



Historic England

Covering letter summarises reps that are given in Appendix A and B -  
input reps as set out in Appendices (majority are already in database - those that are not are marked as such)

FAO:  
The Planning Policy Team  
Oxford City Council

Our ref: [REDACTED]

[planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)  
by email only

05 January 2024

Dear planning policy team

Thank you for consulting Historic England, the Government's adviser on the historic environment, about Oxford City Council's Regulation 19 Local Plan to 2040 (OLP2040).

We warmly welcome many of the changes that have been made to the Preferred Options published last autumn, and the efforts made to take account of our feedback over the past 12 months. For example, we support splitting the policy on designated heritage assets into different types of asset and aligning with national policy when referring to non-designated heritage assets (without losing reference to the Oxford Heritage Asset Register). Also, we support the detailed approach in site allocation policies to refer explicitly to heritage issues as appropriate in the new OLP.

Though we raise concerns about all the proposed heritage policies in the plan, we broadly support the approach being taken by the Council in this plan and are optimistic these soundness concerns can be resolved through editorial discussions with the Council. We suggest revised wording within our detailed comments in Appendix A.

### **The contribution made by heritage to Oxford's economy**

One of our remaining areas of concern is the plan's lack of attention to the contribution made by heritage to the city's economy. There are many ways in which the two are connected<sup>1</sup>, not least through the number of heritage assets in Oxford used as a home or place of work. Oxford's Economic Strategy 2022-2032 notes how the city's physical environment and world class culture (especially in the city centre) contribute to Oxford's global impact and visitor economy. Achieving a positive strategy for the conservation and enjoyment of the historic environment (as required by NPPF paragraph 190<sup>2</sup>) will be harder if the plan offers an incomplete picture on heritage.

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<sup>1</sup> For more general information see: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/>

<sup>2</sup> Where we quote the NPPF in this response, we refer to the version dated September 2023.



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We strongly encourage the City Council to consider this matter in its future planning work, and we assert this needs to be supported by the local plan. This should be achievable through relatively minor amendments such as those we suggest in Appendix A, which include:

- a) adding an extra word to the proposed vision;
- b) changes to the text supporting policy S2;
- c) adding relevant text to the supporting text on tourism;
- d) changes to the opening of chapter 6 on urban design and heritage;
- e) adding a new monitoring indicator that helps to reveal this connection.

### **Housing site allocations**

We consider most of the site allocations to be sound or could be made sound with relatively minor changes in wording. That said, we have conferred previously about the need for proportionate heritage impact assessment, and there are 4 sites where in our opinion the published evidence is insufficient to inform a sound allocation:

- SPS2: Kassam Stadium and Ozone Leisure Park (assuming the site boundary is amended as we suggest it should be in Appendix B)
- SPE17: Jesus and Lincoln Sports Grounds
- SPCW3: Manor Place
- SPCW6: Nuffield Sites

To address this concern, we recommend proportionate heritage impact assessment of the above sites, collated in a way that contributes to your published evidence base. We recommend following a 5-step methodology for HIA, as set out in our advice note on the site allocations in local plans (HEAN 3): <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

Potentially relevant content may already be available in existing design template frameworks. We provide more detailed comments on the above sites in Appendix B.

### **Employment site allocations**

When considering policy E1, we are concerned that as a standalone sentence, “Planning permission will be granted for the intensification and modernisation of any Category 1 or 2 employment site” risks conveying an unconstrained view of the scope for intensification and modernisation of employment sites. Even though the opening of policy E1 refers to avoiding unacceptable environmental impacts, the increasing pressure for development and intensification within Oxford elevates the risk of poor outcomes, where growth is achieved at the expense of heritage. To address this concern, we recommend revised wording in Appendix A, partly by referring to the Council’s heritage policies in policy E1, but also through the plan’s detailed approach on high buildings. Our comments in Appendix A also query the version of the ELNA report in the Council’s evidence base: the plan quotes a 2023 report, but online we can only find the interim 2022 report.



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## High buildings

Our final headline point relates to high buildings. We welcome the safeguards in the plan on protected views and the city's skyline. That said, it is notable that OLP2040 generally takes a light touch approach to its spatial strategy for high buildings. Policy HD9 takes a criteria-based approach to assessment and does not identify areas that are more suitable for high buildings. As a result, the location of new large-scale buildings may be informed by the Council's evidence base but would not be plan-led.

Given the pressure for intensification in Oxford, including a doubling of employment land need (without identifying more employment sites) and the pressure on housing supply using an economic growth-based housing projection, we believe there is a need for the local plan to be clearer on this matter.

To address our concerns, we propose:

- a) referring to Areas of Greater Potential in policy HD9, supported by relevant criteria, coupled with a line in policy HD9 stating that sites outside the Areas of Greater Potential will typically be more sensitive and thus less suited to new large-scale buildings; and
- b) strengthening the Council's evidence base by undertaking a further heights and massing study that uses the Areas of Greater Potential as a starting point and assesses in detail (supported by relevant modelling) the impact of large-scale development on views across and out of the city. If appropriate, this could centre on the Cowley Branch Line and Littlemore Area of Focus as a sub-area within the southern Area of Greater Potential, inferring that is the area of greatest interest for such intensification in the short- to medium-term. We are currently exploring opportunities to work with you and other partners to assist with this aspect of your evidence base.

Taking the above approach should help to avoid large-scale development occurring across swathes of the city's suburbs in an ad-hoc way, harming the city's skyline, its relationship with the wider landscape and the setting of the much-valued central conservation area.

Our detailed comments are set out in Appendices A and B.

To support your analysis of our response, we have endeavoured to complete sections of Council's survey form, particularly where our comments relate to matters of soundness and/or legal compliance. For the avoidance of doubt, this letter and its appendices should be regarded as our complete response.



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I hope that these comments are helpful and look forward to discussing these matters with you, beginning with a meeting later this month as agreed.

Yours sincerely

Guy Robinson, BSc, MRTPI  
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Development Advice – London and the South East Region  
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Letter references this same submission via the consultation portal - have checked portal response and marked the reps not in the database  
 These will all be dealt with via SoCG conversations too

## Appendix A: Table of Historic England’s comments on the Pre-Submission Draft of the Oxford Local Plan 2040

[Historic England’s comments on the proposed Allocations are set out in Appendix B]

Page	Section	Sound/ Unsound	Comments	Suggested Change
7	Vision	Comment	There is much in the vision that we support, and we welcome its reference to heritage. However, ‘respecting’ heritage arguably focuses more on ‘having regard to’ than truly ‘making the most of’. We suggest a minor change that would embed a positive approach in the vision, tied to the city’s economic growth, which could drive heritage-sensitive development in the future.	“In 2040 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects <u>and values</u> our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper...”
8 & 15	Built environment & paragraphs 1.23 – 1.27	Comment	While we are not entirely comfortable with the delineation made in Table 1.1 between the natural environment and built environment (heritage is not a subset of the built environment), of greater importance is the need to acknowledge the contribution of the colleges within Oxford to the townscape. We advise adding wording on the significance of Oxford’s colleges to the city’s identity. The University is mentioned regarding spin-outs and contribution to the knowledge economy, but not in terms of its heritage assets.	
20	Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development	Unsound	The policy does not refer to the historic environment and thus fails to align with national policy (NPPF paragraphs 8 & 190). This should be a fundamental requirement in the Council’s spatial strategy. Therefore, we advise adding a new criterion as suggested.  Also, is there a missing “of” before “district and local centres” in criterion a)?	“To help achieve this it will aim to ensure development is located to:  ... e) ensure new uses are in locations where they will not harm the amenity of existing neighbouring uses; <del>and</del> f) prevent new development in locations where it would damage important blue and green infrastructure networks, public open space, and flood plain-; <u>and</u> g) <u>conserve and where possible enhance the historic environment.</u> ”



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21	<b>Policy S2:</b> Design code and guidance	Unsound	<p>We support the inclusion of what is in effect a strategic heritage policy within the plan; however, the title does not accurately represent what is in the policy and may undermine its implementation. Might “Strategic approach to design and heritage” be considered as an alternative title?</p> <p>Furthermore, we advise two elements to be added to the supporting text:</p> <ul style="list-style-type: none"> <li>• a paragraph adapted from the Oxford Local Plan 2036 on heritage at risk;</li> <li>• wording on the contribution that Oxford's heritage can make to economic growth.</li> </ul> <p>We suggest wording for consideration.</p>	<p>Suggested new title for the policy and subsection: “<u>Strategic approach to design and heritage</u>”.</p> <p>In the supporting text:</p> <p>“1.40. Oxford's heritage is a unique and irreplaceable resource, which has a fundamental role in shaping the city's character, <del>and</del> cultural offer <del>and</del> economic prosperity. <u>Contributing to its positive strategy for the historic environment, t</u>The City Council <u>will look for opportunities to better reveal heritage significance, promote heritage-led regeneration where appropriate, and prepare, review and adopt (as appropriate) is committed to preparing, reviewing, and adopting as appropriate</u> conservation area appraisal and management plans, as well as other evidence base documents to help further understanding of the significance and benefits of our heritage assets. <u>In addition, the City Council will support proposals that would improve upon the condition of heritage assets that are identified as being at risk of being lost as a result of neglect, decay or inappropriate development, providing it can be demonstrated that there would be no resultant harm to their significance.</u>”</p>
23	<b>Policy S3:</b> Infrastructure Delivery in New Development	Unsound	<p>NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ..."</p> <p>Given the importance of cultural infrastructure, it would be reasonable to expect the Council's approach to aim at least to maintain existing levels of cultural assets that exist within the city, and to seek improvements to secure the long-term future of assets classed as 'at risk'.</p> <p>We recommend minor amendment to Policy S3 to enable this to be considered, picking up on a related point about 'improving' on current levels made within the Council's own Sustainability Appraisal</p>	<p>Within policy S3:</p> <p>“Where appropriate, and where there is an identified shortfall across the city <u>or where impacted assets are at risk</u>, opportunities should be taken to maximise infrastructure provision on suitable sites.”</p>



Page	Section	Sound/ Unsound	Comments	Suggested Change
			recommendations on this policy. This could be supported by relevant explanatory text.	
58	Policy E1: Employment Strategy	Unsound	<p>The OLP2040 cites the 2023 Oxford Employment Land Needs (ELNA) Update Report (with estimated need of 269,000 -348,000m<sup>2</sup>). We have not identified the 2023 report in the supporting evidence base, only the 2022 interim report.</p> <p>Some of the employment sites are highly sensitive due to their heritage significance. We do not object to the principle of modernisation and intensification. But the doubling of employment need compared with OLP2036 (135,004m<sup>2</sup>) coupled with the wording of policy E1 and its supporting text gives little sense of the sensitivities of some of these employment sites, potentially compromising the plan's ability to achieve its heritage aims and align with paragraph 189 of the NPPF. We highlight the following sites where their heritage significance should be a key consideration:</p> <ul style="list-style-type: none"> <li>• The University of Oxford Science Area and Keble Road Triangle</li> <li>• Oxford Centre for Innovation</li> <li>• 13-16 Magdalen St</li> <li>• University Student Hub, Turl St</li> <li>• Clarendon House (note this is in not on Clarendon Street, as stated)</li> <li>• 10A New Road</li> <li>• 17-33 Beaumont St</li> <li>• Jam Factory, 27-30 Park Street (is this a new allocation?)</li> <li>• Enterprise Centre, Standingford House, Cave Street</li> </ul>	<p>“Planning permission will be granted for the intensification and modernisation of any Category 1 or 2 employment site. <u>Proposals must demonstrate compliance with policies HD1-9 as appropriate.</u>”</p>



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			<ul style="list-style-type: none"> <li>• 27-28 St Clements St</li> <li>• Angel Court, St Clements</li> <li>• The Old Music Hall, 106-108 Cowley Rd</li> <li>• Former Blackwells Publishing, Marston St</li> </ul> <p>We advise at minimum adding in policy E1 a reference to policies HD1-9 to ensure these other considerations inform decision-making.</p>	
63	Paragraph 3.26	Comment	We recommend including a line about the contribution that Oxford's heritage makes to the visitor economy, drawing as appropriate from Oxford's Economic Strategy 2022-2032.	
71-73	Policy G2: Enhancement and provision of new green and blue features	Unsound	While we welcome reference to the setting of heritage assets in this policy, it may be more than an issue of setting. We advise stating the need to conserve the historic environment, noting in particular the potential for impacts on archaeological remains.	<u>"g) Conserving and, where possible, enhancing the historic environment</u> <del>Enhancing the setting of heritage assets"</del>
84	4.47	Comment	There is the potential for maladaptation from dry-proofing measures if they are applied to traditionally constructed buildings. Maladaptation is mentioned in paragraph 4.63, which we welcome.	Once avoidance has been fully explored, consideration will need to turn to how to mitigate flood risk impacts which can't be avoided through careful design and layout of the site <del>which</del> . <u>This needs to take account of the age, construction and heritage significance of any existing buildings and structures, and could involve a multitude...</u>
90	4.63	Comment	We recommend being explicit about the risk of maladaptation of traditionally constructed buildings.	<u>"Secondly, it requires applicants to demonstrate that the design of new development has been tailored to these risks both for the building itself, as well as occupants, incorporating a range of measures that can ensure resilience to existing and future climate hazards. This is also important for avoiding 'maladaptation', whereby inefficient design results in inappropriate development for future climate and the increased risks for occupants that come with it. When enhancing the resilience of historic buildings, the risk of maladaptation is reduced by taking a whole building approach as required by Policy R3."</u>



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98	Policy R1: Net Zero Buildings in Operation	Comment	Broadly we welcome this policy and support the Council's work towards net zero. That said, the policy's support for renewable energy generation may pose a challenge for achieving the heritage ambitions of the plan (a concern picked up in the Sustainability Appraisal). Mitigating factors are that the policy centres on <u>new</u> development only, which arguably reduces the risk of unwanted outcomes, and heritage policies HD1-HD6 which include welcome detail. Also, we note relevant guidance in Appendix 1, on which we have commented below.	
99- 100	Policy R2: Embodied Carbon in the Construction Process	Sound	We welcome this policy	
101- 102	Policy R3: Retro-fitting existing buildings	Sound	We support this policy and look forward to reading the retrofit TAN.	
106	5.42	Unsound	While we support and welcome the approach to peat conservation, there is a potential point of confusion. It would be helpful if the Council made clear if its strategic approach includes buried peat or not. Natural England's map covers only superficial peat reserves. Will the same conservation approach be adopted for buried peat too? The local plan should refer explicitly to both superficial reserves and buried peat. Buried peat does not usually support a live ecosystem but is equally important for holding carbon and would need to be mapped across application areas before construction plans are finalised.	"Though the mapping of these habitats in the UK is limited, there is evidence of peat deposits (which are especially beneficial as carbon sinks) in several locations across Oxford as highlighted by Natural England <sup>5</sup> , particularly on greenfield sites. Where development comes forward in areas of known potential for ( <u>superficial or buried</u> ) peat deposits, any impacts on the natural and historic value of these reserves needs to be considered, including their important role as carbon sinks. Any harm or loss from a proposal which equates to removal or dewatering of 10m <sup>3</sup> or more of peat will be refused."



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111	Glossary	Comment	We query the rationale for defining conservation areas and listed buildings, but not also Registered Parks & Gardens and Scheduled Monuments.	
112	6.1	Unsound	Ignoring the connection between Oxford's heritage and its economy is, in our opinion, unsound (failing to deliver a positive strategy for the historic environment) and a missed opportunity. We suggest revised wording in this opening paragraph, which also recognises in positive tone how heritage is a matter not simply deserving of respect, but an asset in the broadest sense that can support future growth and development.	A key theme of the Local Plan 2040 vision, which <u>connects with all three addresses both the social and environmental</u> pillars of sustainability, is for Oxford to respect its culture and heritage, <u>respond positively to the city's cherished assets</u> and foster design of the highest quality.
112	6.5	Comment	The current phrasing risks implying that archaeological remains are distinct from heritage, which would be regrettable. We suggest alternative wording for consideration.  For clarity, paragraph 6.5 might usefully refer to the NPPF. Also, it would be useful to state that the assets listed represent the designated heritage assets <u>in Oxford</u> , not a universal definition of such assets.	"Therefore, new developments will need to come forward in a way that respects and responds to landscape, <u>and heritage significance of the city's assets above and below ground</u> , <del>and archaeology</del> and takes opportunities to celebrate this history."  "Paragraphs 199-202 <u>of the NPPF</u> set out considerations for designated heritage assets, which <u>in Oxford</u> are conservation areas, listed buildings, registered parks and gardens, and scheduled monuments..."
113	6.6	Comment	The reader may appreciate seeing the source of the definition at the outset of this paragraph, referring to the Planning (Listed Buildings and Conservation Areas) Act 1990.	
113	6.7	Comment	The description in paragraph 6.7 focuses principally on the appraisal and is silent about the management plan component. We recommend more clarity.  Also, we believe there's a missing word in the final line of this paragraph.	<del>Conservation Area Appraisals and management plans help</del> describe what makes the distinctive character, appearance, and historic interest of the conservation areas, and <u>associated management plans help to articulate appropriate responses to local issues and pressures. Where conservation area appraisals and management plans</u> <del>these</del> exist these should be a starting point in creating good, contextually responsive new development.



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				Full regard should be given to the detailed character assessments and other relevant information set out <u>in</u> any relevant conservation area appraisal and management plan.
114 / 115	<b>Policy</b> HD1: Conservation Areas	<b>Unsound</b>	<p>Criterion a) focuses on understanding significance, which includes consideration of setting. To divorce setting from significance may undermine how the policy is implemented. We recommend deleting the separate paragraph on setting and integrating this consideration into criterion a). This would also help to streamline the policy</p> <p>The policy is currently silent on the potential to enhance conservation areas, a point that is noted also in the Council's Sustainability Appraisal. In this regard the policy fails to align with NPPF paragraph 206, requiring planning authorities to look for opportunities to enhance or better reveal the significance of conservation areas. We propose revised wording in criterion b.</p>	<p>"...A heritage assessment must include information sufficient to demonstrate:</p> <p>a) an understanding of the significance of the conservation area, including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring <u>and the extent to which its setting contributes to its significance</u>; and</p> <p>b) that the development of the proposal and its design process have been informed by an understanding of the significance of the conservation area, <u>the proposal integrates measures to enhance or better reveal the significance of the conservation area where possible</u>, and that harm to its significance has been avoided or where it's not possible, any harm has been minimised through thoughtful design; and</p> <p>c) that, in cases where development would result in harm to the significance of a conservation area, including its setting, the levels of harm has been properly and accurately assessed and understood, that it is justified because alternative possibilities or design arrangements have been explored and that measures are incorporated into the proposal, where appropriate, that mitigate, reduce or compensate for the harm.</p> <p><del>Where the setting of a conservation area is affected by a proposed development, the heritage assessment should include a description of the extent to which the setting contributes to the significance of the conservation area, as well as an assessment that the impact of the proposed development would have on the setting and the setting's contribution to the significance of the asset.</del></p> <p>Where a development proposal would cause less than substantial harm to a conservation area..."</p>



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116	Listed buildings	Comment	We recommend adding a short paragraph (potentially a new 6.11) that refers the reader to Policy R3 on the retrofitting of traditionally constructed buildings.	
116 - 117	Policy HD2: Listed buildings	Unsound	<p>Criterion a) focuses on understanding significance, which includes consideration of the setting of the asset. To divorce setting from significance may undermine how the policy is implemented. We recommend deleting what is currently the final paragraph of the policy and integrating consideration of setting into criterion a). This would also help to streamline the policy.</p> <p>We believe there is scope for improving the opening of criterion b) and we suggest alternative wording for consideration.</p> <p>The current structure of criterion b) combines two different ideas within part i), followed by use of the word “or”. This could imply that if avoidance is impossible, the proposal does not need to meet the first part of b) i), which we infer is not intended. So, we suggest splitting part b) i) into two.</p> <p>This would also give room also for aligning with paragraph 197 of the NPPF, which requires local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets – see our suggested new criterion b) ii).</p> <p>Criterion b sets a focus on avoiding harm, which is welcome. But this paragraph is silent on minimising unavoidable harm, which is the natural product of</p>	<p>“...An application for planning permission or listed building consent for development which would or may affect the significance of a listed building, either directly or by being within its setting, should be accompanied by a heritage assessment that includes</p> <p>a) a description of the listed building and information sufficient to demonstrate an understanding of the significance of the listed building including</p> <p>i. its rarity, group value and how it reveals its historic, architectural, archaeological and/or artistic interest and/or value for its associations to things that shape the identity and character of the area, the way it illustrates the past and helps our understanding of it, its aesthetic contribution to the area, and its importance to the community; and</p> <p>ii. recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; <del>and</del></p> <p><u>iii. the extent to which its setting contributes to its significance.</u></p> <p>b) an assessment of the impact of the development proposed on significance of the listed building and its setting, including on the integrity of the building, <del>its the impact on</del> group value and Oxford’s/the local area’s identity <del>should be explained</del>. The assessment should explain <del>including</del>:</p> <p>i. <del>that how</del> the development of the proposal and its design process have been informed by an understanding of the significance of the listed building; and</p> <p><u>ii. any measures within the proposal to enhance the significance of the listed building (including its setting); and</u></p>



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			<p>NPPF paragraph 199 "... great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)."</p> <p>We recommend use of the term "offset" rather than "compensate". The latter implies giving the asset's significance a monetary value, which would be a regrettable emphasis within Council policy.</p> <p>We welcome reference to change of use in the policy, but recommend amendments to clarify the focus of criterion d.</p>	<p><del>iii. that</del> <u>how</u> harm to its significance has been avoided; or</p> <p><del>iv.</del> in cases where development would result in harm to the significance of a listed building, including its setting, <del>that</del> the extent of harm <u>has been must be properly and accurately assessed and understood, minimised as far as possible,</u> and clearly and convincingly justified.</p> <p>Where a development proposal will lead to less than substantial harm to a listed building, clear and convincing justification must be provided within the heritage assessment. This should explain what alternative proposals have been considered and how measures have been incorporated into the proposal, where appropriate, that mitigate, reduce or <del>offset/compensate for</del> the harm. Only then will the harm be weighed against the public benefits of the proposal.</p> <p>Substantial harm to or loss of Grade II listed buildings should be exceptional. Substantial harm to or loss of Grade I and II* listed buildings should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a listed building, planning permission or listed building consent will only be granted if all of the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.</p> <p>The use of a listed building may be part of its significance. Changes of use should:</p> <p>c) be to a use which would not be harmful to the special interest of the building or its setting; and</p> <p>d) <del>be suitable without harmful extensive reconstruction,</del> <u>not require extensive reconstruction that would lead to unacceptable loss of significance.</u></p> <p><del>Where the setting of a listed building is affected by a proposed development, the heritage assessment should include a description of the extent to which the</del></p>



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				<del>setting contributes to the significance of the listed building, as well as an assessment of the impact of the proposed development on the setting and its contribution to significance."</del>
118	<b>Policy</b> HD3: Registered Parks and Gardens	<b>Unsound</b>	<p>Currently the policy is focused solely on repeating what is in the NPPF. While this has the potential to lead to a sound approach, the proposed is bogged down by internal repetition.</p> <p>We recommend opening HD3 with a locally relevant commitment, that connects to the contribution made by Oxford's parks to its character and cityscape, including the potential to deliver enhancement where possible (aligning with NPPF paragraph 197) and ensuring that the policy also refers to setting.</p> <p>There is a significant level of repetition in the policy as mentioned above. The line midway through that "Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden requires clear and convincing justification in a Heritage Assessment" makes the current opening line redundant. Given the wording of that line is broader than the current opening line, we suggest bringing that forward in the policy.</p> <p>The line on substantial harm in the second paragraph is not needed as it repeats what is currently in the first paragraph.</p> <p>The opening section of the third paragraph of policy HD3 repeats what is currently covered by the second paragraph.</p>	<p>In the policy:</p> <p><u>"The City Council will seek to conserve features that contribute to the special character or appearance of Oxford's historic parks and gardens, avoid or minimise harm to their integrity, character, setting and key views, and support appropriate enhancement where possible.</u></p> <p><u>Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden requires clear and convincing justification in a Heritage Assessment.</u></p> <p><del>Where a development proposal will lead to less than substantial harm to a registered park and garden, clear and convincing justification must be provided within a heritage assessment.</del> Substantial harm to or loss of Grade II registered parks and gardens should be exceptional. Substantial harm to or loss of Grade I and II* registered parks and gardens should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a park or garden, planning permission (or other planning consents where relevant) will only be granted if all of the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.</p> <p><del>Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden requires clear and convincing justification in a Heritage Assessment. Substantial harm to or loss of grade II Registered Parks and Gardens should be exceptional, and of grade I and II* registered should be wholly exceptional.</del></p> <p><del>Planning permission will not be granted for development that would lead to substantial harm to or total loss of significance of a Registered Park and Garden unless it can be demonstrated that the substantial harm or total loss</del></p>



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			<p>Returning to supporting text, we recommend articulating more clearly the distinctiveness of Oxford's RPGs, which have a foundational role in compartmentalising the cityscape and in demonstrating the integrated design and development of the colleges. Their impact on how Oxford's institutions are experienced is significant. We suggest revised wording as outlined, breaking the text into several separate paragraphs to aid the reader's understanding of key points.</p>	<p><del>is necessary to achieve substantial public benefits that outweigh that harm or loss, or the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated.</del> Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.”</p> <p>In supporting text:</p> <p>“6.11 Many parks and gardens in Oxford contribute significantly to its townscape and are an important part of appreciating and understanding its heritage. Historic England's National Heritage List <u>for England</u> includes 15 parks and gardens in Oxford, 5 of which are Grade I, 1 is Grade II* and 9 of which are Grade II. These are designated heritage assets. <u>They represent a dense network of assets, an unusually high proportion of which are highly graded, and they cover a significant proportion of the city, helping to frame the city's relationship with the River Cherwell.</u></p> <p><u>6.12 The majority of are related to colleges, conveying in rich detail the integrated way in which the colleges have been designed and developed. They have a pivotal role in shaping how the city's institutions are experienced and the boundaries between the public and private realms. Certain elements (such as some of the Quadrangles) are only glimpsed through entrances that are in near constant use.</u></p> <p><del>6.13 but they</del> <u>In addition to the colleges, Oxford's Registered Parks and Gardens include High Wall in Pullens Lane, Park Town and St Sepulchre's Cemetery.</u></p> <p><del>6.14 Because of their heritage value as well as other functions as Green Infrastructure, these sites are protected as part of the Core Green Infrastructure Network under Policy G1.</del> Many more parks and gardens are not registered but nevertheless contribute to local significance.</p> <p><u>6.15 The Core Green Infrastructure Network includes both Registered Parks and Gardens and other parks and gardens. Protected under Policy G1, green spaces within the network perform a multitude of functions,</u></p>



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				<p>ranging from flood control to biodiversity net gain. Some (such as Oxford Botanic Garden) have a particularly important educational role linked with botany, genetics and related research.</p> <p>6.16 The Registered Parks and Gardens all have associated listed buildings and form a significant part of the setting of those listed buildings, so the impact of any proposals on associated heritage assets will also be a key consideration (see policy HD2), as will the potential for impacts on archaeological remains if below-ground works are proposed (see policy HD5).</p> <p>6.17 Because the nature of Registered Parks and Gardens in the city is that they are not stand alone heritage assets, but part of a wider heritage asset that includes listed buildings, so of the criteria in paragraph 201 of the NPPF referred to in Policy HD3, those about viable uses, grant-funding and bringing the site back into use are unlikely to apply.”</p>
119	Policy HD4: Scheduled Monuments	Unsound	<p>As with policies HD1 and HD2, there is scope to integrate a reference to setting within the overall approach on heritage assessment, rather than treating setting as an additional, separate consideration.</p> <p>We believe there is scope to streamline the policy, which would help its implementation. The opening paragraph summarises what is in a heritage assessment, which is covered by the criteria in the second paragraph, and so could be deleted.</p> <p>We believe the policy’s references to listed buildings and listed building consent are not intended, though for the two references to listed buildings the point is moot if the Council deletes the text suggested.</p> <p>Criterion b) would benefit from referring to the scope</p>	<p>“An application for planning permission for development which would or may affect the significance of a Scheduled Monument, either directly or by being within its setting, should be accompanied by a heritage assessment that includes a description of the Scheduled Monument and its significance and an assessment of the impact of the development proposed on the listed building’s significance.</p> <p>The submitted heritage assessment must include information sufficient to demonstrate:</p> <p>a) an understanding of the significance of the Scheduled Monument (including the extent to which its setting contributes to its significance), and including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; and</p> <p>b) that the development of the proposal and its design process have been informed by an understanding of the significance of the Scheduled</p>





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			<p>for enhancing the significance / setting of a Scheduled Monument, as part of plan's positive strategy for the historic environment in accordance with NPPF paragraph 190 (especially criterion a).</p> <p>We recommend use of the term "offset" rather than "compensate". The latter implies attributing a monetary value to the asset's significance, which would be a regrettable emphasis with Council policy.</p> <p>In the supporting text, use of the term "designated" is more appropriate than "made". Also, Historic England does not designate, we can only recommend designation. We suggest minor modification to address these points.</p> <p>Also, we recommend including reference to notifying Historic England where SMC is required and encouragement for early engagement.</p>	<p>Monument, that enhancements to the significance of the Scheduled Monument (including its setting) have been identified where possible, and that harm to its significance has been avoided or minimised; and</p> <p>c) that, in cases where development would result in harm to the significance of a Scheduled Monument, including its setting, the extent of harm has been properly and accurately assessed and understood, that it is justified, and that measures are incorporated into the proposal, where appropriate, that mitigate, reduce, or <del>offset/compensate</del> for the harm.</p> <p><del>Where the setting of a Scheduled Monument is affected by a proposed development, the heritage assessment should include a description of the extent to which the setting contributes to the significance of the listed building, as well as an assessment of the impact of the proposed development on the setting and its contribution to significance.</del></p> <p>Where a development proposal would cause less than substantial harm to a scheduled monument, this harm must be weighed against the public benefits of the proposal. Clear and convincing justification for this harm should be set out in full in the heritage assessment. Substantial harm to or loss of significance of a scheduled monument should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a scheduled monument, planning permission <del>or listed building consent</del> will only be granted if all of the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment."</p> <p>In the supporting text:</p> <p>6.13. <u>Scheduled Monuments are a type of designated heritage asset. A heritage asset is only <del>designated</del>made a Scheduled Monument if it is of national importance and also if that is the best means of its protection. <del>It is a national designation, so designation is by Historic England.</del> Scheduled</u></p>



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				Monuments may nor may not be visible above ground. There are 9 Scheduled Monuments in Oxford, which are varied in age and type. They are the remains of Osney Abbey and Rewley Abbey, Oxford Castle and the City Walls, Seacourt Medieval Settlement, Old Abingdon Road Culverts, Grandpont Causeway, Port Meadow, and the Swing Bridge near Oxford Station. Scheduled Monument Consent (SMC) is required for any works that will affect a scheduled monument, through an application to Historic England, in addition to any application for planning permission. <u>Historic England should be notified where SMC is required in addition to planning permission. Pre-application engagement with Historic England is strongly encouraged for all proposals that are likely to affect the significance of a Scheduled Monument.</u>
120	6.16	Comment	This is a helpful paragraph but currently omits Oxford and its surroundings' important pre-Holocene archaeological remains; for example, The Wolvercote Channel, Cornish's Pit in Iffley and several sites of Mesolithic flint artefacts. We suggest revised wording.	"A few of these are formally designated heritage assets such as Scheduled Monuments, however many assets of comparable significance are not currently designated and warrant appropriate protection through the planning system-; <u>for example, well preserved remains found in rapidly accumulating urban deposits or the waterlogged plains in and around Oxford, which have attracted human communities for millennia.</u> Notable assets include <u>Palaeolithic and Mesolithic flint working sites, Neolithic and later</u> prehistoric domestic, ritual, and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city...."
120	6.19	Comment	Reference to archaeology (the study of archaeological remains) should be changed to archaeological remains.	"The City Centre Archaeological Area contains <u>archaeologically remains that are it is</u> essential to preserve and understand."
121	Policy HD5: Archaeology	Unsound	There's a word missing from criterion a) before "information".  Criterion b) would benefit from a comma.  Criterion c) has a typo.	"Within the City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present (including upstanding remains), applications should be accompanied by a Heritage Assessment. A Heritage Assessment should include and be informed by:  a) a description of the impacted archaeological deposit or feature (including



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			<p>Criterion d) would benefit from referring to “archaeological remains” not “archaeology”.</p> <p>The penultimate paragraph is unsound in that it conflates designated heritage assets with heritage assets more generally. We suggest a minor edit that would resolve this problem.</p> <p>The final paragraph risks confusion on what is meant by mitigation. It seems to focus on circumstances where harm is unavoidable; but then it states that the preferred approach to mitigation is to preserve in-situ. This needs to be clarified and we suggest one way this could be done (relying also on the reference to preservation in situ in criterion b).</p> <p>We advise making the final line a separate paragraph, also referring to provision for conservation of remains, where that is needed. This could cover conservation work where preservation in situ is appropriate and where conservation work is needed before archiving.</p>	<p>where relevant its setting), <u>incorporating</u> information to define the character, significance and extent of such deposits or features; and</p> <p>b) an explanation of how early assessment and field evaluation has informed design that aims to preserve deposits and features in situ, avoiding adverse effects from poor siting of foundations, drainage features and hard landscaping; and</p> <p>c) an assessment of the impact of the proposed development on the significance of the deposits <u>or</u> features, using a proportionate level of detail that is sufficient to understand the potential impact of the proposal. The assessment should reference appropriate records (including the information held on the Oxford Historic Environment Record<sub>7</sub>); and</p> <p>d) if appropriate, a full archaeological desk-based assessment and the results of evaluation by fieldwork. This should be produced by an appropriately qualified contractor. Pre-application discussion is encouraged to establish requirements. In the City Centre Archaeological Area, where significant archaeological asset types can be shown to be subject to cumulative impact from development, the desk-based assessment should contain appropriate contextual assessment of this impact. The desk-based assessment in the City Centre Archaeological area should also include a whole site plan (which may be beyond the red line to include a whole campus site, for example) that shows current understanding of any basement and underground servicing, likely locations of hidden <u>archaeological remains</u>, other heritage assets (including settings) to be considered and explain how this whole site understanding has helped inform decisions about the layout and location of the development.</p> <p>Development proposals that affect archaeological deposits and features will be supported where they are designed to enhance or to better reveal the significance of the asset and will help secure a sustainable future for it.</p> <p>Proposals which would or may affect archaeological deposits or features that are designated as heritage assets will be considered against the relevant policy approach (HD2 Listed Buildings, HD4 Scheduled Monuments).</p>



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				<p>Subject to the above, proposals that will lead to harm to the significance of non-designated archaeological deposits or features will be resisted unless a clear and convincing justification through public benefit can be demonstrated to outweigh that harm, having regard to the significance of the deposits or features and the extent of harm. Where harm to an archaeological or <u>palaeoenvironmental</u> asset has been convincingly justified and is unavoidable, mitigation should be agreed with Oxford City Council and should be proportionate to the significance of the asset and impact. The aim of mitigation should be <u>to minimise harm, where possible to preserve archaeological remains in situ</u>, to promote public enjoyment of heritage and to record and advance knowledge.</p> <p>Appropriate provision should be made for investigation, recording, analysis, <u>conservation of remains</u>, publication, archive deposition and community involvement.”</p>
122	<b>Policy</b> HD6: Non-designated heritage assets	Unsound	Neighbourhood plans provide another route through which non-designated heritage assets may be identified, which should be acknowledged in the policy.	“These assets may be identified through the Oxford Heritage Assets Register, conservation area appraisals, <u>neighbourhood plans</u> or the planning application process.”
125	<b>Policy</b> HD7: Principles of High-Quality Design	Sound		
126	<b>Policy</b> HD8: Using Context to Determine Appropriate Density	Unsound	The list in criterion c refers to types of asset, but it does not cover all types of asset and including “etc.” leaves the policy open to interpretation. It would be more appropriate, clearer and more aligned with national policy for the criterion to be edited as suggested.	“is informed by an understanding of the impacts on <u>the significance of designated and non-designated heritage assets, including their setting, and the potential for archaeological remains presence of listed buildings or their setting, conservation areas or their setting, registered parks and gardens, likely or known archaeological deposits, etc;</u> and”



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127 - 129	Policy HD9: Views and Building Heights	Unsound	<p>We have identified several instances in policy HD9 where more clarity is needed for it to deliver a sound approach e.g.</p> <ul style="list-style-type: none"> <li>the opening paragraph refers to “outside” but we are unclear what is meant. We suggest revised wording, linked with the historic core area.</li> <li>the structure of the opening set of criteria could be clarified, and its introduction needs to refer to views as well as character to provide a suitable umbrella for the criteria that follow.</li> </ul> <p>That said, our main concern relates to the policy’s lack of spatial steer on high buildings. Omitting this leaves the spatial strategy for high buildings somewhat fuzzy and not entirely aligned with the Council’s evidence (NPPF paragraph 31 refers).</p> <p>Currently plan users are unclear about the weight to be attributed to Areas of Greater Potential mentioned in the supporting text and the High Buildings TAN, and any design-related criteria to be used when shaping or determining proposals within such areas.</p> <p>We propose that policy HD9 refers to the Areas of Greater Potential, using design-related criteria drawn from policy CBLLAOF, adapting what was criterion g in policy CBLLAOF, plus suitable amendments to the supporting text.</p> <p>In addition, we suggest a further study is undertaken as outlined in our cover note, assessing the Areas of Greater Potential in more detail, potentially focused on the Cowley Branch Lane and Littlemore Area of Focus</p>	<p><b>Policy HD9:</b></p> <p>“Planning permission will not be granted for development that will not retain the special significance of views of the historic skyline, both from within <u>historic core area</u><del>Oxford</del> and from outside <u>the historic core area</u>.</p> <p>Planning permission will be granted for developments of appropriate height or massing. <u>If the Any proposal is for development for height that is above the prevailing heights of the area and that could impact on character or views, the application must demonstrate how all of should be fully explained by the following criteria have been met, all of which should be met:</u></p> <p>a) design choices regarding height and massing have a clear design rationale; and</p> <p>b) regard <del>has been</del> <u>should be</u> had to the guidance on design of higher buildings set out in the High Buildings Study TAN. In particular, the impacts in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character should be explained; and</p> <p>c) <del>it should be demonstrated how</del> <u>proposals have been designed to have a positive impact on important views including both into the historic skyline and out towards Oxford’s green setting, through their massing, orientation, the relation of the building to the street, and detailed design features including roofline and materials (including colour); and</u></p> <p>d) taller buildings have been designed and orientated to avoid potential negative impacts, including on neighbouring amenity, such as overshadowing, overbearing and overlooking, reduced internal daylight and sunlight and wind-tunnel effects.</p> <p><u>When large-scale buildings are proposed in Areas of Greater Potential, planning permission will only be granted where careful design mitigates the impacts of these large buildings upon the Oxford skyline and on existing neighbouring uses in terms of overbearing, overlooking and overshadowing.</u></p>



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			<p>as a sub-area of greatest interest in the short- to medium-term.</p> <p>The current criterion g in policy HD9 (criterion n in our proposed revisions) would benefit from referring to significance. Also, it leaps from accepting harm to justifying harm without consideration of how to minimise harm, which is contrary to national policy. We propose alternative wording for consideration.</p>	<p><u>including:</u></p> <p><u>e) Setting back buildings away from the site boundaries and neighbouring residential areas/gardens boundaries; and</u></p> <p><u>f) Stepping back the upper storeys of proposals; and</u></p> <p><u>g) Ensuring windows in the proposal are angled away from the existing dwellings to reduce scope for overlooking into both houses and gardens; and</u></p> <p><u>h) Reinforcing or introducing landscape planting around the site boundaries to provide more screening and sense of separation between residential and non-residential uses; and</u></p> <p><u>i) Careful choice of materials including colour to mitigate glare and soften the visual impact of the proposal; and</u></p> <p><u>j) Varying the roofscape of the proposals to reduce scope for the merging of several taller buildings which prevent views across the city to the hills beyond; and</u></p> <p><u>k) Demonstrating consideration of the cumulative impacts of the proposal on views from within the historic core area and across the historic core area. This will include the appropriateness, or otherwise, of clustering taller buildings, use of other design features to minimise harm to long distance views, and reference to the latest evidence on the Areas of Greater Potential.</u></p> <p><u>Sites outside the Areas of Greater Potential will typically be more sensitive and less suited to new large-scale buildings.</u></p> <p>The area within a 1,200 metre radius of Carfax tower (the Historic Core Area) contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m (60ft) in height or ordnance datum (height above sea level) 79.3m (260ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height must be limited in bulk and must be of the highest design quality.</p>



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				<p>Applications for any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher) will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:</p> <p>e) a Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible (produced in accordance with the Landscape Institute's GLVIA 3d Edition and Technical Guidance note TGN 06 19 or updated equivalents); and</p> <p>f) use of VuCity 3D modelling (or equivalent if updated by the City Council in future), shared with the City Council so that the impact of the development can be understood from different locations, including any view cone views that are affected; and</p> <p>g) <u>heritage impact assessment</u> if harm <u>would be</u> caused to <u>the significance of</u> a heritage asset or its setting, <u>including</u> a full explanation of other options that have been considered that may be less harmful, <u>how that harm has been minimised</u>, a justification that the benefits outweigh the harm and open book viability assessment if relied upon in the explanation.</p> <p>Any proposals within the Historic Core Area or the View Cones that may impact on the foreground of views and roofscape (including proposals where they are below the Carfax datum point, for example plant) should be designed carefully, and should meet the following criteria:</p> <p>j) they are based on a clear understanding of characteristic positive aspects of roofscape in the area; and</p> <p>k) they contribute positively to the roofscape, to enhance any significant long views the development may be part of and also the experience at street level.</p>



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				<p>Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view. The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map.”</p> <p><b>In the supporting text:</b> In the supporting text, we recommend adding text that gives more advice on key considerations when assessing proposals for high buildings in the Areas of Greater Potential:</p> <p><b>“Areas of Greater Potential</b></p> <p>6.40 The High Buildings Study identified three areas of Oxford where proposals for new high buildings are more likely to be appropriate (Areas of Greater Potential shown in Figure 7 of the High Buildings TAN). These areas are less constrained by heritage considerations and represent areas where there is more potential for them to contribute to regeneration opportunities, and that have good connectivity and availability of existing facilities of district centres. The identified Areas of Greater Potential are the northern suburbs, the eastern suburbs, and the south-eastern suburbs.</p> <p><u>6.41 Within those Areas of Greater Potential, and supporting the determination of future proposals, the Council plans to undertake further modelling and assessment to consider the potential impacts on views across and out of the historic core area, with a particular focus on the Cowley Branch Line and Littlemore Area of Focus within the south eastern Area of Greater Potential. Such views are significant in how they connect the city with the wider landscape. This relationship represents an important part of how Oxford has developed over time, contributing also to the significance of the assets in the city centre. As a result, care is needed to avoid or minimise harm.</u></p> <p><u>6.42 Proposals within the Areas of Greater Potential will be required to consider the visibility of the proposed high building from elevated vantage points within the central conservation area, and from these elevated</u></p>



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				<p><u>vantage points, demonstrate an understanding of the character and quality of the view across the central conservation area with the hillside backdrop beyond (using the approach to analysis outlined in the High Buildings TAN). Informed by an appreciation of that view and responding to criteria e-k in policy HD9, applications will need to demonstrate through height, shape and form of building groups, how the design of the building or building groups would minimise harm to the view and thereby to the significance of the central conservation area (including the contribution made by its hillside setting). A cluster will often become a focus within a view. Tapered clusters may or may not be appropriate. Potential impacts need to be understood, when compared (for example) with a larger number of less tall buildings.</u></p> <p><u>In addition to the High Buildings TAN, sources of relevant information that can support an application include the High Buildings Study (e.g. heritage considerations in Appendix 1), the LCA update 2022 and any relevant new assessments undertaken (early engagement with the Council is recommended). Historic England Advice Note 4 on Tall Buildings provides relevant, more general advice.”</u></p>
142	<b>Policy C2:</b> Maintaining vibrant centres	Comment	We support reference to heritage assets and their setting in this policy. In addition, the Sustainability Appraisal for this policy flags the opportunity to refer here to public art. In theory, we would support such a reference, informed by local context (including the historic environment) and community engagement.	
147	<b>Protection</b> of existing cultural venues and visitor attractions	Comment	Many such venues and attractions are heritage assets. Therefore, it is worth flagging in the supporting text that relevant heritage policies will apply where appropriate in the decision-making process.	



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158	Policy C9: Electric Vehicle Charging	Comment	The Sustainability Appraisal for this policy picks up on the potential impact on townscape due to increased “street clutter”. We recommend the impact on local character is flagged as a consideration within policy or supporting text, especially within the most historic parts of the city.	
166	Figure 8.4	Comment	Is Figure 8.4 showing the correct map?	
317	Appendix 1	Comment	<p>We broadly support Appendix 1 and offer the following few comments that would add detail or clarity:</p> <p>Page 318 (C.2):</p> <ul style="list-style-type: none"> <li>We assert the resources should refer also to the National Heritage at Risk Register</li> <li>The bullet on OHAR mistakenly refers to “Oxford Heritage at Risk” rather than “Oxford Heritage Asset Register”</li> <li>We strongly recommend referring to (archaeological remains via) the local Historic Environment Record, supporting alignment with NPPF paragraph 194</li> </ul> <p>Page 319: should the bullets on views also refer to views identified in neighbourhood plans?</p> <p>Pages 320/321: might the section on heights and massing also refer to Vu City, given this is proposed for inclusion in policy HD9?</p> <p>Pages 326-328: we recommend a minor edit in subsection N.1 to acknowledge that green</p>	<p><b>In C.2:</b> “The following sources of information will help to identify whether any heritage assets or their setting may be affected by the development:</p> <ul style="list-style-type: none"> <li><u>Historic England List</u> National Heritage List for England: <a href="https://historicengland.org.uk/listing/thelist/map-search?clearresults=True/">https://historicengland.org.uk/listing/thelist/map-search?clearresults=True/</a></li> <li><u>National Heritage at Risk Register:</u> <a href="https://historicengland.org.uk/advice/heritage-at-risk/search-register/">https://historicengland.org.uk/advice/heritage-at-risk/search-register/</a></li> <li>Conservation Area Maps and Appraisals <a href="https://www.oxford.gov.uk/info/20195/conservation_areas/871/conservation_areas">https://www.oxford.gov.uk/info/20195/conservation_areas/871/conservation_areas</a></li> <li>Oxford Heritage Assets Register at Risk <a href="https://www.oxford.gov.uk/info/20196/oxford_heritage_asset_register/874/oxford_heritage_asset_register_-_overview">https://www.oxford.gov.uk/info/20196/oxford_heritage_asset_register/874/oxford_heritage_asset_register_-_overview</a></li> <li><u>Oxford Historic Environment Record:</u> <a href="https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/historic-environment-record">https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/historic-environment-record</a></li> </ul> <p><b>In C.3:</b> “Several types of views need to be considered:</p> <ul style="list-style-type: none"> <li>Long ranging views across the city that are protected (Policy HD9) - information on these can be found at:</li> </ul>



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Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>infrastructure can possess its own heritage significance, rather than simply contribute to the setting of heritage assets.</p> <p>Also, within N.2 there is importance scope to acknowledge the heritage benefits that can be delivered from a more holistic approach.</p> <p>Pages 329/330 within R.1: we recommend adding a line to the text on renewable energy generation that reinforces the need to consider local context. Also, we propose include a reference to our emerging Advice Note on climate change and historic building adaptation, which should be adopted in the first half of 2024.</p> <p>Page 331: as mentioned regarding paragraph 4.47, to avoid maladaptation we recommend adding a line to R.4. This could be a new bullet or integrated within the existing bullets.</p>	<p><a href="https://www.oxford.gov.uk/info/20064/conservation/876/oxford_views_study">https://www.oxford.gov.uk/info/20064/conservation/876/oxford_views_study</a></p> <ul style="list-style-type: none"> <li>Views identified in conservation area appraisals – typically shorter in range but important role in supporting the character of these areas – information on these can be found at: <a href="https://www.oxford.gov.uk/info/20195/conservation_areas">https://www.oxford.gov.uk/info/20195/conservation_areas</a></li> <li>Views out towards the city’s landscape setting and low-lying suburbs and landform which visually present the story of Oxford’s history and development</li> <li>Locally important views that create or aid appreciation of the townscape and character of the area (<u>including, but not limited to those identified in any adopted neighbourhood plans</u>).</li> </ul> <p><b>In B.3:</b> “... Building heights may impact views and Policy HD9 relates to high buildings. This includes the use of use of VuCity 3D modelling (or equivalent if updated by the City Council in future) for proposals any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher). An understanding of context is critical...”</p> <p><b>In N.1:</b> “A range of factors should be considered in determining quality – think about not only age and physical condition but also their value to wider amenity of the area as well as other functions that may not be as visible – such as benefits for biodiversity; climate adaptation and carbon storage; as well as <u>its heritage significance and/or contribution to the setting of other setting for heritage assets or for physical recreation.</u>”</p> <p><b>In N.2:</b> A suggested new bullet:</p> <ul style="list-style-type: none"> <li><u>“The natural and historic environment are integral to one another. Oxford’s rich heritage and green spaces in combination shape local identity. Newly created or altered habitats will sit within a historical</u></li> </ul>



Page	Section	Sound/ Unsound	Comments	Suggested Change			
				<p><u>landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets.”</u></p> <p><b>In R.1:</b>  <u>“When considering the deployment of on-site renewable generation on historic buildings or in historic places (such as conservation areas) additional care is needed to consider their potential impact on local character and heritage significance in accordance with policies HD1-HD6. Further advice is available from Historic England in its Historic England Advice Note on Climate Change and Historic Building Adaptation”.</u></p> <p><b>In R.4:</b>  <u>“This needs to take account of the age, construction and heritage significance of any existing buildings and structures”.</u></p>			
358	Monitoring framework	Unsound	<p>We believe it is unsound for the local plan to fail to connect the city’s heritage with its economy.</p> <p>We suggest an additional indicator that would help to reveal this link and supplement the existing indicator linked with policy E1.</p>	<p><b>Monitoring of outcomes every year</b></p> <p>Net gain / loss of employment floorspace within a designated heritage asset (m<sup>2</sup>)</p>	<p><b>Key policies</b></p> <p>E1 - Employment strategy</p> <p>E2 – Warehousing and storage uses</p>	<p><b>Longer term monitoring of sustainability outcomes</b></p> <p>% employment/ unemployment in the city</p> <p>Condition of designated heritage assets</p>	<p><b>Related SA/SEA topic</b></p> <p>Economic growth</p> <p>Urban design and heritage</p>



## Appendix B: Table of Historic England’s comments on the proposed Allocations in the Pre-Submission Draft of the Oxford Local Plan 2040

[Historic England’s comments on the remainder of the Local Plan are set out in Appendix A]

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
NEOAOF	Northern Edge of Oxford Area of Focus	Comment	While we support this policy’s final paragraph regarding its references to taller buildings and policy HD9, we recommend that the bullets in paragraph 8.12 embed this as a key consideration.	We suggest a new bullet within paragraph 8.12. Suggested wording for consideration: <u>“The impact of high buildings on the significance of and views from the city’s historic core.”</u>
SPN1	Northern Gateway	Unsound	Reference should be made to policies HD4, given its proximity to the Port Meadow Scheduled Monument, and HD9, given the site lies within an Area of Greater Potential for high buildings, drawing from similar wording in other site allocation policies.  The Scheduled Monument should also be mentioned in the supporting text, potentially in paragraph 8.16 where Port Meadow is already referenced.	“...Development proposals must be designed with consideration of their impacts on the significance of <u>Port Meadow Scheduled Monument (in accordance with HD4) and the Wolvercote Conservation Area (in accordance with HD1)....</u>  <u>...Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9...</u> ”
SPN2	Oxford University Press Sports Ground	Unsound	Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings, drawing from similar wording in other site allocation policies.	<u>“Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.”</u>
SPN3	Diamond Place & Ewert House	Unsound	Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings, drawing from similar wording in other site allocation policies.  Also, there is a typo in the typo in the opening paragraph (where “of if delivered” we believe should read “or if delivered”).	<u>“Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.”</u>



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
CBLLA OF	Cowley Branch Line and Littlemore Area of Focus	Unsound	<p>We consider the detailed text on considerations when large scale buildings are proposed, could be better incorporated into policy HD9 and used as criteria when considering high building proposals across all Areas of Greater Potential, thus more clearly connecting with the Council's evidence base and High Buildings TAN.</p> <p>Criterion g does not currently make sense. We address this in an edited version of the criterion in our comments on HD9.</p> <p>Also, should the key to the map on page 178 be amended to show hatching for the area of focus?</p>	We suggest moving the whole section of policy CBLLAOF on large-scale buildings into HD9, from the line beginning "When large scale buildings are proposed in the area" to the end of the policy.
SPS1	Arc Oxford	Comment	<p>While we welcome emphasis on the need to demonstrate potential impacts in paragraph 8.64, we are unclear what is meant by "strongly" demonstrate. We suggest alternative wording for consideration. Also note there's a missing full stop in the middle of this paragraph.</p>	"While going beyond this threshold does not automatically preclude proposals from being acceptable, such schemes will be expected to strongly demonstrate that there has been an <u>detailed</u> understanding of the context and the impact of the likely effects with regard to the High Buildings TAN."
SPS2	Kassam stadium and ozone leisure park	Unsound	<p>The following sentences in the opening paragraph are unclear and thus unlikely to be effective: "Within the proximity of the Ozone Leisure Park, larger plot sizes would be appropriate to ensure they are not dominated. Closer to the Northfield Brook and existing lowrise development of Greater Leys, development will need to be lower to avoid dominating this and to reflect the rural landscape fragments. In these locations, a smaller plot size will also be more appropriate."</p> <p>That said, of greater importance from Historic England's perspective, and as stated in our comments on SPS5 below, we believe that the site boundary for SPS2 should be amended to incorporate the eastern part of the Oxford Science Park, coupled with changes in wording of the policy and the inclusion of specific requirements linked with Minchery farmhouse and Littlemore Priory.</p>	"Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Within the proximity of the Ozone Leisure Park, larger plot sizes would be appropriate to ensure they are not dominated. Closer to the Northfield Brook and existing lowrise development of Greater Leys, development will need to be lower to avoid dominating this and to reflect the rural landscape fragments. In these locations, a smaller plot size will also be more appropriate. <u>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.</u>



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			<p>Integrating the parcel of land that includes Minchery Farmhouse within site SPS2 we believe will provide greater potential to conserve the future of this Grade II* building, which is currently on the heritage at risk register.</p> <p>Currently the proposed policy commitment to consider impacts of development on the setting of the listed building indicates there has been insufficient consideration of how to conserve the building's future within any planned scheme and bring it back into use. The approach to Minchery Farmhouse risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>To support a positive response, we believe that heritage impact assessment of the site is needed, in accordance with the NPPF paragraph 31 (assuming that the boundaries are amended as suggested). Clearly such assessment may result in further changes to the policy and supporting text.</p> <p>Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings.</p> <p>Finally, given the site's complexity from a heritage and design perspective (especially regarding Minchery Farmhouse but also the remains of Littlemore Priory), we recommend a requirement for a masterplan within policy.</p> <p>Complimenting these changes to policy, we recommend relevant additional supporting text (adapting paragraph 8.96 as appropriate).</p>	<p><u>A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan.</u></p> <p>The form and layout of development should respond to the South Oxfordshire allocated development site to the south. A set-back may be necessary to minimise noise and air quality impacts from Grenoble Road, but there should be an opportunity to face and address the road, with relatively high-density development. More vulnerable development will be expected to be directed away from the small area of Flood Zone 3.</p> <p><u>Grade II* Minchery Farmhouse must be retained and its conservation and future use supported by integrating the building positively within the design of the scheme, responding to its significance in compliance with Policy HD2.</u></p> <p><del>The 15th Century (remodelled around 1600) Grade II* listed Minchery Farmhouse adjoins the site in the southwest corner by the edge of the Ozone complex (within the Science Park, Policy SPS5). Development proposals must be designed with consideration of their impact on the listed building and its setting and demonstrate compliance with Policy HD2.</del></p> <p>Development must take into consideration the potential presence of prehistoric, Roman and medieval archaeological remains. Due to this potential, development should demonstrate compliance with Policy HD5 <u>and there should be no adverse impact on the remains of Littlemore Priory (above and below ground).</u>"</p>



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
				<p>Alongside the above changes to policy, we advise adding a new paragraph to the supporting text:</p> <p><u>“The 15th Century (remodelled around 1600) Grade II* listed Minchery Farmhouse is within the site and any development should be sympathetic to the significance of this designated heritage asset. Details for the improvement, protection and maintenance of the farmhouse and its setting will need to be agreed with the Council as part of the planning process. The site is of archaeological interest as medieval and Roman remains have been recorded previously and there is high potential for further prehistoric, Roman and early Saxon archaeology. The remaining priory structures (above and below ground) and related features and burials should be preserved in situ.”</u></p>
SPS3	Overflow car park, Kassam stadium	Unsound	Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings.	<u>“Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.”</u>
SPS4	Mini plant, Oxford	Sound		
SPS5	Oxford Science Park	Unsound	Currently the site includes the Grade II* listed farmhouse. As stated in our comments on SPS2, we believe the policy is unsound in its approach to this highly graded asset, which is currently on the national heritage at risk register. Given the site includes the farmhouse, it is inappropriate simply to regard the land's development as a setting issue. The approach to Minchery Farmhouse risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed	<p>Within the policy, add the following paragraph:</p> <p><u>“A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan.”</u></p> <p>And make the following changes:</p>





Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			<p>Buildings and Conservation Areas) Act 1990.</p> <p>We believe that the best way to do this is to amend the site boundaries so that the eastern part of the Oxford Science Park forms part of the Kassam Stadium site, coupled with a change in wording of the policy and the inclusion of specific requirements linked with the farmhouse. We suggest revised wording in our comments on the Kassam stadium policy (SPS2).</p> <p>Assuming this change is made, there is still potential for development on the larger parcel of land in SPS5 to impact on the setting of Minchery Farmhouse, so related text in policy SPS5 can be retained.</p> <p>Given the likelihood of large-scale buildings proposed within Oxford Science Park, we recommend a policy requirement for a masterplan.</p> <p>Accompanying changes to the supporting text are also suggested, though these are indicative only and would need to be checked by the City Council's archaeological adviser.</p>	<p>"...Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and preserve the setting of the nearby listed building. Due to this potential, development should demonstrate compliance with Policy HD5 and there should be no adverse impact on the buried remains of Littlemore Priory."</p> <p>In the supporting text:</p> <p>"8.96. <del>The 15th Century (remodelled around 1600)</del> Development of this site has the potential to impact on the setting of Grade II* listed Minchery Farmhouse is within the site and any development should be sympathetic to the <u>significancesetting</u> of this heritage asset. The site is of archaeological interest as medieval and Roman remains have been recorded previously and there is high potential for further prehistoric, Roman and early Saxon archaeology. <del>The remaining priory structures (above and below ground) and related features and burials should be preserved in situ.</del>"</p>
SPS6	Sandy Lane Recreation Ground	Sound		
SPS7	Unipart	Unsound	<p>Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings.</p> <p>Does the policy have an unwanted apostrophe in its urban design and heritage subsection (before the word "proposed")?</p>	<p>"Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9."</p>
SPS8	Bertie Place Recreation Ground	Sound		



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SPS9	Blackbird Leys Central Area	Unsound	We recommend a reference in policy to significance, rather than simply setting, mirroring what is in the supporting text.	In policy SPS9: “Development proposals must be designed with consideration of their impact on the <del>significancesetting</del> of the Oxford Stadium conservation area and the Grade II listed Church of the Holy Family, and demonstrate compliance with Policy HD1 and HD2.”
SPS10	Knights Road	Sound		
SPS11	Cowley Marsh Depot	Unsound	The Cowley Marsh depot partially intersects with a protected view cone. While the policy acknowledges this, it should also cross refer to policy HD9 as other similarly intersecting allocations have done (e.g. SPS13).	Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Heights should be compatible with surrounding residential streets and should avoid negatively impacting on the view cone, in accordance with policy HD9.
SPS12	Templars Square	Sound		
SPS13	Land at Meadow Lane	Sound		
SPS14	Formerly Iffley Mead playing field	Sound		
SPS15	Redbridge Paddock	Sound		
SPS16	Crescent Hall	Sound		
SPS17	Edge of Playing Fields, Oxford Academy	Sound		



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SPS18	474 Cowley Road (former Powells Timber Yard)	Sound		
MRORA OF	Marston Road and Old Road Area of Focus	Sound		
SPE1	Government Buildings and Harcourt House	Comment	Reference should be made in the supporting text to the grade for St Clements Church.	"There are no listed buildings on the sites but the Grade II* Headington Hall sits within the park and St. Clements Church <u>(also Grade II*)</u> is nearby."
SPE2	Land surrounding St Clement's Church	Unsound	The policy needs to refer to Policy HD3, acknowledging the site's proximity to Magdalen College Registered Park and Garden (Grade I).  Furthermore, given the site's complexity from a heritage and design perspective, we recommend a requirement for a masterplan within policy, which is already obliquely referenced later in the policy regarding parking provision.	We suggest the following additional wording for integration as appropriate in the urban design and heritage subsection of the policy:  "Proposals must demonstrate compliance with Policy HD3 to avoid or minimise harm to the significance of <u>Magdalen College Registered Park and Garden (Grade I)</u> ".  "A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan."  Recommended changes to the supporting text:  "The site surrounds the Grade II* listed St. Clement's Church and its cemetery, <u>is within</u> the St Clement's and Iffley Road Conservation Area, and the setting of the Headington Hill and Central Conservation Areas <u>and the Magdalen College Registered Park and Garden (Grade I)</u> ."



Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SPE3	Headington Hill Hall and Clive Booth student village	Unsound	The policy rightly emphasises views from the historic core, but currently it fails to mention the protected view from Headington Hills allotment. The supporting text should also reinforce this point; for example, at the outset of paragraph 8.194.	<p>“Development proposals must be designed with consideration of their impacts on the setting of the listed buildings, the character of the conservation area, and on views, particularly from the historic core <u>and the Headington Hills allotment protected view.</u>”</p> <p>In the supporting text:</p> <p>“Headington Hill Hall and Lodge House are both listed buildings and much of the site falls within the Headington Hill Conservation Area. <u>Part of the site intersects with the protected view from Headington Hill allotment.</u>”</p>
SPE4	Oxford Brookes University Marston Road campus	Unsound	<p>The opening paragraph within the subsection on Urban Design and Heritage needs work. Clearly the final sentence is incomplete.</p> <p>Within any such review, we recommend deleting the (strange) line “Attention should also be paid to the materiality of the adjacent conservation Area”, noting the policy goes on later to state: “Development proposals must be designed with consideration of their impact on the overall landscape setting and character of the adjoining conservation area, demonstrating compliance with Policy HD1”.</p>	
SPE5	1 Pullens Lane	Unsound	<p>“Development proposals must be designed with consideration of their impact on the conservation area setting” implies the site is outside the conservation area. We recommend alternative wording.</p> <p>Also note typo “sand” in the subsequent paragraph.</p>	Development proposals must be designed <u>respond positively to the significance, character and distinctiveness of</u> <del>with consideration of their impact on the conservation area setting and must demonstrate in</del> compliance with Policy HD1.
SPE6	Churchill Hospital	Comment	The non-designated heritage assets should be clearly explained in the supporting text, as in the adopted OLP2036 i.e. “Buildings from the original hospital used during the Second World War have been retained and these are non-designated heritage assets”.	



Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SPE7	Nuffield Orthopaedic Centre (NOC)	Sound		
SPE8	Warneford Hospital	Unsound	While we welcome the policy commitment to retain the listed buildings, the policy needs also to refer to the significance of the listed buildings. We suggest wording for consideration.	“Development proposals must retain the listed buildings and be designed with consideration of their impact on the <u>significance</u> of the listed buildings ( <u>including their setting</u> ), the broader landscape and the adjoining Headington Hill Conservation Area. Proposals must demonstrate compliance with policies HD1 and HD2.”
SPE9	Bayards Hill Primary School Part Playing Fields	Sound		
SPE10	Hill View Farm	Comment	Though potentially not a matter of soundness, we wonder if naming the conservation area might be more helpful (as done in policy SPE12), rather simply describing it as “adjacent”.	Development proposals must be designed with consideration of their impact on the character of the <u>adjoining Old Marston</u> Conservation Area and the landscape setting and must demonstrate compliance with Policy HD1.
SPE11	Land west of Mill Lane	Comment	Though potentially not a matter of soundness, we wonder if naming the conservation area might be more helpful (as done in policy SPE12), rather simply describing it as “adjacent”.	Development proposals must be designed with consideration of their impact on the character of the <u>adjoining Old Marston</u> Conservation Area and the landscape setting and must demonstrate compliance with Policy HD1.
SPE12	Marston Paddock	Sound		
SPE13	Manzil Way Resource Centre	Sound		



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SPE14	Slade House	No comment		
SPE15	Thornhill Park	Unsound	Reference is made to policy HD1; however, the site's development would not impact on a conservation area.	
SPE16	Union Street car park and 159-161 Cowley Road	Unsound	Reference is made to policy HD1 when we believe what is meant is policy HD7.  Also, there is a typo in the opening line of paragraph 8.277.	It is expected that the requirements for high quality design set out in Policy HD4 <u>7</u> will be met in the following ways.
SPE17	Jesus and Lincoln College Sports Grounds	Unsound	While we welcome encouragement in the policy for small-scale buildings, the section of policy that helps to protect the view cone might inadvertently encourage taller buildings closest to the Chapel (Grade I) and Bartlemas House (Grade II*), potentially harming their significance. To address this concern, we recommend:  a) Minor amendment to policy wording to refer to eastern, rather than north-eastern as shown in the adjacent column; and b) heritage impact assessment to ensure the policy is underpinned by relevant proportionate evidence, in accordance with paragraph 31 of the NPPF.  The approach to the Chapel and Bartlemas House risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.	In policy SPE17:  "A graduation of height, lower on the south-western edge and highest in the <del>north</del> -eastern, would respond to the context of the Crescent Road view cone."
SPE18	Ruskin College Campus	Unsound	The policy does not commit to the retention of the listed buildings, an omission which needs to be corrected.	In policy SPE18: "Development proposals must be designed with consideration of their impact on the Old Headington Conservation Area and the setting of the listed buildings within the site ( <u>which must be retained</u> ) and demonstrate compliance with policies HD1 and HD2."



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				In supporting text: "There are nine buildings on site, including the listed Rookery and wall, set within landscaped grounds with some large trees. Any development would need to ensure that there was no adverse impact upon the setting of the listed buildings <u>and, wall (which must be retained)</u> or on Old Headington Conservation Area, and therefore should demonstrate compliance with Policy HD1 and HD2."
SPE19	Ruskin Field	Sound		
SPE20	John Radcliffe Hospital	Sound		
SPE21	Rectory Centre	Unsound	We are not convinced it is clear what is meant by "adhering" to an existing building height. We suggest alternative wording for consideration, ensuring the policy is effective in accordance with paragraph 35 of the NPPF. Assuming this is what is meant, this calls into question if it is reasonable to expect a "minimum of 21 residential units". We recommend this be double-checked to ensure that this policy conveys a realistic expectation of what would be delivered without adding more height.	"The existing building height should also be respected and <u>not exceeded</u> <del>adhered to.</del> "
NCCAOF	North of the City Centre Area of Focus	Unsound	<p>Criterion j implies a balancing exercise that lacks nuance, and we would argue contrary to national policy (specifically, paragraph 189 of the NPPF). It is open to abuse and misinterpretation and needs to be amended.</p> <p>The current wording could be particularly problematic for employment sites such as University of Oxford Science Area and Keble Road Triangle, which have a very high level of heritage significance.</p> <p>Also, reference only to historic buildings omits consideration of other</p>	"any design should <u>take into account the significance of</u> <del>balance the existing heritage assets historic buildings onsite coupled with the celebration of</del> <u>while seeking to celebrate</u> cutting-edge science."



Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			types of asset, such as Registered Parks and Gardens e.g. The University Parks, Grade II.  Also, note paragraph 8.312 is incomplete.	
SPCW1	West Wellington Square	Sound		
SPCW2	Land at Winchester Road, Banbury Road and Bevington Road Oxford	Sound		
SPCW3	Manor Place	Unsound	<p>While the policy does include welcome detail on heritage considerations, we recommend heritage impact assessment to ensure the policy is underpinned by relevant proportionate evidence, in accordance with paragraph 31 of the NPPF.</p> <p>The Sustainability Appraisal acknowledges the site is sensitive (on page 57); however, the supporting text for this allocation does not reflect the degree of its sensitivity, taking into account the site's proximity to two Grade I listed buildings, the Grade I landscape at St Catherine's College, Grade I Magdalen College Registered Park and Garden and its Grade II* boundary wall. Further changes to the policy and supporting text may be needed, informed by such an assessment.</p> <p>The approach to adjacent highly graded assets risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>"Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, <u>and the setting of the Registered Park and Garden</u> and demonstrate compliance with policies HD1, HD2, <u>HD3</u> and HD9."</p>



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SPCW4	Canalside, Jericho	Unsound	To conform with other site allocation policies, reference to Policies HD1 and HD2 is merited, as is reference to Policy HD3 given the proximity to Worcester College RPG (Grade II*).	“... Finished design should respect the waterfront heritage of the site and, the conservation area and <u>conserve or enhance the significance of Grade I4 listed St Barnabas Church in compliance with Policies HD1 and HD2</u> . A new public square should be created and to open up views of St Barnabas Church from the canal, the wall separating the church and the proposed new square could be demolished. The wall is curtilage listed and as it relates to an active place of worship, separate Faculty approval is required from the Diocese. Listed building consent is not required for such demolition. <u>Proposals should also consider the adjacent Registered Park and Garden (Worcester College, Grade II*) in compliance with Policy HD3.</u> ”
WEAOF	West End and Botley Area of Focus	Comment	Paragraph 8.341 should refer also to policy HD9.	“Wherever high buildings are proposed (over 15 metres) they should be accompanied by a visual impact assessment which clearly shows how the proposal relates to Oxford’s historic skyline, <u>in accordance with policy HD9.</u> ”
SPCW5	Oxpens	Unsound	The supporting text in paragraph 8.357 refers to Oxpens being located “within the city’s High Buildings Area”. We are unclear what is meant. The term High Buildings Area does not appear to relate to any policy within OLP2040. The High Buildings Technical Advice Note refers to “Areas of Opportunity/Areas of Greater Potential” and “Dynamic Areas”. This site would appear to be in a Dynamic Area but not in an Area of Opportunity/Area of Greater Potential. We suggest being clear that this site lies in a Dynamic Area. Inconsistent language may cause confusion.	In the supporting text: “... The Oxpens site lies within the Raleigh Park view cone and <u>a Dynamic Area identified in the High Buildings Technical Advice Note (TAN)</u> <del>the city’s High Buildings Area</del> . The site forms a part of other important views out of the city (for instance, from St. George’s Tower and the University Church of St. Mary’s Tower) and from further views (such as the potential for visibility within other view cones e.g. Elsfield and Doris Field) ...”



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Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SPCW6	Nuffield Sites (Island / Worcester St Car Park/ South of Frideswide Square)	Unsound	<p>More detail is needed on the spread of dwellings between the 3 sites that comprise the Nuffield sites to establish the acceptability or not of this allocation, rather than simply state a headline minimum figure of 59 dwellings across all three sites. The evidence supporting how this headline figure would be achieved needs to be made clear.</p> <p>It is our understanding that South of Frideswide Square is a new allocation within the Central Conservation Area. Clearly this is in a sensitive location and merits proportionate heritage assessment. The detail in the text is insufficient in our opinion. Indeed, paragraph 8.379 is somewhat colloquial in tone, and is poorly integrated with earlier supporting text in paragraph 8.371.</p> <p>Furthermore, in our view the other two parts of the site (the island and Worcester Street car park) merit heritage assessment to ensure the policy for their development is clear and effective and informed by appropriate evidence.</p> <p>The approach to heritage assets risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The car park is located between Worcester College RPG (Grade II*) and Oxford Castle Scheduled Monument. The view from the Castle currently connects with the floodplain and this makes an important contribution to its significance. Also, the land currently used as a car park itself is of heritage significance linked with its former use as a Canal Wharf. Heritage impact assessment provides the mechanism through which connections with that past land use can inform the site's future.</p> <p>Clarity is needed about the buildings that would be retained (or not) across the Nuffield sites.</p>	<p>We recommend clarifying the expected spread of dwellings across the three parts of the site.</p> <p>We recommend adding the following line to the policy:  <u>“A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan.”</u></p> <p>We recommend the following changes to the existing text on views:  <u>“...Development proposals must also be designed with consideration of their impact on views, particularly from Hinksey Hill to the historic core, from views out of the historic core and from further views of the site. The open space of the Worcester Street car park currently allows the only view from Oxford Castle into the floodplain and thus contributes to the setting and significance of the Castle. This important view should be retained to conserve the significance of the Castle in accordance with policy HD4.”</u></p> <p>Also, we recommend the following amendment:  <u>“Development must be designed with consideration of its impact on the Central Conservation Area, <del>and</del> nearby listed buildings (Policy HD1 and HD2), and Worcester College Registered Park and Garden (Policy HD3).”</u></p>



Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			<p>The supporting text states that a masterplan should be developed, but this has yet to be required in policy. Also, it should be recognised in policy that there is potential for development to impact on Worcester College Registered Park and Garden (Grade II*).</p> <p>The supporting text in paragraph 8.372 refers to the Nuffield sites being located “within the city’s High Buildings Area”. We are unclear what is meant. The term High Buildings Area does not appear to relate to any policy within OLP2040. The High Buildings Technical Advice Note refers to “Areas of Opportunity/Areas of Greater Potential” and “Dynamic Areas”. This site would appear to be in a Dynamic Area but not in an Area of Opportunity/Area of Greater Potential. We suggest being clear that this site lies in a Dynamic Area. Inconsistent language may cause confusion.</p>	<p>In the supporting text:</p> <p>“8.372 Some of the Nuffield Sites lie directly within the Raleigh Park View Cone and they are all within <u>a Dynamic Area identified in the High Buildings Technical Advice Note (TAN)</u><del>the city’s High Buildings Area</del>. These sites also form part of other important views out of the city...”</p>
SPCW7	Osney Mead	Unsound	<p>Given the site’s proximity to and potential relationship with the remains of Osney Abbey, Scheduled Monument, reference should also be made to HD4 in the policy. We suggest a way of integrating this wording into one of the existing paragraphs using bullets.</p> <p>The supporting text in paragraph 8.385 refers to Osney Mead being partially located “within the city’s High Buildings Area”. We are unclear what is meant. The term High Buildings Area does not appear to relate to any policy within OLP2040. The High Buildings Technical Advice Note refers to “Areas of Opportunity/Areas of Greater Potential” and “Dynamic Areas”. This site would appear to be in a Dynamic Area but not in an Area of Opportunity/Area of Greater Potential. We suggest being clear that this site lies in a Dynamic Area. Inconsistent language may cause confusion.</p>	<p>In policy SPCW7:</p> <p>“Development should be designed to enhance:</p> <ul style="list-style-type: none"> <li>• the relationship and connection between the site and the river,</li> <li>• <u>the setting of Osney Abbey Scheduled Monument (in accordance with policy HD4)</u> and</li> <li>• <del>to enhance</del> the physical and visual permeability of the site.”</li> </ul> <p>In the supporting text (paragraph 8.385):</p> <p>“...Part of the site lies directly within the Raleigh Park view cone and part of the site lies within <u>a Dynamic Area identified in the High Buildings Technical Advice Note (TAN)</u><del>the city’s High Buildings Area...</del>”</p>
SPCW8	Botley Road Retail Park	Sound		

