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Dear Sirs

## **OXFORD CITY COUNCIL LOCAL PLAN 2040 REGULATION 19 PRE-SUBMISSION PUBLICATION CONSULTATION**

### **1.0 INTRODUCTION**

- 1.1 Oxford Preservation Trust (“the Trust”) is pleased to respond to Oxford City Council’s (“the City Council”) Regulation 19 Pre-submission Publication Local Plan (“the Local Plan”) Consultation.
- 1.2 The Trust was established in 1927 as a charity and local amenity society with the principal aim of conserving and enhancing Oxford and its setting. It takes a forward thinking and positive approach to development, looking to influence change rather than stopping it, preserving the best of the old and encouraging the best of the new. It is committed to ensuring that Oxford can continue to flourish and prosper, whilst protecting its historic character and setting.
- 1.3 The Trust owns and looks after 1000 acres of land in and around Oxford making green space available for local people to benefit from and enjoy.
- 1.4 The Trust has detailed knowledge and expertise built up over a number of years so that it is legitimately recognised as a professional and experienced voice. It is able to speak with conviction on matters relating to landscape, views and the impact of development on the City of Oxford and its heritage, and on its green setting and surrounds.

### **2.0 GENERAL COMMENTS**

- 2.1 The Trust has reviewed the Local Plan and its supporting documentation and evidence. The Trust

as it currently stands has a number of flaws and fails to provide a clear vision for the future. A number of key issues and we must therefore conclude that it is unsound in principle and the Trust has provided some comments on these issues.

2.2 The Plan has obviously been drafted with reference to the National Planning Policy Framework, which was last updated in December 2023, post the publication of the Plan.

2.3 Soundness, however, is still dealt with at paragraph 35 in the Framework (Dec. 2023). For completeness, that paragraph is reproduced below:

*Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*

*a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

### **Approach to plan drafting and consultation**

2.4 The Trust has some concerns about the overall vision and strategy, and certain elements that have been missed out in this publication version of the Local Plan. It is evident that the Plan has been written with the residents of Oxford in mind, and for that we support the Council. However, a number of over-arching and key strategic issues, which have the potential to impact upon residents' daily lives appear to have been missed.

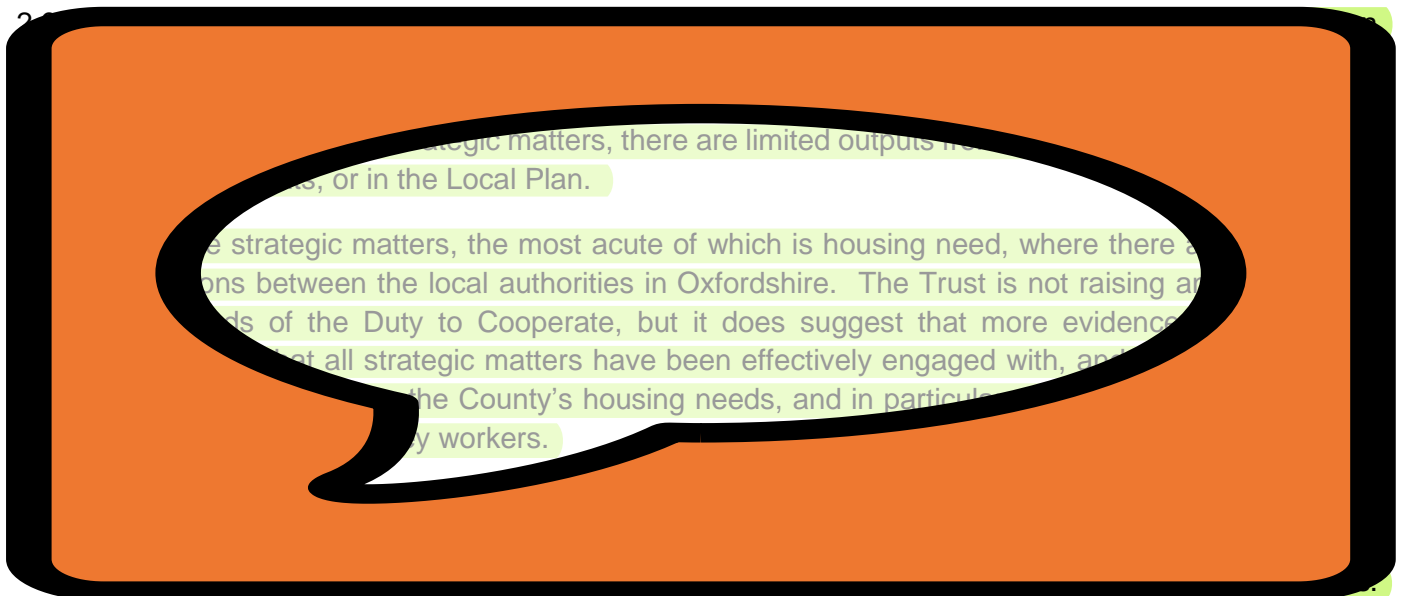
### **Context as set out in the plan**

2.5 Oxford is a city which is internationally renowned for its excellence in academia and research; in science and innovation; and, in design and production. As acknowledged in the opening pages of the Local Plan, it also has a wealth of historic and architectural assets of national and international importance which contribute to the character of the whole city, and its setting. The Trust are pleased to see that its unique heritage is referred to within one of the six themes which underpin the overall vision in the Plan. Furthermore, a reference is made to heritage, and how it should be protected and enhanced is echoed within the overall objectives and strategy.

- 2.6 The Trust are aware of the current mounting pressure to grow the economy and pressure for available sites to be used for employment based uses, especially those in the life sciences sector. This is a demand that is unlikely to dwindle, and as such policies within the Plan that will be in place for the next 15 plus years should seek to balance this pressure against other factors such as the need to preserve Oxford and its unique character, meet the identified housing need and to ensure residents have access to all they need to happily live in the city, such as open space, strong communities and the necessary supporting facilities and infrastructure. The pressure for growth should not come at the expense of the city's unique heritage.
- 2.7 The Trust has six key themes that it has tried to focus on in responding to the Local Plan, and considers that each could be elevated and given greater strength in the policies and supporting text and should also form recurring themes which are woven through the entire plan. The themes are:
1. Heritage
  2. Green setting
  3. Protecting views in and out of the city
  4. Improving and protecting the public realm
  5. Tourism
  6. Access to green spaces and connectivity between them.
- 2.8 Overall the Trust hopes that the Local Plan can be a document which helps improve the lives of those who live in the city, as well as those that come to work and visit.

## Duty to Cooperate

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### 3.0 CHAPTER 1. VISION AND STRATEGY

- 3.1 The Trust is pleased to see that 'Oxford will be a City that respects its heritage' as one of the key objectives within this chapter. The term heritage encapsulates a wide number of factors and it cannot be seen as a generic term as this will dilute the strength of the objective. Oxford has a highly distinctive sense of place which is a result of not only its historic buildings, but also the important role the green setting around the city plays, in addition to the areas of open space scattered around the city and the historic villages still found within the city. These elements cannot be taken for granted and their protection should be woven into the policy guidance throughout the whole document.
- 3.2 In a world-class heritage city, whilst there a number of specific policies relating to heritage, these tend to view heritage assets as a planning consideration, rather than an opportunity which brings its own economic benefit. The economic value of heritage should be woven throughout the policy considerations.
- 3.2 The Trust notes that tourism is not specifically identified as a strength, or opportunity within Table 1.1 within the draft Local Plan. It is the Trust's view that this omission in the overarching vision is a missed opportunity to produce a document which can manage the effects of tourism, especially for residents, or continue to promote it in a sustainable way. This matter is expanded upon in the detailed comments submitted hereunder, but in short the Trust considers that greater detail should be provided in the Local Plan to provide for tourism and manage its effects, particularly on the built environment.
- 3.4 The Trust also consider that there is a significant lack of reference to the public realm, both within Chapter 1 and the overarching vision and strategy, and then further within the Plan and the detailed policies. Notwithstanding a specific policy which could detail how proposals could improve the existing public realm, reference should also be made to this issue within Chapter 1 to highlight the importance of ensuring Oxford's public realm is maintained to a high standard. The provision of high quality public realm throughout the city is key in achieving a number of the other aspirations within the Plan and this should be specifically referenced and given due weight within the document as a whole.
- 3.7 The Trust broadly supports the objectives of the Local Plan. In particular the Trust welcomes:
- Oxford will be a city that respects its heritage and fosters design of the highest quality
  - Oxford will be a healthy and inclusive city to live
  - Oxford will be a green and biodiverse city that is resilient to climate change
  - Oxford will be a liveable city and strong communities and opportunities for all.
- 3.8 The Trust would, however, welcome a more explicit recognition that the "unique" built environment is a result of its significant heritage value and the great care that has generally be taken to plan appropriately to conserve and enhance this.

#### 4.0 CHAPTER 2. A HEALTHY, INCLUSIVE CITY TO LIVE IN

- 4.1 The Trust acknowledges that there is a significant need for new homes in Oxfordshire and particularly in the city. The Housing and Employment Needs Assessment ('HENA'), jointly commissioned with Cherwell District Council, considered the housing need for Oxford. The Trust has some concerns about the conclusions of the report, especially when other neighboring Authorities have not been part of the process or had an input into the assessment.
- 4.2 In order to accommodate housing growth across the city an agreed joint strategy needs to be adopted to ensure all of the relevant Local Authorities agree to the level of need, and how this can be fairly distributed across the County.
- 4.3 The Local Plan chapter two is critical for the whole of Oxfordshire. The Trust notes that much of the planning and more general political debate and argument over the last few years in Oxfordshire has focused on the capacity for housing development in the Oxford and the potential amount of unmet housing need. As detailed elsewhere in these submissions, the Trust is concerned that the balance in the City Council's strategy is tilted too far towards economic and employment growth at the cost of residential opportunities.

#### POLICY H1: HOUSING REQUIREMENT

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 4.4 There is a very acute need for new homes across Oxfordshire and particularly in the city. The Trust is keen to see the delivery of new homes, which people can afford, to maintain a mixed and vibrant community of people in Oxford.
- 4.5 However, the delivery of 481 homes per annum is significantly less than the Council's own HENA has identified. the difference between the total need identified the Housing and Employment Needs Assessment ('HENA') of some 26,440 new homes, and the "capacity" in the City of 9,612 new homes. As we have suggested with reference to the Duty to Cooperate, at present there does not appear to be a clear, and agreed, strategy for meeting the needs of the County as a whole. It would suggest that the assumption is therefore for the neighboring authorities to accommodate the outstanding need. Without an agreed, joint strategy the Trust are concerned that this will result in an increased pressure to release land from the Green Belt to accommodate this need. A solution to this must be found as soon as is practicable.
- 4.6 The Trust makes no comment about the robustness of the housing land capacity identified in the Housing and Economic Land Availability Assessment (HELAA) 2023, but it is vital that the City can demonstrate that it has left no stone unturned in seeking to deliver as many new homes as it can to engage with the very serious affordability challenge in the City. However, the Trust does suggest that the HELAA evidence is reviewed to ensure that the capacity in the city for development is properly reflected in the policy. As the Trust cites regarding the Duty to Cooperate, the discrepancy

between the unmet need and the number of homes planned should be explained – particularly to avoid uncertainty and an undue pressure on the green setting of Oxford.

**POLICY H2: DELIVERING AFFORDABLE HOMES**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

4.7 The Trust strongly supports the need for genuinely affordable homes to be delivered in the city.

**POLICY H11: HOMES FOR TRAVELLING COMMUNITIES**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

4.8 This policy, like others in the plan, lacks reference to some key issues to ensure that any sites that come forward are appropriate and sensitive to their surroundings.

**Suggested modification**

4.9 The Trust believes it would be prudent to include reference to heritage assets or their setting in the policy or supporting text. It would also be appropriate to tie this policy to others in the Local Plan, such as Policy G1, to ensure sites such as recreational areas, or public open space are not brought forward as possible sites.

**POLICY H12: HOMES FOR BOAT DWELLERS**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

4.10 This policy suffers from the same drafting issues as policy H11, and it is not clear how it properly relates to other policies of the Local Plan.

**Suggested modification**

4.11 There is no reference to heritage assets or their setting, nor sensitive blue infrastructure corridors in the policy or supporting text. Reference to these sensitive designations and considerations would prevent inappropriate sites being considered for new residential moorings.

**5.0 CHAPTER 3. A FAIR AND PROSPEROUS CITY WITH A GLOBALLY IMPORTANT ROLE IN LEARNING, KNOWLEDGE AND INNOVATION**

5.1 The Trust understands the City Council's aspirations for economic growth, as aligned with the other authorities in Oxfordshire and the Oxford Local Enterprise Partnership (OxLEP). The Trust is concerned that market forces, with a strong demand for 'Life Science' based employment space, has the potential to create a misbalance in the overall growth across the city. Whilst it is acknowledged that growth needs to be planned and accommodated, there appears to be insufficient consideration of other constraints and needs in the city, the Trust suggests that greater importance should be given to heritage matters but also a better balance should be struck in planning for new homes on suitable sites. A particular example of a missed opportunity for new homes in preference for economic growth is the relatively low number of homes proposed on large redevelopment sites within the city centre. The Trust is of the view that the provision of much needed housing is necessary to create balanced communities across the city and to help to conserve and enhance its setting and its character.

5.2 The focus within the Local Plan as a whole appears to be skewed towards delivering growth, especially economic growth. The Trust would wish to see this rebalanced with a greater focus on the delivery of housing, an overarching strategy which recognises the economic value of heritage and how any new development can benefit

**POLICY E1: EMPLOYMENT STRATEGY**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

5.3 The Trust has some concerns that this policy will enable unrestricted new employment generating uses within the city and district centres. It is apparent that, following the pandemic, the market forces across the city are creating a huge demand for floorspace in the R&D sector. If left to market forces, all brownfield sites that become available within the city centre are likely to be redeveloped for employment uses, meaning very little residential floorspace will be delivered. This is not acceptable in a city where there is such a significant housing crisis and housing stock needs to be delivered across the city. A threshold consideration should be included within the policy to ensure if several sites come forward within close proximity to each other, the Local Authority is able to ensure a mix of uses is delivered.



**Suggested modification**

5.4 The Trust broadly accepts the approach to increase employment uses on existing sites and allocated employment areas. The Trust would however like to see Design Guides, or broader design guidance in place to cover these sites to ensure the scale and massing of any proposed development is appropriate.

**POLICY E5: TOURISM AND SHORT STAY ACCOMODATION**

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

5.5 The Trust welcomes a policy which seeks to restrict and manage short stay accommodation across the city. Development which involves the loss of dwellings into short term accommodation needs to be rigorously considered to ensure existing house stock is not lost to a use which is unlikely to benefit local residents.

5.6 The Trust welcomes reference within the policy to the loss of existing dwellings into short stay accommodation to protect the existing housing stock within the City from being lost to these uses.

5.7 It is however alarming that the only reference made to tourism within the proposed Local Plan policies is related to the provision of holiday and short stay accommodation. As paragraph 3.26 within the draft documents states “*Tourism is a significant sector of Oxford’s economy with distinct needs and pressures*”. A more detailed policy and over-arching strategy is required to deal with the issue. Tourism brings people to visit, and work in the city – the implications of this are only briefly mentioned within the document as a whole.

5.8 Tourism is a vital part of the economy in Oxford. Data from Experience Oxfordshire tells us that each year, Oxford welcomes nearly 7 million visitors to the City of Oxford who spend over £830million in the economy and this supports over 10,500 jobs.

5.9 Tourism has a number of facets that impact upon the built environment and the spaces around it, and as such is a legitimate matter for consideration in the Local Plan. Whilst there is little detail in the NPPF about how Local Plans should consider tourism as a topic or theme, it is clear that the economy, the historic environment – that tourists come to visit and experience – accommodation and transport are all planning matters that should be brought together in the Local Plan to create a coherent and positive strategy for tourism.

5.10 The medieval street pattern in the city’s historic core dictates that tourists, especially in large volume, create enormous pressure in these streets. The fabric of the streets becomes compromised as also does the setting of a huge number of other very significant heritage assets. Better and more comprehensive management of tourists, in particular how they arrive and depart the city, how they move about, and where they go to, is vital to the preservation and enhancement

of the heritage environment but with the consequence of maintaining and improving the economic benefits too.

**Suggested modification**

5.11 Policy E5 is considered unsound not because of its contents *per se* but because it is not coupled with a positive strategy to manage and enhance tourism. Policy E5 is another example in the Local Plan of a ‘development management’ style, criteria-based policy that can be used to react to proposals but is ineffective since it is not balanced with proposals to allocate for tourist facilities and accommodation. It is also considered therefore, that the lack of policies or strategies to promote tourism is unjustified, because the City Council has identified the importance of the issue, but not planned appropriately to engage with it.

**6.0 CHAPTER 4. A GREEN BIODIVERSE CITY THAT IS RESILIENT TO CLIMATE CHANGE**

6.1 Chapter four of the Local Plan addresses the important need for protecting and enhancing a network of green and blue spaces across the city. However, the Trust has concerns that the policies and supporting text of this part of the Local Plan are generic and in particular, do not pay sufficient regard to the wider green setting of Oxford, and its diverse species.

6.2 The Trust is keen to see that new development is designed and delivered in the most sustainable way possible. The Trust is of the view that collectively we should all be trying to consider how future generations will use their homes and workplaces and how they will move around. Local Plans play a key role in shaping that future and should strive to show real imagination and innovation.

6.3 The Trust is very concerned that there is no specific policy relating to the Oxford Green Belt within Chapter four. The protection of the Green Belt, not least for its purpose in protecting the setting of Oxford, is consistent with national policy and this should be provided at a local level too. The Green Belt not only forms part of Oxford’s wider green setting, but also offers the opportunity to provide locations that can be used for public benefit. It is concerning that the Council have not included a specific policy to protect this specially designated land.

6.4 The Trust is not convinced that the policies are capable of being both scaled for smaller developments across the city and applied to larger major development. It is difficult to see how genuine networks will be protected and enhanced, or how the wider landscape has been considered (including views).

**POLICY G1: PROTECTION OF GREEN AND BLUE INFRASTRUCTURE NETWORK**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 6.5 The Trust strongly supports the protection of the existing green and blue infrastructure networks in the city and is pleased to see them recognised in the Local Plan. The green spaces of the city, and indeed those beyond its administrative boundaries, are a vital part of its setting, both in a heritage context, but also for the health and wellbeing of the City and its residents. As stated above, the Trust however have significant concerns that the Green Belt is not specifically referenced within the policy text nor the supporting text.
- 6.6 The Covid pandemic highlighted the importance of green spaces, and how vital it is for a functioning city, by providing a space for people to socialise, exercise, and have access to nature. Green spaces come in all shapes and sizes, from small informal meeting spaces and recreation areas, playing fields, allotments, play areas and water courses. The Trust feel it is of critical importance that the wording within Policy G1 and its supporting text provide a strong level of protection for all these areas to ensure they are not lost to development or alternative uses.
- 6.7 The Trust feels there is an element of conflict with the aims of this Policy and a number of the site allocations put forward within Chapter 8 which propose the loss of playing fields and play areas to allocated sites for redevelopment.

**POLICY G2: ENHANCEMENT AND PROVISION OF NEW GREEN AND BLUE FEATURES**

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 6.8 The Trust – as a landowner of significant areas of richly biodiverse land – is supportive of this policy and is committed to protecting biodiversity where it is able to do so. Policy G2 as drafted, however, tends to focus on consideration of proposals that come forward for development which have the potential to impact upon GI sites, rather than an onus to protect and enhance sites in their own right regardless of whether further development proposals are involved.

***Suggested modification***

- 6.9 The City Council should also identify locations within the Green Belt that can be used for public benefit, and the details of these could be set out within the supporting text.
- 6.10 The Trust would also welcome reference to improvements or enhancement to areas of green space for biodiversity or recreation, and key amongst potential opportunities could be the beneficial use of the Green Belt. It is felt this is a missed opportunity in the Local Plan.

**7.0 CHAPTER 5. A CITY THAT UTILISES ITS RESOURCES WITH CARE, PROTECTS THE AIR, WATER AND SOIL AND AIMS FOR NET ZERO CARBON**

7.1 The Trust is keen to see that new development is designed and delivered in the most sustainable way possible. The Trust is of the view that collectively we should all be trying to plan for how future generations will use their homes and workplaces, and how they will move around the city. Local Plans play a key role in shaping that future and should strive to show real imagination and innovation.

**POLICY R1: NET ZERO BUILDINGS IN OPERATION**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

7.2 The Trust is supportive of the aspirations of Policy R1 and the direction it provides for the operation of new buildings. Whilst the conversion of existing buildings is referred to within the text, and supporting text, there is no specific reference to heritage assets and listed buildings and structures. In a city with such a high concentration of historic and protected buildings, it would be prudent to ensure appropriate protection is afforded to these buildings, whilst also working towards making them more energy efficient.

**POLICY R2: EMBODIED CARBON IN THE CONSTRUCTION PROCESS**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

7.3 The Trust strongly supports this policy and welcomes the provision of a test in policy terms to ensure that any proposed demolition of a building is justified and that the application needs to demonstrate that retention is unfeasible before resorting to demolition.

**POLICY R3: RETRO-FITTING EXISTING BUILDINGS**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

7.4 The Trust welcomes a policy that includes specific reference to traditional buildings and heritage assets. Whilst the policy provides guidance on the asset itself, reference should also be made to the wider setting within which it sits. There may be instances where work to the existing building will result to improvements in the building's energy efficiency, however there would be wider implications

for how the building is viewed from the public domain or within long or short distance views. An example of this could be the introduction of solar panels on the roof of a historic building, which in itself would improve the energy efficiency of the host building, however if these were visible from public vantage points and harmed the character of the roof scape, this should not be outweighed by the aspirations of Policy R3.

**POLICY R7: AMENITY AND ENVIRONMENTAL HEALTH IMPACTS OF DEVELOPMENT**

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

7.5 The Trust questions whether reference should be made to public realm within this policy and its supporting text.

**Suggested modification**

7.6 Development that has the potential to impact upon areas of public realm, should be required to ensure that these areas are protected, or enhanced, for the wider public benefit.

**8.0 CHAPTER 6. A CITY THAT RESPECTS ITS HERITAGE & FOSTERS DESIGN OF THE HIGHEST QUALITY**

8.1 Oxford is a world-renowned historic city with a rich and diverse built heritage. Its iconic skyline has inspired artists and poets, and whilst the city is under pressure to grow, it must also protect what makes it so unique and special. The Trust has some concerns with regard to Chapter 6 in that it contains a number of standalone policies rather than an overarching positive strategy for the historic environment.

8.2 Paragraph 6.8 makes reference to views and landscape features in a wider sense, the Trust feel it is important that specific reference is made to the wider landscape setting of Oxford within this section, in addition to subsequent Policy HD9, as this plays an intrinsic and positive part of the wider setting of the historic setting of the City.

8.3 The Trust is also concerned that the role of 'setting' is underrepresented in the chapter and ought to be strengthened.

**POLICY HD6: NON-DESIGNATED HERITAGE ASSETS**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes

Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

8.4 The Trust supports proposed policy HD6 and welcomes its inclusion within the Local Plan. Non-designated heritage assets can hold significant local importance and their protection and preservation is a key to ensure they are not lost through redevelopment of sites.

**Suggested modification**

8.5 Some commitment to continued monitoring and review of the Local List within the supporting text would help make the policy robust and ensure that assets included in the list are offered a degree of protection. An increased awareness of the assets list would also enable a wider audience to understand the process and how they can identify, enjoy and preserve such buildings.

**POLICY HD7: PRINCIPLES OF HIGH-QUALITY DESIGN**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

8.6 The Trust understands the need to promote high quality design and welcomes the inclusion of a policy that promotes it. It is the Trust's view that the link between design and heritage setting should be made more explicit within the policy and its supporting text. It is however pleasing to see that a requirement is being placed on applicants to provide a design statement which sets out the design rationale for the majority of all new developments.

**Suggested modification**

8.7 Policy HD7 omits householder applications from this requirement, however the Trust feels it should be made clear that high quality design is expected for all development, including householder schemes.

**POLICY HD8: USING CONTEXT TO DETERMINE APPROPRIATE DENSITY**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

8.8 The Trust supports the inclusion of a policy which provides a framework for using context to determine appropriate density. Oxford is a constrained city, with an ever-growing pressure to

accommodate development. Whilst it is important to make efficient use of land, this should not be to the detriment to other considerations such as impact on views, the street scene or nearby heritage assets.

**Suggested modification**

8.9 The Trust welcomes reference to impact on heritage within the Policy text but feels that this could be expanded upon to include reference to more specific heritage elements such as short and long-distance views, both in and out of the city, skyline, roofscape and green setting of the city.

**POLICY HD9: VIEWS AND BUILDING HEIGHTS**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

8.10 The Trust worked very closely with the city and other specialists to create the ‘Assessment of the Oxford View Cones report’ in 2015. It is pleasing to see reference to the report within the Local Plan, but the Trust is concerned that the report is described as an ‘absolute’ and not an approach to assessment. The views of Oxford are experienced and enjoyed from a wide variety of places and not just the specific view points in the report. The report should be seen as a starting point, and all major development proposals should be cognisant of the potential impacts that might occur in any view. The report highlight some particularly important and sensitive views but should not be considered as an exhaustive exercise. The Trust suggests that an update or addition to the View Cones study could be commissioned that also includes the assessment of views within the city and out from it. These elements of heritage setting should also be included in the proposed policy.

8.11 The Trust is concerned that the drafted wording for policy HD9 focuses on urban design and gives insufficient recognition to setting. The proposed criteria references “design choice” and fails to properly consider the appreciation of setting and better revealing that significance. The Trust also suggests that the policy needs to be absolutely clear on the difference between ‘views’ and historic ‘setting.’

8.12 Furthermore, the Trust consider it appropriate that development should only be allowed in exceptional circumstances where the need for it can be demonstrated to be in the public benefit.

**Suggested modification**

8.13 To ensure that proposed policy HD9 is fully justified and effective, the Trust suggest that the wording should be amended as follows (underlined text in addition and ~~struck through~~ deleted):

*Planning permission will not be granted for development that will not preserve and enhance the significance and setting of ~~retain the special significance of~~ views of the historic skyline, ~~both from within Oxford,~~ out from the city and into it from outside.*

*Planning permission will be granted for developments of appropriate height or massing that conserve and enhance the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outward from it. Any proposal for height that is above the prevailing heights of the area and that could impact on character should be fully explained. As part of this, proposals should demonstrate of appropriate height and or massing, as demonstrated by using the following criteria, all of which should be met:*

...

*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 18.2 m (60 ft) in height or ordnance datum (height above sea level) 79.3 m (260 ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height will only be permitted in exceptional circumstances and must be limited in bulk and must be of the highest design quality.*

*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) should demonstrate a clear need for them and that there is a public benefit arising, proposals will also be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including...*

8.14 The proposed policy is also missing an element of national policy that explains how new development can help people's understanding of significance – development involving heritage assets and their setting can “better reveal their significance.” This should also be positively reflected in the proposed policy.

#### POLICY HD10: HEALTH IMPACT ASSESSMENT

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

8.15 The Trust supports the provision of a policy which seeks to ensure the wellbeing of occupants of new development, and those that live close to new development. The Covid pandemic highlighted the importance of access to green space as a key factor in peoples physical and mental well-being.

#### **Suggested modification**

8.16 To ensure the policy is effective, the Trust suggests that Policy HD10 should include reference to access to green space and how this can be provided for the benefit of both future and existing residents.



**9.0 CHAPTER 7. A LIVEABLE CITY WITH STRONG COMMUNITIES AND OPPORTUNITIES FOR ALL**

- 9.1 The Trust has some very great concerns about the lack of detail in the plan as a whole, and specifically this Chapter, with regard to the issue of public realm and the management of tourist coaches. Chapter 7 fails to highlight the issue of public realm and how improvements to these areas should be part of the overall strategy in maintaining a vibrant town centre and local centres. It also fails to provide an overarching strategy with regard to the issue of tourism. Reference is made to the challenge tourist coaches present to the city and yet no specific policy is included to help manage this problem.
- 9.2 The Trust welcomes the aspiration to create a vibrant city centre and local centres, however this will not be achieved through piecemeal stand-alone policies – and overarching strategy needs to be produced that will ensure focus is placed on improving these areas for everyone’s benefit.
- 9.3 It is evident that specific policies on the Covered Market and Sustainable Tourism that can be found in the current local plan have been omitted from the proposed draft. It is unclear why it was considered that these policies would no longer be beneficial to include as they provided useful guidance.

**POLICY C1: TOWN CENTRE USES**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 9.4 The Trust considers that this policy fails to refer to public realm – and how any new development within the identified areas should make positive contributions to these areas. This is contrary to the guidance included in the NPPF at paragraphs 96, 116 and 124.
- 9.5 The Trust also considers that the key to successful and vibrant centres is a healthy balance of uses, including residential. A greater emphasis should be placed on city centre and district centre sites as being areas that should deliver housing development. It is unfortunate that previous site allocations have resulted in relatively low numbers of residential units on well-located brownfield sites close to the city centre, which has resulted in a missed opportunity to deliver areas where people live and invest in the area.

***Suggested modification***

- 9.6 To ensure that Policy C1 is fully compliant with national policy and can be considered to effectively ‘ensure the vitality of centres’ it should also contain a reference to its distinct local character and the public realm should be elevated in its importance to the future of a properly operating city and neighbourhood centres.
- 9.7 The policy should also refer to the potential for residential development, particularly above the ground floor level, and/or away from the prime shopping frontages.

**POLICY C2: MAINTAINING VIBRANT CENTRES**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.8 Again the Trust feels that reference should be made to the wider public realm (noting the NPPF at paragraphs 96, 116 and 124), so that any densification and growth of the district centres occurs with the wider public realm in mind.

**POLICY C6: TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICE AND DELIVERY PLANS**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

9.9 The Trust has some very great concerns about the lack of detail in the Plan regarding the management of tourist coaches. The Plan appears to be advocating continuation of the status quo, with dropping off places in the existing locations with coaches then required to go to an off-street location, currently provided for at Redbridge Park & Ride. Enforcement of the existing on-street stopping regulations is extremely difficult and not very effective. As a consequence there are regularly large numbers of coaches stationary in locations such as St Giles with their engines (and air-conditioning) left running, resulting in obstruction of the carriageways and footways, unacceptable noise and emissions in the vicinity and a general degradation of the public realm.

9.10 This is a disappointing demonstration of the level of disregard for the historic environment shown in the Local Plan, and in 'reality' a lack of disregard for the city centre generally. It is unacceptable to have a coach park in St Giles and Beaumont Street and puts at risk the very attraction that the tourists from across the world comes to enjoy.

9.11 It is acknowledged that transport matters are not within the remit of the City Council and are a County Council matter. Nevertheless the management of tourist coaches – particularly in Oxford where tourism is such an important influence – has very real land use implications. The Trust suggests that the City Council considers an 'additional modification' to the Local Plan that makes a commitment for them to work in collaboration with the County Council and other providers to better manage tourist coaches, in terms of 'drop off' and parking. The Trust suggests that a reasonable alternative to consider in this process could be in the area to the south of the city around Oxpens or to the south side of the Westgate shopping centre at Norfolk Street.

9.12 Whilst this is a matter of real concern and challenge for the city centre and the Trust is convinced that there is a better solution than the status quo, this is not considered to be a matter of soundness for the Local Plan. This should be an issue that the City Council considers taking forward as part of a city centre Area Action Plan.

#### POLICY C9: ELECTRIC VEHICLE CHARGING

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.13 The Trust supports the provision of electric vehicle charging points, however Policy C9 only refers to the technicalities of delivering these within new development.

#### **Suggested modification**

9.14 Reference should be made either within the Policy text itself, or the supporting text, of issues such as public realm (noting the NPPF at paragraphs 96, 116 and 124), and impact upon the historic environment (NPPF paragraph 196) to ensure that charging points in public areas are not located in sensitive areas.

### 10.0 CHAPTER 8. DEVELOPMENT AREAS, AREAS OF FOCUS AND INFRASTRUCTURE

10.1 The Trust has reviewed the various proposed site allocations, and notes that many are carried forward from the extant Plan. The overriding concerns of the Trust are the historic and green settings of the city, but this must not come at the cost of delivering much-needed new homes that the communities of the city can afford.

10.2 There are several site allocation policies where additional detail, or improved precision, would be of significant benefit to the deliverability of the Plan. The Trust is also very concerned about the proposed loss of several playing pitches and other sports provisions suggested in the draft Local Plan.

10.3 The Trust sets out its comments relating to relevant site policies hereunder.

#### POLICY NEOAOF: NORTHERN EDGE OF OXFORD AREA OF FOCUS

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 10.4 The Trust reads with interest the content of this proposed policy, and supports proposed criterion (a) and in particular that development should facilitate the delivery of “pedestrian and cycling infrastructure improvements must be delivered in accordance with the requirements of the Oxfordshire Local Cycling and Walking Infrastructure Plan. All opportunities to optimise connectivity and permeability for people wishing to walk or cycle in the area to other parts of the city and/or to destinations in the neighbouring districts of Cherwell District Council and West Oxfordshire should be taken.
- 10.5 the Trust is keen to see footpaths/infrastructure links considered which link into the area from the surrounding hinterland. The Council will need to work collaboratively with applicants and the County Council to ensure that sites integrate with the neighbouring uses and become part of North Oxford rather than sitting on the edge of it.
- 10.6 The Trust will be watching applications with interest, commenting when appropriate, and offering help where it can, to help facilitate good, connected development.

POLICY SPN2: OXFORD UNIVERSITY PRESS SPORTS GROUND

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 10.7 The Trust is very concerned about the potential loss of sports pitches in this location. Whilst it is noted that the retention of the cricket pitch is encouraged through the policy, and ‘public open space’ is also sought, there should be greater importance placed on the protection of green space and recreation provision.

**Suggested modification**

- 10.8 The Trust suggests that for policy SPN2 to be effective it should include the following text to provide confidence that sports provision, and green space can be retained as far as practicable (underlined text, is suggested as an addition to the policy and deleted ~~struck through~~):

**Open space, nature and flood risk**

*The capacity of the sports provision must be retained unless it can be robustly, and independently demonstrated there is not demand for the facility (~~which is not the case at the current time~~) or the loss of the sports provision will demonstrably can be otherwise compensated for, and secured through planning obligations (Policy G1).*

POLICY CBLLAOF: COWLEY BRANCH LINE AND LITTLEMORE AREA OF FOCUS

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
	Yes	Effective	Yes

Compliant with the duty to cooperate		Compliant with national policy	Yes
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10.9 The Trust cautiously supports this policy and is pleased to see reference to Policy HD9. Where in the proposed policy it says: “*Development proposals must be developed in accordance with Policy HD9,*” it should be made clear that there will be a requirement for an assessment on the potential impacts of building heights in this area – “larger scale buildings” referred to in the proposed policy will need careful assessment and management.

10.10 The Trust will be watching applications with interest, commenting when appropriate, and offering help where it can, to help facilitate good, connected development.

POLICY SPS1: ARC OXFORD

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

10.11 The Trust has concerns about this policy, and its potential operation. There is not sufficient knowledge at this stage about future development on the site for a policy approach that does not include additional focus on the potential for the adverse impacts from building heights.

10.12 The Trust welcomes reference to building heights and Policy HD9, but the requirements of proposed Policy SPS1 (and HD9) must be tightened to ensure their effectiveness.

**Suggested modification**

10.13 In order for Policy SPS1 to be fully effective, and properly manage the effect of building heights, the policy text should be amended as follows (additional test is underlined):

*Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says skylining impacts may be possible from 15m and above) will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.*

POLICY SPS2: KASSAM STADIUM AND OZONE LEISURE PARK

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.14 The Trust is particularly concerned that this policy makes no reference to the Grade II listed Minchery Farmhouse that is on the site. This is a priory farmhouse that is also on the Heritage at Risk register and should be included in the policy; applicants should be required to preserve and enhance the building and look to bring it back into a stable, if not viable, state.

10.15 The Trust notes that there is reference to improving public transport in the proposed policy. This is very difficult and very expensive on match days due to the peak demand created. Having a rail option would help disperse crowds. Stricter conditions specifying enhanced bus services that must be provided on match days should have been a condition when the stadium was first approved. Therefore the Trust suggests that something stronger along these lines should be expected with future development. It is not clear if the future of the sites has been fully assessed, for example the implication of Oxford United achieving footballing success at the top of the championship and seeking to expand capacity.

**Suggested modification**

10.16 The Trust suggests that for policy SP15 to be effective and compliant with national policy, it should include the following text:

a) To secure the preservation of the listed building on site:

*Applicants will be expected to demonstrate how development will seek to preserve and enhance the Grade II listed Minchery Farmhouse. If the farmhouse remains on the Heritage at Risk register the City Council will work with applicants and other relevant stakeholders to consider some kind of enabling development that secures the sustainable future of the farmhouse.*

b) To provide confidence that future public transport provision can be improved (underlined, is suggested as an addition to the policy and ~~struck through~~ to be deleted):

*As a condition to development the applicant, City and County Councils and other relevant stakeholders will work together to ensure that access to the site by public transport and other sustainable modes of transport ~~should~~ will be improved where practicable. There should be no increase in parking.*

**POLICY SPS4: MINI PLANT OXFORD**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

10.17 The Trust has concerns about this policy, and its potential operation. There is not sufficient knowledge at this stage about future development on the site for a policy approach that does not

include additional focus on the potential for the adverse impacts from building heights, especially if there is a clustering of tall buildings.

10.18 The Trust welcomes reference to building heights and Policy HD9, but the requirements of proposed Policy SPS4 (and HD9) must be tightened to ensure their effectiveness.

**Suggested modification**

10.19 In order for Policy SPS4 to be fully effective, and properly manage the effect of building heights, the policy text should be amended as follows (additional test is underlined):

*Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says skylining impacts may be possible from 15m and above) will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.*

POLICY SPS6: SANDY LANE RECREATION GROUND

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

10.20 The Trust is very concerned about the potential loss of sports pitches in this location. Whilst it is noted that the retention or re-provision of the football pitches is encouraged through the policy, and 'public open space' is also sought, there should be greater importance placed on the protection of green space and recreation provision.

**Suggested modification**

10.21 The Trust suggests that for policy SPS6 to be effective it should include the following text to provide confidence that sports provision, and green space can be retained as far as practicable (underlined text, is suggested as an addition to the policy and deleted ~~struck through~~):

**Open space, nature and flood risk**

...

*The capacity of the sports provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. If the sports provision is to be provided elsewhere, then enhanced outdoor sports facilities ~~should~~ must be provided in line with the requirements of Policy G1. The City Council's Active Communities Team must be consulted and in agreement with any relocation of these sports facilities.*

POLICY SPS8: BERTIE PLACE RECREATION GROUND

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

10.22 The Trust is aware of significant of local concern regarding the potential to develop this site. There is more material available – than there was for the last local plan examination – to show that this area is a valued area of open space, for amenity and recreational purposes. Therefore, it should not be the case that the green space is automatically reallocated. The Trust suggests that the use of the site is reviewed, and further consideration of local views is made before automatically reallocating the housing provision.

**Suggested modification**

10.23 The Trust suggests that for policy SPS8 to be effective it should include the following text to provide confidence that sports provision, and green space can be retained as far as practicable (underlined text, is suggested as an addition to the policy and deleted ~~struck through~~):

**Open space, nature and flood risk**

...

The capacity of the recreational provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. If the sports provision is to be provided elsewhere, then it must be an adequate re-provision of the current recreation facilities to meet the needs of those who currently use them facilities (and the new residents). The playground sh could be re-provided within the site. Replacement of the Multi Use Games Area could be with an alternative type of facility or by improvements to the capacity of an existing one, provided the re-provision is in the neighbourhood and meets the recreation needs of teenagers. The nature area to the west of Wytham street provides an opportunity in close proximity to the site, if accessibility and useability of that area is enhanced.

POLICY SPS12: TEMPLARS SQUARE

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

10.24 The Trust has concerns about this policy, and its potential operation. There is not sufficient knowledge at this stage about future development on the site for a policy approach that does not include any reference to the potential for the adverse impacts from building heights.



10.25 The Trust recommends that reference to building heights and Policy HD9 is included in proposed Policy SPS12 to ensure its effectiveness.

**Suggested modification**

10.26 In order for Policy SPS12 to be fully effective, and properly manage the effect of building heights, the policy text should be amended as follows (additional test is underlined):

Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says skylining impacts may be possible from 15m and above) will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.

POLICY SPS13: LAND AT MEADOW LANE

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.27 The Trust is aware that this proposed allocation relates to a previously allocated site in the Adopted Local Plan 2036. We note that the land is within the G1 Protected Green Infrastructure network. It is unclear to us which category within G1 the site falls into, however as the plan sets out the intention to protect the network, the continued allocation of this site requires justification if it is to accord with the Local Plan's apparent intentions. We are aware that there are a number of ecological reports and other studies which need to be given due weight before confirming that this site is suitable as a housing site.

**Suggested modification**

10.28 This site is too ecologically sensitive, and an important part of the Green Infrastructure network. Policy SPS13 should be removed from the plan.

POLICY SPS15: REDBRIDGE Paddock

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.29 The Trust is acutely concerned that this site represents one of the few remaining green spaces at the edge of the city, especially in the south. Development of this land would represent the loss of

part of the green setting on the edge of city, and unduly extend development outwards, into the countryside. This is contrary to government guidance relating to heritage value, local character and the value of the Countryside.

10.30 The Trust is also concerned that the site, as a former landfill site is not necessarily appropriate for residential development. Whilst it is noted that the Council has included text in the proposed policy referring to land contamination, it ought to already be confident in the site's deliverability, if it is to be allocated. It is not sufficient to suggest that fundamental, in principle issues such as land contamination can simply be left to the development management process.

**Suggested modification**

10.31 This site is too sensitive and important to the green setting of the city, and to local character. The site is also an important part of the Green Infrastructure network. Policy SPS15 should be removed from the plan.

POLICY SPS17: EDGE OF PLAYING FIELDS, OXFORD ACADEMY

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.32 The Trust is concerned that this allocation might represent the potential loss of sports pitches, and/or recreational space. Whilst it is noted that policies G1 and G2 are cited in the policy text, and 'public open space' is also sought, there should be greater importance placed on the protection of green space and recreation provision.

**Suggested modification**

10.33 The Trust suggests that for policy SPS17 to be effective it should include the following text to provide confidence that sports provision, and green space can be retained as far as practicable (underlined text, is suggested as an addition to the policy and deleted ~~struck through~~):

***Open space, nature and flood risk***

...

*...It is expected that those requirements will be met in the following ways. The capacity of the sports and recreation provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. If the sports provision is to be provided elsewhere, then outdoor sports facilities should must be provided in line with the requirements of Policy G1.*

POLICY SPE9: BAYARDS HILL PRIMARY SCHOOL PART PLAYING FIELDS

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.34 The Trust is very concerned about the potential loss of playing fields in this location. Whilst it is noted re-provision of the playing fields is encouraged through the policy, and 'public open space' is also sought, there should be greater importance placed on the protection of green space and recreation provision.

**Suggested modification**

10.35 The Trust suggests that for policy SPE9 to be effective it should include the following text to provide confidence that sports provision, and green space can be retained as far as practicable (underlined text, is suggested as an addition to the policy and deleted ~~struck through~~):

**Open space, nature and flood risk**

...

*...It is expected that those requirements will be met in the following ways. The capacity of the sports provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. Any ~~The~~ loss of part of the playing field will require enhanced re-provision in accordance with Policy G1.*

POLICY SPE17: JESUS AND LINCOLN COLLEGE SPORTS GROUNDS

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.36 The Trust is concerned at the further potential loss of sports pitches proposed in this policy. However, the Trust is pleased to see reference to the Bartlemas Conservation Area and nearby listed buildings in the policy. The references to these heritage assets are too closely related to design. This fails to recognise that development that has the potential to affect heritage assets is about more than urban design. The Trust considers that is not compliant with the NPPF approach to conserving and enhancing heritage assets. The Trust also has some concerns that development on this site may have an adverse effect on the views, and as such, suggests that reference to building heights and heritage setting is of value.

**Suggested modification**

10.37 The Trust suggests that for policy SPE17 to be effective, and compliant with national policy it should include the following text (additional text underlined and deleted ~~struck through~~):

**Open space, nature and flood risk**

...

...It is expected that those requirements will be met in the following ways. The capacity of the sports provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. Any loss of part of the playing field will require enhanced re-provision in accordance with Policy G1...

**Urban design and heritage**

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 impact on views, the rural setting of the Bartlemas settlement, listed buildings and the Bartlemas Conservation Area. Proposals must demonstrate compliance with policies HD1, HD2 and HD9 demonstrate how they will conserve and enhance the significance and of the Bartlemas Conservation Area and nearby listed buildings. This will include an assessment of heritage impact and a quality, carefully designed, development proposal (in compliance with policies HD1, HD2).

Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy HD9).

**POLICY SPE18: RUSKIN COLLEGE CAMPUS**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.38 The Trust is pleased to see reference to the Old Headington Conservation Area and nearby listed buildings in the policy, however, the Trust is concerned that the proper reference to conserving and enhancing those assets is not made in the policy. Furthermore, the Trust has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value.

10.39 The Trust also considers it important that the impact of the development of this site should be considered in combination with the adjacent site (SPE19: Ruskin Field) to ensure that the cumulative effects of the two sites can be fully understood and mitigated a necessary.

**Suggested modification**

10.40 The Trust suggests that for policy SPE18 to be effective and compliant with national policy it should include the following text (additions to the policy are underlined and deletions are ~~struck through~~):

~~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 and demonstrate compliance with policies HD1 and HD2. Development proposals must demonstrate how they will preserve and enhance the significance and setting of the Old Headington Conservation Area and listed buildings and structures (in particular the listed Rookery and wall). This will include an assessment of heritage impact and a quality, carefully designed, development proposal, in compliance with policies HD1 and HD2.~~

~~Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy HD9).~~

#### POLICY SPE19: RUSKIN FIELD

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.41 The Trust has concerns about the City Council's approach to identifying this site, and the drafting of the policy. It is not clear what, if any, development is actually suitable or achievable on this site especially given the heritage constraints and the constraints of the views of Oxford and its green setting. .

10.42 Notwithstanding this, the Trust is pleased to see reference to the Old Headington Conservation Area and nearby listed buildings in the policy, however, the Trust is concerned that the proper reference to conserving and enhancing those assets is not made in the policy. Furthermore, the Trust has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value.

10.43 The Trust also consider it important that the impact of the development of this site should be considered in combination with the adjacent site (SPE18: Ruskin College Campus) to ensure that the cumulative effects of the two sites can be fully understood and mitigated a necessary.

#### **Suggested modification**

10.44 The Trust suggests that a heritage appraisal should be undertaken by the City Council to demonstrate that development is actually achievable on the selected for the site, if this shows that there will be any adverse impact, the site should not be allocated for development.

10.45 Notwithstanding the Trust's concerns about the principle of allocating this site, for policy SPE19 to be effective and compliant with national policy it should include the following text (additions to the policy are underlined and deletions are ~~struck through~~):

**Urban design and heritage**

*Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. ~~Development must be well related to the college and carefully and sensitively designed to preserve and enhance the setting of the listed buildings and character and appearance of the conservation area (in accordance with HD1 and HD2). Development proposals must demonstrate how they will preserve and enhance the significance and setting of the Old Headington Conservation Area and listed buildings. This will include an assessment of heritage impact and a quality, carefully designed, development proposal (in accordance with HD1 and HD2).~~*

*Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy HD9)...*

POLICY SPCW3: MANOR PLACE

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.46 The Trust has significant reservations about the identification of this very sensitive site. Notwithstanding these concerns the Trust is pleased to see reference to the Central Conservation Area and nearby listed buildings in the policy, however, the references to these heritage assets are too closely related to design. This fails to recognise that development that has the potential to affect heritage assets is about more than urban design.

10.47 The Trust considers that is not compliant with the NPPF approach to conserving and enhancing heritage assets. The Trust notes that the site is within the historic core and has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value.

**Suggested modification**

10.48 The Trust suggests that for policy SPCW3 to be effective, and compliant with national policy it should include the following text (additional text underlined and deleted ~~struck through~~):

**Urban design and heritage**

*~~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, and demonstrate compliance with policies HD1, HD2 and HD9. Careful design must ensure that~~ Development proposals must demonstrate how they will conserve and enhance the significance and setting the Central Conservation Area and*

*nearby listed buildings. This will include an assessment of heritage impact and a quality, carefully designed, development proposal (in accordance with HD1 and HD2).*

*Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy HD9).*

*Development must be based upon a clear understanding of the significance of the site and its surrounding context. Development should...*

**POLICY SPCW5: OXPENS**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.49 The Trust continues to have concerns over the balance of residential and employment land proposed for this site – a higher number of houses should be proposed on the site as it is in a highly sustainable location that would be appropriate for residential development.

**Suggested modification**

10.50 The Trust suggests that for policy SPCW5 to be fully justified and effective – and to demonstrate the best and most efficient use of land – it should be reappraised, and a new masterplan developed. There is the opportunity to deliver many more new homes in this location where the best land use would be residential. Some employment uses or other services might be complimentary, but the City Council should focus on the delivery of much needed, and affordable new homes.

**POLICY SPCW6: NUFFIELD SITES**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.51 The Trust notes that this is a very sensitive site in terms of the heights of any proposed development and that it sits within several key views in and out of the city. The site is also sensitive in other heritage ways, and reference should be made to previous historic context study and conservation plan called 'Castle, Canal & College' (June 2008).

**Suggested modification**

10.52 The Trust suggests that for policy SPCW6 to be fully justified and effective – and to properly reflect national policy on matters of heritage – it should include the following text (additional text underlined and deleted ~~struck through~~):

**Urban design and heritage**

...

*Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says competition impacts may be possible from 15m and above) ~~will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9~~ will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.*

*Development must be designed with consideration of its impact on the Central Conservation Area and nearby listed buildings with specific reference to the study: 'Castle, Canal & College' (June 2008) (Policy HD1 and HD2).*

POLICY SPCW7: OSNEY MEAD

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

10.53 The Trust notes that this is a very sensitive site in terms of the heights of any proposed development and particularly in views from the Western Hills.

**Suggested modification**

10.54 The Trust suggests that for policy SPCW7 to be fully justified and effective – and to properly reflect national policy on matters of heritage – it should include the following text (additional text underlined and deleted ~~struck through~~):

**Urban design and heritage**

...

*Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says competition impacts may be possible from 15m and above) ~~will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9~~ will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.*



POLICY SPCW8: BOTLEY ROAD RETAIL PARK

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

10.55 The Trust is cautiously supportive of this policy and welcomes the references to heritage assets, and the important views into, out from, and within the City.

10.56 The Trust is acutely concerned however, that there will be pressure in this location to develop at height, and this must be very carefully managed. Building at height, must only be in exceptional circumstances – as we have set out in response to proposed Policy HD9.

10.57 The Trust will be watching applications with interest, commenting when appropriate, and offering help where it can, to help facilitate good, well design and appropriate development.

**11.0 CONCLUSION**

11.1 Oxford Preservation Trust considers that the Local Plan is generally sound but requires some detailed revisions to ensure it is fully justified, effective and compliant with national policy. This is explained through the detailed submissions and suggestions which have been made as to how the plan should be modified.

11.2 This will ensure that the objectives of the Plan can be delivered in a comprehensive and effective way.

**12.0 PARTICIPATION AT THE ORAL PART OF THE EXAMINATION**

12.1 Oxford Preservation Trust confirms that it does wish to take part in the oral part of the Local Plan examination. This is to be able to impart to the Inspector specific and relevant knowledge about Oxford city and its heritage significance, and also to answer questions that the Inspector might have.

I trust that the comments are useful to the City Council, and I confirm that I am happy for my name, organisation, address and postcode to be published alongside my comments at the appropriate time in accordance with GDPR regulations.

Please also keep me informed of the progress of the plan up to and including adoption, but prior to that the preparations for the examination.

Yours Faithfully,



Anna Eavis, CEO