that teachers (the majority of whom cannot afford to live close to their workplaces and who would find commuting by public transport impractical) can continue to commute by car. Otherwise the viability and desirability of working at such institutions long-term will decline.	1			
				Don't abandon churches. Should be recognised that places of worship, in an increasingly mixed ethnic city, provide a vital function for the preservation of national cultures but also a function for the meeting of cultures and the building of cross-cultural understanding, not least through their social outreach.  In addition, the different religious congregations, such as those on Hollow Way and at the Cowley Road end of Magdalen Road collectively manage the use of these locations well. The dispersal of religious meeting places is good for encouraging low levels of private car use, and should be maintained.	4					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option	
	<b>c) considered detrimental</b>	Support (a)	1	Prefer option a) but should be applied selectively. Oxford can afford to lose a number of minor tutorial colleges and to constrain the growth of educational newcomers who are here only to use the Oxford brand; but its major libraries, places of worship, schools and universities should be protected.	7			Is a protective policy needed?	7	Option c would result in the loss of further institutions to the detriment of the area.	1
				Multi-use demands of libraries are managed effectively and carefully with all stakeholders to ensure the long-term viability of these institutions which provide an important service to the local communities they serve.	1						
C6: Provision of new learning and non-residential institution	<b>Preferred Option - a)</b> (Criteria-based policy for assessing suitability of proposals)			Policies specific to H Edu should be in Chapter 3 as the universities key in supporting the learning, knowledge and economy of the city	1	Combine with C5?	2	Support option b – do not have a policy	4	NB although no new schools proposed if there were new school land would be transferred to county. community use of school sites is decided by the trusts or government body	
				This policy should be more positive e to welcome this and there should be a policy expressing support for the knowledge economy.	1	New private institutions should be discouraged as they increase the housing crisis. Expansion must be matched by accommodation provision.	2			Option a is not necessary	1
		Support PO	10	Policy needs to contain strict criteria to assess the suitability of proposals in order to protect the integrity of Oxford as place of learning. In the past there have been instances of dubious institutions setting up in the city. Development of new private or fee-paying schools should be severely limited - the policy should encourage schools for the local community.	6	No more language schools	1				
				When schools are required to increase their capacity, first preference should require them to make use of their existing space, including taller buildings.	2	Don't make children only go to school in the 15 min zones - you will segregate them too much and cause animosity.	1				
				Planning policies should actively support the strategic plans of local health commissioners, and new health facilities to meet the needs of the population should be supported.	1						
				Build houses on school land as commercial support	1						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option	
C7: Protecting cultural, social and visitor attractions	Preferred Option - a) Criteria-based policy that protects existing venues	Support PO particularly to include live music venues and pubs	17	You can't force owners to keep loss-making enterprises going, unless the Council is going to subsidise them. This option should be mentioned in the policy.	1			Support option b – do not have a policy	3	Do not support option a	1
		Historic England acknowledge that such venues are frequently heritage assets, and in such cases often forms part of what makes them attractive destinations.		Sounds fine but central Oxford cultural sites are already largely inaccessible from outside the ring road due to high costs and limited provision of transport and parking.	1						
				Suggested additional policies: to prevent loss/size reduction of community spaces; and ensuring users of community spaces are properly consulted when considering new development.	1						
				Highlight the racism of some of these attractions - show the full history	1						
				Protect small, local, independent shops too. These used to form a great part of Oxford's attraction, sadly now mostly gone.	1						
				Playing fields are culturally important to families and children	1						
	Para 7.10			Mentions attracting "visitors from within the city and tourists", as though these are binary alternatives. Oxford's venues and its cultural and social activities have an attraction and a role for many people from the wider county of Oxfordshire and beyond, often on a fairly frequent basis. They could attract many who do not yet use those opportunities.	1						
C8: Provision of new cultural, social and visitor attraction	Preferred Option - a) Criteria-based policy that assesses suitability of proposals			A distinction need in policy between PB facilities which service public and opposed to facilities which have a main function and serving public is incidental.	1	Combine with C7?	2	Support alternative option c – do not allow new cultural, social or visitor attractions	1	Alternative option b – allow only in city and district. Unsure what this is designed to do. There seems to be conflict between the 15-minute neighbourhood model and attractions in the city centre.	2
		Support PO	20	Provide a criteria-based policy to assess the suitability of proposals, which looks at accessibility, environmental and transport impacts to determine the acceptability of proposals for these uses.				Support alternative option d – do not have a policy. Too many restrictions are harmful and stifles grassroots innovation	4	Disagree with option c	1

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option	
		<b>Historic England</b> advise ensuring that that the historic environment is considered under environmental impacts.		New cultural, social and visitor attractions should be encouraged everywhere, particularly live music venues.	2					Disagree with option d	1
				New tourist facilities should be considered separately from those which benefit residents more (though of course some may be both).	1						
				New attractions should not be developed on greenfield sites or provide additional car parking. There should be a preference for taller structures where new build or sustainable refurbishment is being contemplated.	1						
				There are potential risks of "conflict with Oxford's historic assets" as indicated in Option a. What is provided in the city centre should not undermine the general ambience of the city or the pleasure of enjoying its existing spaces and facilities.	1						
				Need for a clear definition of what is a visitor attraction and what the criteria were to be in the policy. An example is Jericho Canalside. If this is successfully developed, it will attract a lot of visitors - even though visitor attraction is not the specific objective of any element on site.	2						
C9: Pubs	<b>Preferred Option - a)</b> (Criteria-based policy to protect pubs)	Support PO	26	Too many pubs have been lost. They are an integral part of any community and some no longer have one. Some of these are historic buildings and the businesses in them need support. Part of the issue is high rent charges so need to ensure this is affordable so businesses survive and the risk of losing the unique characteristics of local businesses is decreased.  Should be more opportunities for these establishments to become community owned, supported by local policy.	23	Alcohol encourages antisocial behaviour, and does not benefit society. The concept of the pub is culturally important but in social terms, cafes have become the equivalent of the pubs of the past and this is to be welcomed in health terms.	3	Support option B - option A lists requirements that are too onerous	2		
				Support PO: but need to ensure evidence of marketing is sufficiently stringent, to ensure owners do not allow property to get into a state of disrepair in order to develop it for a more profitable use. Council should adopt CAMRA's model planning policy, including Public House Viability Test.	1	The council cannot protect pubs as they have to be commercially viable to survive.  If pubs are to survive, it will be by adaptation into good restaurants combined with a degree of 'cafe culture' in how they present themselves to the community.	5	Already covered by Policy Option C7	1		
				Should consider car park as part of viability assessment	1	Should be left for local communities to determine how best to support Pubs in their community.	1	Alternative option c – do not have a policy. Pubs are less important within the landscape of community facilities than they used to be and are also less suitable to community needs than they once were held to be.	5		
			1	What is most necessary is the protection of medium sized rooms for hire within the 'pub' type building but independent of the main bars in terms of space and for hire.	1	Too many pubs. Should be used for other things such as housing.	1	Alternative option c – most pubs are mediocre and shouldn't be protected. Excellent pubs don't need protection because they succeed.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
				Historic England support the preferred option and suggest the text also refers to [heritage] significance.						
C10: Transport assessments, travel plans and servicing and delivery plans	Preferred Option - a) (Require transport assessments and travel plans to review transport impacts) and b) (Require transport assessments to also include servicing and delivery plans, where relevant)			Unclear what are 'significant transport implications' are. Policy approach needs to align with NPPF.		Option repeats NPPF and Validation Checklist	2	Support Option C - No policy required as TAs, TPs and servicing and delivery plans can call be validation requirements or can be conditioned on permissions.	7	Object to Option C as would not allow potential impacts on SRN to be determined resulting in safety and operational impacts.
		Support PO	23	Refer to the Decide and Provide approach to TAs NB significant can be low trip generation in highly sensitive area	1	Processing all of these assessments and criteria is bureaucratic. Who pays for this?	1			
				Needs to be strict restrictions on the movement and timing of deliveries by heavy lorries and delivery vehicles within the city centre.  Also needs to be monitoring and feedback for policy to be effective.	18	Proposals are wholly inadequate. Should be recognised that private vehicle transport is indispensable. Policy should ensure that private vehicles do not pollute, are small (i.e. no SUVs etc.), and that the entire city is accessible. Here, there should be no separation between vehicles and pedestrians, the latter with priority at all times and traffic reduced to walking pace along the Dutch Woonerf principles.	1			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement of an alt or rejected option
		Support Option a	5	TAs, TPs and DSPs should be reviewed carefully by planners. Wide range of quality in these documents. Often include incomplete/ out-of-date traffic counts, over-optimistic walking times. These documents should also contain a section on key risks to active travellers which gives consideration to the safety and attractiveness of proposed routes.		Mitigation is not enough, there has to be full offset or removal.	1			
				Should be required for all developments, although proportional for smaller schemes. Should consider how a development generally fits into the city's transport system and not just focus on mitigating negative impacts.	6	Support options A & B as this would allow the impact on the SRN to be evaluated. Expand option B to include edge of town commercial/industrial land use could limit the impact on peak travel on SRN				
		Support Option b	4	Plan needs a stronger emphasis on connectivity	2					
				Alterations to travel flows and restrictions to road use should not be imposed on local communities.  The fixation on local emissions needs to be replaced by thinking more about how Oxford as a city might be more environmentally responsible. Instead of concentrating on locally driven cars, it should be considered how much heavy industry the city relies upon.	4					
				Have an assessment which leads to a flexible, reliable and city wide transport system and not one which requires a half mile walk across town to change buses. At the moment the transport system suits the providers not the users.	1					
				Transport assessments have to be more meaningful. Not like a recent example in Old Marston which referred to a 10 minute walk to a bus stop which is (only) serviced hourly. Should be more protection for local bus routes.	2					
				Ensure the plans allow for rapid technological and behavioural change in the future, not just the current situation. E.g. deliveries to houses replacing shopping, local collection points, bicycle and scooter couriers.	1					

## 5.8 Sites Allocation Policy Options

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Introduction & Infrastructure Needs	8.1	OULD supports existing allocations of 2036 Plan and wishes to discuss each site to ensure most efficient use of land, reference to housing nu should be removed		City council must work with Integrated Care system to ensure primary care facilities are provided across the city. Water and sewerage infrastructure needs to be properly considered city wide and planned for also need to ensure that public transport is supported the serve the needs the whole of the city- need routes that get people to places of work, BMW, hospitals as suggested in the local connectivity plan.		Littlemore PC looks forward to working with the City Council to improve infrastructure provision for residents			
				Infrastructure section does not include any infrastructure projects. Suggest infrastructure projects are included in this section, especially active travel measures.		There will be more floods in the future and so must be invested in water treatment works. Boundary Brook could be restored to a natural river to manage an increase water absorption			
	8.1 & 8.3			<b>Historic England</b> suggest reference is made to minerals and waste planning policy.					
Introduction & Infrastructure Needs	Fig 8.1	NB - refer to county reps which lists which sites they consider that should be car free.		Support addendum to IDP however it needs to be considered within viability assessment and within the context of the level of employment and residential development, the sites chosen and what is essential.	5	Before any unmet need is met from neighbouring dc the deficit of infrastructure delivery must be addressed and delivered	2		
				Divisions in IDP are useful but there are also likely to be Oxford-wide issues that require a joined up approach. Consider using 15 minute city zones	4	East Oxford, Littlemore and BBL should be considered as a whole rather than piecemeal	1		
				Infrastructure also needed outside of Oxford's boundary to facilitate development within Oxford. A wider and joined up approach is required. Include more crossing for cycle and pedestrian over A40	2	Littlemore needs more attention, an area with deprivation that needs input.			
				<b>Natural England</b> flag that in accordance with NPPF the plan should allocate land with the least environmental or amenity value - sufficient evidence needs to be provided through SA/HRA to justify site selection. <u>They note that a number of site allocations are within close proximity to designated sites.</u> Allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. <u>Sites which would result in unavoidable impacts and/or where mitigation cannot be secured, should not be pursued.</u>		Infrastructure plan needs complete change of economic model.			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				<p>Thames Water make various comments in relation to water supply/wastewater infrastructure - see comments against S3, R6 and R8. Also, <u>highlight that they are concerned that the water and sewerage network in this area may be unable to support the demand anticipated from the developments. We therefore would seek for as early engagement as possible with the Local Planning Authority to ensure that there is adequate water and wastewater infrastructure to serve all new developments.</u> They do not reserve network or treatment capacity for specific development sites. A consideration to the potential impact on water and wastewater infrastructure should be included when promoting a development and provision for upgrades should be made, where required</p>					
	207			<p>Consider more sites will be required to meet Oxford's unmet need from the surrounding districts. Need to keep working with surrounding districts to bring forward additional sites and supporting infrastructure.</p>	2			<p>Overall housing and employment need should be defined before pushing into surrounding districts. Existing OLP2036 allocations should be maintained and reviewed to see if they can accom. additional development</p>	2
				<p>New developments should be future proofed for future innovations and look for potential freight consolidation centres, need to consider how the grid will be decarbonised.</p>	2				
				<p>PO document does not identify which sites are new and which are already extant allocations in the 2036 Plan. No indication of quantum of development suitable on suggested sites. New sites have been added but it is not clear how these will contribute to the housing numbers etc.</p>					
	207- para 8.5			<p>I regret that in Para. 8.5. "Whilst each of the neighbouring authorities will be responsible for the delivery of these sites, the City Council retains a strong interest in seeing them developed in a sustainable manner. In infrastructure terms, this means that they should be well connected into existing networks and reflect Oxford's particular approach to transport provision, with a strong emphasis on the need for dedicated pedestrian and cycle provision in addition to an effective public transport system offering residents a realistic alternative to the private car", you show no recognition that there are many other aspects to consider when the City impacts on neighbouring authorities. It is not only the sites themselves which should be sustainable; the impact on environment, wildlife corridors, specially recognised sites, the health and well being of your own Sandhills community (and those in Barton who make use of and benefit from that area of prime countryside) should equally be listed as matters of concern.</p>					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
	Fig 8-3			<p><b>Historic England</b> flag that whilst the LP's approach to the location of unmet need housing sites within adjacent Oxfordshire local authorities will have limited weight, a number of sites have the potential to impact on designated/undesigned heritage assets, which needs to inform the consideration of and approach to these potential allocations. They note following allocations in particular: a) land east of Oxford and potential impact on the significance of St Frideswides Farmhouse (GI*) b) land south of Grenoble Road, and its potential impact on the setting of a Scheduled Monument c) land at Northfield and its potential impact on the significance of a cluster of designated heritage assets associated with Wick Farm d) land within the Oxford and Abingdon Fringe area of search and its potential impact on the significance of Marcham Conservation Area and designated heritage assets e) land west of Eynsham and its potential impact on the significance of Scheduled Monuments.</p>					
				<p><b>Historic England</b> also make two general comments about the approach to site allocations: firstly, they note within the HELAA appendices, a 'rather artificial delineation' between policy constraints and physical / environmental constraints, which should be avoided, as significant elements of what are currently listed as policy constraints are often also environmental constraints. Secondly, the current LP 2036 currently deals with heritage considerations within the supporting text of policies - whilst this may be appropriate in some cases, in others, the relevant concerns should be put into main policy text, or else risk of insufficient weight being given to the conservation and enhancement of designated heritage assets, particularly those that are highly graded. They've flagged against the relevant policy options in this consultation where they are looking for specific policy text to address the heritage considerations on a proposed development. For archaeology specifically, they would prefer to see text in policy where there is high potential for archaeological remains and/or the evidence base suggests a particular policy approach is required.</p>					
Areas of Focus	8.7-8.8			Site should be more loosely allocated for "residential" rather than specifying key worker or student accommodation.		The Aof F could be too narrow a focus on specific area and need to consider all sites if Oxford is to meet its housing requirement.			
				Existing OLP2036 housing allocations should not be removed from the plan.		Aof F should be aligned to 15/20 minute neighbourhoods, unclear as to the boundaries as it could imply whole area becomes a policy	1		
				Where sites can tolerate additional homes, this should be set out in the updated allocation		The Plan is unclear about Aof F - it cannot allocate sites beyond its boundaries. The city has not discussed taking any unmet need with SODC. There has been no attempt to properly justify exceptional circumstances for higher growth. We must discuss these issues. SODC/VWHDC	2		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				Consented schemes should be updated accordingly.					
				<b>Environment Agency</b> flag that at present it is unclear, but appears as if a number of sites (particularly in the South and Central/West areas) are at risk of flooding. This should be explored in new SFRA and Local Plan would be unsound without this. A sequential test should be undertaken at earliest possible stage as well as exception test if necessary - this should be followed up with Level 2 SFRA where necessary. Agree with para 8.6 statement about sequential approach to site layout. Flag that Council should demonstrate that it has avoided allocating land for inappropriate development within its flood zone. Also the south and central/west areas include the route of OFAS which should be acknowledged in context of these areas.					
				<b>Environment Agency</b> agree with area of focus approach which might prove simpler in due course to work on several sites concurrently in relation to ground contamination. They flag that they have been unable to provide specific comments on sites due to lack of national grid references but that if this is provided they can provide more detailed assessment with regards to sensitive groundwater sites - without more detailed consideration of constraints and ground water protection they would find the Local Plan unsound. Also info on sites is not currently sufficient to make assessment of suitability of sites regarding how they will sustainably discharge wastewater and access water resources. Would like to see a Water Cycle Study or Water Quality Assessment to assess the impacts of the development on local STWs and have concerns about Oxford and Cassington STWs already. Any impacts of development on the bathing water should also be assessed. Would be able to help with Water Cycle Study/Water Quality Assessment. Any issues identified should be appropriately mitigated before development is approved.					
				<b>Environment Agency</b> also have comments in relation to biodiversity/ecology on sites, but cannot give specific information until they better understand detailed site boundaries and NGR information.					
<b>North Area Northern Edge of Oxford Area of Focus (AOF)</b> OUP Sports Ground HELAA #49 Jordan Hill Business Park #512 Frideswide Farm #107 Oxford North (formerly Northern Gateway) #001	A - Preferred Option - Designate AOF with its own SA policy	<b>Natural England</b> support the proposed Northern Edge AOF designation and would welcome further detail as to the key development principles to be included in policy for the area to protect Port Meadow SSSI & Oxford Meadows SAC. No comments on proposed sites.		Figures for each AOC should also include all development on the edge but outside of City boundary.	2	Strongly oppose any further development in this area, new housing would be used by commuters to London and will do very little to meet Oxford's unmet need		Support Option C	1



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Pear Tree Farm #590									
		Support inclusion of Pear Tree Farm within the North Area of Focus. Eventual allocation Policy should allow for employment and residential development		With reference to IDP for this area, a large proportion already has pp that fixes infrastructure, IDP can only seek new elements via new app's that come forward.		Increased traffic impact	3	Support Option D	5
		Support 'preferred option' approach of designating the wider area surrounding Pear Tree services as an Area of Focus and giving this area its own strategic policies. Consider that Red Barn Farm should have its own policy allocation	2	County - refer to our previous comments on site policies for 2036 Plan		This policy option set presupposes that North Oxford should be further developed, which implies further incursion into the green belt. There has been too much development in the Northern Edge already, and future development should be focused on brownfield sites and increased density in the Oxford core area.	4	Support Option E	5
		Agree with preferred option - but there should be proper, grade separated cycle infrastructure installed for any large development outside the ring road.	3	<b>Historic England</b> (on basis of combining options a and b) do not think it is appropriate to list 'Wolvercote NP' as a key principle. Needs to better articulate what is meant; for example, linked with the protection of local distinctiveness in the area and with reference to Wolvercote NP. Also, do not support the over-simplistic conclusion in the SA that the area has 'limited local character' as evidenced by the relevant Conservation Area Appraisal. Consider that Oxford North needs its own policy to articulate how proposals will enhance the Wolvercote conservation area and any designated and non-designated heritage assets that would be impacted by the development.		Bike lane needed on both sides of Woodstock Road		Focus is already Summertown. No more foci required.	
		Support Option A	7	TWO and ONV recommend that Northern Gateway is included as a specific policy in the LP2040. Failure to do this would result in no specific allocation policy to deliver those aspirations beyond the extant planning application, which only relates to part of the wider Northern Gateway allocation.		Oxford has permitted overdevelopment without adequate thought about communities or transport. Other towns in Oxfordshire should take some of this burden.		Respect the Green Belt and similar areas, and do not join Kidlington to Oxford.	
		Support Option B	7	Necessary to review each existing allocation to see if it can accommodate additional development		Developments at Northern edge have not been handled well so far e.g. no decent cycle track to Parkway Station, destruction of golf course etc.		This is too little, too late. The area is already devastated and Wolvercote will be a shrinking island overshadowed by an overpowering and polluting development. The local plan has been quite ignored in the interests of profit.	
				OUS - we are not convinced all these sites are strategic a more coherent grouping should be established sites 49, 512 and 107 relate but linked to sites in CDC as opposed to 1 and 590		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines		Improve transport especially A40 and put in a rail link to Witney.	



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						What about public transport?			
						No development outside the ring road should be allowed unless and until high-quality grade-separated active travel connectivity across the ring road towards the centre is provided.			
						Less business allocation, more housing. Green space/habitat			
						There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.			
						The only permitted development should be on brownfield sites.			
						Oh yes! There will be a tremendous impact on roads into and out of the city under pressure from additional houses. It is unlikely that people will cycle anywhere from the North since the traffic load already putting pressure on the area will discourage this.			
						We do not need more businesses to add further pressure.			
						Mosaics development should not have been permitted and should not be a precedent for further destruction of valuable green field green belt land. Destruction of natural habitat. Polluted with fumes from northern bypass.			
						Nothing should be allocated until sufficient Infrastructure is in place			
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
						<p>As a general position, the <b>Woodland Trust</b> objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland.</p>					
						<p>These proposals will result in a very built-up area in N. Oxford. The cumulative effect would result in urban sprawl between Oxford and Kidlington potentially from Shipton to South Abingdon. It would change the character of the area &amp; undermine policies to protect nature corridors. Some of the allocations around Yarnton &amp; Begbroke appear to be meeting the needs of the University of Oxford rather than city's need. The allocations will result in loss of Kidlington Gap, which would be further threatened by proposed Green Belt Review. Concerned about wording which considers outdoor recreation not inappropriate appears to offer potential support for new Kassam Stadium.</p>	1				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						a) rail line re-opening Witney-Oxford, and then to Carterton with exploration of options for further extension to help reduce traffic within West Oxfordshire; b) Electronic Road Pricing to be applied to the A40 and alternative routes servicing Oxford to create downward pressure on car movements permanently; c) substantial upgrades for cycle tracks including colour marking and width large enough for cargo and e-cargo bikes; d) look at options for bus lanes, use ERP funds for electric buses and ensure bus lanes, advance stop areas for bicycles and more pedestrian crossings in current high traffic areas are all implemented.			
Oxford North (formerly Northern Gateway) (HELAA #1)				<b>Historic England</b> don't object to allocation, but note that the boundary appears to have (slightly) changed and that the site assessment states that 'Design sensitivity may be required for the part of site which is within the Wolvercote CA'. Feel this is too weak and is likely to have minimal impact. Mindful of the duty for special attention to be paid to the desirability of preserving or enhancing the character or appearance of that area, state that the supporting text in the OLP should refer to the need to enhance the conservation area.					
	Fig 6.4			Plan in Fig 6.4 is inaccurate as indeed is Fig 1.2	1				
<b>North Area Sites Outside AOF</b>				Review each of these allocations to see if could deliver more development	1				
Summertown House HELAA #580	A - Allocate for grad. student accommodation			<b>Historic England</b> do not object to allocation, but look for a commitment in policy to retain the Listed Building and protect its setting. Also, note that the adopted OLP2036 has included for archaeological interest at this site; however, the site assessment does not pick this up.					
Diamond Place HELAA # 18	A - Allocate for mixed use			DP has potential to deliver more by increasing height of development		No opportunity to comment on key sites, such as Diamond Place.	1		
				<b>Historic England</b> do not object to the allocation; however, note that the site assessment identifies high potential for archaeological interest as the site is adjacent to cropmarks of likely prehistoric or Roman date and that the site lies adjacent to some Listed Buildings, Diamond Cottages. Noting this information, they challenge the site assessment's conclusion that there are no environmental constraints associated with this site. This needs to be resolved in the final plan to acknowledge the heritage interests of this site more accurately and ensure that they are afforded suitable protection.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
Wychwood Tennis Courts HELAA # 623	A - Allocated for residential			<b>Historic England</b> do not object to the allocation of this site; however, supporting text needs to articulate clearly the need to enhance the conservation area adjacent.							
	8.1	Support reopening of CBL need to provide supporting infrastructure in terms of car and bike facilities and a third station.		Do not consider that Cowley Branch Line is a viable and deliverable project. Services likely after 2028. Bus service is more affordable. Inappropriate to use this scheme as planning the location of development without much greater certainty as to its delivery.							
<b>South Area Cowley Branch Line, Littlemore and The Leys AOF</b> Kassam Stadium and Ozone Leisure Complex #28a Overflow Car Park as Kassam Stadium SITE #28b Oxford Science Park #588 Oxford Business Park #587 Mini Plan Oxford #497 Sandy Lane Rec. Ground #289 Oxford Stadium #111	A - Preferred Option -	<b>Natural England</b> support the proposed Cowley Branch Line, Littlemore and the Leys AOF designation and would welcome further details as to the key development principles to be included in policy for the area. We would anticipate this may include details on the proposed protected green infrastructure network and the application of a specific UGF for this particular area given the current baseline position.		Why does this area exclude Unipart and sites 401 and 604 - should be included. Need clear site boundaries check for errors.		Too much focus on CBL which is unlikely to happen without public finances. The project was proposed by NIC before any realistic appraisal of its feasibility by NR. Whilst it could be explored it is an inappropriate bases of which to plan the location of development without much greater certainty as to its delivery	5	Support Option C	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		<p>Railfuture Thames Valley strongly supports the re-opening of the Cowley branch line to passenger services, with the two new stations as proposed, and given the advance planning already undertaken by Network Rail, works should be brought forward to commence as soon as reasonably practical so that the line can open as soon as possible after the completion of the next phase of Oxford Station redevelopment which will bring into use the necessary 5th platform.</p> <p>This scheme will greatly improve social inclusion in east Oxford, including some of the most deprived parts of the city, as well as the wider catchment area for the new stations, with much better connectivity for employment, education, health, leisure and other reasons. The journey time to central Oxford will be much reduced compared to by bus and it will relieve congestion on the busy main roads in east Oxford.</p> <p>We consider the city should be open minded as to the destinations of the trains serving the Cowley line; Chiltern Railways have in the past shown interest in running the service by extending their Marylebone-Oxford trains but other options should be considered such as Milton Keynes, via EWR or Hanborough for a cross-city "metro" style service with investment in the Cotswold line &amp; Hanborough station. All these or perhaps other options should be borne in mind.</p>		Concerned that the Cowley Branch Line won't be delivered within plan timeframe. As such is it sensible to make policies that relate to it. Lots of development coming forward in the South Area of Focus seems to rely on CBL. Concerned of transport impacts if CBL not delivered within plan period.		Do not allocate any greenfield site to housing		Support Option D	1
		Support allocation of Oxford Stadium for mixed-use leisure / recreation and residential use, subject to consultation with local residents & users of leisure facilities. Welcome no mention of Greyhound use.	1	Consider that 'contextual analysis' should include and acknowledge regional, national and international attraction of R&D companies. Allied to this, a key principle should be to support the needs of businesses located there.		Both the business park and science park have available plots. Question why employment land is left undeveloped when there is a shortage of land for housing.		Support Option E	1
		<b>Savills on behalf of Cowley Investments Ltd</b> supports principle of identification of AOF and also Ox. Stadium as a specific development site. PO also supported in principle. The detailed site development guidance under 'B' must reflect the guidance in OLP2036 SP51, particularly reference to enabling residential development not impacting on operation of stadium and also opp. for resi led dev if Speedway and Greyhound racing become unviable.		<b>Historic England</b> note that something may be wrong with Figure 8-5. Sites allocated in AOF not shown in figure, and other sites inc which seem not to be part of AOF in accompanying text (see submission). Feel that for high-level principles, text needs to pick up the contribution made by the AOF's historic environment; for example, wording such as "Enhance Temple Cowley and Littlemore conservation areas and protect the area's archaeological remains and the significance of its designated and non-designated heritage assets". Support PO A in combination with B.		It is disingenuous to present this as a viable and deliverable project. The Network Rail report on the Oxford Rail Corridor implies that the only interested passenger rail operator for this line, Chiltern Railways (aka Deutsche Bahn) would consider running a passenger service to Cowley, after 2028, only if enough commuter passengers from the proposed new Cowley stations bought 'through return tickets' to London (i.e. not local commuting). The public bus service from Cowley to Oxford Station will always cost much less than using a passenger railway to carry workers into that part of Oxford, and long-distance commuting is now contra to local and national policy. This project was proposed by the National Infrastructure Commission before any realistic appraisal of its feasibility was undertaken by Network Rail.			
		Support option A	11	Should be a good bus services around the ring road. linking all these areas to the hospitals at least. Also should be affordable housing around these employment hubs to minimise travel.	1	Whilst further exploration of this scheme is desirable, it is inappropriate to use it as a basis for planning the location of development without much greater certainty as to its delivery.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		We support the re-opening of the Cowley branch line to passenger use. We support a north-east re-opening of the line to allow it to connect to the existing rail line near Wheatley as part of reducing traffic heading for the utterly appalling Green Road roundabout, Windmill Road-Old Road junction and the non-roundabout roundabout sloppily permitted at the Corner House at the top of Hollow Way. Please note a traffic filter on Hollow Way, which we support, will cause more traffic to move to and from the Slade and Horspath Driftway, making vehicle and traffic movements north on Hollow Way more problematic than they are already.		Agree partly with preferred option, but there needs to be stringent attention to impacts on noise for residents near the line, and who would be affected by increased rail traffic. This was not done by Network Rail in past developments in the North of Oxford, and they reneged on their noise abatement commitments (e.g. backing out of installing Silent Track, and settling on inadequate noise barriers).		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.	2		
		Given current and planned developments on the East side of Oxford, the reopening of the Cowley Branch Line would greatly enhance connectivity and in accordance with the County's transport plans, reduce vehicular traffic.	3	<b>BMW</b> support Preferred Options A and B. BMW have no objection to the Preferred Option of safeguarding land to enable the future expansion of the Cowley branch line. However, should the expansion be achieved, it would be essential that this should not in any way disadvantage the existing rail freight users, including BMW, who rely on the Cowley branch line to transport finished cars from their site to UK ports for export.		Spindleberry park is the wrong message for younger generations who do not have a say on future ecological concerns			
		Safeguard land for Cowley Branch Line proposed stations and access, improved connectivity for the area and between areas		Mini Plant Oxford (HELAA 497) could have houses built over the car park. Building houses over car parks seems to have been ignored.		Thomson Terrace Allotment, Rose Hill is a valuable community asset and should be included as a full viable green space within the Oxford plan. I understand the land is only rented by OCC but long term agreement or buy out should be pursued to assure long term use of the space. The land itself has very restricted site access due to the limiting road access to the south.			
		Putting Cowley on the GB railway map will boost east Oxford's economy and benefit the whole city. Local bus routes (such as to the hospitals, Headington and settlements in south Oxfordshire) should connect to the service with a rail/bus interchange hub.		If the council is going to build houses near to the Cowley Branch line stations, please ensure they are medium density. The sites will all have great transport infrastructure and therefore are great plots to build a large number of flats		You are inviting generic comments on site selection via these questions but appear to have already shortlisted sites. Why is comment on individual sites not being invited?			
				This should come with improvements to the ring road cycle path (which is currently fractured going through Littlemore)		Cowley branch line protection is good, as is better cycle and walking routes to the station. But it doesn't say anything about the level crossing between Spring Lane and the cycle and walking path to Kassam stadium, which will need to be upgraded to reduce car traffic to the new houses off Knights Road.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
				Just improve the bus services by removing all the traffic filters.		Goals of increasing public access to green spaces, protecting wildlife corridors and enhancing existing tree cover don't have any concrete actions. Instead list areas covered by new housing. As a background paper states, every development will need a 10% biodiversity net gain. This is possible in the Leys, but not in the 2040 option documents. It would need, e.g. wildlife corridors crossing Grenoble Road, linking Northfield Brook to the forest area in Sandford.					
				Wildlife corridors -can you say that the residents really understand what these are and what purpose they serve?		Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					
						What wildlife corridors would you have in mind? Railway banks can be good habitats in themselves, but a wildlife corridor must lead to other areas of the same kind or it is a corridor to nowhere. Would this line be purely local? Would you put a ban on using the line for travel to other destinations such as London, and, if not, how do you avoid making the area a dormitory site for long-distance commuters? 'Improved connectivity' of this sort would have detrimental results from other perspectives.					
						Yes, any development should give due regard to the natural environment, but that is not what you are asking.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
	B - Preferred Option - Include detailed site development policies for sites listed.	<b>JLL on behalf of Firoka Group</b> support inclusion of the <u>Ozone Leisure Complex together with the Kassam Stadium site for redevelopment</u> . Recognition of the potential for 'redevelopment of the Ozone Leisure Complex within Use Class E' is specifically supported as it is clear that the Ozone Leisure Park's location immediately adjoining the Oxford Science Park provides an excellent opportunity to provide additional office, light industrial and life sciences uses. Significant provision of Class E employment uses in this location would enable existing life sciences hub to be enlarged beyond the limitation of the Oxford Science Park and would also reduce pressure on development of green belt land in order to meet the huge need fro this form of development in and around Oxford.		JLL on behalf of the Firoka Group - welcome the proposed allocation of the Kassam Stadium, Ozone Leisure Complex and the Overflow car park to deliver mixed use development incl. housing, the 'detailed site development guidance' should allow for detailed consideration of the balance of non- resi and resi development in the car park and stadium land through a masterplanning approach, with the distribution of uses also to be informed by an updated SFRA.		<b>JLL on behalf of Firoka Group</b> - Support expressed in principle for the proposed allocation of the <u>Overflow Car Park at Kassam Stadium Site</u> but <b>object</b> to this site being identified to specifically comprise a residential allocation, as this upfront requirement is not adequately justified and thus is likely to be to the detriment of proper masterplanning of both HELAA #28a and HELAA #28b to optimise mixed-use development across both sites. Concern that containing employment development to the existing confines of the Ozone Leisure Park and specifically defining HELAA #28b as a residential allocation appears arbitrary and contrary to the principles of good planning, with no clear rationale as to why employment development should not extend northwards of the Littlefield Brook and onto the overflow car park. Dwelling houses constitute a land use more vulnerable to flooding impacts according to Annex 3 of the NPPF, whereas employment uses are classed as less vulnerable. Despite a significant area of the Overflow Car Park being within FZ3 the proposed residential allocation favours development of 'more vulnerable' dwellings houses rather than 'less vulnerable' Class E use' - despite the Kassam Stadium and car park to the South being within FZ1 and not subject to any significant flood risk. The proposed allocation of the overflow car park for resi development appears to run contrary to the approach of Para 159 of the NPPF. Although a SFRA was published by the City Council in 2017..... this clearly led to the clarification that 'more vulnerable development will be expected to be directed away from FZ3b'. The OLP2040 PO Flooding and Drainage BP recognises that an update of this assessment is needed, ahead of the update being provided, there is no apparent justification for development of 'more vulnerable dwelling houses as opposed to less vulnerable class E use on the overflow car park.			
		Support Option B	8			We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children.			
						Some things are too niche to have access to them in every local are - not all sports can be played in all places etc.			
						Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland.</p>			
						CT PG should not be deallocated.			
	Kassam Stadium and surrounding area HELAA (#28)			<b>Historic England</b> do not object to this allocation; however, adopted OLP2036 notes archaeological interest, but no mention of archaeological interest in the site assessment making it inadequate/incomplete. New OLP needs sufficient detail on the archaeological interest and potential of this allocation. Note also potential for groundwater levels to impact on archaeological remains in this area.					
				HELAA 28 (Kassam Stadium and Ozone) could have houses built over the car park. Building houses over car parks seems to have been ignored. The Site assessment carefully leaves out the Ozone Leisure centre part including a heritage asset that has been allowed to decay.					
	Oxford Science Park. HELAA (#588)			<b>Historic England</b> flag current LP allocation guidance on archaeology. Support the continuation of suitable policy protection for archaeological remains associated with this location. Note also the potential for groundwater levels to impact on archaeological remains in this area.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
				HELAA#588 (Oxford Science Park) would be useful to provide specific guidance for site regarding the height of buildings - pressure will continue to build upwards and a framework that will guide and manage development would be useful.							
	Oxford Business Park (HELAA #587)			<b>Historic England</b> remark that the site assessment picks up that the site has archaeological interest. Also, it is adjacent to Temple Cowley Conservation Area and a Listed Buildings GI adjoins (The Nuffield Press, East Wing and attached former school house). They flag that its environmental sensitivities do need to be accurately reflected in the emerging Plan.							
				<b>ARC</b> (Advance Research Clusters) has renamed Oxford Business Park, ARC Oxford. Requests that reference to the site in the OLP2040 are changed. Welcomes South AOF							
				HELAA#587 (Oxford Business Park) would be useful to provide specific guidance for site regarding the height of buildings - pressure will continue to build upwards and a framework that will guide and manage development would be useful.							
	Oxford Stadium (HELAA #111)			<b>Historic England</b> highlight that there is potential for heritage-led regeneration around stadium. They regard the SA's conclusions as too negative. Heritage provides opportunities too and this needs to be identified in policy terms. For this opportunity to be fully explored requires a heritage impact assessment for the site (which the Oxford Stadium CAAMP would usefully inform), supported by site-specific policy that outlines how the development could successfully deliver agreed objectives for the site.							
	Sandy Lane Recreation Ground (HELAA # 289)					HELAA 289. A proposal to build houses on half of this small recreation ground, reducing the space for sport. That is bad.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
South Area Sites Outside AOF		<b>Natural England</b> will require further information on the following proposed allocations to determine the potential impacts to designated sites, the scope for mitigation and to inform appropriate policy wording. (Bertie Place 008; Redbridge Paddock 113; Court Palace Gardens 013; Land at Meadow Lane 389; Former Iffley Mead Playing Fields 104) - see detailed response for more info. Also flag the following allocations have potential impacts on the Lye Valley SSSI: 016- Cowley Marsh Depot, 516- Former Powell's Timberyard, 593- Knights Road, 095a1, 095a2, 017, 014		Safeguard areas for PT and cycle improvements as required by County					
		Support allocations	1						
Bertie Place Rec Ground #8	A - Allocate for residential			Site allocation needs updating to reflect no need for primary school capacity in this location.	2	BBOWT - we consider this site to be ecologically sensitive and in Flood zone 3a so should not be considered for development.		Option B - Do not allocate a recreation ground for development	3
				See <b>Natural England</b> comments - further info required		Object to proposals to build homes. Green space, playground & MUGA well used for recreation by residents would be lost. Current proposal would cause conflict between use of reduced recreation space & residents. Road layout could result in safety issues between vehicles, cyclists & pedestrians.	1		
Redbridge Paddock # 113	A - Allocate for residential			If the council is going to build houses on Redbridge Paddock (HELAA #113) please ensure they are medium density. The site will have great transport infrastructure and therefore are great plots to build a large number of flats (and residential moorings)		Object to proposals to develop site for housing. Former landfill site and prone to flooding likely to cause health / risk problems for future residents. Suggest alternative nature reserve use.	2	Option B - Do not allocate	2
				See <b>Natural England</b> comments - further info required				Do not allocate this site is it part of Oxford's Riverside Nature Network and important green space	2
				BBOWT - the site forms important GI function and in proximity to the Iffley Meadows SSSI and that development on this site could increase damage to it with increased dog walking and vandalism. Support the need for hydrological assessments to be carried out, a buffer zone should be required in perpetuity to protect the SSSI. The allocation site adjoining the Thames and Cherwell CTA and any potential development would need to further the aims and objectives of the CTA - oppose the allocation owing to impact on SSSI					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Court Place Gardens #3	A - Allocate for grad student or resi or a mix of both			BBOWT concerned about the potential impacts of the dev on the nature conservation interest of the nature reserve, OCW site and GI network	1				
				<b>Historic England</b> highlight that development of this site has the potential to impact on Iffley Conservation Area, GI Court Place, GI St Mary's Church, the Rectory (GI*), the stable and garden walls of the Rectory (GI*) and other nearby listed buildings. The potential for impacts on designated heritage assets and suitable mitigation measures need to be in policy and supported by relevant supporting text.					
Land at Meadow Lane # 389	A - Allocate for residential			See <b>Natural England</b> comments - further info required		Strong objection to this allocation - poor consultation and this site should be protected as green space in CA. Development would be harmful to the allocation of principal quiet route for Active Travel, loss of valuable GI for health and wellbeing of residents and climate. Development of this site is contrary to the council's objectives if the site were to be developed it should be for AH not private market housing, there is insufficient sewerage capacity to support this allocation.		Option B - Do not allocate	37
				Children from local schools use site as an educational resource.		Oppose allocation for development. This site provides wildlife corridor, includes badgers & is rich in biodiversity.	3		
				<b>Historic England</b> state that any allocation of this site needs to ensure that its development will conserve and enhance Iffley conservation area. The site falls within a view cone, which also needs to be made explicit in the text associated with this proposed allocation. Policy should state that careful design must ensure that development proposals contribute to the character of the conservation area.		Need an ecological assessment before allocation.	3		
				Site forms part of a quiet route. Not mentioned as part of 2036 plan allocation. any development here would increase vehicular traffic and harm quiet route.		Lots of people signed petition against development at this location. Consultation for last local plan was not carried out adequately so not enough people knew. Against wishes of local community.			
						Do not support site for development.			
						Any development here would not support conservation objectives set out in Iffley Conservation Area Appraisal (2009). Should be preserving site rather than developing which would harm the conservation area.			
Northfield Hostel #39	A - Allocate for residential			<b>Historic England</b> flag that the site being of archaeological interest (some Roman potential, 90m from Roman kiln) should be acknowledged in the emerging OLP.					



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	
Former Iffley Meads Playing Fields # 104	A - Allocate for residential			support site for use as affordable housing but aware there are some access issues that need to be overcome		Oppose allocation for residential development. Provides a wildlife corridor & is rich in nature. Suggest use for public green space.	1	Option B - do not allocate	1	
				See <b>Natural England</b> comments - further info required						
				<b>Historic England</b> highlight that any allocation of this site needs to ensure that its development will enhance the adjacent Iffley Conservation Area.						
Unipart #120	A - Allocate for employment			This site should be considered in context of development of Northfield allocation in SODC	1			B - Do not allocate	1	
				<b>Logicor</b> strongly support the option of allocating the Unipart site for employment purposes. This would reflect the historic land use of the site and support future growth of the area as a source of employment opportunities for the local community. However, Logicor stress that development guidance for the Unipart site will require appropriate consideration of the cross-boundary allocation at Northfield in South Oxfordshire. The delivery of the Northfield allocation should not prejudice the future potential of the Unipart site as an employment location. As such, Oxford City Council must ensure that any development guidance that is attached to the Unipart site maintains compatibility between the sites. Logicor are exploring various options in improving accessibility in the site to overcome accessibility constraints relating to Transport Way. This includes potentially securing a new entrance from Oxford Road which will improve circulation around the wider employment site, as well as more direct accessibility to the strategic highway network. This, as well as the compatibility with the Northfield development to the south, should be duly recognised through the Local Plan preparation process.						
Blackbird Leys Central Area # 9	A - Allocate for mixed use			If site is developed then it needs to provide replacement community centre of the same size as the existing centre. New building needs to provide significant / innovative space with good facilities for local people.	1	Blackbird Leys redevelopment is wrong and not necessary to destroy current layout with restrictions and limit community centre as a building site ruin				

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				This development relies on funds released by housing development on Knights Road. In the initial good consultations, residents sat down to redesign the central area. Those designs included shops and a community centre at the same size as the existing community centre. But current plans will demolish the community centre on one side, then eventually build a smaller community centre on the other side (and no design work has been done for that). The catch in the site assessment is the number of times it mentions "depends on implementation". E.g. Allocation leads to a significant increase or improvement in community facilities (depending on implementation). It looks like there will be a decrease in community facilities. And "The site has the potential to increase the number of jobs or economic floorspace in the knowledge-based economy but it will depend on implementation if there is to be a gain or no change", ignores the potential of setting up a maker space or hack space in Blackbird Leys where people can learn 3D printing and other skills using shared equipment like people do around Aristotle Lane.					
				<b>Historic England</b> flag that any allocation of this site needs to ensure that development on the site takes account of the character or appearance of the Oxford Stadium Conservation Area and not to adversely affect views out from St Mary's Tower.					
Knights Road # 593	A - Allocate for residential			Could be acceptable if recreational facilities provided in Fry Hill's Park and linked and extension of nature park provided along both sides of Northfield Brook, adding to biodiversity. Cycle and footpath improvements required.	1			B - Do not allocate	1
				See <b>Natural England</b> comments - further info required					
Cowley Marsh Depot # 16	A - Allocate for residential			Support high-density, car-free residential development. Site has good space, access to public transport, active travel links and potential for significant social housing.	1				
				See <b>Natural England</b> comments - further info required					
Between Towns Rd on corner of St Lukes Rd #95a2	A - Allocate for residential			See <b>Natural England</b> comments (and 095a1)					
Royal British Legion #604	A - Allocate for residential			Consider for primary health care not residential					
Crescent Hall #17	A - Allocate for student			<b>Historic England</b> flag that any allocation of this site needs to ensure that its development will enhance Temple Cowley conservation area.					
				See <b>Natural England</b> comments - further info required					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Workshops, Lanham Way #98	A - Allocate for residential			<b>Historic England</b> flag that the limited site assessment in the interim HELAA report identifies the site is adjacent to the Littlemore conservation area. This proximity and the potential to impact on the setting of the conservation area needs to be mentioned in text associated with allocation of this site.					
Grandpont Car Park #106	A- Allocate for residential			Extensive studies required prior to development to ensure there is no toxic contamination from former gas works site.	1				
				<b>Historic England</b> do not object, but disagree with stage 2 conclusion that "The site is also not sensitive from either an ecological or heritage perspective." The OLP2036 includes the icon denoting archaeological interest. Also, the text associated with this allocation needs to cover the potential for impacts on views.					
Littlemore House (Former SAE Institute) #401	A - Allocate for economic use			<b>Historic England</b> highlight potential for impacts on the setting of Littlemore Hospital (GII) and for any development of the site to consider the potential design implications of this proximity. This should be carried forward and supported in the emerging OLP, if the site is allocated.					
Former Powells Timber Yard #516	A - Allocate for residential			See <b>Natural England</b> comments - further info required					
Cowley Centre Templars Square #14	A - Allocate for district centre/ mix uses, commercial, leisure and residential	<b>CBRE on behalf of Redevco</b> - providing the site allocation acknowledges the site's important contribution to meeting local needs then supports the site not being included in the AOF.		<b>Historic England</b> do not object to this allocation; however, any allocation needs to recognise the environmental sensitivity of the site, including (but not necessarily limited to): Its archaeological interest; It partly adjoins Beauchamp Lane conservation area; Potential for tall buildings to affect views out from St Mary's Tower. The site is in an elevated position in the city.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				<p>CBRE on behalf of Redevco request that reference to design guidance for sites in the AOF is made more clearer. Also request that current wording in 'Consideration for allocation incl. constraints and landowner intention' is changed to '<i>Landowner reviewing options to demolish, redevelop, optimise the efficient use of land to provide a mix of uses including retail, leisure, office, commercial, residential uses. Given the site's location in the District Centre there is potential for all residential products including specialist residential products such as build to rent, student accommodation, co-living and senior living. In light of changing retail market, repositioning of the existing retail is likely but will require justification and a strategy for repurposing that maintains the District Centre status. Three existing car parks on site are significantly underutilised / closed - the quantum of car parking provided is to be reviewed and reduced</i>'.</p>					
				See <b>Natural England</b> comments - further info required					
	para 8.12			<p>You note in Para. 8.12 "The strategic site of Land North of Bayswater Brook (STRAT 13) adjoins this area and has been allocated in the South Oxfordshire Plan 2035. This site is expected to deliver affordable housing to meet Oxford's unmet need. Policy STRAT 13 recognises the need for this development to be well linked to the city in terms of both design and connectivity across the ring road." As I have noted previously the entire basis of what Oxford's unmet housing needs now are has to be established by fresh surveys in the light of considerably changed conditions. In particular it is highly questionable whether the Bayswater Field which was tacked on at a late stage into the Land North of Bayswater Brook into STRAT 13 will actually be needed. In which case that incursion into the Green Belt should be abandoned as the land is of considerable significance to the communities in Barton and Sandhills. When you speak of "the need for this development to be well linked to the city in terms of both design and connectivity across the ring road" the situation is quite different in terms of the main site North of Bayswater Brook and that of Bayswater Field. Access to the latter, both by construction traffic and subsequently by domestic traffic coupled with delivery vehicles &amp;c, would cut through Sandhills within the City boundary, dramatically changing and impacting that community with many deleterious effects.</p>					
				<p>We broadly agree the preferred policy but with certain exceptions: Land North of Bayswater Brook will have very poor connections so don't do policy based on it being connected.</p>					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
<b>East Oxford Marston Road and Old Road Area of Focus</b> Government Buildings and Harcourt House # 24 Land Surrounding St Clements Church #117 Headington Hill Hall and Clive Booth Student Village #560 Oxford Brookes University Marston Rd Campus #439 Old Road Campus # 43 Warneford Hospital #63 Churchill Hospital #12 Nuffield Orthopaedic Centre #42 Pullens Lane Residential #440	A - Preferred Option - Designate AOF .....	<b>Natural England</b> supports the Marston Old Road proposed AOF and would welcome further detail as to the key development principles to be included in the policy to protect the Lye Valley SSSI. But flag that the following proposed site 462- Park Farm - 165m from New Marston Meadows SSSI. New Marston Meadows is an area of Lowland Neutral Grassland and the proposed allocation may have potential impacts on the site, mitigation may therefore be required.		Areas of focus should not be an attempt at creating development control measures to reduce development in certain areas.		Land North of BWB will have poor connections so don't base a policy on that, dont allocate Ruskin Field as it is part of a vital stretch of open land don't allocate Park Farm - rural lung of Marston meadows, don't allocate OB Marston Road, vital POS, don't allocate Valencia Road, or Westlands Ave		Support option D	1
		BBOWT - support allocation not including Warneford Meadow which is important in relation to the Lye Valley and is part of ecological compensation for housing dev in Littlemore. Small development in the area can impact upon hydrogeology of the Lye Valley. Welcome need for a buffer and this should be provided for both SSSI and adjacent LWS buffer should be for both construction and operation of the site. Support need for BNG to be delivered on site or nearby		<b>Oxford Health NHS Foundation Trust - RE: Warneford Hospital (HELAA #63) and wider East AOF</b> - have made a response specifically about their plans at this location for a new hospital complex and globally significant brain health sciences campus. They note that they have had initial consultations with OCC planners in 2020. They would like to discuss and understand further the implications of the suggested 'Area of Focus' policy initiative. If it represents continuing support for the principles of collaborative working and excellence, they can support it. They assume that it does not suggest the need for wider coordination or studies which might delay development. Flag that within east Oxford, there are many campus sites which operate as 'mini neighbourhoods' with own character and needs - current approach in LP seems to work successfully to enable individual development. Not aware of any strategic issues that require additional management/intervention. Would be grateful if their proposals for Warneford Park could be fully taken into account as you development the Local Plan.		Too much land given to staff parking at hospital sites. Knock-on impacts of so many staff driving to work include air quality impacts, traffic pressures etc.		Support Option E	1
		Support Option A	6	Many sites in Marston / Headington have significant issues with transport connectivity. Future developers should be asked through the planning process to provide significant investment to public & active transport.		Joined up strategy required to reduce staff parking at the hospitals is required including reductions in spaces, increased frequency of P&R buses etc.,			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				Why were parking reductions removed from previous local plan? This is contrary to CIL Regs. Do not consider that the Inspector's suggested alternative - a sustainable travel plan - is sufficient to address these concerns. Policies need to reduce staff parking.	1	Other issues that need addressing include - Marston flooding due to run-off from JR car parks; heritage impacts on Old Headington Conservation Area from Cuckoo Lane and green space at the JR being used as a helipad rather than for the benefit/ enjoyment of Headington residents.			
				<b>Historic England</b> support option A in combination with B. Also welcome key principles but suggest some improvements needed - <i>see their submission for suggestions</i> . Also flag that whilst the SA correctly identifies area's many heritage assets and CAs, language used is rather general and vague when describing potential impacts from development - needs to be clearer in new LP. They make a number of specific comments and suggestions relating to local context of each of the allocations within the AoF (HELAA #24, #117, #560, #439, #43, #63, #12, #42, #440) - <i>see submission for full details</i> (they are not listed below).		In relation to Government Buildings (24), Land adj. St. Clements Church (117), Headington Hill / Clive Booth (560) and Oxford Brookes Uni Marston Rd Campus (439), in all cases the level of detail does not allow scope for public comment. Concerns over impact on green infrastructure, heritage assets & risk of sewerage flooding.			
				The Old Road is heavily congested in rush hours and school run, acting as a parallel line of movement to the London Road/Headington crossroads axis. Investigation of who is moving on both these axes should prompt policy initiatives to reduce traffic movements, until such time as Electronic Road Pricing can act as a deterrent for some drivers. Alternative routes - eg. Horspath Driftway-the Slade - would need to have deterrent levels of ERP charging to stop big increases in vehicle movements if they were tempted to avoid using Headington or the Old Road by moving into this part of Oxford on the already disturbingly congested Horspath Driftway from the Eastern ring road.		Do repairs to the bridge to Shotover and get a bus route starting there.	1		
				No development without public transport options		Parking available for South Park which is empty since cycleways taken parking spaces			
				The options are vague. NM(S)RA is committed to improving the quality of life of residents in New Marston, alongside safeguarding / protection of heritage assets, particularly of Headington Hill and New Marston Meadows. The area of focus should reflect these local commitments and also the necessity of upgrading the neighbourhood facilities to create a functioning 15 minute walk community.		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				Any development within the area should be contingent on proper active travel provision for the area, including the Headington LTNs, provision of adequate cycle tracks or lanes along London Rd and Old Rd, and redesigns of all the main road junctions in the area that prioritise making walking and cycling safe and accessible. Three people have been killed cycling in this area in the last two years.	2	What about a GP surgery rather than clinical research?			
				Any development outside the ring-road should be contingent on provision of safe and accessible grade separated walking and cycling routes across the ring road.	2	Marston Road is appalling, no shops, an unused car park, the unused Government building , hopeless new bike lanes . Why don't you speak to local residents about what we need?			
				Absolutely no additional car parking should be allowed at sites within the ring road, and new buildings should replace current car parking space before any expansion of sites is permitted.		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.			
				Important to protect Lye Valley		As commented earlier. the only permitted development should be on brownfield sites.			
						Any change must be within the city boundaries and not in green belt			
						Again, this area is being developed beyond genuine need with encroachments into the Green Belt and devastating consequences for biodiversity.			
						Do not build anything on greenfield or green belt land			
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland.</p>					
						<p>Surface level parking must be removed if possible., especially at Headington Hospitals Traffic issues have not been addressed. Runoff must be reduced to stop flooding from Headington Hill</p>	2				
						<p>ALL calcareous spring areas (Lye, Dunstan Park, Headington Hill) must be analysed and suitable protections given</p>					
						<p>East Oxford has the least green space and the fastest growth of population anywhere in Oxford, it is not a "more open area" - this needs addressing via policy</p>					
						<p>Managing parking must translate into actual policies agreed with Oxfordshire Council both to control traffic inflows and flooding downstream. The unchecked increase in employee numbers must be addressed by housing on the car parks and by displacement of positions out of Oxford where possible.</p>					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						An area of focus will only work if defined in conjunction with Oxfordshire, as traffic is the most important environmental and health problem, as it is now the centre of Oxford by population and traffic.			
						Create a new Road access route direct to the ring road from the John Radcliffe and Churchill hospitals			
	B - Preferred Option - Include detailed site development policies for sites listed.	Support Option B	8	<b>Government Buildings and Harcourt House</b> Policy should allow the provision of employer-linked affordable housing (Policy H5) to expediate development on this under-utilised land. Policy should carry forward full schedule of uses permitted under OLP2036 SP16. Any min. housing no's should be expressed to make it clear that either student no's or C3 equiv general housing would be acceptable.					
Old Road Campus				This has expanded without any coherent master plan					
Warneford Hospital		<p><i>(possible duplicating text in Oxford Health Foundation Trust response above in cell above..... )</i> Land at Warneford Hospital should be specifically identified as a strategic development site in comparable terms to that set out in the Local Plan 2036 (Policy SP22 and from paragraph 9.126 onwards).</p> <p>The existing listed mental health hospital is no longer fit for purpose and a new hospital needs to be constructed at Warneford in order to de-cant the existing uses and create an opportunity for a world class mental health campus.</p> <p>A joint venture has been formed between the NHS Trust, the University of Oxford and a private philanthropist in order to promote comprehensive development of a new hospital, a new research facility dedicated to mental health and a new University college. The joint venture formed between the parties has written a letter to accompany the response to this questionnaire (letter sent from Dr. Nick Broughton, Chief Executive, Oxford Health NHS Foundation Trust &amp; Dr. David Prout, pro-Vice Chancellor, Oxford University to Ms. Rachel Williams, Head of Planning Policy &amp; Place Management, 11 November 2022).</p> <p>Given the importance of the proposal, Local Plan policies need to develop to support the emerging plan and to recognise the particular suitability of the Warneford Hospital site to meet this use.</p>				Note that some of the sites proposed for development outside of the area of focus are controversial, and that the development proposed by the landowners - obviously seeking to make money out of their assets - is in some cases inappropriate for various reasons and resisted by the local residents. To be truly a community local plan, the residents' concerns for a particular idea must outweigh the fancy of landowners. Indeed there is an argument for having a citizens' list of areas and sites which ought to be protected from development.			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
		Considerable care should be taken not to harm the secluded character of Warneford Meadow, which is an important amenity providing quiet enjoyment of natural and peaceful open space; ensure that design and materials of future development reflect the rural character of the meadow, and avoid creating a sense of enclosure on the south eastern boundary. The link between the historic hospital buildings and the meadow should be respected with the retention of some open space connecting the two. Adequate space should be given around the boundary trees on the south western boundary with Hill Top Road in any further development in that area of the site.									
Oxford Brookes Marston Road Campus						Don't allocate Oxford Brookes Marston Road. a) It is important open space for local people. b) It has a high wildlife grassland with orchids c) your other proposals at Government buildings and Harcourt House will urbanise the Marston Road sufficiently-this would be a step too far					
East Area Sites Outside AOF						BBOWT - concerned about potential impact of development on the conservation of the area. MG4 grasslands are dependent upon hydrological flows, low nutrients and management - these must be considered as this site is developed.					
Hill View Farm #112a1	A - Allocate for residential						1	Option B - Do not allocate on grounds of traffic generation and/or greenfield site use	1		
Land West of Mill Lane#112b1	A - Allocate for residential			Development of this site will have significant transport implications if there is no junction with A40.	1		1	Option B - Do not allocate on grounds of traffic generation and/or greenfield site use	1		
				<b>Historic England</b> - Careful design is needed to ensure that development proposals contribute to the character of the nearby conservation area.							
Marston Paddock #114d	A - Allocate for residential					Don't allocate Marston Paddock- it may not now be in the Green Belt but it still functions as a green context for the village urban form of Marston, and a visual green buffer from the A40. It will also result in more people living by a noisy and polluting main road, and will cause traffic problems in Old Marston		Option B - Do not allocate on grounds of traffic generation and/or greenfield site use	1		
						Object to this allocation which is part of the green setting of Oxford and should be retained for future generations					
Barton Comm. Centre and Underhill Circus Shops #354	A - Allocate for mix of uses as part of local centre										

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
JR Hospital Site #57	A - Allocate for health care and complementary uses	care with heights of buildings		<b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area and to retain the Listed Building and protect its setting.					
Ruskin Field #463	A - Allocate for residential	Support for this allocation - submission includes planning assessments to support inclusion of the site also refer to Call for Sites form March 2022	1	BBOWT - rare Tufa springs and associated habitats and species are v sensitive to hydrological changes which might have implications for proposed allocations at Ruskin College Campus and Ruskin Fiend and appropriate hydrological surveys should be carried out on these sites if developed. 3 fields below Ruskin college on sloping land towards the ring road are old fields with carbon-rich with well-developed soil profiles. Area between Dustan Pk and Larkin Lane has a number of wetland springs, likely to be carbon-rich peat areas (1.67m depth over 0.6ha - Dustan Pk, Ruskin Fields likely to have a number of wet peat accumulating areas with carbon storage. It should not be disturbed to ensure no oxidation and CO2 emissions.		Don't allocate Ruskin Field- it is part of a vital stretch of open land that it would break up and change - a major change that should be a policy on its own- and not one we would support.	1	Support option b - do not allocate.	1
		UWL considers that the existing policy allocations in the Local Plan 2036 (OP55 and OP56) continue to represent an appropriate approach and a sensible range of land uses to meet housing and/or student accommodation requirements in a sustainable location at and adjacent to Ruskin Campus.		Land at Ruskin Fields should be allocated for housing and student accommodation and it represents a significant opportunity to add to the scarce supply of housing land in the City without giving rise to significant adverse effects. It is a genuine opportunity site which should be considered for allocation. UWL have commissioned evidence base studies which are submitted separately to the Planning Policy Team at the City Council at the same time as this questionnaire response (14 November 2022). Those evidence base reports relate to Heritage and Transport. They demonstrate the suitability of the site for development and the lack of any constraints which would justify foregoing an opportunity to contribute towards the urgent, pressing need for additional residential accommodation within the City. Given the scale of housing need, the alternative to taking opportunities such as this will be inevitable Green Belt release in less sustainable locations outside the City. Also submitted on behalf of UWL is an initial feasibility study by architects Eric Parry Architects on behalf of UWL which demonstrate the capacity for the site to deliver between 200 and 300 dwelling units at the same time as providing a significant extension to open space, of which there is an acknowledged shortage in the local area.		<b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.		Do not allocate on grounds of traffic generation and/or greenfield site use	1



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
								Old Headington Conservation Area Appraisal considers these fields as a positive attribute of Old Headington and sets out some positive characteristics of these fields as: - the last remnants of the green fields that once ran along the edge of the village now cut off from countryside; - views from public realm across the green open spaces with visual connection to SODC countryside beyond Bayswater Brook. - the green spaces in this character area are important views to the conservation area from outside its boundaries			
								Do not allocate site - rejected through Barton AAP process and not allocated in OLP2036 (only small part of field allocated in SP56, not whole site as currently proposed). Should not be allocated in OLP2040.			
								Site previously not accepted as an allocation - Barton AAP (2013) and Sites and Housing DPD (2013). SA process for these documents also considered that site should not be allocated. OLP2036 considered that there should be "no development on Northern Fields"			
								Consider that there would harm to conservation area if any amount of housing is delivered here. Also number of homes delivered would be "insignificant" compared to other large developments nearby therefore no need to allocate.			
								Existing policy should not be a precedent which would cause harm to the conservation area including loss of "view lines" from Stokes Place across the field.			
								Wider views would also be damaged if the whole site was allocated for development.			
								Site forms part of wider green Headington. Allocation and development of this site would damage this green setting.			
								Likely to be very high quality soil at the site, given proximity to peat deposits at nearby Larkin's Meadow.			
								Headington has a lack of publicly accessible green space.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
								Importance of Stoke Place Bridleway is considered in the city's Old Headington Conservation Area Appraisal. It is the only accessible place in the city where residents can enjoy a rural experience of great beauty. The creation of pedestrian/ cycle access from Stoke Place would destroy its character.			
								The proposed site allocation would score poorly when considered against the criteria in the conservation area appraisal (see Headington Heritage Rep for full details).			
								HELAA #463 (Ruskin Field) would ask that this is removed from the proposed development site lists. A large amount of residential development is proposed within the immediate area and it would be preferable to keep this as an area of open green space.			
Ruskin College Campus #54	A - Allocate for educational and student accommodation	UWL supports the allocation of sites 054 and 463, both of which fall within its ownership. UWL considers that the existing policy allocations in the Local Plan 2036 (SP55 and SP56) continue to represent an appropriate approach and a sensible range of land uses to meet housing and/or student accommodation requirements in a sustainable location at and adjacent to Ruskin Campus.		policy needs to ensure the historic setting of Headington is better respected. Previous development has caused harm.		<b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area and to retain the Listed Buildings on-site and protect their setting.					
Thornhill Park #38a2	A - Allocate for residential										
Oxford Trust Wood Centre for Innovation #437	A - Allocate for employment uses if there is opportunity for expansion/intensification on the site										
Slade House #124	A - Allocate for health and/or residential development										
Manzil Resource Centre #524	A - Allocate for health and/or residential development which could be employer linked housing	Allocation should ensure sufficient consideration would be given to impact on adjoining housing. Any development should be small-scale.		<b>Historic England</b> - ...the site "Lies to the west of the Bartlemas Conservation Area but not adjoining. Crescent Road View Cone across part of site". These sensitivities need to inform the wording of what is said in the Local Plan about this allocation.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Union Street Car Park #61	A - Allocate for residential/ student development			Support: portion of car park could be developed for residential but not student accommodation with remaining spaces left to serve Cowley Rd shops and entertainment uses.	1			Site seems to be a well-used car park, particularly for people doing a weekly shop at Tescos, but also visiting the other shops along Cowley Road. There has already been considerable building in the area just around the site. The car park is adjacent to the block along Cowley Road which has recently been renovated into any number of flats. On the other side is a primary school. Not only would this development overlook the school and one of its (tarmacked over) playgrounds, the school already overlooked by the dense student housing developments to the east (where the builders yard used to be). What kind of living would be possible? What about access to green space, air, light and so forth? What about the policies advanced in this document?	
				Should only be allocated for development without parking	1				
				<b>Historic England</b> are keen to learn if any further work has been done to understand the nature and significance of any archaeological remains and the potential impact of the development on this site on the significance of those remains.					
Park Farm #462	A - Allocate for residential			See <b>Natural England</b> comments - further info required				Don't allocate Park Farm- it is part of the rural lung of the Marston meadows, development here would break-up its open feel with a graduation along the edge to urban form.	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				Historic England flag that the current LP notes that consideration should be given in design to the impact on views from Headington. The site assessment notes that this allocation lies within a view cone (from north east hills), which naturally should inform the policy approach to this allocation.				It is an utterly insane suggestion to develop this site. 1. It floods. 2. Even if the bit of land where the farmhouse sits doesn't flood, if a development were put on it, it would negatively impact the surrounding lands and houses, even if so-called mitigation measures are put in place (let's call it what it is - displacement, not mitigation) and even if we were not facing increased risk of flooding and more severe flooding in the near future. 3. It would involve the creation of infrastructure (sewers and the like) which would entail the alteration of ditches and waterways which control the flooding, against the proposals in this local plan. (Moreover, the provision of sewers and so forth in this area desperately need an upgrade, not more users. Thames Water have failed to remedy this in the nearly 30 years I've lived here.) Infrastructure could only be placed along the sole access to the site: a long narrow lane, much used by the public for walking, running etc. etc. and also for getting into town. Also used for access to university sports facilities. It is not suitable for all the vehicular traffic that would be using it. Any upgrade would interfere with the ditches which assist flooding control as the fields on both sides flood. 4. The access point to the lane forms a t-junction with Edgway Road, the unadopted/unknown who owns it Ferry Road, in reality a continuation of the fourth spur, the recently upgraded and heavily used cycle path/pedestrian way to Croft Road and beyond. If it were to be turned into a road, this would be of serious detriment to all those who are travelling sustainably and would put people off from doing so, going against the promotion of sustainable travelling. 5. The site is next to and within the proposed green corridor, encompassing areas of nature which are protected.	
								Do not allocate on grounds of traffic generation and/or greenfield site use	1
Carpenter's Yard	A - Allocate for residential							Object to allocation	
								Do not allocate on grounds of traffic generation and/or greenfield site use	1
								Object to Option C	1
Valentia Road #329	A - Allocate for residential	Support Option A	1			Don't allocate Valencia Road- this area of Oxford is high on the HMO and deprivation scale. People living here at high density HMOs deserve some open space on the estate. A step to far in searching for housing land.	2		
						Oppose: it would result in the loss of another small playground.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Jesus College Sports Ground #26	A - Allocate for residential	Support Option A	1	site suitable for delivery of post-graduate and fellows' accommodation in self-contained units (including family accommodation). Allocation should include reference to graduate accommodation					
				Car-free development is easier to enforce if site delivered for student accommodation.					
				Should be allocated for very minimal residential use with majority of the site being public open space	1				
				Supports allocation: sustainable location, would like to see public open space and use of sports facilities by public.	1				
				<b>Historic England</b> - look for a continuation of the mitigation measures for this site outlined in the OLP2036.					
Lincoln College Sports Ground #32	A - Allocate for residential	Support Option A	1	Supports the allocation of this site but it should be broadened to include student accommodation as well as general resi to help meet student accomm needs and thus release market housing across the city - follow guidance in NPPF and PPG to plan for student needs.		Strongly object to the limiting of this site for student accommodation. Previous applications have been refused. It doesn't meet the proposed criteria for student accommodation and other residential options should at least be given equal weight to students accommodation.			
				Supports allocation: sustainable location, would like to see public open space and use of sports facilities by public.	1				
				Support the preferred option for residential accommodation. The college's preference for student accommodation is not required for the college's own needs (it has largely sufficient accommodation).					
				<b>Historic England</b> - look for a continuation of the mitigation measures for this site outlined in the OLP2036.					
				Should be allocated for very minimal residential use with majority of the site being public open space	1				
Former Bartlemas Nursery School #346	A - Allocate for residential	The College would support the allocation, however the site would also be suitable for graduate student accommodation, as was proposed by the application which was refused in 2020. The reasons why we consider that it would be suitable for allocation for development as graduate accommodation are outlined within the comments which we have made in respect of Policy Option Set H9.		Support: providing a rigorous prohibition on height of development is imposed.	1	Object to option of student accommodation (as indicated in Site Assessment document), but support allocation for Residential accommodation (shown as preferred in chapter of 8 of main document), subject to great weight being placed on minimising impact on the conservation area. Previous applications for student accommodation have been refused and the site doesn't meet the proposed criteria for student accommodation. Constraints should include that a proportion of the 0.24 hectare site is undevelopable as it consists (in addition to the water ditch) of an approach road (south) and, we understand, a 12" pressurised water main (west).		These representations also present an opportunity to promote other sites within the Oriel College's estate in East Oxford which may be suitable for development allocation.  Whilst the Council undertook a Call for Sites exercise during the summer of 2021, the accompanying FAQ Document to the Call for Sites identifies as follows: "We are undertaking a Call for Sites exercise for an eight-week period to ensure the Oxford Local Plan 2040 process can include a robust assessment of all known potentially available land in the city. However, that does not preclude sites being submitted after 25 August 2021. If a site is submitted after 25 August 2021, we will include these in its assessment; however they are likely to be assessed at a later stage of the plan-making process".  The sites in particular which the College wishes to promote are:	

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
								<p>1. Former bowling green at the junction between Cowley Road and Bartlemas Close – 0.3ha site within the boundary of the Bartlemas Conservation Area – formerly used as a bowling green and tennis court, albeit now surplus to requirements. This site is considered suitable for development of a modest and appropriate scale, potentially incorporating residential and student accommodation. Equally, it could also deliver a replacement sports facility with ancillary car-parking.</p> <p>2. Land to the west of Meadow Lane, Iffley – site contiguous with HELAA Site Ref: #389 (“Land at Meadow Lane”) which is identified in the Preferred Options document as a site which the Council may allocate. The College’s holding amounts to 6.5ha bounded by the river to the west and Meadow Lane to the east. Part of it is within the flood zone. It currently has no use (but has previously been used for tipping). The site in question was put forward by Oriel College as part of the Call for Sites for the Oxford Local Plan 2036. The College proposed that the site would be suitable for a range of uses comprising residential (including key worker and student accommodation).</p> <p>3. 49-51 Jeune Street – the site is within the Cowley Road District Centre at the very fringes of the District Shopping Frontage, adjacent to the Ultimate Picture Palace to the southeast and Oriel College’s James Mellon Hall to the east and northeast. It measures around 500sqm in size. The site’s authorised use is for vehicular repair and as a hand car wash. It could be used to deliver accommodation for the College.</p> <p>These sites are available and deliverable. We will complete the Council’s pro forma “Call for Sites” document for these sites and will issue this to the Council under separate cover, however the College is keen that their suitability for development and allocation in the emerging Local Plan should be assessed as part of the Local Plan process.</p>			
				Historic England object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.							
				Should be available for graduate student accommodation, with landowner contributing to residential development elsewhere.							



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Halliday Hill/ Westlands Drive # 602	A - Allocate for residential					Don't allocate the square at Westland's Avenue- its an integral part of the layout of the estate and has potential as part of a neighbourhood centre providing the setting for shops nearby, and having associated open space function=- outdoor cafe, play area etc.			
Rectory Road Centre #620	A - Allocate for residential			Supports allocation: providing health care services can be provided elsewhere in an accessible location, offering same facilities.	1				
<b>Central and West Area</b> <b>University areas north of the city centre Area of Focus</b> Science Area and Keble Road Triangle #62 Radcliffe Observatory Quarter #579 Banbury Road University Sites # 6 West Wellington Square #65 OUP - Cat 1 Employment Site #523	A - Preferred Option - Designate AOF .....	Support allocation as an area of focus and sites identified.	9	Creation of an area of focus is welcomed as long as it does not impede delivery of other sites outside it.		Would like to see this area allocated for more housing & less hotel, retail, leisure & employment uses. Opportunities for denser development and taller buildings in appropriate locations to contribute to skyline.		Support option C	3
		Improved pedestrian and cycle access is always a good thing		<b>Historic England</b> preferred option is A in combination with B. Welcome approach as set out in SA, however feel that the key principles would benefit from further editing to provide positive strategy for heritage - <i>see their submission for more detail</i> . They have also provided comments on the allocations included within the AoF (HELAA #62, #579, #6, #65) - there are objections to all these and suggestions for additional considerations or local context which needs to be taken into account - <u>see their submission for full details</u> (they are not listed below)		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines	2	Support option D	1
				Good design principles are only mentioned with regard to these areas-should be across the board.		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.		Support Option E	2



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
						As commented earlier. the only permitted development should be on brownfield sites.		Alternative option 2, because as a cyclist I feel threatened, not empowered, by the current designations for cycle use. As a pedestrian, I don't want to share a pavement route with cyclists, and the same applies to me as a cyclist. And I don't want to share any space with powered vehicles, which includes e-bikes and e-scooters.			
						Motor vehicles should only be allowed to enter the city centre if unavoidable: disabled users, service and loading, emergency access, operational vehicles, etc. Development should be predicated on a car-free city centre.					
						Developments, whether residential, commercial or industrial need to be car-free (except for disabled and service/operational traffic). There is no way to provide for safe and accessible cycling, wheeling and walking in the city centre or West Oxford without drastic reductions in the existing levels of motor traffic.	2				
						Need to ensure that new developments do not exceed genuine need in order to protect biodiversity.					
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					
						Pedestrianisation of area should be priority. To include: Queen Street; most of St Giles; George Street up to Gloucester Green; Little Clarendon Street; New Inn Hall Street; High Street-St.Aldates and Magdalen Bridge with buses turning around on the Plain, and in St.Giles. This is partly contingent on moving the existing bus-coach station to the Beckett Street car park and making it a major bus-coach terminus/turnaround area. It would no longer be necessary to have as many buses starting/terminating at the rail station as a result of major upgrade of station including expansion of cycle parking, radical improvements to colour marked cycle and walking routes from the rail station, including to the Beckett Street car park. ERP charging should be used to discourage car use on the Botley Road and especially from Botley Road to the Abingdon Road to be a major nuisance queueing for the Westgate Shopping Centre low priced and badly planned car parking.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p>			
	B - Preferred Option - Include detailed site development policies for sites listed.	Support Option B	7	Aof F could be better designed to reflect the WE SPD	1	These areas are unsuitable for residential accommodation , needs more public space at the ROQ			
Banbury Road University Sites						Concerns over the allocation of this site and the scale of development proposed in the North Oxford CA.			
<b>West End and Botley Road AOF</b> Oxpens #76 Osney Mead #585 Oxford Railway Station #75 Island Site #70 Worcester Street Car Park #81 Oxford Centre for Innovation #448 Botley Road Retail Park #607 Units 1 and 2, 135-137 Botley Road #607	A - Preferred Option - Designate AOF .....	Support WE area of focus.	8	Area should be extended to include Botley Road area west of station and Botley Road area which is facing pressure for change.		Refurbishment existing built environment for passivhaus standard new homes; not building on greenfield; car free developments throughout the area with pedestrianisation adding to colour marked walking and cycling routes; live work units in this area rather than adding to conventional employment usage of existing or new buildings. ERP to reduce use of the Botley Road by traffic, with very limited exceptions.		Support Option D	1

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		Inclusion of Botley Road Retail Park in AOF is welcomed. Support for economic uses at Botley Retail Park welcomed		Key sites in the WE and Botley Road area of focus are broadly correct. Worcester St. Car Park should be specifically considered as an employment opportunity while the Island Site should be updated to refer to an "employment-led mixed use opportunity". RE: Worcester St. Car Park - intention is to redistribute residential provision to other sites in locality (not lose it altogether)		Ensure the canal terminus is included in the West End area of focus and improved as a focal point at the end of the canal.		Support Option E	1
		Yes - must be a mix of uses and well-connected.		Additional site request: South Frideswide Square Site. Request that this site is added to the list of specific development sites in the area of focus. Suggest an "employment-led mixed use allocation" with the inclusion of some residential on Becket St. (Nuffield College)		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines			
		<p>UBS recently acquired the headlease to 23-42A Hythe Bridge Street in Oxford (known as 'Beaver House' and its immediately adjoining buildings). The land is situated within the boundary of the West End and Botley Road Area of Focus.</p> <p>UBS strongly supports the designation of the Area of Focus and welcomes the intention for this be aligned with the principles established by the emerging West End SPD. The Local Plan identifies that the Area has some 'significant development and regeneration opportunities' and, given the pressure on local land supply and the desire to make best use of land, the area is anticipated to provide a significant quantum of new floorspace to meet various policy objectives. There is lower levels of sensitivity within the existing urban fabric than in some other locations across the City Centre and as such, the opportunity for new, denser forms of development must be realised in order to meet the various targets within the Plan.</p>		<p><b>East West Rail Company (EWR Co)</b> (responsible for delivering East West Rail project) note that their comments to the Issues consultation do not appear to have been acknowledged/addressed. Would like to see EWR's role within emerging Local Plan fully integrated with the city's planning strategy - flagging it will meet many core objectives inc climate, improving movement and access to/from housing and jobs.</p> <p>Flag that a number of improvements at Oxford station to facilitate delivery of EWR being developed in collaboration with Network Rail (see submission) that would increase network capacity and improve design/quality of facilities at the interchange at Oxford Station.</p> <p>They welcome the preferred policy options A and B for the proposed West End and Botley Road Area of Focus will be based on a number of key planning principles that carry forward the key objectives of existing policies.</p> <p>Note that whilst their specific proposals are still under development, continuing engagement between OCC and EWR will be needed as LP progresses. New Local Plan policies should facilitate the proposals once they are confirmed, and if necessary identify and safeguard any land required for EWR on the Local Plan Proposals Map.</p>		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				<p><b>Historic England</b> preference is for PO A in combination with B. They express concern that the text of the SA does not present an accurate picture of the AoF's sensitivities. Number of assets is much less important than their significance, also incorrect to say that there are a few heritage assets - there may be few within allocated sites but not within the AoF. Also feel contextual analysis in the West End/Botley POs fails to mention historic environment - no mention of CAs or scheduled monuments. Support ref to Careful consideration of heights of buildings, being mindful of views into and out of the historic core, and the landscape setting of Oxford. Suggest adding "Enhance the character or appearance of the conservation areas" to the key principles. Also they make a number of comments/suggestions for local specific considerations for the allocations within the AoF (HELAA #586, #75, #70, #81), including objection to Worcester Street car park wording - <a href="#">see submission for full details</a> (not copied below)</p>		<p>There should never be any development leading to a diminution of flood plain.</p>			
				<p>The 'Key Principles' refers to the Area contributing to the knowledge economy but doesn't refer to the target to establish an Innovation District (as per the West End SPD). That objective should be specifically picked up as part of the Preferred Option.</p>		<p>As commented earlier. the only permitted development should be on brownfield sites.</p>			
						<p>Reduce car parking to make more efficient use of land is a very limited perspective on the need to reduce car parking. Developments, residential or commercial or industrial, need to be car-free (with disabled and service/operational motor traffic only). There is no way to provide for safe and accessible walking and cycling along and across Botley without drastic reductions in motor traffic.</p>			
						<p>Likewise need to ensure that new developments do not exceed genuine need in order to protect biodiversity.</p>			
						<p>We would be concerned if the approach adopted in the Local Plan policy was to include some or all of the design guidance recently endorsed in the Botley Road Retail Park Development Brief (Technical Advice Note), October 2022. We made a number of comments on the Development Brief itself and sought to contribute positively to its drafting with officers. Whilst we understand that this now provides guidance as a start point for development discussions, if this were to be further embedded in policy, it would have a fundamental impact on the shared ambitions for the delivery of high quality and comprehensive regeneration of Botley Road Retail Park. In this regard, we would make the following comments.</p>			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
						The whole of the west side of Oxford needs careful reconsideration with re designation of much of the Botley Road to allow more sustainable development rather than retail sheds that are there. A policy that if they fall out of use after a certain period of say a year the area could be designated for housing or research.			
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits			
						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p>			
						In line with the aims of the traffic filter proposals it is important to significantly reduce the amount of car parking across these areas and thereby require active / sustainable travel and not frustrate the wider transport plans alongside any intensification proposals.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
	B - Preferred Option - Include detailed site development policies for sites listed.	Support	2	The Council's Preferred Option (b) proposes detailed site development guidance for the listed sites, which we have no objection to in principle. However, we would strongly urge the council to carefully consider the approach to such policy to ensure that such development guidance does not impact negatively on the ability to bring forward sustainable development. We have worked successfully in a number of city centre regeneration locations where a more 'criteria based' policy approach has been taken that enable the Council and development sector to work collaboratively to secure the best outcomes.	1				
Osney Mead		Whilst flood risk will be an issue, it should be recognised that the frontages onto the river and meadows of the Osney Mead site are more suited to residential (perhaps with commercial on the ground floor) than to larger institutional R&D type uses. The core of the site is more suited to such uses.		The aspiration for intensification of the use of the Osney Mead area is supported, but it needs to be balanced with the reservation of specific sites for community uses / access and facilities.					
Botley Road Retail Park		<p>"1. We welcome the fact that the Botley Road retail area is being recognised as a part of the Area of Change. It provides an important opportunity to regenerate a brownfield site for the benefit of the economic future of the city in a sustainable location close to Oxford Train Station and on a key arterial route into the city.</p> <p>2. We are in broad support of preferred option (a) to align the redevelopment of Botley Road Retail Park with the draft West End and Osney Mead SPD principles. These principles aim to revitalise and regenerate the city, providing opportunity to build on its key strengths in research and development. Botley Road Retail Park is unsuitable for housing and given its close proximity to the West End it can perform a complementary role in developing the wider innovation ecosystem in Oxford. It also presents significant opportunity to mirror the West End's aspirations to deliver local improvements including:</p> <ul style="list-style-type: none"> <li>• Provision of a legible, permeable and direct active travel network</li> <li>• Urban greening</li> <li>• Integration of blue and green infrastructure</li> <li>• Venues to activate public spaces e.g. cafes and mobile eateries</li> <li>• Enhancement of local biodiversity</li> <li>• High quality public realm</li> <li>• An 'inclusive economy'</li> </ul> <p>5. In terms of the vision for Botley Road Retail Park, we agree with the Council's</p>		Botley Road Retail Park: support plan for less car-centric development. Developers should be encouraged to explore with EA potential for expanding floorspace to allot shorter buildings rear to residential streets.		Botley Road retail park soon likely to become non-viable with growth of online shopping and closure of Botley Road, large area of brownfield land soon available for residential development. Close to city centre. Green space behind. Perfect for high density affordable housing.			



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
		assessment that the retail park presents a major opportunity to meet unmet demand for commercial research and development space and help Oxford become a stronger global city. We also agree with the aim of enabling a more inclusive economy and moving towards a zero carbon economy.							
		Allocate Botley Road Retail Park for residential/mixed developments. With changes in shopping and a drive to net zero the Local Plan needs to deliver housing on transport axis on land on outdated retail economic model.		<p>3. The Council's Preferred Option (b) proposes detailed site development guidance for the listed sites, which we have no objection to in principle. However, we would strongly urge the council to carefully consider the approach to such policy to ensure that such development guidance does not impact negatively on the ability to bring forward sustainable development. We have worked successfully in a number of city centre regeneration locations where a more 'criteria based' policy approach has been taken that enable the Council and development sector to work collaboratively to secure the best outcomes.</p> <p>4. We would be concerned if the approach adopted in the Local Plan policy was to include some or all of the design guidance recently endorsed in the Botley Road Retail Park Development Brief (Technical Advice Note), October 2022. We made a number of comments on the Development Brief itself and sought to contribute positively to its drafting with officers. Whilst we understand that this now provides guidance as a start point for development discussions, if this were to be further embedded in policy, it would have a fundamental impact on the shared ambitions for the delivery of high quality and comprehensive regeneration of Botley Road Retail Park. In this regard, we would make the following comments.</p> <p>6. Our concern however, is that the design guidance and parameters set out within the Development Brief do not necessarily facilitate best use of land and secure redevelopment opportunities within the retail park that add to a unique sense of place, contrary to national planning policy and the stated vision and objectives. This is due to the rigid way in which the parameters are set out in the Development Brief and the implied constraints on development area – both of which act to reduce the viability and commercial potential for redevelopment schemes. We are starting to see the impacts of this in the marketing of units for 'permitted development conversions' rather than redevelopment opportunities. If the Development Brief is carried forward in its current state into the new Local Plan 2040, it is highly likely that the full benefits of regeneration to this area will not be met.</p> <p>7. The guidance at paragraph 8.7 of the Development Brief divides the site into three areas and proposals maximum heights to inform further rigorous testing and analysis at application stage. There is no formal townscape or viewpoint analysis underpinning the</p>		<p>The approach outlined is too broad for the Botley Road retail park area. Again it is essential to reduce the level of car parking in that area as part of any redevelopments to ensure that does not frustrate wider transport aspirations and impact on the Botley AQMA - which should be a key test of any assessment. The case for changing this area to "economic uses" undefined has not been demonstrated. The aim should be firstly to ensure that the Botley Road retail park changes over time to support the needs primarily of the community on the western end of the city including the 9,000 population Botley Communities just outside the city boundary that look to that area for its retail needs as well. This area in comparison with the rest of the City is severely under-supplied in terms of community facilities (halls, swimming, health and fitness) and additional employment uses in that area will exacerbate that issue. The focus needs to be away from a car park frontage to the main road and into a more pedestrian focussed access frontage. It is essential that the City Council recognises the need to consult actively with the population of the Botley Communities (North Hinksey, Dean Court and Cumnor) over the proposals for this area.</p>			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				<p>Development Brief and whilst visual analysis has been carried out using Vu.City, it does have significant limitations. It is evident in discussions we have had with the Environment Agency that site specific flood assessments are required to understand the true extent of site potential and impacts on development layout, height and deliverability.</p> <p>8. As set out above, we suggest that any policy avoids a prescriptive approach with a more criteria-based response that allows for design, height and heritage issues to be dealt with on a site-by-site basis. By setting some clear criteria and requiring effective assessment in accordance with the Development Brief and High Buildings TAN, the best use of the land will more likely be achieved in line with local and national planning policy. Were a more prescriptive approach to be adopted in the Local Plan it will mean that the policy objectives will not be achieved as development will not be brought forward and the opportunity to regenerate this area to the benefit of the city will be lost as the parameters imposed will potentially incentivise Permitted Development conversions on a piecemeal basis.</p> <p>9. We would suggest that landscape improvements can be achieved in a number of ways not just through green fingers and pocket parks and needs to be carefully balanced against the urban context of the site and the need to make efficient use of limited land. The green fingers indicated in Figure 9 of the Development Brief are significant in breadth and would not necessarily make best use of land. Several pocket parks are also located within the opportunities diagram and whilst we support the notion of achieving improved public realm, the suggested areas shown take up large swathes of land and would make more sense in a residential area or out of town business or science park. It would make more sense in our view if the guidance were to identify areas where there is opportunity to improve public realm that could also tie in with staff amenity areas and existing green infrastructure.</p> <p>10. The stated key objectives of the Development Brief in relation to prioritisation of pedestrians, cyclists and public transport, reduction in car parking and provision of EV charging points are understood. However, a reduction in access points from Botley Road proposed to improve traffic flow could, in some cases, have a negative impact by directing more traffic along residential routes. It would also negatively impact on the permeability of the site and limit emergency access routes.</p> <p>11. We agree with the Council's assessment that the Retail Park represents a highly sustainable location within Oxford with good potential for public transport, cycling and walking. Clearly, the current level of car parking is not appropriate and does not reflect this and we recognise the Council's ambition to reduce car parking as a</p>					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	
				priority. However, again, the success of the vision for the area means that this needs to be balanced with the commercial realities and requirements of potential occupiers.						
				The guidance at paragraph 8.7 of the Development Brief divides the site into three areas and proposals maximum heights to inform further rigorous testing and analysis at application stage. There is no formal townscape or viewpoint analysis underpinning the Development Brief and whilst visual analysis has been carried out using Vu.City, it does have significant limitations. It is evident in discussions we have had with the Environment Agency that site specific flood assessments are required to understand the true extent of site potential and impacts on development layout, height and deliverability.						
<b>Central and West Area Proposed Development Sites outside AOF</b>										
Canalside Land #11	A. Allocate for Mix of Uses			Canalside SPD could be updated to reflect public space requirements and canal crossing work commissioned by Jericho Wharf Trust		Canalside Land should be a strategic site.				
				Use the Area of Focus policies proposed in OLP2040 to safeguard adequacy of non-housing requirement or the Canalside site. The 'University areas north of city centre' area of focus would need to be extended to include this site.		Should include student accommodation as existing policy.				
				Include bespoke requirements in allocation policy for minimum public open space which would be verified through the Design Review process. Also specify the location of the canal crossing, size of boatyard etc. Concerned if these are left to developer's viability tests then they won't be delivered.						
				Challenge to deliver all benefits successfully.						
				Need to ensure that the requirement to provide a new community centre is included in the policy.						
				Any public space needs to be of a high quality and a vibrant and attractive social space for the whole community.						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				<p>The consultation document excludes Jericho Canalside (HELAA 11) from the Areas of Focus, yet the site occupies a strategic location and potential connection between the University areas north of the city centre, the city centre and the West End and Botley Road. The site is the last significant mixed use and housing site in Jericho, as well as adjoining major heritage assets. The importance of these and other features are recognised in the current SPD and the Council policies it contains, yet reference to the SPD is absent in the consultation document.</p> <p>The site should be taken into the Areas of Focus with support for detailed development guidance. Failing this the Canalside SPD should be updated to ensure that there is a robust planning policy framework. Simply allocating the site for a 'mix of uses' in the Local Plan is inappropriate and undermines adopted Council planning policies.</p>					
				<p><b>Historic England</b> note that LP2036 flags this as a sensitive location for the historic environment and, to a degree, that this is picked up in the site assessment. This needs to be carried forward in the emerging OLP. It would be helpful to refer explicitly to Christ Church Meadow as a GI RPG.</p>					
Faculty of Music #21	A. Allocate for residential and educational uses			<p>Support allocation of site for residential however other suitable uses should also be considered for allocation (e.g., PBSA, life sciences, commercial)</p>		<p><b>Historic Environment</b> object, flag that any allocation here needs to take account of the historic environment - but that the current site assessment is incomplete/weak - stating that 'There will be some [listed buildings] close to the site' is inadequate. They flag a range of listed heritage assets in the area (see submission for list) and that it is within Central (University and City) Conservation Area with high potential for archaeological remains linked with the Civil War defences. Flag that they are looking for policy to state that careful design must ensure that development proposals contribute to the character of the conservation area and protect the setting of the adjacent Registered Park and Gardens, the setting of nearby listed buildings and the Civil War defences.</p>			
				<p>Support continued allocation of this site for extant mix of uses.</p>					
Manor Place #31	A. Allocate for residential					<p>Remove this from the list as a very sensitive site due to proximity to Holywell Cemetery and being within the Central Conservation Area.</p>			
						<p>Not allocate Manor Place- it is too sensitive a site for development, including proximity to the King's Mill and St Cross Cemetery, and Magdalen Park.</p>			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.		
Oriel College Land at King Edward Street and High Street #44	A. Allocate for mix of uses	Oriel College would support the continuation of this site-specific allocation in the forthcoming development plan.		Policy should ensure that the ground floor level of development is retained for retail use.		<b>Historic England</b> object, any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the site lies within an area where there is potential for important archaeological remains and is within the Central (University and City) Conservation Area. Also, the site contains a listed plaque and forms the setting to several of listed buildings fronting onto Oriel Street. Are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.					
Sites adjacent to the east of Osney Bridge to the north and south of Botley Road #613	A. Allocate for a mix of uses	support proposed allocation		<b>Historic England</b> flag that any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the Hotel is currently on the OHAR, the site adjoins the conservation area and lies within the city centre archaeological area. It states that: 'Any development would need to take into account the various heritage constraints'.				Not allocate the Osney site with the Riverside Hotel. Major redevelopment would lose the characteristic architecture and urban form and grouping of Victorian buildings.			
Site to the south of Cripsey Place #614	A. Allocate for residential			<b>Historic England</b> flag that any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the site lies within an area where there is potential for important archaeological remains and is adjacent to Osney Island Conservation Area and a building on the OHAR.							
				We welcome the allocation of Cripsey Place- but care will be needed to secure improved design and build quality, and integration with adjoining areas, protecting the historic rail bridge.							
Osney Warehouse and St Thomas School #616	A. Mixed-use development	support proposed allocation	2			<b>Historic England</b> object, flagging that any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the site lies within an area where there is potential for important archaeological remains and is partly within the Central (University & City) Conservation Area. Looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.		Not allocate the Osney warehouse and St.Thomas School. Oxford needs the availability of such sites for its current uses- community based action and SMEs			
St Stephen's House, 17 Norham Gardens #609	A. Allocate for residential (student accommodation) and academic use only.					<b>Historic England</b> object, the site assessment acknowledges that the site lies within the North Oxford Victorian Suburb Conservation Area and is adjacent to a GII Listed Building (No.19 Norham Gardens). The archaeological potential would seem to be unknown. The proximity to University Parks (GII) RPG needs also to be acknowledged in the text supporting this allocation, so that any future development does not adversely impact on the setting of the RPG. Are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.					



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
1-3 Cambridge Terrace #611	A. Allocate for mixed use	support proposed allocation				<b>Historic England</b> object, flag that interim HELAA report notes this site is in a sensitive location – adjacent to Listed Buildings (Campion Hall and Clarks House), within Central (University & City) Conservation Area and in an area where archaeological remains are likely to be encountered, which any allocation in this location needs to take into account. Looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.			
Digital infrastructure general comments		Difficult to get 4g connection, broadband coverage is patchy, cable subscription is costly	3	Council needs policy on digital exclusion, set of bold ideas to tackle this issue					
		Digital infrastructure should be guaranteed in all new developments  All mobile companies should ensure 5g outdoor coverage over all of Oxford if they need permits for equipment in city		Risk that any policy on digital infrastructure could be outdated quickly.					
				Concern about carbon impacts of having more communications equipment provision going against net zero aims.					
				Digital infrastructure must be improved across the whole city if it is to be truly inclusive.					
				5G connectivity health effects unknown in long term, should make permissions caveated (to be removed in future if needed) until full results understood		Concern and opposition to 5G/smart cities due to unknown health effects, increased surveillance			
<b>Policy DS1: Digital Infrastructure</b>	A. Rely on national policy/ future DM policies. No local policy. Include digital connectivity requirements in design checklist (PO)	Support preferred option - no need for a policy.	10	Support PO: but consider planning officers should encourage developers in areas of poor broadband connectivity to improve service.		Doubt expressed over connectivity still being a problem – is it not automatic to get broadband nowadays?		Option B	9
				Consider Oxford-Cam Arc deeply flawed – would prefer option without connection to this.	2			Option C	12
				Concern about poor siting/design of communication infrastructure, policies should allow for option to hold applications to account.				Option C - Support - particularly important to support research capacity in oxford in future if it is to expand.	1
				Support having a policy than just relying on national policy given the importance of connectivity in a post covid world (e.g. internet speed demand exacerbated by work at home). Many Oxford sites are small scale so may not be covered by national policy.	1			Supports either option B or C - flags that relying on market provision alone cannot meet city's needs	2



Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				Need a policy to help deliver appropriate digital infrastructure to meet needs of all occupants (including working/ learning from home). Needs to be a policy in place for expectations of broadband connectivity that are required from new developments.					
				Support promotion of decentralised power systems through on-site renewable energy generation. Lack of secured covered cycle provision everywhere but especially City centre. LP should encourage covered cycle parking in public spaces. Greater cross-referencing of LTCP & COTP in LP to ensure future transport policy is embedded in document. Travel hierarchy needs reference including car-sharing, & motorbikes.					
Other comments				Provision should be made for on-road induction charging at all bus stops and all buses electric.	1				
	Section 8.22			Investing in/supporting EVs is important for those who must rely on cars (e.g. those who cannot walk)		Concern also about lack of EV policies/incentives; need to do more to support transition to EVs			
Electric vehicles	Section 8.24					Need to balance out the environmental impact of promoting EV car usage which are not carbon neutral from a production/maintenance perspective		We recommend the City should seriously consider, as an alternative to electric buses for the longer term, the introduction of light trams on the busiest core routes, using the technology being developed for Coventry (battery powered, light vehicles with no overhead wires and reduced construction costs due to less utility work required). Trams can achieve higher modal shift from cars than buses and reduce particulates emissions thus improving air quality in the city.	

## 5.9 Sustainability Appraisal

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Sustainability appraisal		Sustainability topic is key/ sustainability measures must be a high priority	2			SA does not appropriately consider the climate emergency/ecological emergency and the impacts of continually growing population. Economic growth does not seem to fully consider potential growth in remote working, nor does LP encourage it enough. SA does not address climate adaptation (as a distinct need from mitigation) enough; they highlight work from EA including 8 point plan which the Oxford work needs to dovetail with; also their own adaptation work which has previously been submitted to council.			

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
				County note we were consulted on screening and this SA takes this forward		Need to change POs to make Plan sustainable.	2		
				Concern that findings/data is not current or reflective of immediate issues		Concern about errors with site descriptions in SA, unclear on weight given to it at this stage. Feels there should be a separate consultation on the SA and its scoring before any further progress on LP.			
				A lot of work is borrowed from the last LP review with updating - particularly in relation to Site Appraisals.		SA brings into question the sustainability of the preferred options and indicates need for significant change.			
						Greenfield S2b is preferable as there is almost no greenspace left in the Headington area with a rising population which has not been accounted for or calculated			
SA obj 4						Overconcentration on home rather than accommodation, Oxford has an unusual population mix consisting of key workers and students, most of whom will want rooms/small flats not large homes. Also overconcentration on providing space inefficient family homes which impacts ability to deliver medium/high density accommodation.			
SA obj 7, 9, 10, 11, 12						Disagreement with analysis/scoring of S2b in objs 7, 9, 10, 11, 12. Feels S2b should score better than other, e.g. adequate blue/green leisure - S2b is clearly better for leisure. Losing greenspace brings more population in (increasing demand) and reduces greenspace so increases demand and reduces supply. Heritage assets include greenfield sites in OHCA's so again S2b scores better. Under obj 12, an unhealthy, overcrowded and undesirable city will not support economic growth.			
SA obj 7 Biodiversity		Natural England suggest the use of the BNG metric 3.1 and EBNT at this stage of plan making in order to establish a baseline position and inform the SA evidence base. Also, have not reviewed plans listed in SA but suggest that the following types of plans relating to the natural environment should be considered where applicable to plan area: GI strategies, Biodiversity plans, Rights of Way Improvement Plans, River Basin Management Plans, Relevant landscape plans and strategies.							

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
HRA		Natural England supports the approach that Oxford City Council are taking in regards to the Habitat Regulations Assessment as detailed in the background paper submitted with this consultation stage. They look forward to providing further advice on the assessment once it becomes available.	1	The Lye Valley is wholly absent from reference in HRA which is one of the most unique habitats in the UK.		AQ impacts resulting from increased traffic on A34 as a result of traffic filters and LTNs must be factored into HRA			
		OCC welcomes HRA and agree Oxford Meadows SAC to be included.	1						
HIA		Support and welcome	1			Not enough on air quality PM2.5			
				Must be data driven					
				Health impact around airport is not addressed					
				Concern about air pollution from yard and agricultural waste burning					
				Sewerage flooding should be factored into the HIA process					
				Concerns about air quality (including PM2.5)	3				
				Green and recreational space is very important					
				Health impacts of more cycling/walking leading to more accidents					
				Particular health/life expectancy inequalities, or lack of provision of facilities across areas of city (lower in Littlemore for example)	2				
				HIA should not be used to justify bus gates/15 min city plan					
Housing need paper BGP				Put jobs where people live outside of Oxford		The BGP reports that 144 AH delivered pe year, is this a success?	2		
				Providing family homes is laudable, but the space used for a detached house with a car and garden could house 30-40 key workers. Predominantly, key Workers with lower incomes require affordable, decent housing.		Housing need paper wrongly treats Oxford in isolation from wider economic market of Oxfordshire. Does not reflect the recession or recent impacts of Brexit and therefore overstates growth needs. Nature and climate emergency needs to be taken into account in that paper too, net zero retrofitting will necessitate materials and skilled labour that will have to come from supply for housebuilding creating a constraint on new homes.			
Flooding BGP		A new flood assessment is needed		Agree that more than just fluvial flood risk needs to be taken into account, flags that building in flood zone 3a or 3b is not acceptable, particularly in light of climate change, also will be more expensive, impacting viability and delivery on other objectives.					

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Climate risk assessment				Misses both the serious danger of flash flooding due climate change, and Oxford's Flood History. Urgent actions needed to restrict any further development on the flood plain (e.g. impose Article 4 directions to suspend PDRs to restrict paving over gardens increasing run off).		Doubt expressed over points made in climate change background paper discussion inc reality of warmer summers and evidence of climate change actually impacting Oxford.			
Natural Resources		Leave any sites which may have an impact upon the Lye Valley out of the Plan until study completed	2	Although the Lye Valley Survey is welcome, further public involvement and consultation is required to produce a strategy and regulations (e.g. Article 4 suspension of permitted development rights) – disappointing so little is available after Warren Crescent and Dynham Place developments					
GI BGP		Any loss of GI should be avoided							
Inclusive economy BP				MINI is an established large local employer, and would welcome the opportunity to contribute to the inclusive Economy Strategy referenced in this paper					
				There is a tension between support for consolidation centres and preference for employment land for 'higher order' employment uses. Unmet need for warehouse/logistics that will require engagement with neighbours.					
Net zero BP				BMW would be keen to understand what standards would be set by policy to mandate net zero unregulated energy.					
				More research needed – green renewables are not all positive – EVs not the answer, hydrogen is being pursued in Europe.					
Urban design and heritage BP				Conservation Areas are Heritage Assets not just buildings inside them, yet are not even mentioned, although they are the single biggest contributor to wellbeing.					
Site assessment #104 Iffley Mead Playing Fields		SA Objective 3 and 7 need review. Information appears inaccurate							
site assessment #389 Land at Meadow Lane		Site needs a proper biodiversity survey.							
site assessment 463 Ruskin Fields		SA Objective 3 - question "unprotected open space" classification. Site is greenfield, and part of the OHCA.	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
site assessment 463 Ruskin Fields		SA Objective 4 - previous assessments (OLP2036 and previous inquiries) have shown that the site is not suitable or viable for development. (Friends of OH Rep for details)	2						
site assessment 463 Ruskin Fields		SA Objective 5 - misleading to say that site is adjacent to Barton (one of most deprived areas in Oxford). Site is adjacent to Barton Park and on the other side is Old Headington & Foxwell Drive. Barton Park is less deprived than Barton itself. This needs to be reflected in the assessment.	2						
		SA Objective 7 - site currently forms part of uninterrupted green corridor, which has wildlife benefits and has potential to create a green walking/ cycling route. OPT recognise the importance of protecting this corridor. This corridor/ potential green route would be interrupted by development.	2						
site assessment 463 Ruskin Fields		SA Objective 10 - incorrect reference to conservation area. Should read - Old Headington Conservation Area. Given this mistake, we question other aspects of the appraisal. Listed buildings nearby include Ruskin Hall, Stoke House and the garden wall.	2						
site assessment 463 Ruskin Fields		Vehicular access - we question the statement "there is currently no vehicular access to the site" as vehicular access could be created from Foxwell Drive. OLP2036 set out that any vehicular access would need to be through the college.	2						

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Site assessment Bertie Park		<p>Site assessment for Bertie Park is misleading. Should remove site B from the local plan as this site can neither be used for construction or for the location of a new recreation ground, perhaps only a nature trail though no established local need. Ultimately, Site A should be considered on its own merits, and also removed from the local plan. Flags that the 2 sites have completely different characteristics, which leads to confusion and inaccuracies, gives a number of reasons summarised as follows:</p> <p>Site B is greenfield site in flood zone 3; not suitable for any sort of construction; site B is unprotected green space whereas, site A is public open space. Regarding provision of essential services and facilities, assessment doesn't mention that there will be destruction of an outdoor amenity space used by people from area. Also, amenities to replace Bertie Park are too small, would only be used by residents of new development. If not possible for Site B to be converted into public open space, there will therefore be a decrease in the provision of public open space. If site A was assessed independently, the impact on the provision of public open space would be immediately apparent. Also, Hinksey stream borders both sites A and B. This means that housing cannot be built within 10m of the stream; there is a steep bank down to the stream which developers appear to be unaware of as they have shown this as part of an area for free play on site A.</p>							

## 5.10 Other Evidence Base Studies

Evidence base	Comments received	No. of comments
A Character Assessment of Oxford in its Landscape Setting: 2022 Update - Addendum Draft Report	<p>CPRE provided addendum to their main comments, specifically on A Character Assessment of Oxford in its Landscape Setting: 2022 Update - Addendum Draft Report. They state that the failure to articulate the statutory and policy framework in report is a fundamental flaw making the study fail in both its aim to assist in local planning and management and in the limitations of the approach in NOT reflecting approaches required for assessing where and how statutory 'setting' 'character' and 'appearance' considerations apply OR the purposes of the Green Belt policy.</p> <p>Feel that the study is problematic, stemming from update of a limited study (2002) to begin with. Two chapters on setting and landscape in Oxford without mentioning function/ characteristics of Oxford Green Belt. In most of the characterisations, heritage is one brief entry in list of character traits, where in fact it is the predominant consideration in complex, interrelated issues of setting.</p> <p>Highlight findings of the Goodstadt review of the Castle Mills flats proposal (see submission for details), and use this to reinforce point that an approach relying on separate studies is flawed and that there is a need for more integrated approached identifying in policy and practical terms the interrelationship between landscape/townscape character, views and setting. Set out a hierarchy for considering this (a statute, (b 'great weight' policies for defined assets/areas, (c other policies. (see submission for more detail).</p>	



Evidence base	Comments received	No. of comments
	Does not mention the Oxford Green Belt, while making reference to the setting and landscape of Oxford.	x2
	Concerned that there are a number of inconsistencies between the LCA and the 2009 Iffley Conservation Area Appraisal. Shift in language in LCA for Iffley which is now described as having a suburban character rather than the ICAA language which recognises the village's rural character. Suggestion that there has been a deterioration in landscape quality since 2009. Question why this change in language has been used and why there has been a change in emphasis when not aware of any significant developments that would have caused it. Does not appear to be evidence-based.	
	Biodiversity comments seem to be cursory and based on a desk-based review of GIS rather than by an expert and seem to be un-evidenced.	
	Shift in nuance with description of Iffley Village in new Landscape Character Appraisal, unclear why and feeling that nothing has changed to warrant.	2
	Not yet been consulted upon	
Botley Road Retail Park Development Brief	Section 8 - the inclusion of set max. building heights is much too prescriptive - by setting max. height criteria without the ability to assess the impact of specific dev. there could be sign. Impact on ability to maximise potential of the site. Same is true of setting blanket of 25m margin between blocks and existing residential dev. Building heights have also not been thoroughly tested and could limit the scope of development to come forward. Recommended that brief support need for applicants to provide detailed townscape and visual impact assessment to support individual proposals	
Consultation Process	No households in Iffley received questionnaire. What is being done about this?	
	PO document does not set out quantity or spatial distribution of proposed development. Housing need consultation is postponed. sites do not have a clear indication of amount of housing. Without above info, not possible to provide informed comment.	
	There must be a further consultation before the submission document is published, setting out the amount of housing and employment, and the preferred locations for development	
	PO document is informed by previous consultation and nature and intention are to be welcomed. However given the wide range of topics and issues, it must be overwhelming for the majority of people who are being asked about it.	
Duty to Co-operate Scoping Strategy	Agree with authorities listed for co-operation. Agree that housing need is a top priority for agreement and this should be well-reflected within OLP2040. OLP2040 should ensure agree authorities work together to address housing need and where it cannot be met in Oxford, it should be accommodated in surrounding authorities.	
ELNA	Noted that the gross employment floorspace requirement ranges from 45,710 sqm to 412,310 sqm, based on five scenarios. The assessment concludes that a need of 296,270 sqm is appropriate for the plan period and that additional supply would need to come forward through the new Local Plan. This could include additional supply at sites within the West End, Oxford Science Park and Oxford Business Park, which would suffice for Research and Development and light industrial requirements.	
	Draws on OGNA and as such should not form part of evidence base.	
	There is little evidence about a lack of employment floorspace available in the city. At least 26,000 sqm available at present according to a recent websearch. Lichfields have not commented on changes in working patterns/ reduced demand for office floorspace due to increased homeworking etc.	
	Section 5.8 - it is considered that the full potential contribution of the Science Park is underestimated. Planning app's that are pending determination by OCC will if granted double the amount of E use class floorspace identified in the ELA. Plus considerable opp. for further intensification and development beyond the current planning app's that should be acknowledged and reflected in the LP.	
	Interim Employment Land Assessment - should correct reference to MINI Plant – no longer comprises sports pitches.	
	Numerous allocated employment sites still not built out, e.g., Business Park has 12 acres left to be developed. Lichfield's report concludes that there is a shortage of employment land in the city but there are vacant plots here and at other sites.	

Evidence base	Comments received	No. of comments
ELNA and OGNA	The Interim ELNA refers to the OGNA. This is mis-leading as the projections produced by CE for the OGNA are out of date. Lichfields report should not form part of the evidence base as their work is based on the OGNA	
Future viability work	Evidence underpinning the Council's Local Plan and building requirements should be robust to address the increased emphasis on Local Plan viability testing set out in national policy.	
2022 GI Study	Not fit for purpose. Shows Headington House garden as useable green space when it is enclosed entirely behind high walls and is inaccessible to public. Barton Triangle and Ruskin Fields are not shown in the report. Ruskin Fields are publicly accessible but only adjacently along "paths" - A40 and Stoke Place public bridleway.	x2
	No details as to methodology, or how it reached its conclusions, concern that this could impact on the validity of site allocations and feels it must be entirely rerun	
	Seems incomplete. Agree that any loss of Green Infrastructure is going to be very difficult to replace and therefore loss of green infrastructure should be avoided.	
	Green Infrastructure Study hasn't been turned into a nature recovery plan for Oxford. Nor does it appear to have informed details within the LP other than in discussion regarding mitigating housing/employment (as opposed to greening as its own goal). Trees within gardens alone will not be sufficient.	
	To enhance biodiversity along Northfield Brook and Littlemore Brook, it needs wildlife corridors to outside the city, across Grenoble Road and Garsington Road, and widening the treescape on either side. But the plans will build from Knights Road right up to the brook, worsening the situation.	
Comments may apply to GI study or GI BP (unclear)	Recommendations are not reflected in the preferred options (e.g. no consideration of large scale biodiversity corridors, doubling tree-cover, lack of nature recovery programme for Oxford)	
	Too restrictive on sites included/ needs to be more comprehensive	x2
	The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in the PPG on viability. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.	
Green Infrastructure Background Paper	Welcome the value placed on trees and woodland in the Green Infrastructure background paper	
Growth Deal	Cannot use the Growth Deal to justify "exceptional circumstances for increased housing need". Growth Deal only extends to 2031 and this plan to 2040. Also, all housing as part of GD is to be delivered in surrounding districts.	
HELAA	Support Northfields, IM playing field, BBL site 604 RBL Lakefield Road, site 98 Lanham Way , Grandpont - keep SP as for 2036 sites, some sites don't have Site allocation and County support that position.	
	County comments on additional sites re car free - refer to Rep	
	Interim Housing and Economic Land Availability Assessment is too out of date and needs to be updated.	
	When it comes to update - As per government guidance the council should ensure that the new evidence document also looks at the requirement for specialist housing for older people.	
	Note that the MINI Plant site was considered to have 'Development Potential' in interim HELAA and BMW would invite discussion with the Council to ascertain how it is envisioned that the site could be redeveloped / intensified. OCC will need to engage with BMW to determine the 'potential' for the site.	
	HELAA and Housing Mix Background Paper/ BGP_1___Housing_need and requirement - wholly inadequate as not taking account of Oxford's transient/medium term population of students, Key Workers and tenured lecturers. For student and key worker accommodation, hard data can be researched in Oxford including estimated employment growth so using national metrics is not required. The Housing Register should not be the only metric, many such as above will never be on that list.	

Evidence base	Comments received	No. of comments
	Site assessment process seems to be a 'fait accompli'. unclear whether consultation is invited on these forms. Some forms have basic errors. (Site 389, Land at Meadow Lane). The Council should be engaging in a transparent process that makes it clear what is being consulted upon, what decisions that will inform and what decisions have already been made at this stage of the LP process. To fail to do so wholly compromises the meaning and worth of the consultation.	
	Lack of detail about figures for housing and sites and a lack of evidence to support any proposals.	
HRA	unclear whether all traffic policies/ proposals - LTNs, bus filters, ZEZ etc., have been assessed/ properly factored in to Air Quality Modelling Assessments.	
Infrastructure delivery plan	Figure 4 incorrectly shows green space distribution, showing space that does not exist, and not including important space that does.	
	Fig 7 shows Ruskin Fields 463 as already a housing site although it was rejected two times at two Planning Enquiries	
	No calculation or acknowledgement of needs of a growing population which is well in excess of the national average, and how that extra infrastructure will be provided.	
	CIL Contributions are tiny compared to the cost to the community of the vast car-parking provision at the Headington Hospitals. CIL seems to be set lower for institutions generating most carbon but higher for those that may have lower CO2 footprint such as student accommodation.	
	More engagement is needed to assess the implications of the IDP's proposal to "maximise levels of developer contributions for infrastructure (insofar as can be demonstrated to be viable) as part of the process of preparing the new Local Plan".	
	Annex A of IDP states that Jericho Community Centre project is complete – this is not correct and should be reviewed.	
	There is no calculation or acknowledgement of the needs of a growing population which is well in excess of the national average, and how that extra infrastructure will be provided	
Infrastructure needs general	General reflections flagging that there are infrastructure gaps in city at present/ Doubt expressed about conclusion 'no significant gaps' in infrastructure	2
	Gaps in infrastructure in Marston	
	Concern regarding need for traffic permits around Oxford and to reach hospitals, particularly for those coming from outside city.	
	Concern that city centre should not be limited by further traffic measures	
Infrastructure needs - better links across and into city	More links needed through city beyond buses and bike lanes.	
	Need to consider public transport infrastructure for those commuting into city for work	
	Foot and cycle bridge over the Thames linking South and East Oxford needed	
	Reconsider the rejected proposal for separate footbridge west of Folly Bridge on Abingdon Road.	
	More cycle and pedestrian bridges across the rivers and A40	
	Public transport to the centre and especially the railway and coach stations is inadequate	
	Access including public transport to hospitals is inadequate and needs to be addressed	2
	Improved public transport to/from Marston to improve 15 min access to other parts of city	
Infrastructure needs - buses	More frequent and/or cheaper bus services	6
	Bus system is inadequate for surrounding villages/outer areas of city	2
	Coach services to London should depart only from Thornhill Park and ride with linking local services.	
	Larger buses should be eliminated in favour of a fleet of smaller capacity vehicles that operate on higher number of routes to increase frequency, and improve efficiency of service.	

Evidence base	Comments received	No. of comments
Infrastructure needs - walking/cycling	Need for improvements in cycle infrastructure across city	7
	Safer, segregated mixed-use of routes in city	5
	Concerns about cyclists safety inc obstructions from parked traffic, and congestion	
	Infrastructure plans need to align with aspirations for increasing cycling as set out in the LTCP	
	Workplaces should pay into workplace levy to fund active travel	
Specific locations cycling improvements needed	Plain roundabout needs cycling safety upgrade	
	Cycle paths around Broad Street (inc from Parks Road and St Giles) need to be made safer	
	Improved cycle route on the downhill part of Old Road	
	Corner House roundabout is hazardous to cyclists in its present form and attention needed around Hollow Way traffic filter before it is implemented	
Infrastructure needs - other forms of transport	Oxford Road-Cowley Road meeting point and around Marsh Lane – need for improvements in cycle/walking infrastructure	
	Trams and/or underground trains should be considered to move people quickly and efficiently	4
	Reconsider light rail/tram from Redbridge P&R to city centre – questions impact on grandpont nature reserve due to it being capped off contaminated land.	
	Trams or light railways along existing tracks from Kidlington into Oxford with pick ups through north Oxford, as well as Abingdon Road and reinstated Cowley Branch.	
	Single tram to replace park and ride route through Headington and Abingdon Road and replace the cycle lane.	
	Need for on demand service – similar model to ‘pick me up’	
	More traffic calming measures (e.g. planters, speed displays, raised pavements)	
	More roads needed to provide for new development e.g. near Port Meadow	
Infrastructure needs - transport issues flagged in specific locations	General opposition to use of LTNs as traffic calming	2
	Bring back short term parking in city centre	
	Concern over congestion caused by people accessing the Westgate carpark	
	Don't close Botley Road for a year	
Infrastructure needs - community facilities/amenities	Flag concern about reduced viability in Summertown/Ferry Centre if car parking reduced at diamond place.	
	More amenities needed e.g. shop, post office, schools	
	Need for supporting arts (e.g. dance) through provision of appropriate facilities.	
Infrastructure needs - healthcare	Community hub needed in Littlemore – could incorporate mix of uses including education, IT and financial advice	
	Flags lack of healthcare/doctors/dentistry in Littlemore	2
	New housing growth could lead to pressure on existing healthcare needs and need for new provision – this should be carefully reviewed and contributions sought from developers. Cross-boundary impacts of developments also need to be considered where NHS services often span multiple LPA Boundaries. Cumulative impact of the additional proposed site allocations, on top of those already allocated, needs to be carefully considered too.	
Infrastructure needs - wastewater	NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. NHS should receive a commensurate share of S106/CIL contributions to mitigate the impacts of growth and help deliver transformation plans. Any mitigation to meet the needs of new population needs to be flexible to meet any changing NHS care model, particularly as development is likely to come forward over a number of years.	
	Sewerage system needs to be upgraded to cope with new development	

Evidence base	Comments received	No. of comments
	Concern over lack of processing of wastewater and need for Sandford Treatment Works to be upgraded – lack of clarity over Thames Water’s plans or where funding will come from; SuDS will not address the impact from new housing on this issue.	
Infrastructure needs - energy/carbon	Need to address energy provision	2
	Community and District Heating infrastructure should be prioritised inc provision of outbuildings/infrastructure for heating infrastructure which are not counted in housing/density reqs.	
	Council should be promoting renewable energy delivery within the city on all new development as well as temporary installations on landbanked or reserved land.	
Infrastructure needs - green inf	Need to maintain green spaces inc addressing maintenance issues like litter, graffiti	
Infrastructure needs - other	Critical infrastructure' in the form of logistics and warehousing needs to be considered to support changing trends in how individuals and businesses access goods/services.	
Issues Consultation Feedback Paper	Paper outlines some useful initiatives that will assist in ensuring the 2040 LP meets its objectives in respect of protecting existing green sites and unlocking or expanding others. However there appear to be no concrete actions inviting public participation in this process as part of the Reg 18 consultation and this is a further flaw of the process.	
	Not yet made available.	
	Failure to take account of issues consultation paper and to take to cabinet/ scrutiny committees is unacceptable.	
linking LTCP with OLP2040	OLP2040 should be discussing LTCP/ COTS schemes. Development Plans and Transport Plans must be integrated. Concerned that there is no integration at present as timetables not aligned and no modelling evidence seems to be available for LTCP or OLP2040.	
Local Industrial Strategy	Not justifiable evidence on which to base increased housing numbers over standard method. LIS needs to be up-to-date. Current version Produced in 2019, which pre-dates pandemic and levelling up agenda etc. Current LIS can no longer be considered "up-to-date" evidence.	
	2020 LIS is out of date and should not be used as evidence to inform the plan. 2020 LIS cannot be used to attempt to justify housing requirement because it (the LIS) has not been consulted on.	
	Should not be seeking to grow economy as set out in LIS. Instead the plan needs to focus on affordable housing delivery	
Neighbourhood Plans	The PO document does not acknowledge the numerous neighbourhood plans in existence.	
OGNA and future growth needs assessment work	Should not use this work as the basis for future decisions. Need to employ a different set of consultants. Any consultants employed for future growth needs assessment work should not be reliant on the development sector for the majority of their income. Brief for new consultants should include consideration of whether there is a potential case for pursuing a below Standard Method figure.	
	OGNA was deeply flawed and widely criticised. Alternative Housing Need Assessment work commissioned by ORS criticised the methodology from the OGNA.	
	The same consultants that undertook the OGNA should not undertake any future growth needs assessment work. Any consultants that are used should not be reliant on the development sector for the majority of their income The brief should include consideration for pursuing a below-standard-method figure.	
	No consultation on growth needs assessment.	
	ORS appointed to review OGNA. There are a number of challenges made to this based around questioning population projections, employment projections and overall housing need. Rather than separate projections, ORS suggest a central trajectory with high and low variants should have been used. They also consider that there are "exceptional circumstances" for adopting a "lower than SM" based on the lower population projections from National Statistics. For more info see CDWA Rep	
	Any future assessment of housing need must be open and transparent, and not artificially inflate figures. It must be realistic in view of financial and supply constraints. Any consultants used must be demonstrably independent and not reliant on the development sector for most of their income.	

Evidence base	Comments received	No. of comments
	Based on flawed statistics. The city's own estimates of housing need and affordable need have been consistently overstated.	
Old Headington Conservation Area Appraisal	Sets out the importance and value of green spaces (in particular Ruskin Field Site).	
OxIS (Oxfordshire Infrastructure Strategy)	Need to align with Local Plans since the cessation of work on Oxfordshire Plan 2050.	
Urban design and heritage background paper	<p><b>Historic England</b> feel that the current BP is limited in scope and detail. They encourage the Council to consolidate the evidence base on Oxford's heritage, bringing together key points from the National Heritage List for England, Historic England's Heritage at Risk Register, the local HER, the OHAR, the Oxfordshire Historic Landscape Characterisation / a Character Assessment of Oxford in its Landscape Setting 2022 Update, Conservation Area Appraisals, and other relevant Oxford specific studies. They suggest that a new BP, to be consulted on in 2023, would provide scope for coverage of a range of important issues inc (see response for full details): a) an overview of the different types of designated heritage asset within the city; b) More detail on the proposed approach to a holistic management plan for the city's archaeological remains, especially those within college owned sites; c) Heritage at risk - and subsequently a new section in LP that sets out approach to this; d) the contribution made by heritage to the local economy</p>	
Viability Assessment	<p>HBF has prepared a briefing note for whole plan viability assessments and Rep highlights several issues:</p> <ul style="list-style-type: none"> <li>- abnormal infrastructure costs should now be factored into whole plan viability assessments and not left to be addressed through site-by-site negotiation. Important that a significant buffer is included in the viability assessment to cover these costs otherwise risk of potential delays while negotiation takes place, or risks of non-delivery due to costs being too high.</li> <li>- encourage council to use upper end of any ranges suggested with regards to fees/ profit margins.</li> <li>- need to take into account wider policy aspirations and leave sufficient headroom to deal with additional costs arising from e.g., BNG and Future Homes in addition to local plan policies.</li> <li>- approach to land values needs to be a balanced approach and needs to recognise that land won't come forward if land values are too and policy/ infrastructure costs are too high.</li> </ul>	
15-minute city/ healthy city	PO document does not include the work of transport groups to show how the 15-minute city concept relates to getting about more widely throughout the city.	





## Appendix 1: Statutory Consultees

EE
Three
Vodafone and 02
Beckley & Stowood Parish Council
Elsfield Parish Council
Garsington Parish Council
Gosford and Water Eaton Parish Council
Horspath Parish Council
Kennington Parish Council
Littlemore Parish Council
North Hinksey Parish Council
Sandford on Thames Parish Council
South Hinksey Parish Council
Stanton St John Parish Council
Woodeaton Parish Council
Wytham Parish Council
Blackbird Leys Parish Council
Cherwell District Council
Canal and River Trust
Civil Aviation Authority
Environment Agency
Highways Agency
Historic England
Homes England
Integrated Care System (ICS) for Buckinghamshire, Oxfordshire, Berkshire West
National Grid UK
National Health Service Commissioning Board
Natural England
Network Rail
NHS Oxfordshire Clinical Commissioning Group
Office of Rail and Road
Old Marston Parish Council
Oxfordshire County Council
Oxfordshire Local Enterprise Partnership (OxLEP)
Risinghurst and Sandhills Parish Council
Scottish and Southern Energy

South Oxfordshire District Council
Thames Valley Police
Thames Water
The Coal Authority
The Office of the Police and Crime Commissioner for Thames Valley
Vale of White Horse District Council
West Oxfordshire District Council
Wild Oxfordshire

## Appendix 2: additional local groups and organisations contacted directly

Bartholomew Road Allotments Association	Oxford Historical Society
Barton Fields Allotment Association	Littlemore Local Historical Society
Cripley Meadow Allotment Association	Iffley History Society
Town Furze Allotment Association	Wolvercote Local History Society
Trap Grounds Allotment Association	Oxfordshire Buildings Record
Barns Court Allotment Association	Build a Dream Self Build Association
Barracks Lane Allotment Association	Diamond Cottages Residents Association
Bartlemas Close Allotment Association	Feilden Grove Residents Association
Bullstake Close Allotment Association	Iffley Fields Residents Association
Cuttesslowe Allotment Association	South Oxford Residents Association
East Ward Allotment Association	Hinksey Park Area Residents Association
Fairacres Road Allotment Association	St Margaret's Area Society
Fairview Allotment Association	Pullen's Lane Association
Ingle Close Allotments	Oxford Waterside Residents Association
Kestrel Crescent Allotment Association	Residential Boat Owners' Association
Lower Wolvercote Allotment Association	Co-ordinating Committee of Headington Residents' Associations (CCOHRA)
Marston Ferry and Blackhall Allotment Association	Apsley Road Residents Association
Mill Lane Allotment Association	Central Ward Residents Association
Osney, St Thomas & New Botley Allotment Association	New Marston South Residents Association
Ramsey Road Allotment Association	Central North Headington Residents' Association
Risinghurst Allotment Association	Harberton Mead Residents' Association
Rose Hill (Lenthall Road) Allotment Association	Headington And St Clements Residents' Associations
South Ward Allotment Association	Highfield Residents' Association
Spragglesea Mead and Deans Ham Allotment Association	Hill Top Road Residents' Association

St Clement's Allotment Association	Hobson Road Group
Upper Wolvercote Allotment Association	Horspath Road Area Residents' & Tenants' Association
Van Diemens Lane Allotment Association	Jack Straw's Lane Residents Association
Watlington Road Allotment Association	Jordan Hill Residents' Association
Oxford and District Federation of Allotment Associations	Moreton Road Residents' Association
Blackbird Leys Allotment Association	Polstead Road Residents' Association
Binsey Lane Allotment Association	St John Street Area Residents' Association
Headington and District Allotments Association	Wood Farm Area Tenants' & Residents' Association
Friends of Old Headington	York Place Residents' Association
Friends of North Hinksey	Divinity Road Area Residents Association (DRARA) Planning Action Group
FOXCAN	Osney Island Residents Association
CPRE Oxfordshire	Falcon Close Resident's Association
Friends of Cutteslowe and Sunnymead Park	East Oxford Residents Association Forum
Friends Of Iffley Village	Headington Hill Residents Association
Friends Of Quarry	London Place Residents Association
Friends Of Warneford Meadow	Middle Cowley Action Group
Iffley Fields Community Nature Plan Group	Northway Action Group
North Oxford Association	Stoke Place Residents' Association
Oxford Civic Society	Alhambra Residents and Tenants Association
Oxford Green Belt Network	Argyle Street Residents Committee
Oxford Preservation Trust	Aston Street Residents Association
Park Town Trust	City of Oxford Bed and Breakfast Residents Association
Rescue Oxford	Beauchamp Place Residents Association
Summertown Riverside Group	Barton Howard House Residents Association
Wolvercote Against Masts	Benson Place Residents Association
Friends of Bury Knowle Park	Bainton Road and District Residents Association
Friends of Holy Trinity Church	Bridge East Street Residents
Barton Community Association	Bath Street Residents Association
ENGAGE Oxford	Binsey Village Residents Association
East Oxford Action	Cunliffe Close Residents Association
Residential Landlords Association	Cordrey Green Residents Association
Headington Action	Chalfont Road Residents Association
Jericho Wharf Trust	Canal Walk Residents Association
BOAT Boaters of Oxford Action Team	Dorchester Court Residents Committee
Cutteslowe Community Association	Dove House Close Residents Association
South Oxford Community Association	Donnington Residents Association
Littlemore Community Association	Easiform Tenants Association
Wolvercote Neighbourhood Forum	Evenlode Tower Residents Association
Headington Neighbourhood Forum	Fairacres Road Residents Association

Summertown St Margaret's Neighbourhood Forum	Fitzherbert Close Residents Association
Blackbird Leys Community Association	Iffley Road Area Residents Association
Bullington Community Association	Ferry Hinksey Road Residents Association
Donnington Community Association	Granville Court Residents Association
East Oxford Community Association	Gipsey Lane Council Tenants Association
Florence Park Community Association	The St George's Park Residents Association
Headington Community Association	Gladstone Road Tenants and Residents Association
Jericho Community Association	Heron Place Residents Association
Northway Community Association	Hayfield Road Residents Association
Regal Area Community Association	Jeune Street Residents Association
Risinghurst Community Association	Lathbury Road Residents Association
Rose Hill Community Association	Laurel Farm Close Residents Association
West Oxford Community Association	Little Oxford Residents Association
Friends of Aristotle Recreation Ground	Linton Road Neighbourhood Association
Friends of Florence Park	Leafield Road Residents Association
Friends of Headington Hill Park	Mileway Gardens Residents Association
Friends of Kendall Copse	Old Marston Residents Association
Friends of Aston's Eyot	Norton Close Residents Association
Friends of Lye Valley	New Headington Residents Association
Friends of Raleigh Park	Norham Manor Residents Association
Friends of South Park	Northway Tenants and Residents Association
Friends of the Trap Grounds	North Parade Residents Association
Freemen of the City of Oxford	Nursery Close Residents Association
North Oxford Green Belt Preservation Group	Old Friars Residents Association
Save Port Meadow	Oxford Pegasus Residents Association
Wolvercote Commoners Committee	Plowman Tower Residents Association
Headington Heritage	Paddox Residents Association
Friends of Oxpens Meadow	Park Town Residents Association
St Margaret's Church	Rose Hill Tenants Association
St Aldate's Parish Church and Centre	Richards Way Estate Residents Association
Oxford Quakers	East Oxford Residents Association
Oxford Muslim Community Initiative	Stephens Road Residents Association
Oxford Hindu Temple & Community Centre Project	St Ebbes New Development Residents Association (SENDRA)
The Oxford Buddha Vihara	Stockmore Street Residents Association
Thrangou House Oxford	South Summertown Residents Association
Gurdwara Sri Guru Singh Sabha Oxford	St Anne's Road Residents Association
Advisory Council For the Education of Romany and Other Travellers	St Thomas Residents Association
Oxfordshire Unlimited	Old Temple Cowley Residents Association
Oxford Access Forum	St Aldates Residents Group

Oxfordshire Association for the Blind	Upper Wolvercote Association
Deaf Direct Oxford	Victoria Road Group
Showman's Guild of Great Britain (London and Home Counties)	Webbs Close Action Committee
Age UK Oxfordshire	Woodstock Close Residents Association
Friends, Families & Travellers Community Base	Walton Manor Residents Association
The Travellers Movement	Whitworth Place Tenants Association
Oxford Irish Society	Windmill Road Residents Association
Oxfordshire Youth Support Services	Summertown Riverside Group
Oxford Youth Works	Harefields and Marriott Residents Association
Thames Valley Gypsy and Traveller Association	Wingfield Residents
The Gypsy Council	West Quarter Residents Association
Oxford Asian Cultural Association	Waterways Residents Association
	Waterside Residents Association
Oxford Archaeology South	Templars Square Residents Association
Oxfordshire City and County Archaeological Forum	St Mary's Road Residents Association
Oxfordshire Architectural and Historical Society	North Oxford Estates Residents Association
The Twentieth Century Society	Marston Street Residents Association
The Garden History Society	Lye Valley Residents Association
The Georgian Group	Hurst Street Residents Association
The Society for the Protection of Ancient Buildings	HART Residents Association
The Ancient Monuments Society	Essex Street Residents Association
Oxfordshire Gardens Trust	Churchill Residents Association
	Harefields Residents Association



## Appendix 3: Performance of Social Media Campaigns

The consultation was promoted online on several social media platforms. The following appendices detail the content (comprising of articles, videos, photos and other material) that made up the campaigns, the platforms, and the extent of audience reach or levels of engagement as relevant.

### Council Newsletter

Date	Newsletter title	Link	Total clicks	Unique clicks
07/10/2022	<a href="#">Record your views on Oxford 2040 📄</a>	<a href="https://consultation.oxford.gov.uk/">https://consultation.oxford.gov.uk/</a>	129	106
14/10/2022	<a href="#">Think a private rented property should be up to standard? So do we! 🏠📄✖️</a>	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	20	15
21/10/2022	<a href="#">A sneak peak at exciting developments to come 🏠🏠</a>	<a href="https://consultation.oxford.gov.uk/">https://consultation.oxford.gov.uk/</a>	25	18
28/10/2022	<a href="#">Using wine, oil, corn and salt to bless a house... no this isn't a House of the Dragon reference 🏠</a>	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	9	8
03/11/2022	<a href="#">Oxford remains a diverse and youthful city 🌍</a>	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	13	12
11/11/2022	<a href="#">Working to retrofit council homes, we wish it was as easy as EPC 🏠📄</a>	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	35	29

### Facebook Ads

Ad name	Results (link clicks)	Reach	Impressions	Page engagement	Post reactions	Post comments	Post saves	Post shares	Link clicks
Overview video	790	17639	32007	8899	51	16	5	8	790
15 minute city	1006	11864	33897	4240	47	34	3	5	1006
Climate emergency	1217	7191	27448	3264	10	11			1217
Inequalities	1528	4821	31296	3050	2	2			1528

### Facebook Organic Posts

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p>"the Covid pandemic and lockdowns really reminded us how important local neighbourhoods and local communities are"</p> <p>The Local Plan 2040 looks at the idea of a 15 minute city in which daily needs are within a 15 minute walk of your home.</p> <p>This provides the opportunity to build strong</p>	Video	5	211		24	63	817	39	26	10	75	727	240	405

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p>local communities that enable residents to thrive.</p> <p>Do you agree with this idea? Have your say on #Oxford2040  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>														
<p>Record your views on Oxford's future 🗨️.</p> <p>#Oxford2040 is a planning document required by law, it will be used to inform all future planning applications, by setting out how and where new homes, jobs and community facilities will be delivered to make Oxford a better place to live, work and visit.</p> <p>Shape the #Oxford of 2040 (and beyond!) here:  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Photo	1	5			0	71	1	1	0	2	62	6	0
<p>EDIT: University Parks Parkrun has been cancelled, but the team will be available at Cuttleslowe Park Parkrun instead. Timings remain the same.</p> <p>Got questions about #Oxford2040? Talk to the team!</p> <p>You can find them:</p> <ul style="list-style-type: none"> <li>◆ Monday 24 October - Ferry Leisure Centre - 12 - 2pm</li> <li>◆ Tuesday 25 October - Oxford City Football Club, Marsh Lane - 6:15 - 7:30pm</li> <li>◆ Friday 28 October - Gloucester Green Market - 12 - 2pm</li> <li>◆ Saturday 29 October - Cuttleslowe Park Parkrun - 8:30 - 10:30am</li> <li>◆ Sunday 30 October - Florence Park Parkrun - 8:30 - 10:30am</li> <li>◆ Wednesday 2 November - Sainsbury's Heyford Hill - 11am - 1pm</li> <li>◆ Thursday 3 November - Further Education College (EMBS) - 12 - 12:45pm</li> <li>◆ Friday 4 November - Templars Square</li> </ul>	Photo	1	22	4		0	1907	1	5	5	11	1900	27	0

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p><b>Shopping Centre - 11am - 1pm</b></p> <p>More info and consultation:  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>														
<p>Oxford has diverse communities and a strong identity but there are wide inequalities across the city, exposed and exacerbated further by the recent pandemic.</p> <p>Identified by you in a consultation last summer, some of the inequalities include access to housing and employment opportunities and in health and wellbeing. #Oxford2040 aims to reduce these inequalities and create opportunities for all.</p> <p>We want your views on how this can happen to make Oxford a fairer city in 2040? Have your say on #Oxford2040 ↓  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Video	1	10			8	463	0	2	0	2	463	11	120
<p>Under two weeks to record your views on #Oxford2040!</p> <p>Play a part in making Oxford's future better for everyone, share your views on the Local Plan before November 14.</p> <p>Head over to →  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Photo	1	1			0	159	0	4	2	6	144	2	0
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>You can find them:</p> <ul style="list-style-type: none"> <li>◆ Tuesday 8 November - Oxfordshire County Library, Westgate - 12 - 2pm</li> <li>◆ More locations to be confirmed</li> </ul> <p>More info and consultation:  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Photo	2	3			0	107	0	4	0	4	93	5	0

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p>Don't miss your chance to shape the future of Oxford! The consultation on #Oxford2040 closes November 14 📅.</p> <p>Head to the "Consultations" link in bio to record your views 🗣️</p> <p>#LocalPlan #OxfordCityCouncil #planningcommunity #communitiesupportingcommunities #climateemergency #climatechange</p>	Video		19		5	0	530	10	8	1	19	515	24	226
<p>Last summer, we asked you to give your views in an 'Issues' consultation for the Local Plan 2040.</p> <p>The views you shared have helped us to create a first draft which we are now sharing with you to record your views on before a more detailed draft is produced.</p> <p>The consultation is split into three key threads:</p> <ul style="list-style-type: none"> <li>◆ 15-minute neighbourhoods (where everything residents need to live well is within a 15 minute walk of home)</li> <li>◆ Climate change (accelerating the move to net zero buildings and ensuring the City's resilience against impacts of climate change)</li> <li>◆ Reducing inequalities (narrowing the gap in housing, health and employment inequalities across the city by creating real opportunities for everyone)</li> </ul> <p>You can find out more and record your views here ↓  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p> <p>#Oxford2040</p>	Photo	1	32			0	183	4	8	2	14	160	33	0

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p><b>Got questions about #Oxford2040? Talk to the team!</b></p> <p><b>You can find them:</b></p> <p><b>Monday 10 October - St Mary's and St Nicholas Church - 10:30am - 12pm</b>  <b>Wednesday 12 October - Blackbird Leys Community Centre 2 - 4pm</b>  <b>Tuesday 18 October - Rose Hill Community Centre - 2 - 4pm</b>  <b>Thursday 20 October - Tesco Superstore Blackbird Leys - 11am - 1pm</b></p> <p><b>More info and consultation:</b>  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Photo		1			0	193	0	2	3	5	175	1	0

#### Instagram Posts

Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
<p><b>The Oxford Local Plan 2040 is a planning document that shapes the city for the good of its people, that's why we need you to record your views!</b></p> <p><b>Have your say on the city's future, head to the 'Consultation' link in bio</b>  <b>#Oxford2040</b></p>	49	IG video	3091	2963	0	4	1536	103	11	13
<p><b>Would you like to have everything you needed within a 15-minute walk of you 🏡🚶?</b></p> <p><b>Last year we collected your views on what #Oxford's future issues could be. You told us that local neighbourhoods, communities and access to local amenities were really important. That has helped us to shape the 15-minute city idea and we'd like to know if it meets your needs.</b></p> <p><b>Record your views on the latest stage of the Oxford Local Plan 2040 by heading to the "Consultations" 🗨️ in bio.</b></p> <p><b>#Oxford2040</b></p>	13	IG video	3836	3504	6	4	2028	175	1	19

Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
<p>Record your views on Oxford's future 🗨️.</p> <p>#Oxford2040 is a planning document required by law, it will be used to inform all future planning applications, by setting out how and where new homes, jobs and community facilities will be delivered to make Oxford a better place to live, work and visit.</p> <p>Shape the #Oxford2040 (and beyond!) by heading to the "Consultations" link in bio 📄</p> <p>#LocalPlan #OxfordCityCouncil #planningcommunity #communitiesupportingcommunities #climateemergency #climatechange</p>	0	IG image	421	402	0	0	0	3	0	0
<p>It may be grey and rainy today in #oxford, so we thought we'd share a video from a sunnier time.</p> <p>#radcliffesquare is an iconic part of Oxford's city centre and history. We're working on #Oxford2040, a local plan for the city's future.</p> <p>To shape the draft plan, we collected your views on what Oxford's future issues could be. You told us that the climate emergency and transitioning to net zero was important, however, there was concern about how that could happen in a city with so many historical buildings. The two things can seem at odds, but #Oxford2040 looks to address both issues.</p> <p>Have your say on the Local Plan by heading to the "Consultations" 📄 in bio</p>	4	IG video	4917	4626	12	6	2573	218	8	16
<p>Have your say in the Oxford Local Plan to help shape the city of tomorrow 🗨️🗨️.</p> <p>#oxford2040 is a planning document that will help to shape new developments in the city and make it a better place for you to live, work or visit!</p> <p>Head to the "Consultations" 📄 in bio for more information.</p> <p>👤 @oxfordyouthambition</p> <p>#oxford #oxfordcity #youthambition #planning</p>	35	IG video	2273	1972	2	0	1293	45	2	4



Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
<p><b>Under two weeks to record your views on #Oxford2040!</b></p> <p>Play a part in making Oxford's future better for everyone, share your views on the Local Plan before November 14.</p> <p>Head to the "Consultations" link in bio 📄</p>	0	IG image	362	333	0	0	0	2	0	0
<p><b>Don't miss your chance to shape the future of Oxford! The consultation on #Oxford2040 closes November 14 🗓️.</b></p> <p>Head to the "Consultations" link in bio to record your views 📄</p> <p><b>#LocalPlan #OxfordCityCouncil #planningcommunity #communitiesupportingcommunities #climateemergency #climatechange</b></p>	49	IG video	1634	1562	0	0	845	58	9	6
<p><b>Only four days left to have your say about #Oxford2040 🗨️.</b></p> <p>Head to the "consultations" 📄 in bio for more info!</p> <p><b>#oxford #oxfordcitycouncil #consultation #haveyoursay</b></p>	35	IG video	866	822	0	0	438	18	0	1
<p><b>Last summer, we asked you to give your views in an 'Issues' consultation for the Local Plan 2040.</b></p> <p>The views you shared have helped us to create a first draft which we are now sharing with you to record your views on before a more detailed draft is produced.</p> <p>The consultation is split into three key threads:</p> <ul style="list-style-type: none"> <li>◆ 15-minute neighbourhoods (where everything residents need to live well is within a 15 minute walk of home)</li> <li>◆ Climate change (accelerating the move to net zero buildings and ensuring the City's resilience against impacts of climate change)</li> <li>◆ Reducing inequalities (narrowing the gap in housing, health and employment inequalities across the city by creating real opportunities for everyone)</li> </ul> <p>You can find out more and record your views on #Oxford2040 by heading to the "Consultations" link in bio 📄</p> <p><b>#Oxford #OxfordCityCouncil #NetZeroCity #ClimateEmergency #inequalities #healthandwellbeing #communities #communitiesupportingcommunities</b></p>	0	IG image	635	571	0	0	0	9	0	0

Twitter Posts

Tweet text	impressions	engagements	retweets	replies	likes	user profile clicks	url clicks	hashtag clicks	detail expands	dial phone	media views	media engagements
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>You can find them:</p> <p>Wednesday 2 November - Sainsbury's Heyford Hill - 11am - 1pm  Thursday 3 November - Further Education College (EMBS) - 12 - 12:45pm  Friday 4 November - Templars Square Shopping Centre - 11am - 1pm <a href="https://t.co/3jEmATeGpR">https://t.co/3jEmATeGpR</a></p>	720	4	3	0	0	0	0	0	0	0	1	1
<p>The Oxford Local Plan 2040 is a planning document that shapes the city for the good of its people, that's why we need you to record your views about tackling the #ClimateEmergency!</p> <p>Have your say on the city's future, today <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a></p> <p>#Oxford2040 <a href="https://t.co/nnLzrBlvMi">https://t.co/nnLzrBlvMi</a></p>	780	34	2	2	4	0	3	2	11	0	243	10
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>24 Oct - Ferry Leisure Centre - 12-2pm  25 Oct - Oxford City Football Club - 6:15-7:30pm  28 Oct - Gloucester Green Market - 12-2pm  29 Oct - Uni Parks Parkrun - 8:30-10:30am  30 Oct - Florence Park Parkrun - 8:30-10:30am  <a href="https://t.co/ufkCM86Yqa">https://t.co/ufkCM86Yqa</a></p>	1195	10	3	0	5	0	0	0	1	0	1	1
<p>Record your views on Oxford's future →.</p> <p>#Oxford2040 is required by law and will be used to inform all future planning applications to make Oxford a better place to live, work and visit.</p> <p>Shape the #Oxford of 2040 here <a href="https://t.co/ShHTuf1SMe">https://t.co/ShHTuf1SMe</a>  <a href="https://t.co/HHV0iHeCVW">https://t.co/HHV0iHeCVW</a></p>	619	9	1	2	2	0	2	0	1	0	1	1
<p>#Oxford2040 looks at the idea of a 15 minute city in which daily needs are within a 15 minute walk of your home.</p> <p>This provides the opportunity to build strong local communities.</p> <p>Do you agree with this? Have your say, today:  <a href="https://t.co/ShHTuf1SMe">https://t.co/ShHTuf1SMe</a> <a href="https://t.co/7lg5KKspfv">https://t.co/7lg5KKspfv</a></p>	17567	2135	55	109	33	134	141	3	922	0	5814	736

Tweet text	impressions	engagements	retweets	replies	likes	user profile clicks	url clicks	hashtag clicks	detail expands	dial phone	media views	media engagements
The Oxford Local Plan 2040 is a planning document that shapes the city for the good of its people, that's why we need you to record your views!  Have your say on the city's future, today <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a>  #Oxford2040 <a href="https://t.co/isj4dhXlp1">https://t.co/isj4dhXlp1</a>	563	22	1	1	2	8	1	0	5	0	193	4
Got questions about #Oxford2040? Talk to the team!  10 October - St Mary's and St Nicholas Church - 10:30am-12pm 12 October - Blackbird Leys Community Centre 2-4pm 18 October - Rose Hill Community Centre - 2-4pm 20 October - Tesco Superstore Blackbird Leys - 11am-1pm <a href="https://t.co/USHDNY9xm2">https://t.co/USHDNY9xm2</a>	902	10	0	3	1	0	0	0	3	0	5	3
Record your views on #Oxford2040 Local Plan and help to shape the city for future generations  <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a> <a href="https://t.co/XqsJb47I2m">https://t.co/XqsJb47I2m</a>	455	5	0	0	1	0	4	0	0	0	0	0
Only a few days left to have your say on the Oxford Local Plan! Help shape the city of tomorrow  #oxford2040 is a planning document that will help to shape new developments in the city and make it a better place for you to live, work or visit!  <a href="https://t.co/aXmPyG3Gpz">https://t.co/aXmPyG3Gpz</a> <a href="https://t.co/DkVmOavTwc">https://t.co/DkVmOavTwc</a>	780	26	1	1	3	0	9	0	1	0	245	11
Got questions about #Oxford2040? Talk to the team!  You can find them:  Tuesday 8 November - Oxfordshire County Library, Westgate - 12 - 2pm More locations to be confirmed  More info and consultation: <a href="https://t.co/ShHTuf1SMe">https://t.co/ShHTuf1SMe</a> <a href="https://t.co/pTEwef5e8z">https://t.co/pTEwef5e8z</a>	911	24	0	1	5	2	6	2	5	0	3	3
Under two weeks to record your views on #Oxford2040!  Play a part in making Oxford's future better for everyone, share your views on the Local Plan before November 14.  Head over to <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a> <a href="https://t.co/ltliuremMN">https://t.co/ltliuremMN</a>	498	6	0	1	1	0	2	0	2	0	0	0

[www.oxford.gov.uk](http://www.oxford.gov.uk)



**Town Hall**

St Aldates, Oxford

T: 01865 252847 E: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

[www.oxford.gov.uk](http://www.oxford.gov.uk)