

County Hall
New Road
Oxford
OX1 1ND

Planning Policy
Oxford City Council

By email: planningpolicy@oxford.gov.uk

Corporate Director Environment and
Place: Bill Cotton
Director of Planning, Environment and
Climate Change: Rachel Wileman

5th January 2024

Dear Planning Policy

Regulation 19 - Oxford Local Plan 2040
Closing date for comments: 5th January 2024

Please see our response on the Regulation 19 Oxford Local Plan attached. The Plan was approved by Oxford City Council on 7th November 2023 for this consultation and subsequent submission to government for examination by the Planning Inspectorate. We understand that the City Council will summarise comments made at this stage and submit the Plan, likely with some minor amendments and recommendations for modifications to be considered by the Inspector.

These comments build on those we provided in March 2023 on the Housing Needs Assessment; in November 2022 on the Preferred Options; and in August 2021 on the Issues and should be viewed in conjunction with those comments.

This response also comments on the Infrastructure Delivery Plan which has been published as a 'live' document subject to amendment, as well as some of the other related documents. The completed City Council's form for comments is at the end of the attachment.

We look forward to continued involvement as the process progresses. We understand that your current timetable is:

- Submission in March 2024 and
- Adoption by summer 2025.

Yours sincerely



Rachel Wileman
Director of Planning, Environment and Climate Change



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**OXFORDSHIRE COUNTY COUNCIL RESPONSE
REGULATION 19
THE OXFORD LOCAL PLAN 2040
Closing 5th January 2024**

Introduction

All the comments made below on the Regulation 19 Local Plan are made on the grounds of soundness. To be sound the Oxford Local Plan 2040 must be:

- 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;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 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
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies of the NPPF and other statements of national planning policy, where relevant.

The County Council has reflected on the content of the Regulation 19 Local Plan in relation to the Oxfordshire Strategic Vision and its own strategies and policy documents, references to which can be found towards the end of this response.

The County Council is the Highways Authority and has prepared the Local Transport and Connectivity Plan (LTCP) in accordance with the statutory requirement to do so. The LTCP will contain not only the main document adopted in July 2022, but also several supporting strategies, an innovation framework and area travel plans, some of which are already complete and available online. The LTCP includes headline targets as follows, and it is expected that the Oxford Local Plan 2040 will help in the achievement of these by reducing the need to travel, discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice.

By 2030 our targets are to:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire.
- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week.
- Reduce road fatalities or life changing injuries by 50%.

By 2040 our targets are to:

- Deliver a net-zero transport network.
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire.

By 2050 our targets are to:

- Deliver a transport network that contributes to a climate positive future.
- Have zero, or as close as possible, road fatalities or life-changing injuries.

The city of Oxford will change considerably over the lifetime of this Local Plan. A sustainable and reliable transport system is at the heart of the core transport schemes: traffic filters, an expanded zero emission zone and a workplace parking levy. Controlled parking zones, mobility hubs, improved bus services and other measures will also help to change the way that people move around the city. Trains on the Cowley Branch Line serving passengers, with two new stations around the Littlemore area serving the Oxford Science Park, and the Cowley area serving the ARC Oxford Business Park, will provide new travel opportunities and improve

accessibility, along with wider improvements to the rail network and a revitalised Oxford Station area. A comprehensive safe cycle network is also part of the vision for delivering a net-zero transport system.

The County Council is also the Lead Local Flood Authority, the Education Authority, the Minerals & Waste Planning Authority, and has lead roles in other areas such as Public Health and Social Care. We also have a Climate Action team which is able to provide advice on the climate change emergency. Teams from the different parts of the County Council have contributed to this response.

The response has been coordinated by the Strategic Planning team which has also contributed to this response. From a strategic perspective, the County Council is interested to comment on the Local Plans in Oxfordshire in a consistent way about issues which need to be addressed by all, having regard to the interactions between the districts and city. The city of Oxford will change during the lifetime of this Local Plan, not only because of changes to the environment within the city, but also changes across the boundaries in the districts, particularly the substantial developments on sites already allocated on the edges of the city.

Chapter 1: Vision & Strategy

SUPPORT for S1

Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development

Strategic Planning and Infrastructure team

Policy S1 is preceded by some twenty pages of text explaining Oxford's strengths, weaknesses, opportunities and threats, then setting a vision and objectives. The overarching threads are 'addressing climate change', 'reducing inequalities' and 'liveable city' and it is under those threads that the policies of the Plan are grouped. Oxfordshire County Council made comments on overarching matters in previous consultation responses. In our response on the Preferred Options in November 2022 we highlighted the following:

- As the Oxfordshire Plan 2050 is not proceeding, it is important that Local Plan policies are consistent with the Oxfordshire Strategic Vision and the range of other policy documents available, including County Council documents.
- We support policy to deliver zero carbon developments and address the climate emergency.
- We support prioritising housing developments over other uses of land.
- Transport policies need to be clearly articulated, consistent with the Local Transport and Connectivity Plan (LTCP).
- Whether additional land in the Green Belt within Oxford's boundaries needs to be removed from the Green Belt should be clearly set out.
- We support carefully reviewing all brownfield land both within Oxford's boundaries and encourage joint consideration of any nearby brownfield land in the districts.
- While there is a huge need for general affordable housing, there is also a need for specialist housing, for example for older people, those with special needs and key workers and that should also be provided for. The County Council is working to update its market position statements, but in respect of older people our current evidence is that there is a need for affordable extra care housing but no need for more care homes.
- There are no proposals for new school sites in Oxford City. If there were, the new school land would be required to be transferred to the County Council, but an Academy Trust would run the school. Community use of school sites is a matter for Academy Trusts where they exist, or the governing body, and agreements are made outside of the planning process.

- Infrastructure requirements for development sites need to be clearly set out in the Local Plan policies.
- We want to see more car-free developments and will expect low or no car parking in accordance with the adopted County standards. Local Plan policies should refer to the County standards and not encourage developers to seek alternative standards.
- New developments should futureproof for likely future innovations, and innovation should be encouraged. The Local Plan should require innovation plans in accordance with the Innovation Framework which is part of the LTCP suite of documents.
- The potential for freight consolidation centres being brought forward should be enabled in the Local Plan.
- We support the recognition that air quality implications will need to be considered in respect of development, having regard to the City's Air Quality Action Plan.
- We support defining a green and blue infrastructure network and proposals for policies to enhance the network. We would like to see a requirement for 20% biodiversity net gain if viable.
- Flood risk issues need to be clearly addressed and strong policies for sustainable drainage systems incorporated.
- We support policy aimed at better digital connectivity.

No land is proposed to be removed from the Green Belt in this Local Plan. Paragraph 4.8 in the Plan notes that any applications proposed within Green Belt land will be determined in accordance with national policy. On any allocated sites on land adjoining the Green Belt, it is our understanding that there are appropriate provisions in this Plan to protect the adjoining Green Belt land.

Policy S1 refers to the presumption in favour of sustainable development. The Local Plan will only allocate land for larger developments, but many developments will also be acceptable on smaller sites. Policy S1 needs to be sufficiently flexible to ensure that appropriate developments, for example demolishing old buildings and replacing them with new housing, can be found to be compliant with policy.

Oxfordshire County Council seeks that the effects of development are mitigated through appropriate conditions, works and contributions to infrastructure. We expect to agree S106 contributions and S278 works in respect of development envisaged in this Local Plan, as well as agreeing the use of Community Infrastructure Levy (CIL) receipts for some infrastructure needs.

Where the matters we raised in our earlier responses have not been addressed to the extent that the Plan is unsound, comments are made later in this response. If modifications are proposed to the vision, objectives and spatial strategy along the lines of the points made above, we would support those. This response does not provide requested modifications to these introductory parts as we have not identified that such is needed to make the plan sound. The overall spatial strategy policy and its accompanying text are largely supported.

Modifications

No changes are requested.

Public Health team

The Vision and Strategy chapter of the Plan includes several of the elements we would hope to see, such as the inclusion of 'reducing inequalities' as an overarching theme which various policies are trying to address.

The Public Health team welcomes the inclusion of Policy S1 in promoting access to facilities for sport and play through active, sustainable travel. We also concur with the sentiment of new developments being places where people want to live, play, learn and work.

Modifications

No changes are requested.

Policy S2: Design Code and Guidance

Policy S2 unsound test d: Environment team – Landscape

This policy and/or design code should include references to the green infrastructure policies and the requirement to protect existing trees and hedgerows. See also our separate comments on the Design Code Appendix 1.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Add references to green infrastructure policies in Policy S2 or the Design Code.

Innovation team

Text supporting Policy S2 should reference the Innovation Framework which is available as part of the Local Transport and Connectivity Plan online.

The production of an Innovation Plan, as required by the Innovation Framework is a mechanism for developers to comprehensively consider the need for innovation and futureproofing in the pre-planning stages of major new developments.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Add reference to the Innovation Framework produced as part of the Local Transport and Connectivity Plan (LTCP) in the supporting text of Policy S2.

Policy S3: Infrastructure Delivery in New Development

Policy S3 unsound test b Strategic Planning and Infrastructure team

Policy S3 and its supporting text are important to the County Council as they set out the requirements for contributions to infrastructure.

The County Council's core schemes involve the introduction of traffic filters, the workplace parking levy and an extended zero emission zone. Those core schemes are being developed together with lots of other transport schemes aimed at improving conditions for active travel in the city.

The transformation of Oxford Railway Station and the re-opening of the Cowley Branch Line to passengers are significant rail projects aimed at improving accessibility. East-West Rail and other line improvements will also help make Oxford more accessible.

The bus network will need to be continually improved. Following a successful bid to government, all-electric buses are starting to be delivered for the Oxford Smart Zone area. Contributions from development will kick-start new and improved routes.

The County Council will continue to provide updates and corrections for the Infrastructure Delivery Plan as information becomes available given that this is a live document.

Modifications

No changes are requested.

Central Place Planning team / Strategic Planning and Infrastructure team

The text of Policy S3 includes the following: 'Proposals to enhance the City's rail and bus network will be supported. In particular, the redevelopment of Oxford Station and additional rail capacity to accommodate services including opening of the Cowley Branch Line (CBL) for passengers. Proposals for improvements to Oxford Railway Station that increase network capacity, improve the design and quality of facilities and interchange and support the CBL will be supported. Enhancements to public transport accessibility in the south east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the CBL to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations will be expected in order to achieve public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL.'

Overall, we support the inclusion of Policy S3. Some additional text is needed to make it clear that Oxford Railway Station should be a place where the public realm is prioritised. Some amended text is needed to allow for contributions from developments taking place more than 1,500m away from the Cowley Branch Line stations where justified. Such contributions may continue to be taken after the railway line opens as it will be necessary to claw back forward funding.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the last two paragraphs of Policy S3 text to read as follows: 'Proposals to enhance the City's rail and bus network will be supported. In particular, the redevelopment of Oxford Station and additional rail capacity to accommodate services including opening of the Cowley Branch Line (CBL) for passengers. Proposals for improvements to Oxford Railway Station that increase network capacity, improve the design and quality of facilities and interchange and support the CBL will be supported. Oxford Railway Station should be transformed to facilitate integrated transport with a new entrance on the west, additional secure cycle storage, cycle racks, new bus interchange facilities and new priority public realm areas. Enhancements to public transport accessibility in the south east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the CBL to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development in the areas around the proposed CBL stations will

be expected in order to achieve public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL.’

Policy S4: Plan Viability

Policy S4 unsound test b
County Councillors / Strategic Planning team

If a developer suggests that a site will not be viable this policy allows for stripping out planning measures until it is. This involves ‘looking at first any carbon offsetting, then any low parking and finally affordable housing’. This is not in line with the County Council’s policies on low carbon and the LTCP’s objective of reducing car trips by 1:4 by 2030 and 1:3 by 2040. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at good densities and not using land wastefully on car parking.

Modifications

(A minor modification that does not materially affect the plan’s policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy S4 so that it is not a clear hierarchy of allowing for the policy requirements about net zero buildings and car parking to not be met before there is any consideration of reducing the affordable housing requirement. Instead, all the possible allowances to provide for viability should be considered in the round.

Strategic Planning team

Paragraph 1.49 refers to the Local Plan viability study. The amount for S106 and S278 contributions anticipated in the viability study appears low. The County Council seeks that developments are mitigated by conditions, undertaking works and providing contributions towards infrastructure as needed.

Modifications

See above request.

Chapter 2: A Healthy Inclusive City to Live In

Policy H1 – Housing Requirement

Policy H1 unsound test a, b, c
Strategic Planning and Infrastructure team

Policy H1 sets a housing requirement of 9,612 new homes to be built in Oxford over the plan period 2020-2040 (an average of 481 per annum). Provision is made for windfall within the number. The main evidence for the proposed requirement is an assessment of capacity in the Housing and Economic Land Availability Assessment (HELAA) which we have not reviewed in detail.

The supporting text to Policy H1 refers to the Housing and Employment Needs Assessment (HENA) jointly commissioned with Cherwell District Council. That assessment identifies scenarios and on the basis of the chosen scenario and chosen distribution it concludes a housing need in Oxford of 1,322 new dwellings per annum (26,440 homes over 20 years). Oxfordshire County Council questioned the report in our comments provided in March 2023,

and those comments can be referred to for further detail of our position. Our concerns are two-fold about the choice of the scenario which results in a high figure for housing need over the whole of Oxfordshire, and secondly the choice to distribute that figure by an assessment of likely employment in 2040 which results in Oxford being apportioned 30% of the total. We note that government policy and guidance expect instead that the Standard Method will be used to identify the housing need number. Other methods, such as that used in the HENA, are only to be used in exceptional circumstances. The Standard Method produces a figure of 762 new dwellings per annum (15,240 homes over 20 years).

Background Paper 1 to the Oxford Local Plan 2040 argues that there are exceptional circumstances to choose a method producing a higher figure than the Standard Method in Oxford. The reasons relate to using more up to date demographic projections, dealing with the historic suppression of household formation, providing better for affordable housing need, addressing in-commuting and recognising economic growth trends and strategies.

The text of Policy H1 only refers to the requirement within Oxford City, which is based on capacity, not the HENA. The question of the figure of housing need, how to deal with unmet need and what its quantum is for each District, will therefore presumably be left to be considered in respect of each of the District Local Plans, and via statements of common ground. The County Council has an interest in understanding the total amount of housing need because any new allocations are likely to have transport, education and other implications of particular interest in relation to our statutory functions. In particular, we are concerned about growth leading to more vehicle trips, counter to our targets as set out in the Local Transport and Connectivity Plan (LTCP), and whether the cost of necessary infrastructure to service housing growth can be met as it may be unaffordable to developers and government and therefore lead to a reduction in quality of life or services. The County Council wishes to be involved in future discussions about housing need numbers and can act to support the districts and city in highlighting issues where there are differences in approach and offering a way forward for example in relation to infrastructure needs. We have not undertaken evidence work to define the unmet need number ourselves, but the County Council would be prepared to be at the examination table for those hearings to provide advice on the implications of the number in respect of unmet need being identified. We will also seek to be involved in relevant future statements of common ground.

The County Council's position has been, and continues to be, that any site allocations should be well located in relation to the people they are intended to accommodate. Therefore, Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking, cycling and public transport links or the ability to provide such links funded from development. It was established during the last series of Local Plans that there was unmet need, and the District Councils agreed to supply 14,300 houses for Oxford's unmet need in their adopted Local Plans. To date only a small number of these 14,300 houses have been built. There is potential for a greater number of houses on sites allocated close to Oxford than is anticipated in the allocations. We estimate that some 16,900 houses can be accommodated on already allocated sites close to Oxford. Coincidentally, 16,828 is the unmet need figure identified in this Oxford Local Plan i.e. the need figure of 26,440 minus the capacity number of 9,612 equals 16,828. If there can be agreement that all houses in future on certain allocated sites close to Oxford are for Oxford's unmet needs, that would be helpful, as it would aid clarity and provide for additional unmet need numbers beyond the 14,300 already agreed.

The supporting text to Policy H1 is not sound in that it does not explain all these issues and does not provide a convincing case for the housing requirement, nor the stated housing need set out in the HENA. It is not positively prepared in the absence of any agreement with all the District Councils and the County Council. The HENA appears to be unjustified evidence. The policy will not be effective as there is no strategy for addressing the cross-boundary issues arising.

Modifications

(This is a soundness issue for the plan to be based on effective joint working on cross-boundary strategic matters. The HENA was not agreed across the County and a new statement of common ground should be agreed. Oxfordshire County Council seeks to be heard on this.)

- The supporting text to Policy H1 which says, 'The housing need in Oxford is for 1,322 new dwellings per annum' is not based on adequate evidence. Alternative numbers should be considered through the examination.

County Councillors

The disagreement around housing numbers led to the collapse of the Oxfordshire 2050 Plan. The County Council was not involved in the HENA assessment and its validity is questioned. We understand that three out of the five Districts have accepted the government's standard method for assessing housing need.

Most of the sites that were suitable for housing surrounding the City boundaries were allocated for the City's unmet needs in the Local Plans up to 2030s. Any other available land on the edges of the City is most likely in the Green Belt. The NPPF states that Green Belt land should only be built on in defined special circumstances. We would not support the use of Green Belt land for housing unless it meets those circumstances.

Modifications

See above request.

Policy H2 Delivering affordable homes

Policy H2 unsound test c
Strategic Planning and Infrastructure team / Housing Services team

Policy H2 sets a requirement for 40% affordable housing on qualifying sites. 4/5ths of those are to be Social Rented and 1/5th may be provided as intermediate forms of housing.

The need for affordable housing is well evidenced, and it is disappointing that the requirement is being reduced from that in the current Oxford Local Plan 2036 which has a 50% requirement. We understand that the 40% requirement is based on viability. Background Paper 2 accompanying the Oxford Local Plan 2040 provides detail of the City Council's evidence, including the reasoning why delivery of the government mandated proportion of 'First Homes' is not expected.

On various sites adjoining Oxford there is a requirement for 50% affordable housing. This has mirrored the Oxford Local Plan 2036 requirement. Would the current requirement for 50% affordable housing on sites in Cherwell, South Oxfordshire and West Oxfordshire be undermined by having a 40% affordable housing requirement adopted in Oxford City? We have also raised a similar query in our comments on the recent Cherwell Local Plan Regulation 18 consultation where 30% affordable housing is proposed to apply to new sites, but 50% affordable housing requirements apply to some existing allocated sites.

The County Council has a particular interest in affordable housing given its social care role. We want to see provision being made for affordable forms of housing catering for those who are older or who have specialist needs, particularly in the form of affordable extra care housing.

The County Council has commissioned its own research on the needs for specialist housing for older people, such as extra care housing, in order to update our current Market Position Statements on that. The work is not yet complete at the time of writing.

In the Districts, we are asking for a requirement in those Local Plans to provide an affordable extra care housing development of at least 60 units as part of the affordable housing component of very large sites. We do not think there are any proposed allocations in Oxford City where such a requirement would be suitable, as sites are smaller. Even Oxpens is expected to be an unsuitable site for such a requirement. We anticipate some extra care housing being delivered at a small number of sites in adjacent Districts to meet the City's need e.g. at Bayswater Brook. We would be concerned if a reduced affordable housing threshold makes it more difficult to get affordable specialist housing provided on sites.

Modifications

(This is a soundness issue for the plan to be based on effective joint working on cross-boundary strategic matters. The viability evidence that supports the reduction in affordable housing should be tested at examination. Given the potential effect on sites at the edge of the City, this matter should be reflected in a new statement of common ground. Oxfordshire County Council may not need to be at a hearing on this matter.)

- The evidence for the percentage requirement for affordable housing and what that means for specialist housing and for sites outside of the City boundaries should be considered at the examination.

Policy H3 Affordable housing contributions from new purpose-built student accommodation No comment.

Policy H4 Affordable housing contributions from self-contained older persons accommodation

Seems to be a comment neither of support nor objection, so not classified as a rep
Strategic Planning and Infrastructure team / Housing Services team

Policy H4 sets a requirement for a financial contribution towards affordable housing from private retirement complexes and the like. The text indicates that provision is unlikely to be made on site because of management agreements and other restrictions, therefore the financial contribution will be used by the City Council to provide affordable housing on other sites.

The County Council generally expects that an affordable extra care housing development will need to involve at least 60 units in order to be viable. Therefore, if the requirement for affordable housing is 40%, we would agree that unless a total of 150 units are proposed, it may be difficult to separate off an affordable element of extra care housing.

There is nothing in the text of the policy to indicate that the financial contribution will be directed to affordable extra care housing, as opposed to any other sort of affordable housing. It appears that the contributions gained from affordable housing on self-contained older persons housing will, like other contributions, go into a pot for affordable housing generally.

The County Council would like to see some provision being made within the affordable housing pot for extra care housing for older people and specialist needs. This may not need to be addressed by any change of policy in the Local Plan, but instead by a working arrangement,

perhaps addressed through a memorandum of understanding. The contributions could be pooled into a pot for future supported housing projects.

Modifications

Assuming the working arrangements can be addressed outside of the Local Plan, no changes to Policy H4 are requested.

Policy H5 Employer-linked affordable housing

Support Policy H5

Strategic Planning and Infrastructure team / Housing Services team

The County Council has published a draft Adult Social Care Workforce Strategy, which outlines higher than national average housing costs within Oxfordshire as an obstacle to the recruitment and retention of social care professionals. Recruitment into the sector remains a significant challenge within Oxfordshire; we see key worker housing provision as a key enabler in ensuring we can attract and retain a talented pipeline of social care professionals to meet the current and projected workforce capacity. The introduction to this Local Plan notes that homes should be delivered as general market and affordable housing unless expressly stated in the site allocation policy that student accommodation or employer-linked affordable housing are suitable on the site. We welcome the recognition in Policy H5 and some site policies of the need for employer-linked affordable housing in order to provide for some key workers. We can provide further advice if needed about the ongoing need for key workers undertaking multiple social care roles.

Modifications

No changes are requested.

Policy H6 Mix of dwelling sizes (number of bedrooms)

Policy H6 unsound test c

Housing Services team / Strategic Planning and Infrastructure team

This policy sets out the number of bedrooms, but this may not be sufficient to ensure an appropriate mix of dwellings to create mixed and balanced communities.

Given that extra care housing developments within Oxford City are unlikely, we consider there is a need for provision within the policy that refers to the possibility of providing affordable specialist supported housing.

We note that in paragraph 7.3 of Background Paper 5 on elderly persons and other specialist accommodation, it mentions that the overall need for such housing is generated on the basis of a prevalence rate of units required per 1,000 of the over 75's population, but it does not state what the prevalence rate is. The City's evidence of the ongoing need for such housing is therefore unclear.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Policy H6 says 'Planning permission will be granted for residential development that is demonstrated will deliver an appropriate mix of dwelling sizes that responds to the site context, including local needs, and that results in mixed and balanced communities.'

Evidence to support the proposed mix should be proportionate to the application and may include evidence from the HENA, market demand, design considerations, and should include regard to the housing register and current requirements if the below mix for affordable housing does not apply'. Add between the two sentences: 'Provision for specialist inter-generational supported housing should be made where needed.'

Policy H7 Development involving loss of dwellings No comment.

Policy H8 Houses in Multiple Occupation No comment.

Policy H9 Location of new student accommodation No comment.

Policy H10 Linking new academic facilities with the adequate provision of student accommodation No comment.

Policy H11 Homes for travelling communities No comment.

Policy H12 Homes for boat dwellers No comment.

Policy H13 Older Persons and Other Specialist Accommodation

Support for Policy H13
Strategic Planning and Infrastructure team

The policy sets out the requirements for older persons and other specialist accommodation proposals and indicates that permission will not be granted for the loss of existing specialist care accommodation apart from in specific circumstances. The supporting text explains the range of specialist housing types. The County Council's evidence of need for affordable extra care housing is set out in the existing market position statement supplement, but additional updated evidence is currently being commissioned. As the County Council's interest is predominantly in respect of affordable housing, rather than market provision of housing for older people, our comments on this issue are covered earlier in this response in respect of Policies H2, H4 and H6. However, we support the part of this policy which indicates that planning permission will not be granted for the loss of existing specialist care accommodation unless replaced or there is evidence of no need for the facility.

Modifications

No changes are requested.

Policy H14 Self-Build & Custom housebuilding No comment.

Policy H15 Hostels

Policy H15 unsound test c
Central Place Planning team / Transport Development Management team

We assume that the intention is that hostels will have no car parking on site, but the policy does not say that explicitly. This should be added into the policy.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Policy H15 should be amended to indicate that no car parking on site is expected. This can be done by amending 'b' to read as follows: 'The location is within 800 metres of the city centre or a district or local centre, to ensure it is easily accessible to residents and there is no need for car parking on site.'

Policy H16 Boarding school accommodation No comment.

Chapter 3: A Fair and Prosperous City with a Globally Important Role in Learning, Knowledge and Innovation

Policy E1: Employment Strategy

Policy E1 unsound test b, c
Strategic Planning and Infrastructure team

Policy E1 indicates the circumstances in which new employment uses will be favourably considered. It also includes a part which provides for residential development on employment sites subject to criteria. The criteria include matters of particular interest to the County Council such as being well connected to public transport and active travel opportunities.

Modifications

No changes are requested.

OCC Estates

The proposed wording of policy E1 is such that it seeks to make the most efficient use of the land by upgrading, or, reusing existing buildings which are in an employment use. The policy sets out that the key employment sites will be categorised as Category 1, 2 or 3 sites with stricter requirements applying to those sites which fall within Category 1.

New employment uses or the intensification of existing sites, will only be granted for Category 1 or 2 sites. Category 1 and 2 sites are those which are found within the City and District centres; the policy also notes that all proposals must ensure they use sustainable methods of construction and are operationally energy efficient.

The OCC Estates team has a number of properties across the Oxford City area and some are within, or adjacent to, the Category 1 and 2 sites. With regards to the wording of the policy as proposed, with reference to 'loss of employment space' this stipulates that planning permission will not be granted for any net loss in the category 1 sites, unless it can be justified that the number of *overall* jobs will be retained across the proposal site.

This policy therefore allows for the potential development of sites, if necessary, providing there is no overall loss of jobs on that site. It is unclear exactly how this requirement could be fully justified or provided for within any proposal, when a specific 'number' of jobs is quite often fluid

and changeable with market conditions and rarely would stay as a constant specific number for any period of time. As such this policy wording is quite restrictive and potentially unachievable or enforceable.

The wording may be better revised to suggest a % threshold number based on the existing job numbers rather than a specific figure which in reality may be difficult to maintain, especially in the instance of some particular type of jobs where there may be a consistently high turnover.

In relation to the second part of the policy which refers to residential development on employment sites; as per the previous Oxfordshire County Council comments on the preferred options document, a policy which supports housing and mixed uses will have the opportunity to help free up under-utilised land, and this aim is supported. The wording of the policy lists the key requirements any proposal would have to comply with in order to be considered acceptable with that policy as set out. Many of the points listed suggest a 'desirability' for certain objectives to be achieved; this policy wording is not very clear, but it is recognised that it says there will be a 'balanced judgement' in relation to these, which is an important caveat.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy E1 to change 'as long as the number of jobs related to employment generating uses at the site is retained' to instead include a percentage threshold as the acceptable amount of reduction of the number of jobs.

Policy E2: Warehousing and Storage Uses No comment.

Policy E3: Affordable Workspace Strategy and Affordable Workspace Provision on Commercial Sites No comment.

Policy E4: Community Employment and Procurement Plans

Support Policy E5
Strategic Planning and Infrastructure team

OxLEP promotes policies requiring such Community Employment Plans. The hospitality and care sectors suffer acute labour shortages within Oxfordshire and employment plans can support these sectors to develop a local skilled workforce where new development proposals are coming through the planning system. In conjunction with OxLEP we therefore support this proposed policy.

Modifications

No changes are requested.

Policy E5: Tourism and Short Stay Accommodation No comment.

Chapter 4: A Green Biodiverse City that is Resilient to Climate Change

Policy G1 – Protection of Green Infrastructure

Policy G1 unsound test d (although comments of the two teams do not seem entirely consistent with each other)

OCC Estates

This policy has some additional sub policies which apply to 'Core' green and blue spaces and subsequent 'supporting' green and blue spaces.

It is understood that any loss of green infrastructure would have to be mitigated by an alternative provision of an equivalent standard, or higher. As stated previously in the response to the 'preferred options' consultation, Oxfordshire County Council owns various school playing fields and other sites which would fall under the consideration of this policy.

The policy should not have the effect of preventing the delivery of the County Council's statutory duties which may, at some point, include the expansion of educational facilities for example, or spaces which may be better utilised for other purposes or alternative provisions.

The approach taken within the wording of the policy to 'split out' the hierarchy of areas is noted, however the sub wording does repeat and could potentially be combined in some way to avoid this repetition.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Review the text of Policy G1 to ensure it does not unduly restrict the use and reuse of school sites.
- Rationalise the text of Policy G1 to avoid repetition.

Environment team – Landscape

Policy G1 is welcomed but we have concerns about the effectiveness of this policy in protecting green infrastructure assets that are not shown on the policy map (not G1A or G1B features), but which might make an important contribution to the overall green infrastructure network connectivity. It is recognised that section a) to d) of the policy seek the protection of trees and other mature vegetation outside the identified network, but the wording includes several exceptions, which are likely to compromise the effectiveness of this policy with regard to tree retention and related to this the retention and enhancement of the existing tree canopy.

The use of the Urban Green Factor (UGF) as required by G3 is welcomed but is unlikely to adequately compensate for the loss of mature green infrastructure elements in the short-and medium-term. As such the retention of existing trees and other mature vegetation irrespective of its location in relation to the GI network should be a priority.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Strengthen the text of Policy G1.

Environment team – Countryside Access

There is no reference in this Local Plan to public rights of way, although there is an occasional reference to 'footpaths'. Within the City area and vicinity there are footpaths, bridleways,

restricted byways and byways open to all traffic - the full range of public rights of way - and they and their non-motorised users (walkers, cyclists and horse riders) all need protection and enhancement and new links by means of unambiguous policies set out in the Plan. NPPF paragraph 100 states that 'planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Provide protection for public rights of way by amending the text of Policy G1.

Policy G2 – Enhancement and provision of new Green and Blue features

Policy G2 unsound test c

Environment team – Landscape

This policy is welcomed but would benefit from more detail.

Urban settings can be challenging environments for new planting and the right species choice and ongoing management are very important. The principle of the right tree in the right place should be applied. Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Include more detail in the text of Policy G2.

Environment team – Countryside Access

Further to our comment on Policy G1, there is also a need to provide for new public rights of way, and that should be referred to in Policy G2.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Provide for new public rights of way by amending the text of Policy G2.

Policy G3 – Provision of new Green and Blue features – Urban Greening Factor

Policy G3 unsound test c

Environment team – Landscape

We believe that the Urban Greening Factor (UGF) has potential to deliver benefits in delivering green infrastructure across the city, and we welcome its inclusion in the policy framework.

We note that the policy is that the UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments unless particular circumstances and reasoning are demonstrated.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Make the Urban Greening Factor mandatory for all developments except where policy provisions for exceptions are met.

Policy G4 – Delivering mandatory net gains in biodiversity

Policy G4 unsound test c, d
Environment team – Biodiversity

This policy should be reviewed in view of the secondary legislation and guidance relating to Biodiversity Net Gain (BNG) which was published on 29th November 2023. This flags that policy wording should not duplicate legislation, but also makes a distinction between the mandatory process for securing BNG post-permission, and the need to consider biodiversity gain policy in determining an application. The scope for LPAs to set higher percentage requirements for BNG is included in the guidance, and we would encourage this in line with the Oxfordshire LNP Biodiversity Net Gain Guiding Principles and reflecting commitments made by all Oxfordshire Authorities through adoption of the Arc Environmental Principles, to seek 20% BNG.

We note reference to the Nature Recovery Network; the Thames Valley Environmental Records Centre have recently completed a piece of work commissioned by all the Districts, City and Oxfordshire County Council to produce the Interim Oxfordshire Nature Recovery Network 2023. It is intended that this mapping can help inform development of Local Plan policies across the County by identifying zones for nature recovery. References to the NRN should therefore be updated accordingly.

However, policy should be clear that the Interim NRN will be succeeded by the Oxfordshire Local Nature Recovery Strategy (LNRS) once it has been published. LNRSs are a statutory requirement under the Environment Act 2021, they will be spatial strategies that establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits. Oxfordshire County Council are the Responsible Authority for production of the Oxfordshire LNRS and we are engaging widely with relevant groups across the County, including Oxford City Council as a Supporting Authority, as we develop the strategy; it is anticipated that the LNRS will be published in 2025.

Recent amendments to the Levelling Up and Regeneration Act will mean that all local planning authorities will have a duty to take account of their relevant LNRS. Further information on incorporating LNRS when planning for Biodiversity Net Gain is available in this Defra Blog.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Amend Policy G4 having regard to the latest legislation and guidance.

OCC Estates

Previously in response to the Local Plan Preferred Options, OCC Estates noted that many of the sites within Oxford City Centre are very constrained due to their location and compact nature and it may prove difficult to provide 10% BNG on all sites which may come forward, without potentially having the implication of impacting on the viability of such sites.

The wording of G4 very much follows the NPPF wording and national guidance which follows the hierarchical approach to offsetting, if necessary, and therefore would be compliant with the NPPF, although it is noted the full guidance on mandatory BNG and small sites exemptions details are yet to be released which may have the effect of superseding Local Plan Policy.

Modifications

- See above requests.

Public Health team

The Public Health team recognise the inclusion of a 10% minimum target of biodiversity net gain within this policy. However, we feel this is not ambitious enough having regard to the climate emergency and the ability for new development to play a key role in healthy place shaping.

We encourage wider adoption of policy for >10% BNG; all Oxfordshire local planning authorities signed up to the OxCam Environment Principles, which agreed to a 20% BNG requirement. Oxfordshire County Council has committed to deliver >10% BNG with an ambition to achieve 20% for our own planning applications (Climate and Natural Environment Policy Statement).

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy G4 to include an ambition for 20% Biodiversity Net Gain.

Policy G5 – Enhancing onsite biodiversity in Oxford

Support Policy G5
Environment team – Biodiversity

We welcome this policy.

Modifications

No changes are requested.

Policy G6 – Protecting Oxford's biodiversity including the ecological network

No comment.

Policy G7 – Flood risk and Flood Risk Assessments (FRAs)

Policy G7 unsound test d
Environment team - LLFA

The general principles in relation to flooding are in line with national policy. The policy sets out the requirements in Flood Zone 3b. The extent and scale of Flood Zone 3b as determined by Oxford City needs to be identified within this or the Strategic Flood Risk Assessment so that those promoting development are clear about the requirements at a policy level.

The policy discusses that development needs to consider all sources of flooding, however the remainder of the text does not state how this should be considered from a spatial planning point of view and what Oxford City would consider in policy terms being appropriate in areas that are shown to be at risk from sources other than those linked to fluvial flood zones. This includes how they would sequentially test sites in relation to other sources.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Amend Policy G7 to make it clear what will be considered appropriate in areas that are shown to be at risk from sources of flooding other than those linked to fluvial flood zones.

Policy G8 – Sustainable Drainage Systems (SuDS)

Policy G8 unsound test d
Environment team - LLFA

Bullet point 4.57 needs to refer to national SuDS guidance as there are both national and local standards applicable across the County. It would also be helpful to clarify that the LLFA's role is to review major applications in relation to surface water drainage including SuDS measures and to provide information on whether the proposals at planning stage meets the local standards. We as LLFA have no other remit as a statutory consultee and do not set policies in relation to surface water drainage.

In relation to the policy, it is useful to see our local standards mentioned. It may also be useful to add that there are national standards that run alongside our local standards as Defra set these out and may at some point amend these and we have no control over these changes.

Modifications

(A minor modification that does not materially affect the plan's policies, to be consistent with national policy)

- Amend Policy G8 or supporting text to refer to the national standards set by Defra in addition to our local standards.

Policy G9 – Resilient Design and Construction

Support policy G9
Strategic Planning and Infrastructure team

Policy G9 is about design in relation to the most up-to-date climate change projections, addressing overheating, flood risk and water consumption.

This comment is about the water consumption bullet points in the draft policy. The standard of 110 litres per person per day is in line with government advice. The then Secretary of State for Defra wrote to local authorities in July 2021 asking them to adopt this as a building standard where there is a local need, such as in water stressed areas like the South East.

There is a national target of water consumption to be an average of 110 litres per person per day or less by 2050 in the National Framework for Water Resources produced in March 2020. The latest Water Resources Planning Guideline (WRPG) from April 2023 states that the water companies' plans and programmes should be based on that.

The government published the Environmental Improvement Plan in January 2023, which builds on the national target with interim targets to reduce the use of public water supply in England per head of population by 9% by 31 March 2027 and 14% by 31 March 2032, and a longer term target of 20% by 31 March 2038. This is to be achieved by reducing household water use, reducing leakage and reducing non-household (e.g. business) water use.

Water Resources South East (WRSE) released its final draft regional plan on 31st August 2023. This plan includes reducing per capita consumption over time from the current 150 litres per person per day to below an average of 110 litres by 2050, also complying with the interim targets as set out in the government's Environmental Improvement Plan. It is expected that this will require not only new build housing and renovations to be designed to be efficient with water, but also that home occupiers change their ways to use less water. Smart meters are helping companies to better understand how water is used, and data from companies that have installed smart meters shows that many people typically use between 100 and 110 litres per day, but a moderate proportion of very high users exists that causes average usage to be higher. Local Plan policy could also encourage the take up of smart meters.

Reduced demand, together with the reduced leakage targets in the final draft regional plan will together reduce the need for new infrastructure and abstractions as the population grows. At present, nearly 16% of the water that is treated and put into supply in the South East is lost through leaks from water companies' and customers' pipes.

Thames Water is the company that provides water to most of Oxfordshire. Its individual Water Resource Management Plan 24, also released in final draft form on 31st August 2023, has an initial focus on delivering ambitious programmes of demand management.

The WRSE and Thames Water plans envisage a need for a 150 Mm³ South East Strategic Reservoir by 2040, even with the demand management proposed. Thames Water is therefore progressing work towards a Development Consent Order application for the reservoir. Oxfordshire County Council and Vale of White Horse District Council, along with others, have opposed the reservoir proposals, but support the demand management measures.

The two bullet points in the policy require all dwellings (including conversions, reversions and change of use) to achieve an estimated water consumption of no more than 110 litres per person per day, and applicants are encouraged to go further than this: all non-residential development should demonstrate what measures have been incorporated to reduce water use; and other measures to conserve water use including rain/grey water harvesting/reuse where appropriate should be incorporated.

Modifications

No changes are requested.

Chapter 5: A City that utilises its resources with care, protects the air, water and soil and aims for net zero carbon

Policy R1 – Net Zero buildings in operation

Support Policy R1

Climate Action team

We fully support the broad thrust of the policies relating to new net zero buildings and the retrofitting of existing buildings. They align closely with the priorities of the county council as set out in PAZCO and the Climate Action Framework.

We are pleased that the Regulation 19 Oxford Local Plan adopts a fabric first approach (in line with recommendations of the 'Oxfordshire Net Zero Route Map & Action Plan') Oxford Net Zero & Action Plan Oxfordshire Net Zero Roadmap) to minimise energy consumption and reduce space heating demand (for instance, a very high levels of insulation, solar gain and natural ventilation etc in both new build and retrofit). In line with best practice, net zero carbon buildings should achieve the highest possible fabric standards (Climate Action Framework and Oxfordshire Innovation Framework for Planning and Development).

Modifications

No changes are requested.

Policy R2 – Embodied carbon in the construction process

Support Policy R2

Climate Action team

This policy requires demonstration of the consideration of embodied carbon and the choices made.

In addition, there is a requirement to measure total embodied carbon for large scale new-build developments using a recognised methodology such as a Whole Life Cycle Carbon Assessment. We are very supportive of the whole life cycle approach to buildings (including long term maintenance not just the construction phase).

Modifications

No changes are requested.

Innovation team

The Innovation Service are pleased to see the inclusion and emphasis on embedded carbon and the innovative choice of alternative materials that this focus can lead to. One such is the increased use of timber in construction. This also has the potential of reducing the quantity of concrete in foundations as wooden structures can be lighter than traditional build.

Modifications

No changes are requested.

Policy R3 – Retro-fitting existing buildings

Climate Action team

In relation to policy R3, we are wholly supportive of the approach to retrofitting. In addition, it is worth making the point that a lot of most retrofit measures fall under permitted development, and therefore it would be useful to indicate which schemes would require permission.

We welcome the reference to the circular economy. However, the policies should set out the principles of how the circular economy will be achieved through the development process in Oxford, in line with best practice. For instance, the Local Plan could require the preparation of circular economy statements alongside the submission of planning applications, setting out how the principles of the circular economy will be embedded into the design and layout of major developments (as advocated as best practice). These principles have already been factored into site waste management plans (e.g. Begbroke Innovation District, Oxford).

The Oxfordshire Innovation Framework actively supports innovation and resilience in the circular economy (e.g modular housing design). In line with this approach, the Oxford Local Plan should encourage modern methods of construction (e.g. offset fabrication, 3D printing and modular housing) to help reduce costs, facilitate innovation and increase energy efficiency of buildings (including though not limited to, increased use of timber and reduced use of concrete and the use of low or no carbon asphalt).

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Add how the circular economy will be achieved to Policy R3.

Policy R4 – Air quality assessments and standards No comment.

Policy R5 – Land contamination No comment.

Policy R6 – Soil quality No comment.

Policy R7 – Amenity and Environmental Health Impacts of Development

Support Policy R7
Public Health team

It is good to see noise and water within the range of factors to be used to determine whether to approve a development.

Modifications

No changes are requested.

Chapter 6: A City that Respects its Heritage & Fosters Design of the Highest Quality

Policy HD1 Conservation Areas No comment.

Policy HD2 Listed Buildings No comment.

Policy HD3 Registered Parks and Gardens No comment.

Policy HD4 Scheduled Monuments No comment.

Policy HD5 Archaeology

No comment because the County Archaeology team does not respond on City Council applications and there is no need for the County Council to consider this as the City Council has its own archaeologists who provide the necessary advice.

Policy HD6 Non-designated Heritage Assets No comment.

Policy HD7 Principles of High-Quality Design No comment.

Policy HD8 Using Context to Determine Appropriate Density

Support policy HD8
County Councillors

It is important that density is maximised in areas that have or will have good public transport accessibility. The need for higher densities is reflected in this policy. If a modification is proposed for this policy to require even higher densities, we would support that as it could lead to more housing being provided in sustainable locations. The policy requires the efficient use of land, and we note that this is likely to mean that developments in some locations will likely have no car parking associated with them, and this is in accordance with our policies to encourage car free development and create more walkable neighbourhoods, driving demand for local shops and amenities.

Modifications

No changes are requested.

Policy HD9 Views and Building Heights No comment.

Policy HD10 Health Impact Assessment

Support Policy HD10
Public Health team

Policy HD10 on Health Impact Assessment is welcomed.

Modifications

No changes are requested.

Policy HD11 Privacy, Daylight and Sunlight No comment.

Policy HD12 Internal Space Standards for Residential Development

Support policy DH12
Public Health team

The Public Health team welcomes this policy recognising the range of ways in which internal living conditions can affect the health and wellbeing of Oxford residents.

Modifications

No changes are requested.

Policy HD13 Outdoor Amenity Space

Policy HD13 unsound test c
Public Health team

It is welcomed that this policy includes the provision of spaces to sit and play in communal areas. However, the policy only states that residential units with three or more bedrooms will be provided with outdoor drying space for clothes. Considering smaller residences such as 1 and 2 bedroom flats are more likely to lack private outdoor space, it is pertinent that all residential units are given access to some form of drying space, such as a communal drying area. This is to ensure that indoor air quality is protected from the potential risks from damp clothes drying, and the subsequent hazards to human respiratory health.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy HD13 to include a requirement for outdoor drying space in smaller residences.

Policy HD14 Accessible and Adaptable Homes

Taken to be a comment rather than a representation
Housing Services team / Public Health team

We appreciate the recognition in the supporting text to Policy HD14 that homes need to be built with the flexibility to be adapted to the changing needs of residents.

The policy requirements include 100% of affordable dwellings and 15% of market dwellings on major sites being constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4. There are some further requirements to a higher level in the policy, as well as exceptions identified. The City Council needs to be confident that even if the Building Regulations change, that the requirements of the policy will still apply. The County Council wants to see 'lifetime homes' built to the maximum extent possible so that people do not need to enter the care sector prematurely. The County Council does not wish to see more care homes built in Oxford City.

Modifications

No changes are requested.

Policy HD15 Bin and Bike Stores and External Servicing Features No comment.

Chapter 7: A Liveable City with Strong Communities and Opportunities for All

Policy C1: Town Centre Uses

Policy C1 unsound test b
Public Health team

We consider that there should be mention of the potentially multi-functional benefits that community facilities can offer.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy C1 to mention multi-functional benefits of community facilities.

Policy C2: Maintaining vibrant centres No comment.

Policy C3: Protection, alteration and provision of local community facilities

Policy C3 unsound test b
Public Health team

As with Policy C1, we consider that there should be mention of the potentially multi-functional benefits that community facilities can offer.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy C3 to mention multi-functional benefits of community facilities.

OCC Estates

Previous comments provided on the Preferred Options consultation by OCC Estates noted that Policy C3 should provide more guidance on exactly what is regarded as a 'community facility' and what level and type of evidence would be needed in order to prove there was no longer a need for a particular facility in its' location.

The supporting text of policy C3 now includes the definition of Use Class F2, noting that outdoor facilities are dealt with in Policy G1 (commented on above). It also notes that the loss of such facilities will not be permitted unless a replacement can be provided, or there are facilities nearby which can be enhanced, or there is an alternative facility for which there is a greater need or demand than the existing.

However, the policy wording still does not provide clear advice on what type and form of evidence would be required within an application to allow for the circumstance where there is a greater need or demand elsewhere and resources are being diverted to that.

Making the best utilisation of Oxfordshire County Council owned land may be required in some instances, in line with the other policies in the Local Plan. As such this may result in alternative uses of sites needing to be considered based on the need and location of the site.

The policy should be amended to provide detail on the level of evidence which would be required in respect of demonstrating the case that there is no longer 'need' or demand for a facility.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy C3 to add a fourth bullet point allowing for the circumstance of where there is clear evidence of no continuing need for the community facility.

Property Services team / Education team

Policy C3 Community Facilities states, 'Planning permission will be given for new community facilities, including those within schools and colleges where opportunities are taken to secure community joint user agreements'. Oxfordshire County Council cannot mandate the use of school facilities by the community as it is for the consideration of the operating Academy to determine how their facilities are used.

It is unclear whether 'community facility' here is defined to include schools, or whether it is used to mean only a community use within a school. For the avoidance of doubt, if this policy is intended to apply to new schools, such schools would be established as academies, and joint use arrangements would be a matter for the academy trust responsibly for the school. At the time of granting planning permission, the academy trust is usually not known, so there is no responsible body to agree to joint use, and the county council cannot enforce community use upon an academy. It is therefore not appropriate for any such restriction to be applied to a new school.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Include in the supporting text to Policy C3 explanation that community joint user agreements cannot be required by Oxfordshire County Council in respect of new schools given that an Academy Trust will not be available to be a party to any S106 agreement.

Policy C4: Protection, alteration and provision of learning and non-residential institutions

Policy C4 unsound test c OCC Estates

Oxfordshire County Council previously responded about this policy in the preferred options document and noted that securing joint user agreements was not likely to always be possible on some leisure and educational sites due to safeguarding or contractual arrangements. It is noted the policy wording has been altered slightly to say "...where possible, joint user and shared user agreements are made".

This addition of 'where possible' to the wording is welcomed, however, it would be useful to have clarification on what level of data or justification would be required in order to assess whether such an agreement is 'possible' or not in each case.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy C4 or supporting text to indicate the level of information needed to comply with the policy when explaining that joint user and shared use agreements are not possible in some cases, for example when an academy trust is not in place for a new school.

Education team

Policy C4 states that planning permission will be granted for new / redeveloped learning institutions if (inter alia) where possible, joint user and shared use agreements are made. This is an appropriate phrasing: as, in the case of new schools it will not be possible at the point of granting planning permission to make joint use agreements, as there is not at that time a responsible body in place. Redevelopment projects at existing schools vary greatly and will not necessarily result in any change in facilities which could be made available to the community.

The requirement that school developments will be accessible to those who will use it by walking, cycling and public transport should allow for some flexibility as a matter of equality of access, as, for example, if the project is an expansion of a special school, depending on the needs of the pupils it may not be possible for them to travel by walking, cycling and public transport.

The restriction that the loss of learning institutions will only be permitted where (inter alia) it can be demonstrated that the use can no longer feasibly be provided in its location could be changed to "feasibly and viably". Financial viability of provision is one element of feasibility.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend last bullet point of Policy C4 to read: 'It can be demonstrated that the use can no longer be feasibly and viably provided in its location'.

Policy C5: Protection, alteration and provision of cultural venues and visitor attractions

No comment.

Policy C6: Transport Assessments, Travel Plans and Service and Delivery Plans

Policy C6 unsound test
Transport Policy team

There is no reference to the Local Transport and Connectivity Plan (LTCP) under the section on 'Transport Assessments, Travel Plans and Servicing and Delivery Plans'. Reference is needed in Policy C6 and supporting text. Working in partnership with the County Council, the City Council should ensure that this Local Plan is working towards the targets in the LTCP. There is reference in paragraph 7.40 to one of the supporting strategies to the LTCP (the Mobility Hub Strategy), but all the relevant documents need to be mentioned. The County Council's 'Implementing Decide and Provide' should also be mentioned as it is important for

developers to follow that advice to devise sustainable developments that help create liveable neighbourhoods.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the text of paragraph 7.40 as follows: 'Transport Assessments will be considered in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and supporting strategies including the Central Oxfordshire Travel Plan, Active Travel Strategy, Innovation Framework and Mobility Hub Strategy. Particular attention should be given to the Mobility Hub Strategy on proposals at railway stations, bus stations, town and district centres, hospitals, university campuses and Category 1 employment sites.'
- Amend the first paragraph of Policy C6 to add: 'Consideration of proposals will be in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and its supporting strategies and advice such as 'Implementing Decide and Provide'.

Central Place Planning team

At the beginning of this section on 'Transport and Movement in Oxford to help Create a Liveable City' there is a very long sentence about the transport and movement strategy of the Local Plan. As this supporting text may be relied upon, it is a matter of soundness to ensure it is correct and understandable. It is important that the Local Plan clearly promotes sustainable transport and connectivity. County Council officers are willing to help with creating alternative text.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the text of paragraph 7.21 to make it easier to read and understandable.

Policy C7: Bicycle and Powered Two Wheelers Parking Design Standards

Policy C7 unsound test a, c

Central Place Planning team / Transport Development Management team / County Councillors

These standards are not the same as the County Council's requirements set out in our recent Parking Standards document that is available online and was available at the time this Local Plan was being prepared. The City Council agreed these standards prior to their adoption.

County officers, representing the Highways Authority, will be seeking compliance with the County Council standards as our professional advice. County officers are willing to work further with City Council officers to prepare a draft modification of the Local Plan standards to ensure they do not contradict the standards of the Highways Authority.

The City's standards in some cases do not require as much bicycle parking as the County standards. The City's standards are also difficult to understand in part and imprecise. An example is hospitals where it is said that the requirement is for '1 space per 5 staff or visitors'; as it is highly unlikely that future visitor numbers will be known or set in a planning consent.

The County's cycle parking standards deal not only with quantum of parking spaces but also the need for high quality secure cycle storage, and cycle parking for cargo bikes and e-bikes. The County also has its own standards for school sites.

Modifications

(There is a soundness issue as the Plan needs to be based on effective joint working and justified as an appropriate strategy based on evidence. The amendments needed may be considered to be minor modifications as the intention of the policy is not materially affected.)

- Amend Policy C7 and the related appendix so that bicycle and powered two wheeler parking design standards do not contradict the County Council's standards.

Policy C8: Motor Vehicle Parking Design Standards

Policy C8 unsound test a,b,c

Central Place Planning team / Transport Development Management team / County Councillors

Our concerns on Policy C8 and the related appendix are based on the same issues as with Policy C7 above. The City Council agreed the now adopted County Council parking standards and it is necessary to the effectiveness of the Local Plan for there to be no contradiction. Some of the other Districts in the county refer to the need for cycle, motorcycle and car parking provision to be made in line with the Oxfordshire County Council parking standards and street design guidance, which is a simpler approach that we agree with also.

Modifications

(There is a soundness issue as the Plan needs to be based on effective joint working and justified as an appropriate strategy based on evidence. The amendments needed may be considered to be minor modifications as the intention of the policy is not materially affected.)

- Amend Policy C8 and the related appendix so that motor vehicle parking design standards do not contradict the County Council's standards.

Policy C9: Electric Vehicle Charging

Policy C9 unsound test a,b,c

Innovation team / Transport Development Management team

Where Policy C9 refers to non-residential EV charging requirements it does not follow the County Council's Street Design Guide, (which pulls from the Oxfordshire Electric Vehicle Infrastructure Strategy (OEVIS)). Here the requirement for non-residential EV charging is a 'minimum 25% of spaces'. Policy C9 only requires 'access to electric vehicle charging infrastructure' which is unclear. OEVIS was jointly produced by the Oxfordshire councils and sets out the policies and plans to realise our vision for EV charging in Oxfordshire.

Further references to EV charging requirements are made in the OCC Local Transport and Connectivity Plan.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Policy C9 so that it is consistent with the Oxfordshire County Council Street Design Guide and Oxfordshire Electric Vehicle Infrastructure Strategy requiring that at least 25% of car parking spaces for non-residential development have EV charging infrastructure.

Chapter 8: Development Sites

Policy NEOOF – Northern Edge of Oxford Area of Focus

There was no Area of Change in OLP2036 covering this area.

Policy SPN1: Northern Gateway

Part of this was previously SP28 Pear Tree OLP2036, and part was allocated as Northern Gateway in an AAP. HELAA ref = 1. This allocation is for the remaining areas which don't have permission yet. Summary = 142 dwellings + employment + mixed uses.

Property Services team

We note the potential expansion of Wolvercote Primary School and provision for additional SEND in schools given this allocation, as previously agreed.

Modifications

No changes are requested.

Policy SPN2: Oxford University Press Sports Ground

Was SP52 OLP2036. HELAA ref = 49. Summary = 130 dwellings.

Policy SPN3: Diamond Place & Ewert House

Was SP6 OLP2036 with slightly less development than. HELAA ref = 18. Summary = 180 dwellings.

Policy SPN3 unsound test c
County Councillors

We welcome the allocation of this car park for development.

Modifications

No changes are requested.

Transport Development Management team

The following sentence needs to be improved and strengthened: 'The new route should explore the scope for potential improvements to the restricted width of the existing footpath/cycle way adjacent to the Bowls Club, which links to Cherwell School.'

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the last sentence of the first paragraph on movement and access in Policy SPN3 to read: 'Along with the new route, improvements should be made to the existing footpath and cycleway adjacent to the Bowls Club which links to Cherwell School.'

Policy CBLAOF: Cowley Branch Line and Littlemore Area of Focus

This is different to Area of Change Policies AOC1, AOC4 and AOC7 in OLP2036.

Policy SPS1: ARC Oxford

Was SP10 OLP2036. Summary = employment.

Policy SPS1 unsound test c
Central Place Planning team

The policy needs to signal that reduced car parking is expected on the ARC Oxford site in future.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Add to the end of the paragraph on movement and access in Policy SPS1: 'It is expected that proposals will have less car parking associated with them than has existed historically.'

Policy SPS2: Kassam Stadium and Ozone Leisure Park

Was part of SP14 (with SPS3) OLP2036. Summary = 275 dwellings if Kassam Stadium demolished.

Policy SPS2 unsound test c
Central Place Planning team / Transport Development Management team

There is significant opportunity for redevelopment on this site, particularly if the Kassam Stadium is demolished. Stronger text about providing direct and convenient pedestrian and cycle access to the site is needed to ensure much greater use of active travel modes and public transport in future. The current text implies that the existing footpaths are adequate. Contributions to the Cowley Branch Line and for active travel connections to its stations will also be expected upon development of this site.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the paragraph on movement and access in Policy SPS2 so that is clear that additional and improved footpaths and cycleways will be required as well as contributions to the Cowley Branch Line.

Policy SPS3: Overflow Car Park, Kassam Stadium

Was part of SP14 (with SPS2) OLP2036. Summary = 77 dwellings.

Policy SPS3 unsound test c
Central Place Planning team

The existing footpaths and cycleways in this vicinity need to be improved. Stronger text is needed as the current text only suggests that opportunities to enhance such routes be investigated.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the paragraph on movement and access in Policy SPS3 to include as the second and third sentences: 'The informal pedestrian access from Falcon Close should be made into a more attractive pedestrian and cycle link. Pedestrian and cycle access from the western corner of the site towards Littlemore, via Priory Road, should also be improved.'

Policy SPS4: MINI Plant Oxford

Was SP8 OLP2036. Summary = employment.

Policy SPS5: Oxford Science Park

Was SP9 OLP2036. Summary = employment.

Policy SPS6: Sandy Lane Recreation Ground

Was SP11 OLP2036 – included land safeguarded for Cowley Branch Line. Summary = 300 dwellings.

Policy SPS7: Unipart

Was SP7 OLP2036. Summary = employment.

Central Place Planning team

Development on the Unipart site should provide for pedestrian and cycle links which don't exist at present. The text of the policy needs to require this.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the paragraph on movement and access in Policy SPS7 to include as the last sentence: 'The existing active travel network should be improved and added to as a consequence of development to ensure better connections to both existing and planned development in the area, including that adjoining in South Oxfordshire District.'

Policy SPS8: Bertie Place Recreation Ground

Was SP32 OLP2036. HELAA ref = 008a. Summary = 30 dwellings.

Policy SPS9: Blackbird Leys Central Area

Was SP4 OLP2036. HELAA ref = 9. Summary = 200 dwellings. Note 23/00405/OUTFUL approved 25/10/23.

Policy SPS10: Knights Road

Was SP15 OLP2036. HELAA ref = 593. Summary = 80 dwellings.

Property Services team

This site has been identified for residential use at 50-60 dph. As the site abuts the boundary of Orion Academy Special School, neighbouring development will need to meet Oxfordshire County Council's requirements to avoid overlooking and overshadowing of the school site. Those requirements are set out in our school design criteria.

We support the reference in the policy that 'development should not overlook the Orion Academy'.

Modifications

No changes are requested.

Policy SPS11: Cowley Marsh Depot

Was SP35 OLP2036. HELAA ref = 16. Summary = 80 dwellings.

Policy SPS12: Templars Square

Was SP3 OLP2036 – slightly less development than. HELAA ref = 14. Summary = retail + 350 dwellings.

Central Place Planning team

The developer has started on public consultation for redevelopment of Templars Square. Issues of movement and access are fundamental to the consideration of this site. The movement and access part of the policy as written does not reflect the need to consider the site and its surrounds in a holistic way. We note that parts of the allocation which are currently adopted highway may need to be closed to facilitate a good redevelopment. The amount of car parking provided is expected to reduce from that existing.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the paragraph on movement and access in Policy SPS12 to make it clear that the access arrangements will change as a result of redevelopment. The redevelopment must better provide for people to walk and cycle. There should be a requirement for a mobility hub being created on site.

Policy SPS13: Land at Meadow Lane

Was SP42 OLP2036. HELAA ref = 389. Summary = 29 dwellings.

Policy SPS14: Former Iffley Mead Playing Field

Was SP38 OLP2036. HELAA ref = 104. Summary = 84 dwellings.

OCC Estates

We note that this remains an allocated site. The County Council is landowner. An outline application is forthcoming. The emerging proposals accord with this policy.

Modifications

No changes are requested.

Policy SPS15: Redbridge Paddock

Was SP29 OLP2036 – slightly less development than. HELAA ref = 113. Summary = 200 dwellings.

Policy SPS16: Crescent Hall

New – not in OLP2036. HELAA ref = 17. Summary = 29 dwellings.

Policy SPS17: Edge of Playing Fields, Oxford Academy

Was SP13 OLP2036. Summary = 20 dwellings.

Property Services team

We note the allocation on this school site for employer linked affordable housing.

Oxfordshire County Council's school design criteria must be taken into consideration when developing the school site including maintaining site security and safeguarding for pupils. A S77 application for the change of use of playing field land will be required.

Modifications

No changes are requested.

Policy SPS18: 474 Cowley Road (Former Powells Timber Yard)

New – not in OLP2036. HELAA ref = 516. Summary = 20 dwellings.

Policy MRORAOF: Marston Road and Old Road Area of Focus

This is different to Area of Change Policies AOC6, AOC8 and AOC9 in OLP2036.

Policy SPE1: Government Buildings and Harcourt House

Was SP16 OLP2036. HELAA ref = 24. Summary = 70 dwellings.

Policy SPE2: Land Surrounding St Clement's Church

Was SP18 OLP2036. HELAA ref = 117. Summary = 40 dwellings.

Policy SPE3: Headington Hill Hall and Clive Booth Student Village

Was SP17 OLP2036 – slightly less development than. HELAA ref = 560. Summary = 229 dwellings.

Policy SPE4: Oxford Brookes University Marston Road Campus

Was SP50 OLP2036. HELAA ref = 439. Summary = university +.

Central Place Planning team

This site is the Oxford Brookes Marston Road campus. Text within the policy is weak on movement and access, especially compared to other matters which are considered in more detail. The text needs to be revised to provide scope for improved pedestrian and cycle connectivity through the site in the event of development.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the paragraph on movement and access in Policy SPE4 to make it clear that although vehicle access points won't change, development will create a need for improved pedestrian and cycle connectivity.

Policy SPE5: 1 Pullens Lane

Was SP53 OLP2036. HELAA ref = 440. Summary = 11 dwellings.

Policy SPE6: Churchill Hospital

Was SP19 OLP2036. HELAA ref = 12. Summary = hospital +.

Policy SPE7: Nuffield Orthopaedic Centre (NOC)

Was SP20 OLP2036. Summary = hospital +.

Policy SPE8: Warneford Hospital

Was SP22 OLP2036. HELAA ref = 63. Summary = hospital +.

Policy SPE9: Bayards Hill Primary School Part Playing Fields

Was SP63 OLP2036. HELAA ref = 173. Summary = 30 dwellings.

Property Services team

We note the allocation on this school site for employer linked affordable housing.

Oxfordshire County Council's school design criteria must be taken into consideration when developing the school site including maintaining site security and safeguarding for pupils. A S77 application for the change of use of playing field land will be required.

Modifications

No changes are requested.

Policy SPE10: Hill View Farm

Was SP25 OLP2036 – slightly less development than. HELAA ref = 112a. Summary = 159 dwellings. Note 20/03034/FUL.

Policy SPE11: Land West of Mill Lane

Was SP26 OLP2036 – slightly less development than. HELAA ref = 112b. Summary = 80 dwellings. Note 21/01217/FUL.

Policy SPE12: Marston Paddock

Was SP23 OLP2036. HELAA ref = 114d. Summary = 40 dwellings. Note 21/02580/FUL.

Policy SPE13: Manzil Way Resource Centre

Was SP46 OLP2036. HELAA ref = 574. Summary = health care facility +.

Policy SPE14: Slade House

Was SP57 OLP2036. HELAA ref = 124. Summary = health care facility +.

Policy SPE15: Thornhill Park

Was SP47 OLP2036. HELAA ref = 38a. Summary = 402 dwellings. Note 21/01695/FUL – which has a resolution to approve from 13/12/22.

Policy SPE16: Union Street Car Park and 159 –161 Cowley Road

Was SP59 OLP2036. HELAA ref = 61. Summary = 20 dwellings. Note 19/01821/FUL.

Policy SPE17: Jesus and Lincoln College Sports Grounds

Was part of SP40 and SP45 OLP2036. HELAA refs = 26, 32, 234. Summary = 52 dwellings.

Policy SPE18: Ruskin College Campus

Was SP55 OLP2036. HELAA ref 54. Summary = 28 dwellings. Note 22/00962/FUL.

Policy SPE19: Ruskin Field

Was SP56 OLP2036. HELAA ref 463. Summary = 20 dwellings.

Policy SPE20: John Radcliffe Hospital

Was SP41 OLP2036. HELAA ref 27. Summary = hospital +. Note 19/01038/FUL.

Central Place Planning team

Opportunities should be taken for better pedestrian and cycle access upon development at the hospital site. The text on movement and access needs a couple of minor amendments to provide for this.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend the first sentence on movement and access in Policy SPE20 so that it reads as follows: 'Improvements to public transport, walking and cycling access to and through the site will be required'.
- Amend the last sentence on the first paragraph on movement and access in Policy SPE20 so that it reads as follows: 'Additional access points for non-vehicular traffic onto the site should be identified and provided where possible.'

Policy SPE21: Rectory Centre

New – not in OLP2036. HELAA ref 428. Summary = 21 dwellings.

Policy NCCAOF: North of the City Centre Area of Focus

This is different to Areas of Change Policy AOC5 in OLP2036.

Transport Development Management team

There is an issue in the inconsistency between policies on the areas of focus in respect of reference to the Oxford Local Cycling and Walking Infrastructure Plan (Oxford LCWIP). The Oxford LCWIP was approved in 2020. A statement similar to that in Policies WEAOF, CBLLAOF and MRORAOF is needed here.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Add as 'k', or renumber and include as 'a' in Policy NCCAOF: 'Pedestrian and cycling infrastructure improvements, delivered in accordance with the requirements of the Oxford Local Cycling and Walking Infrastructure Plan (Oxford LCWIP). All opportunities to optimise connectivity and permeability for people walking and cycling should be taken'.

Policy SPCW1: West Wellington Square

Was SP62 OLP2036. HELAA ref 65. Summary = 18 dwellings.

Policy SPCW2: Land at Winchester Road, Banbury Road and Bevington Road

Was part of SP31 OLP2036. HELAA ref 11. Summary = 52 dwellings.

Policy SPCW3: Manor Place

Was SP45 OLP2036. HELAA ref 31. Summary = 43 dwellings.

Policy SPCW4: Canalside Land, Jericho

Was SP33 OLP2036. Summary = mixed use. Note 20/01276/FUL – appeal allowed.

Policy WEAOF: West End and Botley Area of Focus

This is different to Areas of Change Policy AOC1 in OLP2036.

Policy SPCW5: Oxpens

Was part of SP1 OLP2036. HELAA ref 76. Summary = mixed use including 450 dwellings. Note 22/02954/OUT.

County Councillors

We welcome the allocation of the Oxpens car park for development as part of this site.

Modifications

No changes are requested.

Policy SPCW6: Nuffield Sites

Was part of SP1 OLP2036. HELAA ref 70 + 81. Summary = mixed use including 59 dwellings.

County Councillors

We welcome the allocation of the Worcester Street car park for development.

Modifications

No changes are requested.

Policy SPCW7: Osney Mead

Was part of SP2 OLP2036. HELAA ref 586. Summary = mixed use including 247 dwellings.

Policy SPCW8: Botley Road Retail Park

New – not specifically allocated in OLP2036. HELAA ref 607. Summary = employment.

Transport Development Management team

The movement and access part of this policy needs amending to reflect the need to contribute to the Botley Road Active and Sustainable Transport Corridor Scheme. There are ongoing improvements planned along Botley Road further to the study undertaken in 2016.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Add between the two sentences in the movement and access part of Policy SPCW8: 'Contributions will be expected to progress the Botley Road active and sustainable transport corridor scheme.'

Omissions

Public Health team

We have identified that there are no policies which address the following:

- Hot food takeaways – this is a major policy gap as Oxford City has a substantial number of geographical areas with consistently high levels of childhood excess weight. These areas are set out in the need identified in the Director of Public Health's Report on Healthy Weight 2022/23. The Local Plan should take the opportunity to reflect this, either by including a standard restriction on any new hot food takeaways within 400m radius of a school OR by not allowing new hot food takeaways in geographical areas with consistently high levels of excess weight in children (or a combination of both). Both of these are approaches that have been taken successfully elsewhere across the country. There is a strong evidence base to support this approach readily available from the public health team. In addition, conversations with the population in some of the areas with consistently high childhood excess weight in Oxford City as part of the healthy weight health needs assessment reflected a frustration in the ready access to 'fast food' close to home and the increased likelihood of consuming this which has higher calorific as well as fat, sugar and salt content. The Local Plan cannot effectively deliver its ambition of reducing inequalities without such a policy. The lack of such a policy is a soundness issue as it is not justified. County officers are willing to work further with City Council officers to prepare a draft modification of the Local Plan.
- Community growing – We would have expected to see a standalone policy which commits to improving residents' access to growing spaces, including edible spaces in new development and ensuring those in priority neighbourhoods are able to access fresh food. We accept this is not a soundness issue.
- Indoor air quality – We note the inclusion of ventilation in homes as being important (page 329), but this should be incorporated into a policy which obliges developers to ensure new developments are sufficiently ventilated and with additional features where necessary, such as communal outdoor drying space for laundry in apartment blocks. We have commented earlier in this response on a policy in respect of this.
- Active Travel – Whilst several policies refer to active travel as being a contributing factor to their success, there appears to be no standalone active travel policy. It would have been helpful to reference the movement hierarchy identified in Oxfordshire County Council's LTCP and the importance of securing connectivity via active travel between new developments and existing communities. We accept this is not a soundness issue.
- Liveable Neighbourhoods – We would like to see a policy which is specific to the notion of new development being located where it is easy to walk to amenities. While this might be assumed for many urban areas in the City, we want to ensure that all new developments

take into account the ease of access to amenities for its residents and visitors and ensure that improvements to active travel routes are made where necessary. We accept that there is an overarching thread about liveable neighbourhoods in this draft Local Plan and hope that there are sufficient policies to ensure that developments are sustainably located.

- Stewardship – We would have expected a policy to be included referring to the importance of effective stewardship of the public realm and in particular green spaces in new developments. This is important to ensure that public spaces remain attractive and accessible. We accept this is not a soundness issue as it can be addressed through S106 agreements.

Modifications

(This is a soundness issue. Having no policy restricting hot food takeaways is not justified – it is not an appropriate strategy to address the evidence and a key health priority for the City, namely levels of obesity. Reasonable alternative policies are available such as those that have been included in other Local Plans.)

- Include a policy limiting the location of hot food takeaways.

Appendices

Appendix 1: Strategic

1.1 Design Checklist

Environment Team – Landscape

The inclusion of the design code in the Local Plan is supported. We welcome that the design code requires consideration to be given to the existing landscape/townscape context and views, and the use of green roofs not only for the benefit of SUDS, climate adaptation and biodiversity but also as a recreational resource. References to the various strategies and studies relating to green infrastructure and the natural environment are welcomed. The challenge will be to ensure that the findings of these are adequately taken into account in the design.

More emphasis and guidance could be given in the design code and Local Plan policies to the soft landscape considerations such as ‘the right tree in the right place’ and the need for greater species diversity in planting schemes for the benefit of biodiversity and to increase the resilience of planting to pests and diseases and climate change.

It is essential that new green infrastructure elements including planting schemes are managed in the long-term and not only for the first five years. The design code and policies recognise this and make reference to the need of long-term management of green infrastructure elements, but it is often unclear how this will be secured.

Modifications

(A minor modification that does not materially affect the plan’s policies, to be consistent with national policy)

- Amend Appendix 1.1 to add emphasis on soft landscape considerations.

Innovation team

Ref M2 Active Travel – this should make reference to the Local Transport and Connectivity Plan that contains detail on Active Travel.

Ref L3 – It is not clear how the scheme will be flexible to changing needs. Here a point could be added that future proofing is not an exact science and wherever possible, flexibility should be built into solutions to enable the take-up of innovations that may become mainstream in the lifetime of a development. Examples of future innovations and their possible time horizon are given in the Innovation Framework. For example, private car-parking of today might become the turning space, pick-up and set down of micro-bus services that are predicted to reduce the use of private cars the future. These may be fully autonomous, on-demand and will be electric. Or perhaps parking spaces may become the drop zones of drone parcel deliveries.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend M2 of Appendix 1.1 to reference the Local Transport and Connectivity Plan.
- Amend L3 of Appendix 1.1 to make it flexible so that future innovations can be taken up.

Central Place Planning team

Ref M2 Active Travel – this should indicate that for all routes there is priority for pedestrians and cyclists, not just some categories of roads.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend M2 of Appendix 1.1 to indicate that priority is given to pedestrians and cyclists in the design of all roads.

Appendix 2: Housing

- 2.1 Method for Calculating Affordable Housing Contributions
- 2.2 HMO Calculation
- 2.3 Thresholds Linking Academic Facilities with the Adequate Student Accommodation

Appendix 3: Employment

- 3.1 Category 1 Employment Sites
- 3.2 Category 2 Employment Sites

Appendix 4: Urban Greening Factor

- 4.1 Urban Greening Factor
- 4.2 Biodiversity Points

Appendix 5: Carbon/Resources

- 5.1 Additional External Guidance on Net Zero Carbon Design

Appendix 6: Design and Heritage

- 6.1 Conservation Areas
- 6.2 Health Impact Assessment Process
- 6.3 Privacy, Daylight and Sunlight: The 45 and 25 degree guideline

Appendix 7: Communities

- 7.1 Marketing Expectations
- 7.2 Transport Assessments
- 7.3 Travel Plans
- 7.4 Bicycle Parking Standards



Ref Policy C7 – these standards should be amended so as not to contradict Oxfordshire County Council's parking standards. County officers can provide details.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Appendix 7.4 to so that the bicycle parking standards are clear and consistent with the Oxfordshire County Council parking standards.

7.5 Shower, Changing Room and Locker Facilities Provision

7.6 Vehicular Parking Standards

Central Place Planning team

Ref Policy C8 – these standards should be amended so as not to contradict Oxfordshire County Council's parking standards. County officers can provide details.

Modifications

(A minor modification that does not materially affect the plan's policies, to be justified as an appropriate strategy based on evidence)

- Amend Appendix 7.4 to so that the vehicular parking standards are clear and consistent with the Oxfordshire County Council parking standards.

No comments.

Policy Maps

No comments.

Sustainability Appraisal for Oxford Local Plan 2040

Strategic Planning and Infrastructure team

The full Sustainability Appraisal (SA) published with this consultation assesses the impacts of the submission Local Plan and updates the scoping report published in July 2021 and follows an SA/Strategic Environmental Assessment (SEA) published in September 2022 to assess the impacts of the Plan options.

Appendix A of the report provides the full detail of the assessment of the Plan vision, themes and policies. The summary table 1.3 shows that the majority of the Plan scores as 'neutral/none', 'positive impacts (compared to the current situation)', 'some positive and some negative impacts' or 'negative impacts (compared to the current situation)'.

In our response to the Reg18 consultation on the Preferred Options for Oxford Local Plan (Nov 2022) we noted that the Northern Edge Area of Focus had a number of SA objectives RAG rated as red. This remains the case and is largely relating to impact to the Oxford Meadow SAC.

Infrastructure Delivery Plan October 2023

Strategic Planning and Infrastructure team + Transport Development Management team

The IDP report published is dated October 2023 and it is noted that this is labelled as 'Final' however, text at 1.1 of the document states that "IDPs should be treated as 'live documents' which provide a snapshot at a point in time". We suggest the sub-heading of 'Final' is deleted.

County Council officers have provided comment to the City Council in July 2022 as noted in our response to the Reg18 consultation on the Preferred Options for Oxford Local Plan in November 2022. We have continued to engage with City Council Officers and provided further comment by email in September 2023 and note that many of our comments have been incorporated. We will continue to work in collaboration with the City Council (and other adjoining districts) to identify infrastructure requirements to support allocated development sites. Some outstanding comments are noted below.

- Include information from the Central Oxfordshire Movement and Place Framework (COMPF) if available when republishing.
- T9 – Workplace Parking Levy – Change prioritisation to 'critical'.
- T21 – B4495 Corridor Improvements – There is a typo. The cost should be £32,046,000.
- T28 – Controlled Parking Zones – Delete '(city-wide)' from scheme description.

Transport Evidence

Strategic Planning and Infrastructure team

The City Council's Transport Background Paper is BGP14. As a result of a joint commission between Oxford City Council and Oxfordshire County Council, there is also an 'HRA Screening Addendum – Air Quality' dated November 2023, which identifies the transport effects of development in relation to the Special Area of Conservation.

Some additional research and work have been undertaken. A further transport evidence report may need to be published to address any queries on the transport effects of the development envisaged in the Local Plan.

Health Impact Assessment

Public Health team

The Local Plan is accompanied by a Health Impact Assessment and a Health & Wellbeing Topic Paper. We welcome the inclusion of a Health Impact Assessment (HIA) as part of the evidence for the Oxford City Local Plan 2040. However, in its current form it is incomplete, and

we consider it does not provide adequate evidence to withstand examination. Please see detailed comments below.

Introduction and Methodology

The HIA sets out the role of the Local Plan in addressing and seeking to improve the health and wellbeing of local people. It correctly identifies the importance of Local Plan policies and their influence on whether future development in the City has a positive or negative impact on health.

The HIA helpfully sets out the health and wellbeing issues identified in the screening assessment at the Preferred Options stage of development of the Local Plan and uses them to prioritise assessment of policies within the Regulation 19 Draft of the Local Plan.

However, we would expect a City Health Baseline to be included within the main report. Much of these data are contained within the Health & Wellbeing Topic Paper and we would at least have expected reference to have been made to that report or for it to be included as an Appendix if not included in the main report.

HIAs conclusions by topic

For each topic the HIA sets out the issues highlighted in the screening report. However, each topic areas also needs to provide detail of the health and wellbeing needs and priorities, using data identified in the health and wellbeing topic paper.

Although specific policies are identified as seeking to address issues identified in the screening report, this only addresses part of the Plan. A robust HIA needs to identify the impacts (positive, negative or neutral) of all the policies in the Local Plan against the key issues. These are ideally set out as a table where green is beneficial, yellow is neutral and red is adverse.

Without consideration of all policies in the plan it is not possible to support the recommendations as currently stated in the HIA. We would anticipate that some policies might have negative impacts and in those cases mitigation or comments would need to be identified, with key actions listed in the conclusion.

Health & Wellbeing Topic Paper

Public Health team

The topic paper aims to provide a baseline regarding the health and wellbeing profile of Oxford City residents, with a view to identifying issues and challenges that need to be addressed through the Local Plan.

The paper correctly identifies the range of national and local policies and strategies that provide the rationale for the Local Plan to address health and wellbeing issues.

It reports on a range of relevant health indicators identifying where Oxford City appears to perform better or worse than other places in Oxfordshire or in comparison with national data. However, there are a number of key data that would have provided greater insight into the health and wellbeing issues of the population, including:

- Age Structure (including anticipated changes to this structure) – this is important as it will highlight any changing levels of need for services/housing types etc.

- Smoking prevalence – smoking remains one of the most preventable cause of death and disease and is particularly high in people with manual occupations. Rates for Oxford should be included given the strategic priority on smoking cessation.
- Healthy Life Expectancy – this highlights the impact of health inequalities on residents' ability to enjoy living in good health.
- Healthcare Capacity – specifically the numbers of patients per GP in each practice (this is important in identifying need for additional facilities linked to housing development).
- Unemployment data – number of unemployment claimants/long term unemployed – as economic status has a key impact on health.
- Poverty data – households in fuel poverty/pupils eligible for free school meals.

In addition to these City-wide data the report should signpost to the detailed ward profiles that have completed with local residents in the following areas: The Leys; Barton; Rose Hill.

All the above data are available in [Oxfordshire's Joint Strategic Needs Assessment](#).

The paper concludes with a section on the need for a health impact assessment policy to ensure that new development addresses these health challenges.

Oxfordshire County Council Guidance and Resources

Further information and guidance are available using the following resources.

Document(s)	URL
OCC Strategic Plan 2022-25	https://www.oxfordshire.gov.uk/council/our-vision-0
Adopted and Emerging Minerals and Waste Local Plan	https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/core-strategy
Pupil Place Plan	https://www.oxfordshire.gov.uk/residents/schools/our-work-schools/planning-enough-school-places
Childcare sufficiency assessment	https://www.oxfordshire.gov.uk/residents/children-education-and-families/childrens-services/delivering-services-children/childcare-market-assessment
Flood Management	https://www.oxfordshirefloodtoolkit.com/planning/flood-management/
Oxfordshire's Rights of Way Management Plan 2015-25	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/countryside-access/rights-way-management-plan
Oxfordshire Market Position Statement, Extra Care Housing	https://www.oxfordshire.gov.uk/residents/social-and-health-care/housing-options-and-care-homes/extra-care-housing/information-providers
Local Transport and Connectivity Plan <ul style="list-style-type: none"> • Active Travel Strategy • Mobility Hub Strategy • Freight and Logistics Strategy • Innovation Framework • Area and Corridor Travel Plans 	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp-area-and-corridor-plans

Travel Plans	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/travel-plans-and-statements
Active Travel <ul style="list-style-type: none"> • Cycling Design Standards • Walking Design Standards • LCWIPs 	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-travel-0
Transport Development Management <ul style="list-style-type: none"> • Street Design Guide • Parking Standards for New Developments • Implementing 'Decide & Provide' 	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development
Oxfordshire's Resources and Waste Strategy (2018-23)	https://www.oxfordshire.gov.uk/residents/environment-and-planning/waste-and-recycling/our-role-waste-management
Oxfordshire Electric Vehicle Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/electric-vehicles
Climate Action Framework	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/net-zero-2030
Oxfordshire Energy Strategy	https://www.oxfordshirelep.com/energystrategy
Joint Health and Wellbeing Strategy (2018-2023)	https://www.oxfordshire.gov.uk/residents/social-and-health-care/health-and-wellbeing-board/health-improvement
Oxfordshire Health Impact Assessment Toolkit	https://futureoxfordshirepartnership.org/projects/oxfordshire-health-impact-assessment-toolkit/
Digital Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/community-and-living/digital-infrastructure
Tree Policy for Oxfordshire	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/trees-and-woodland
Developer Contributions Guide	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/developer-contributions
Neighbourhood Planning Guide	https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/neighbourhood-planning-guide
Oxfordshire Environmental Principles	https://mycouncil.oxfordshire.gov.uk/documents/s62860/CA_NOV1522R08%20Appendix%202.pdf
Community Activation	https://www.oxfordshire.gov.uk/residents/social-and-health-care/public-health-and-wellbeing/healthy-place-shaping/community-activation
Oxfordshire Way Strategic Vision	https://www.oxfordshire.gov.uk/residents/social-and-health-care/adult-social-care/oxfordshire-way
Adult Social Care Workforce Strategy	https://letstalk.oxfordshire.gov.uk/adult-social-care-workforce
OCC Vision Zero	https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&MId=6882

Form Completed for this Regulation 19 Consultation

Data Protection: We are happy for Oxford City Council to refer to our response as being from Oxfordshire County Council, New Road, OX1 1ND.

Oxfordshire County Council wishes to speak at the examination hearings. We recognise that the Inspector will make the decision on who to invite to speak.

We wish to be notified when the Council submits the Oxford Local Plan 2040 to government, when the Inspector's report is published, and when the Plan is adopted.

All details of what parts of the document or associated document we are commenting on are contained above.

We consider that the Oxford Local Plan 2040 is not sound in relation to the points raised and set out our reasons for that and the changes we consider necessary above.

A copy of the modifications sought above is as follows:

Policy S2: Design Code and Guidance

- Add references to green infrastructure policies in Policy S2 or the Design Code.
- Add reference to the Innovation Framework produced as part of the Local Transport and Connectivity Plan (LTCP) in the supporting text of Policy S2.

Policy S3: Infrastructure Delivery in New Development

- Amend the last two paragraphs of Policy S3 text to read as follows: 'Proposals to enhance the City's rail and bus network will be supported. In particular, the redevelopment of Oxford Station and additional rail capacity to accommodate services including opening of the Cowley Branch Line (CBL) for passengers. Proposals for improvements to Oxford Railway Station that increase network capacity, improve the design and quality of facilities and interchange and support the CBL will be supported. Oxford Railway Station should be transformed to facilitate integrated transport with a new entrance on the west, additional secure cycle storage, cycle racks, new bus interchange facilities and new priority public realm areas. Enhancements to public transport accessibility in the south east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the CBL to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within an area of around 1,500m from the proposed CBL stations will be expected in order to achieve public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL.'

Policy S4: Plan Viability

- Amend Policy S4 so that it is not a clear hierarchy of allowing for the policy requirements about net zero buildings and car parking to not be met before there is any consideration of reducing the affordable housing requirement. Instead, all the possible allowances to provide for viability should be considered in the round.

Policy H1 – Housing Requirement

- The supporting text to Policy H1 which says, 'The housing need in Oxford is for 1,322 new dwellings per annum' is not based on adequate evidence. Alternative numbers should be considered through the examination.

Policy H2 – Delivering affordable homes

- The evidence for the percentage requirement for affordable housing and what that means for specialist housing and for sites outside of the City boundaries should be considered at the examination.

Policy H6 Mix of dwelling sizes (number of bedrooms)

- Policy H6 says 'Planning permission will be granted for residential development that is demonstrated will deliver an appropriate mix of dwelling sizes that responds to the site context, including local needs, and that results in mixed and balanced communities. Evidence to support the proposed mix should be proportionate to the application and may include evidence from the HENA, market demand, design considerations, and should include regard to the housing register and current requirements if the below mix for affordable housing does not apply'. Add between the two sentences: 'Provision for specialist inter-generational supported housing should be made where needed.'

Policy H15 Hostels

- Policy H15 should be amended to indicate that no car parking on site is expected. This can be done by amending 'b' to read as follows: 'The location is within 800 metres of the city centre or a district or local centre, to ensure it is easily accessible to residents and there is no need for car parking on site.'

Policy E1: Employment Strategy

- Amend Policy E1 to change 'as long as the number of jobs related to employment generating uses at the site is retained' to instead include a percentage threshold as the acceptable amount of reduction of the number of jobs.

Policy G1 – Protection of Green Infrastructure

- Review the text of Policy G1 to ensure it does not unduly restrict the use and reuse of school sites.
- Rationalise the text of Policy G1 to avoid repetition.
- Strengthen the text of Policy G1.
- Provide protection for public rights of way by amending the text of Policy G1.

Policy G2 – Enhancement and provision of new Green and Blue features

- Include more detail in the text of Policy G2.
- Provide for new public rights of way by amending the text of Policy G2.

Policy G3 – Provision of new Green and Blue features – Urban Greening Factor

- Make the Urban Greening Factor mandatory for all developments except where policy provisions for exceptions are met.

Policy G4 – Delivering mandatory net gains in biodiversity

- Amend Policy G4 having regard to the latest legislation and guidance.
- Amend Policy G4 to include an ambition for 20% Biodiversity Net Gain.

Policy G7 – Flood risk and Flood Risk Assessments (FRAs)

- Amend Policy G7 to make it clear what will be considered appropriate in areas that are shown to be at risk from sources of flooding other than those linked to fluvial flood zones.

Policy G8 – Sustainable Drainage Systems (SuDS)

- Amend Policy G8 or supporting text to refer to the national standards set by Defra in addition to our local standards.

Policy R3 – Retro-fitting existing buildings

- Add how the circular economy will be achieved to Policy R3.

Policy HD13 Outdoor Amenity Space

- Amend Policy HD13 to include a requirement for outdoor drying space in smaller residences.

Policy HD14 Accessible and Adaptable Homes

- Amend Policy HD14 so that it remains applicable even if there are changes to building regulations.

Policy C1: Town Centre Uses

- Amend Policy C1 to mention multi-functional benefits of community facilities.

Policy C3: Protection, alteration and provision of local community facilities

- Amend Policy C3 to mention multi-functional benefits of community facilities.
- Amend Policy C3 to add a fourth bullet point allowing for the circumstance of where there is clear evidence of no continuing need for the community facility.
- Include in the supporting text to Policy C3 explanation that community joint user agreements cannot be required by Oxfordshire County Council in respect of new schools given that an Academy Trust will not be available to be a party to any S106 agreement.

Policy C4: Protection, alteration and provision of learning and non-residential institutions

- Amend Policy C4 or supporting text to indicate the level of information needed to comply with the policy when explaining that joint user and shared user agreements are not possible in some cases, for example when an academy trust is not in place for a new school.
- Amend last bullet point of Policy C4 to read: 'It can be demonstrated that the use can no longer be feasibly and viably provided in its location'.

Policy C6: Transport Assessments, Travel Plans and Service and Delivery Plans

- Amend the text of paragraph 7.40 as follows: 'Transport Assessments will be considered in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and supporting strategies including the Central Oxfordshire Travel Plan, Active Travel Strategy, Innovation Framework and Mobility Hub Strategy. Particular attention should be given to the Mobility Hub Strategy on proposals at railway stations, bus stations, town and district centres, hospitals, university campuses and Category 1 employment sites.'
- Amend the first paragraph of Policy C6 to add: 'Consideration of proposals will be in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and its supporting strategies and advice such as 'Implementing Decide and Provide'.
- Amend the text of paragraph 7.21 to make it easier to read and understandable.

Policy C7: Bicycle and Powered Two Wheelers Parking Design Standards

- Amend Policy C7 and the related appendix so that bicycle and powered two wheeler parking design standards do not contradict the County Council's standards.

Policy C8: Motor Vehicle Parking Design Standards

- Amend Policy C8 and the related appendix so that motor vehicle parking design standards do not contradict the County Council's standards.

Policy C9: Electric Vehicle Charging

- Amend Policy C9 so that it is consistent with the Oxfordshire County Council Street Design Guide and Oxfordshire Electric Vehicle Infrastructure Strategy requiring that at least 25% of car parking spaces for non-residential development have EV charging infrastructure.

Policy SPN3: Diamond Place & Ewert House

- Amend the last sentence of the first paragraph on movement and access in Policy SPN3 to read: 'Along with the new route, improvements should be made to the existing footpath and cycleway adjacent to the Bowls Club which links to Cherwell School.'

Policy SPS1: ARC Oxford

- Add to the end of the paragraph on movement and access in Policy SPS1: 'It is expected that proposals will have less car parking associated with them than has existed historically.'

Policy SPS2: Kassam Stadium and Ozone Leisure Park

- Amend the paragraph on movement and access in Policy SPS2 so that is clear that additional and improved footpaths and cycleways will be required as well as contributions to the Cowley Branch Line.

Policy SPS3: Overflow Car Park, Kassam Stadium

- Amend the paragraph on movement and access in Policy SPS3 to include as the second and third sentences: 'The informal pedestrian access from Falcon Close should be made into a more attractive pedestrian and cycle link. Pedestrian and cycle access from the western corner of the site towards Littlemore, via Priory Road, should also be improved.'

Policy SPS7: Unipart

- Amend the paragraph on movement and access in Policy SPS7 to include as the last sentence: 'The existing active travel network should be improved and added to as a consequence of development to ensure better connections to both existing and planned development in the area, including that adjoining in South Oxfordshire District.'

Policy SPS12: Templars Square

- Amend the paragraph on movement and access in Policy SPS12 to make it clear that the access arrangements will change as a result of redevelopment. The redevelopment must better provide for people to walk and cycle. There should be a requirement for a mobility hub being created on site.

Policy SPE4: Oxford Brookes University Marston Road Campus

- Amend the paragraph on movement and access in Policy SPE4 to make it clear that although vehicle access points won't change, development will create a need for improved pedestrian and cycle connectivity.

Policy SPE20: John Radcliffe Hospital

- Amend the first sentence on movement and access in Policy SPE20 so that it reads as follows: 'Improvements to public transport, walking and cycling access to and through the site will be required'.
- Amend the last sentence on the first paragraph on movement and access in Policy SPE20 so that it reads as follows: 'Additional access points for non-vehicular traffic onto the site should be identified and provided where possible.'

Policy NCCAOF: North of the City Centre Area of Focus

- Add as 'k', or renumber and include as 'a' in Policy NCCAOF: 'Pedestrian and cycling infrastructure improvements, delivered in accordance with the requirements of the Oxford Local Cycling and Walking Infrastructure Plan (Oxford LCWIP). All opportunities to optimise connectivity and permeability for people walking and cycling should be taken'.

Policy SPCW8: Botley Road Retail Park

- Add between the two sentences in the movement and access part of Policy SPCW8: 'Contributions will be expected to progress the Botley Road active and sustainable transport corridor scheme.'

Omissions

- Include a policy limiting the location of hot food takeaways.

Appendix 1: Strategic

- Amend Appendix 1.1 to add emphasis on soft landscape considerations.
- Amend M2 of Appendix 1.1 to reference the Local Transport and Connectivity Plan.
- Amend L3 of Appendix 1.1 to make it flexible so that future innovations can be taken up.
- Amend M2 of Appendix 1.1 to indicate that priority is given to pedestrians and cyclists in the design of all roads.

Appendix 7.4 Bicycle Parking Standards

- Amend Appendix 7.4 to so that the bicycle parking standards are clear and consistent with the Oxfordshire County Council parking standards.

Appendix 7.6 Vehicular Parking Standards

- Amend Appendix 7.4 to so that the vehicular parking standards are clear and consistent with the Oxfordshire County Council parking standards.