

Statement of Common Ground between Oxford City Council and Oxfordshire County Council

Submission Draft (Regulation 19) Oxford Local Plan 2040

March 2024

1. Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared by Oxford City Council and Oxfordshire County Council for the Oxford Local Plan 2040. This SoCG reflects and confirms current positions on matters agreed by both parties with regard to the Duty to Cooperate.

1.2 Oxford City Council is producing a new Local Plan covering the period to 2040. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise.

1.3 The area covered by this Statement is Oxford, which is the area covered by the Local Plan. The matters in this Statement are however cross-boundary and other SoCGs have been prepared on cross boundary matters with other authorities.

2. Background

2.1 Oxford City Council and Oxfordshire County Council have been working closely together on matters of strategic cross boundary importance. The Councils are members of the Future Oxfordshire Partnership (FOP).

2.2 Up until August 2022 the six local authorities in Oxfordshire (Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council) were collaborating on a strategic joint Oxfordshire Plan 2050 with a supporting Oxfordshire-wide evidence base including housing and employment needs in the form of the Oxfordshire Growth Needs Assessment (OGNA). That process has now ended, and the local planning authorities are instead preparing individual local plans and are working together via the Duty to Cooperate.

3. Duty to cooperate

3.1 There are a large number of areas that require cooperation between the two parties. Oxfordshire County Council is Highways Authority for the area. 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. Discussions have continued between the two councils for the duration of the preparation of the plan, including sharing drafts of policies, making changes and discussing areas of difference. There has also been some joint working, in particular on transport modelling.

3.2 The position of the two councils in relation to relevant strategic matters is outlined below.

4. Strategic Matters

Housing needs

Overall number of homes needed in the area

4.1 The County Council is not currently satisfied that exceptional circumstances have been demonstrated to justify the Local Plan's alternative to using the Standard Method as its housing requirement, or that the HENA provides an appropriate assessment of need in Oxford. The County Council considers this should form a key part of the examination of the plan as set out in Appendix 1 in relation to Policy H1.

Specialist accommodation needs

4.2 The County Council addresses specialist housing as part of its social care responsibilities. The County Council is working to update its market position statements. In the Districts, the County Council is 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. However, both parties agree that there are no proposed allocations in Oxford City where such a requirement would be suitable, as sites are smaller. The County Council anticipates 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. The County Council has a concern that a reduced affordable housing threshold would make it harder to get affordable specialist housing provided on these sites. The County Council's comments and City Council's response in relation to Policy H2 are outlined in Appendix 1.

Economic needs

Jobs needed in the area

4.3 The County Council does not disagree with the general approach of Policy E1, which is to categorise sites and to allow housing to a greater or lesser extent on all of them. The County Council raised some detailed points relating to Policy E1, which are outlined in Appendix 1, with a City Council response.

Provision of retail, leisure and other commercial development

4.4 There are no unresolved issues relating to this topic. Oxford city centre plays an important sub-regional role and co-operation with neighbouring authorities is essential as current and future populations will not shop exclusively in their own areas, but will travel to others.

4.5 The matter does also affect the duties of the County Council in terms of how it relates to generation of transport need. The overall spatial strategy and levels of parking are fundamental to managing these impacts and are discussed below.

Infrastructure needs

Provision of infrastructure for transport

4.6 Oxfordshire County Council is the highways authority responsible for producing the Local Transport Plan. Discussions have centred around how the Local Plan and the County Council's Local Transport and Connectivity Plan align, what the impacts of the Local Plan's proposals will be on the road network, what modelling is needed to establish that, and the Plan's approach to parking, travel plans and transport strategy. The City and County Councils jointly commissioned transport modelling work. As a result of this joint commission between Oxford City Council and Oxfordshire County Council, there is an 'HRA Screening Addendum – Air Quality' dated November 2023, which identifies the transport effects of development in relation to the Special Area of Conservation.

4.7 City Council officers have continued to engage with County Council officers who provided some comments on draft policies and site allocations in relation to transport and access before publication in 2023. Both parties are committed to continuing to work in collaboration to identify infrastructure requirements to support allocated development sites. Some comments are summarised and responded to in Appendix 1 of this SOCG in relation to Policies S3, C7, C8, C9, SPS2, SPS3, SPS7, SPS12, SPE4, SPE20, NCCAOF, SPCW8, and Appendix 7 of the draft Local Plan.

Provision of health infrastructure and local facilities

4.8 Oxfordshire County Council has public health responsibilities. The County Council has set out concerns about the Health Impact Assessment carried out to support the Local Plan and have said they are not sure it would stand up to scrutiny at examination. Appendix 1 summarises the comments made on the Health Impact Assessment and the City Council's response.

4.9 The County Council's response indicated that having no policy restricting hot food takeaways does not address the evidence and a key health priority for the city in respect of obesity. The comments on this omission are summarised in Appendix 1 and the City Council's response is set out.

4.10 The County Council is supportive of policies that protect and promote local facilities, although they have made some detailed comments on some of the policies, set out in Appendix 1 in relation to Policies C3 and C4.

4.11 The County Council has not raised issues with the soundness of the Plan regarding meeting educational needs. Both parties agree that the County Council has been able to review the information on growth expectations across the city and discussions have been ongoing about any school place needs and how to meet them.

Environment Issues

Climate change mitigation and adaptation including flood risk

4.12 Oxfordshire County Council as lead local flood authority has included some detailed queries around flood risk in their representation, as outlined in Appendix 1 in relation Policies G7 and G8. The County Council also has a climate action team and broadly supports Policies R1 and R2 about net zero buildings in operation and demonstration of the consideration of embodied carbon in the construction process. In respect of innovation, the County Council has sought that there be additional policy provision in the Local Plan, as outlined in Appendix 1 in relation to Policy S2.

Conservation and enhancement of the natural and historic environment, including landscape

4.13 The County Council has an environment team and provided some detailed points around biodiversity and green infrastructure, set out in Appendix 1 in relation to Policies G1, G2, G3 and G4. It was noted that the County Council is working to produce a Local Nature Recovery Strategy in 2025 and that policies should be updated having regard to the latest legislation and guidance.

Signed on behalf of Oxfordshire County Council

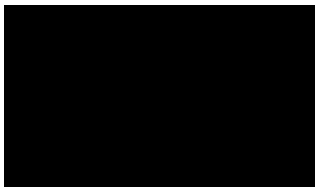


Nicholas Perrins

Head of Strategic Planning

Date: 27 March 2024

Signed on behalf of Oxford City Council



David Butler

Head of Planning and Regulatory Services

Date: 27 March 2024

Appendix 1: Detailed comments and responses

Policy/ Para	Summary of County Council's representation	City Council response	Change proposed	County Council further response
S1	<p>The County Council's key interests in the spatial strategy were set out in the response on the Preferred Options in November 2022 and were repeated in this response. This response does not provide requested modifications to these introductory parts as it was not identified that such is needed to make the plan sound. The overall spatial strategy policy and its accompanying text are largely supported.</p>	<p>The support is welcomed</p>		<p>N/A</p>
S2	<p>This policy or the design code should include references to the GI policies and requirement to protect existing trees and hedgerows.</p> <p>Text supporting Policy S2 should reference the Innovation Framework which is available as part of the Local Transport and Connectivity Plan online.</p>	<p>Policy S2 does refer to protection of the natural environment and paragraph 1.41 of the supporting text says that this includes green features. The need to consider protection of existing trees and green features is already referred to several times in the design guide Appendix 1.1.</p> <p>It is agreed that reference to the Innovation Framework may be helpful, so a modification is suggested.</p>	<p>Amend paragraph 1.41: This means encouraging a range of measures that secure energy efficiency and energy generation so that our buildings operate without adding to greenhouse gas emissions, are constructed in ways that use natural resources prudently and enable future occupants to travel and live in ways that can help them to reduce their carbon footprint.</p> <p><u>Future proofing is also a key part of good design, and innovation within developments can help to achieve this, as set out in Oxfordshire County Council's Innovation Framework.</u></p>	<p>The explanation in relation to green infrastructure is appreciated.</p> <p>Status: Green</p> <p>The response about the Innovation Framework is appreciated, along with the proposed modification.</p> <p>Status: Green</p>

S3	<p>The County Council will continue to provide updates and corrections on transport schemes for the IDP as information becomes available.</p> <p>Additional text is needed to make it clear that Oxford Railway Station should be a place where the public realm is prioritised.</p> <p>Amended text is also needed to allow for contributions from developments taking place more than 1,500m away from CBL stations where justified, and after the line opens as it will be necessary to claw back forward funding.</p>	<p>Agree that wording could be added to refer to public realm enhancements at Oxford Railway Station.</p> <p>In relation to the CBL, do not agree with changing 'development within a 1,500m buffer zone...' to 'development in the areas around the proposed CBL stations'. The buffer zone area has previously been identified in conjunction with the County Council and offers a lot more certainty about what is expected from developers. It underlies the approach to the site allocation policies in Chapter 8 of the Local Plan.</p>	<p><u>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 areas.</u> 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.</p>	<p>The additional text proposed as a modification is appreciated.</p> <p>Status: Green</p> <p>Discussions are ongoing about contributions to be taken for the Cowley Branch Line. We are content with the City's decision to retain the approach as drafted. The County Council will assist with any queries on this matter.</p> <p>Status: Amber</p>
S4	<p>The approach of looking at carbon offsetting first is not in line with the County Council's policies on carbon and the LTCP's objective of reducing car trips. Developers should be encouraged to make best use of land,</p>	<p>Affordable housing is a clear priority of the City Council. However, this policy is very carefully worded to limit the extent to which other policy</p>	<p>No change proposed.</p>	<p>The explanation is appreciated.</p> <p>We note the intention that Policy S4 not be used in the</p>

	<p>creating sustainable buildings at good densities and not using land wastefully on car parking. The policy should be amended so it is not a clear hierarchy of allowing policy requirements about net zero buildings and car parking not to be met. Instead, all the possible allowances to provide for viability should be considered in the round.</p> <p>The assumption about S106 and S278 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.</p>	<p>requirements may be considered again before affordable housing is reduced. Firstly, the policy only applies if it can be clearly demonstrated by the developer that the policy requirements make the scheme unviable. Secondly, there are only small adjustments that can be made. Offsetting is only accepted in exceptional circumstances anyway, and only when as much as possible is done to make a development zero carbon. So Policy R1 is not weakened by this approach. Similarly, any adjustments to parking are only up to maximum standards, so there is not the option for large swathes of parking.</p> <p>It is agreed that the impacts of development, including on the need for infrastructure, will need to be met by a combination of developers undertaking works and also through contributions to infrastructure. These contributions may be from CIL as well as S106 and S278. The assumption in the viability</p>		<p>manner we were concerned about (whereby carbon offsetting and parking restrictions might be given away before any affordable housing).</p> <p>The explanation about the viability assessment is appreciated. We will continue to require contributions under S106 and S278. We note that the City Council controls the spending of CIL.</p> <p>Status: Green</p>
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		assessment has been considered carefully and reflects the importance of CIL to delivering infrastructure in Oxford, where most developments are relatively small sites and the infrastructure needs generated are very much cumulative.		
H1	<p>Oxfordshire County Council questioned the HENA 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. Policy H1 only refers to the capacity-based requirement, not the need. 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</p>	<p>Comments noted. Policy H1 sets the housing requirement, and the supporting text relates mainly to this. However, it is agreed that a small amount of additional text relating to how the housing need and capacity have been calculated and to unmet need would be helpful.</p> <p>The case for exceptional circumstances has been set out in Background Paper 1 and will most likely form a key part of the examination, as will the calculation of need.</p>	Change proposed to text supporting Policy H1 to give more information about need calculation.	<p>We welcome the City confirming they will be proposing a modification and will be interested to review the proposed text supporting Policy H1.</p> <p>How the housing need is calculated and the implications of this for identified levels of unmet need will likely need to be considered at examination.</p> <p>Status: Red</p>

<p>considered in respect of each of the district local plans, and via statements of common ground. Any new allocations are likely to have implications for transport, education and other statutory county council functions. The county council therefore wishes to be involved in future discussions about housing need numbers and can act to highlight issues and offer a way forward in terms of infrastructure needs.</p> <p>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. There is potential for a greater number of houses on sites already allocated close to Oxford than is anticipated in the allocations.</p> <p>Policy H1 should explain these issues and provide a convincing case for the requirement and need. It is not positively prepared in the absence of any agreement with all the district councils and county council. The HENA appears to be unjustified evidence and the policy will not be effective and there is no strategy for addressing the cross-boundary issues arising. Alternative need numbers should be considered through the examination.</p>			
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	The County Council does not support the use of Green Belt land unless it meets the defined special circumstances.			
H2	<p>Given the well-evidenced need, it is disappointing that the requirement is being reduced to 40%. Uncertain what this means for unmet need sites that require 50% affordable housing to match LP2036. The County Council has a particular interest in affordable housing given its social care role. 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.</p> <p>The evidence for the percentage of affordable housing and what it means for</p>	<p>The implications of the viability report to support the LP2040 have been carefully considered, with the aim of maximising affordable housing but ensuring the whole plan approach is viable without negotiation needed for most applications. Within the overall 40% requirement is a need for 80% social rented housing. The tenure split requirement is not built in to the affordable housing requirement of the unmet need site policies. Therefore, there is scope for these to remain viable whilst maintaining a 50% affordable housing requirement. The tenure split has continued to be a point of negotiation between councils and developers and that will continue to be the case.</p> <p>We agree with the difficulty of finding sites suitable for affordable extra care housing within the city and the need for</p>	No modification required	<p>The explanation is appreciated.</p> <p>The County response indicated that we may not need to be involved in the examination on the level of affordable housing. County officers remain available to support the examination and assist with any queries if needed.</p> <p>Status: Green</p>

	specialist housing and sites outside the city should be considered at examination.	adjacent sites to help meet this need (if this need is found in the County's evidence base. To note that there was limited need found for this specific housing type in the HENA).		
H5	Support the approach	The support is welcomed		N/A
H6	<p>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. Insert a new sentence between the first two sentences of the policy to say: 'Provision for specialist inter-generational supported housing should be made where needed'. 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.</p>	<p>Comments in relation to Policy H2 acknowledge that delivery of affordable extra care housing is likely to be difficult in Oxford. This policy is specifically related to size of units (in terms of the number of bedrooms), so the additional wording suggested would be confusing, being about a separate matter.</p> <p>The prevalence rates are set out in table 10.27 of the HENA (on page 161), and paragraphs 10.9.7 to 10.9.18 explain how these have been derived.</p>	No change proposed.	<p>The explanation is appreciated.</p> <p>The matter of how to best provide for forms of specialist affordable housing, other than extra care housing, can be discussed as an ongoing operational matter rather than through a change to the Local Plan.</p> <p>Status: Green</p>

H13	Support the approach	The support is welcomed		N/A
H15	The policy should be amended to make it explicit that hostels will have no car parking on site. Amend criterion b to say: 'the location is within 800m of the city centre or district centre, to ensure it is easily accessible to residents and there is no need for car parking on site.'	The amendment proposed does not add any requirement or expectation. Instead, a new bullet point is proposed.	Add new bullet point to Policy H15 to say: <u>No additional parking is provided except operational and disabled parking.</u>	The explanation is appreciated along with the proposed modification. Status: Green.
E1	It is unclear how the requirement for no overall loss of jobs on a site can be justified when the 'number' of jobs is often quite fluid and changeable with market conditions and rarely would stay as a constant specific number. The policy wording is quite restrictive and potentially unachievable/unenforceable. A percentage threshold number based on existing job numbers is proposed as a better approach.	Policy E1, on category 2 sites, does allow for a loss of jobs if there is no loss of employment floorspace, so this gives flexibility in the face of changing employment types and needs. Only if there is a loss of employment floorspace is it important that the number of jobs is maintained. This is to acknowledge that in some cases buildings are not being used efficiently and can be reduced in size whilst maintaining their contribution to the economy (in terms of jobs). To calculate a percentage threshold would require the same knowledge of current jobs as maintaining the same number and isn't considered to be any more	No change proposed.	The explanation on the purpose of using space efficiently is noted and supported. Our query remains on the clarity of part of the policy which requires the 'number' of jobs on Category 1 and 2 sites to be retained (where there is a loss of employment floorspace or change of use), as it appears to be imprecise as a measure of something which can be very fluid over a period of time. However, we do not wish to pursue the matter and will leave this to other interested parties. Status: Green

		practical in terms of operation of the policy.		
E4	Support the policy	The support is welcomed		N/A
G1	<p>Oxfordshire County Council owns various school playing fields and other sites which would fall under the consideration of this policy and therefore where any loss would need to be mitigated by an alternative provision of an equivalent standard or higher. 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. Review the text of Policy G1 to ensure it does not unduly restrict the use and reuse of school sites.</p> <p>Rationalise the text of Policy G1 to avoid repetition.</p> <p>Policy G1 includes several exceptions and the policy needs to be strengthened in relation to green infrastructure not shown on the policy map. 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</p>	<p>Policy G1 follows the NPPF approach to green spaces, which protects them but which does allow their loss if they can be replaced or if they are surplus. Alternative provision may include more intensive use within the same site or a nearby site. Therefore, there is enough flexibility in the policy to allow necessary expansion of schools.</p> <p>Policy G1 (rather than Policy G3) protects existing green infrastructure and refers specifically to ancient and veteran trees.</p> <p>Public rights of way have their own protections which do not need to be repeated in the Local Plan.</p>	No change proposed.	<p>The explanations are appreciated.</p> <p>While we believe that the amendments suggested would have improved the policies, we are not proposing to pursue these matters further as the policies are likely to be effective anyway.</p> <p>Status: Green</p>

	<p>existing trees and other mature vegetation irrespective of its location in relation to the GI network should be a priority.</p> <p>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’ and Policy G1 should provide protection for public rights of way.</p>			
G2	<p>The policy is welcomed but would benefit from more detail, in particular to refer to the principle of the right tree in the right place so that larger growing trees are chosen where space permits as they have potential to offer greater environmental and visual benefits.</p> <p>Provision for new public rights of way should be referred to in Policy G2.</p>	<p>The policy is clear that the selection of green/blue features, or enhancement of any existing features, should be tailored to the specific context of the site and surrounding area, and there are many considerations as set out in the criteria of the policy.</p> <p>The text gives more detail about tailoring the features to context, e.g. in 4.14 and 4.15. There are many considerations, including whether trees are most appropriate, whether native species are most appropriate and what functions they should provide in the space. Reference could usefully be made to public</p>	<p>Amend paragraph 4.13 to reference public rights of way:</p> <p>This might include providing enhancements to the existing green/blue features on a site, as well as providing entirely new features and space, <u>including potentially new public rights of way.</u></p>	<p>The explanations are appreciated.</p> <p>While we believe that the amendments suggested would have improved the policies, we are not proposing to pursue these matters further as the policies are likely to be effective anyway.</p> <p>We appreciate the proposed modification to add ‘including potentially new public rights of way’ to the end of the supporting text.</p> <p>Status: Green</p>

		rights of way as an example of new GI, and a minor modification is proposed.		
G3	Wonder whether the greatest green infrastructure benefits could be achieved if it was mandatory to achieve UGF for all developments unless particular circumstances and reasoning are demonstrated.	The UGF is heavily based on Natural England's approach, which is based on case studies. It only provides suggested UGFs for major developments, although acknowledges that in future it may become used more in smaller developments. As it is a new approach and has only been worked through so far on major developments this seems the most justified and appropriate approach to use in Oxford. We do not consider it is unsound to not include smaller developments in the policy.	No change proposed.	The explanation is appreciated. Status: Green
G4	This policy should be amended having regard to the latest legislation and guidance relating to Biodiversity Net Gain (BNG) including that published on 29 th November 2023. 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	Oxford has small sites and limited scope for enhancements nearby to many of these sites. Other policies focus on urban greening and protecting green infrastructure features, which are important to the successful development of sites. At 20% BNG most of the benefits will be outside Oxford and even Oxfordshire. It is therefore not	No change proposed.	The explanation is appreciated. The County Council's Environment team would be available to support the examination and assist with any queries if this matter is further discussed. Status: Green

	<p>the Arc Environmental Principles, to seek 20% BNG.</p> <p>The policy should be clear that the Interim Nature Recovery Network will be succeeded by the Oxfordshire Local Nature Recovery Strategy once it has been published.</p>	<p>seen as the right approach in Oxford. We do not think that 20% BNG is required for the plan to be sound.</p> <p>The policy text: 'Land in Oxford identified for its ecological potential within the Oxfordshire Nature Recovery Network or the future Local Nature Recovery Strategy' indicates that which is applicable at the time will be applied.</p>		
G5	Support the policy	The support is welcomed		N/A
G7	<p>The policy discusses that development needs to consider all sources of flooding; however, the remainder of the text does not state 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.</p>	<p>For the sequential test, we have mainly discussed the risk from fluvial flooding which is the major source of flood risk in the city although Stage D in the paper 9b also discusses the other sources of flooding and how these affect the city as does background paper 9a. Of course, the SFRA itself also considers risk from all sources of flooding as is required through national policy. These have been considered for sites included in the level 2 SFRA, and if anything relevant was raised it is included in the policy.</p>	<p>A main modification is proposed to Policy G7: on sites within Flood Zone 1 in areas identified as Critical Drainage Areas.</p> <ul style="list-style-type: none"> • <u>on sites within Flood Zone 1 in areas at risk of flooding from other sources such as surface water and ground water flooding.</u> 	<p>We appreciate the explanation and the proposed modification.</p> <p>Status: Green</p>

		<p>The maps are available to developers so it can be seen whether there is anything relevant to their site from another source of flooding.</p> <p>A main modification is proposed to Policy G7 to make it clear that sites in FZ1 at risk from other sources of flooding will need to carry out an FRA.</p>		
G8	<p>It is useful to see the County Council's local standards mentioned. Policy G8 or the supporting text should also refer to national standards set by DEFRA. 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 meet local standards.</p>	<p>The DEFRA guidance is non-statutory technical standards. These are reflected in the County Council guidance and the TAN. If the guidance does change, this will not affect implementation, but can be reflected in any updates to the County guidance or TAN if considered helpful. Reference to the document is therefore not considered helpful in the policy or text. The policy and text already set out the LLFA's role.</p>	No change proposed.	<p>We appreciate the explanation and note the descriptive text in paragraph 4.57 appears to be sufficient.</p> <p>Status: Green</p>
G9	Support the policy	The support is welcomed		N/A
R1	Support the policy	The support is welcomed		N/A
R2	Support the policy	The support is welcomed		N/A

R3	We welcome the reference to the circular economy. However, the Policy R3 should set out how the circular economy should 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 plan should also encourage modern methods of construction.	We do not consider it justified to require circular economy statements alongside the submission of planning applications. The principles referred to are embedded within policy requirements.	No change proposed.	We appreciate the explanation. Status: Green
R7	Support the policy	The support is welcomed		N/A
HD8	Support the policy	The support is welcomed		N/A
HD10	Support the policy	The support is welcomed		N/A
HD12	Support the policy	The support is welcomed		N/A
HD13	The policy only states that residential units with three or more bedrooms will be provided with outdoor drying space for clothes. All residential units should be given access to some form of drying space, such as a communal drying area.	The policy does require all units to have outdoor space. An amendment to the supporting text is suggested to make it clear that outdoor space may be used to dry clothes.	Amend (as a minor mod) paragraph 6.52: The adequate provision of outdoor amenity space is a key factor in supporting the physical and mental health and wellbeing of residents.	The explanation is appreciated along with the proposed modification. Status: Green

			Usable outdoor space should it provide a space to dry clothes, <u>and</u> grow plants and vegetables, and <u>it</u> can provide shade and limit urban heat-island effects.	
C1	Amend Policy C1 to mention multi-functional benefits of community facilities.	Policy C1 sets out the overall strategy for town centre uses and for district and local centres and does not seem the best place to refer to community facilities.	No change proposed.	The explanation is appreciated. Status: Green
C3	Amend Policy C3 to mention multi-functional benefits of community facilities. Include an additional bullet point allowing for the circumstance of where there is clear evidence of no continuing need for the community facility. There should be clear advice on what type and form of evidence would be required within an application to allow for the circumstances 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.	Paragraph 7.12 of the Local Plan says: 'Co-locating multiple facilities on a single site can be an efficient way to improve both quality and accessibility.' Therefore we consider there is already positive wording about multi-functional benefits of community facilities. It is considered that the policy provides sufficient flexibility and clarity, being clear under which circumstances a case may be made for loss of a facility and how it may be shown that it can be replaced or changed to an alternative facility. It is also agreed that the policy refers to	Amend Policy C3: Planning permission will be granted for new local community facilities, including those <u>located</u> within schools and colleges grounds , where opportunities are taken to secure community use and joint user agreements.	We appreciate the explanation about community facilities and the proposed modification. We accept that the City's requirements where a loss of community facility is proposed may become clear in practice over time. Status: Green

		community facilities that may be within school sites, rather than schools themselves.		
C4	<p>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.</p> <p>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'.</p>	<p>In terms of joint user agreements, the policy allows a lot of flexibility for demonstrating they are not possible. To attempt to predict all the reasons, risks missing many and the list being read as exhaustive.</p> <p>The proposed wording from the County Council is to require demonstration can no longer be <u>feasibly and viably</u> provided in its location. This is an extra test in addition to feasible (which would capture viability anyway), that is not necessary, because there may be feasibility issues that are unrelated to viability.</p>	No change proposed	<p>We accept the requested amendments are not necessary for soundness.</p> <p>Status: Green</p>
C6	<p>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</p>	<p>Agree that the additional references could be helpfully added to the text, and that the text of paragraph 7.21 should be amended to make it easier to read and more understandable. The text explains what is expected to be considered in</p>	<p>Amend paragraph 7.21:</p> <p>The transport and movement strategy of the Plan is based upon: reducing the need to travel; the promotion of active travel and public transport; <u>and</u> the support for and implementation of the county council's core schemes. <u>Important</u></p>	<p>The explanation is appreciated along with the proposed modification.</p> <p>This resolves the concern.</p> <p>Status: Green</p>

<p>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. 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.'</p> <p>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'.</p>	<p>transport assessments. To add this to policy is unnecessary and removes flexibility should these considerations change over time.</p>	<p>approaches are, reduction include reducing in car parking while yet ensuring the retention of an appropriate level of disabled and servicing needs including taxi access, the support for car clubs, the support for well-designed electric vehicle charging provision and ensuring suitable levels of bicycle parking are provided in new development. During the Plan period it is anticipated that trial traffic filters will be introduced. These are predicted to have a transformational impact on congestion-reduction...</p> <p>Amend paragraph 7.40:</p> <p><u>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</u> Consideration should be given to the County Council's Mobility Hub</p>	
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	Amend the text of paragraph 7.21 to make it easier to read and understandable.		Strategy where appropriate in new development proposals. These requirements will be expected to relate to railway stations and bus stations, town and district centres, hospitals and university campuses and Category 1 employment sites.	
C7	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. 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. 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.	It is agreed that the differences in categories, and small differences in measures and requirements are confusing and not necessary. Main modification proposed to refer to County Council's standards.	Amend Policy C7: Planning permission will only be granted for development that complies with or exceeds the minimum bicycle parking provisions and the parking provision for powered two wheelers as set out in Appendix 7.4. Oxfordshire County Council's Parking Standards for New Developments.	The explanation is appreciated along with the proposed modification. This resolves the concern. Status: Green
C8	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 the Local Plan will be most effective if there is no contradiction. Amend Policy C8 and the related appendix	Unlike other districts the city council has long set out its own parking standards. The standards in the OLP2036 are reflected in the County's recent parking standards document. The City Council considers it important as	No change proposed.	We accept that the City Council will continue to include vehicle parking standards in the Local Plan. The standards in the Reg 19 Local Plan are effectively the same as the County Council's

	so that motor vehicle parking design standards do not contradict the County Council's standards.	part of its overall strategy, as something that should be led by the Local Plan.		recently issued parking standards and therefore both parties are in agreement. Status: Green
C9	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.	Agree that that part of the Policy could be more clearly worded.	Propose main mod to Policy C9 as follows: In all non-residential development providing additional one or more car parking bays, <u>25% should have EV charging infrastructure access to electric vehicle charging infrastructure must be provided.</u>	The explanation is appreciated along with the proposed modification. Status: Green
SPN3	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.'	The current wording of the policy is considered more appropriate as it gives flexibility, which is needed at the current time and the ability for the landowner to effect the suggested change when no scheme has yet been tested is not 100% certain.	No change proposed	The explanation is appreciated. We accept that this matter can be considered at planning application stage. Status: Green
SPS1	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 CBLAOF includes criterion b, which says: 'Development sites coming across the area should seek to reduce car parking in line with Policy C8.'	No change proposed	The explanation is appreciated. Status: Green

		The ARC site is within this area of focus, so this does not need to be repeated in Policy SPS1.		
SPS2	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. 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.	Regarding pedestrian and cycle access the policy is already clear that existing footpaths should be enhanced and that the site must be developed to allow easy pedestrian and cycle movement to and across the site from all directions. There is no implication in the policy that existing routes are adequate, and enhancements are already expected. However, reference to the Cowley Branch line could be added to the policy, along with additional text to make the intention clear.	Amendment to Policy SPS2 as follows: <u>Although there are publicly accessible footpaths wrapping around the north (Northfield Brook) and east of the Stadium site, linking up with Minchery Lane to the west and Littlemore/Blackbird Leys to the north, the site is currently vehicle oriented. The vehicular access points will continue to be in the same location from Grenoble Road, but any redevelopment should be designed to ensure that the site does not remain car dependent. It will be important to contribute to better public transport, including the proposed Cowley Branch Line station nearby. Development of the site must be designed to allow easy pedestrian and cycle movement east to west and north to south across the site and into the surrounding areas and active travel linkages to and from a future Oxford Littlemore railway station and the future development South of Grenoble</u>	The explanation and proposed modification are appreciated. Status: Green

			<p>Road will need to be provided. Public transport enhancements will be required to ensure that the site does not remain car dependent.</p> <p>There are frequent bus services from Pegasus Road, <u>and the need for further bus services will be considered, depending on the scale of development, and t.</u> The pedestrian access to these bus stops via the public footpaths should be enhanced to support new commercial and residential uses. Public transport enhancements will be required to ensure that the site does not remain car dependent. The vehicular access will continue to be in the same location from Grenoble Road.</p>	
SPS3	<p>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. 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</p>	<p>Agree that the policy could be clearer that an improved pedestrian access from Falcon Close is expected and improved access in the western corner.</p>	<p>Amend Policy SPS3:</p> <p><u>Although there are publicly accessible footpaths wrapping around the north (Northfield Brook) and east of the Stadium site, linking up with Minchery Lane to the west and Littlemore/Blackbird Leys to the north, the site is currently vehicle oriented. The vehicular access points will continue to be in the same location from Grenoble Road, but any redevelopment should be</u></p>	<p>The explanation is appreciated along with the agreement to propose a modification.</p> <p>Status: Green</p>

	<p>site towards Littlemore, via Priory Road, should also be improved.</p>		<p><u>designed to ensure that the site does not remain car dependent. It will be important to contribute to better public transport, including the proposed Cowley Branch Line station nearby.</u> Development of the site must be designed to allow easy pedestrian and cycle movement east to west and north to south across the site and into the surrounding areas <u>and active travel linkages to and from a future Oxford Littlemore railway station and the future development South of Grenoble Road will need to be provided.</u> Public transport enhancements will be required to ensure that the site does not remain car dependent. There are frequent bus services from Pegasus Road, <u>and the need for further bus services will be considered, depending on the scale of development, and t.</u> The pedestrian access to <u>these bus stops</u> via the public footpaths should be enhanced to support new commercial and residential uses. Public transport enhancements will be required to ensure that the site does not remain car dependent. The vehicular access will continue to be</p>	
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			in the same location from Grenoble Road.	
SPS7	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.'	The wording proposed is a clearer version of the existing wording, so agree with the proposed amendment.	Amend Policy SPS7: This site is located within the geographical area of the Eastern Arc. This is an area where it has been identified that future travel demand will be focused. Opportunities should be taken through the development of this site to support sustainable travel by providing greater public transport links and services, including the re-opening of the Cowley Branch Line to passengers. <u>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.</u> Support should be provided for improved pedestrian and cycle links and enhancements to the existing network and better connections to both existing and planned major developments in the area.	The explanation is appreciated along with the proposed modification. This resolves the concern. Status: Green

SPS12	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.	Between Towns Road already accommodates an important public transport hub, and that is referred to in the policy. It is agreed that a change to make it clearer there should be better provision for people to walk and cycle would be helpful.	<p><u>Amend Policy SPS12:</u></p> <p><u>Development must better provide for people to walk and cycle, including by Development should seek to significantly improving the public realm to accommodate improved pedestrian connectivity across Between Towns Road and an improved pedestrian and cycle experience, whilst supporting the important public interchange hub located at Between Towns Road. Development should take opportunities to consolidate public car parking, improve bus stopping areas, signage and facilities, and the taxi ranks.</u></p>	<p>The explanation is appreciated along with the proposed modification.</p> <p>This resolves the concern.</p> <p>Status: Green</p>
SPE4	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 through the site.	The need for good pedestrian and cycle connectivity through the site could be made more explicitly.	<p><u>Amend Policy SPE4:</u></p> <p><u>The existing accesses allow good permeability through the site and are likely to remain the best locations for accessing the site in future, and it will need to be ensured there is good pedestrian and cycle connectivity through the site.</u></p>	<p>The explanation is appreciated along with the proposed modification.</p> <p>This resolves the concern.</p> <p>Status: Green</p>

SPE20	<p>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'.</p> <p>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.'</p>	<p>Agree that the proposed changes would be helpful.</p>	<p>Amend Policy SPE20 as follows:</p> <p>...Improvements to public transport, walking and cycling access <u>to and through</u> the site will be required... Additional access points <u>for non-vehicular traffic onto the site should be identified and provided where possible.</u> will also be beneficial.</p>	<p>The explanation is appreciated along with the proposed modification.</p> <p>This resolves the concern.</p> <p>Status: Green</p>
NCCAOF	<p>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.</p> <p>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'.</p>	<p>Agree that this reference could usefully be added to NCCAOF for consistency.</p>	<p>Add criterion k to Policy NCCAOF as follows:</p> <p><u>K Pedestrian and cycling infrastructure improvements, delivered in accordance with the requirements of the Oxfordshire Local Cycling and Walking Infrastructure Plan (Oxford LCWIP)</u></p>	<p>The explanation is appreciated along with the proposed modification.</p> <p>This resolves the concern.</p> <p>Status: Green</p>
SPCW8	<p>The movement and access part of this policy needs amending to reflect the need to</p>	<p>Our understanding is that this is the improvements that were</p>	<p>No change proposed.</p>	<p>We appreciate the explanation and accept that</p>

	<p>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.</p> <p>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.'</p>	<p>started years ago but implementation only got as far as Binsey Lane in Stage 1, with Stage 2 intended to be the section between Binsey Lane and the Rail Station, but which the station works then superseded. At the current time we are not sure there is sufficient justification to ask for contributions to this scheme, as we're not sure that it is necessary or of particular benefit to this site, and we're not sure how much certainty there is about future schemes on the Botley Road near the site.</p>		<p>a modification is not needed for soundness.</p> <p>Status: Green</p>
Omission policy	<p>There would ideally be policies about a number of public health issues. On the matter of hot food takeaways, having no policy is not addressing the evidence and a key health priority for the City, namely levels of obesity. Policies have been included in other Local Plans.</p>	<p>The City Council fully understands the concerns around excess weight and supports the objectives of the Director of Public Health in addressing health inequalities. There are a number of policies in the Local Plan that help to do so.</p> <p>We're aware that some authorities have taken the approach of implementing takeaway exclusion zones as one</p>	No change proposed.	<p>We appreciate the explanation and do not wish to pursue this matter.</p> <p>Status: Green</p>

		<p>tool to help this further. We have looked at this in Oxford and do not consider it to be the right solution in the city. It feels a fairly blunt tool given that takeaways are far from the only source of poor diet, and are not necessarily, purely by definition, of poor quality.</p> <p>There are also a number of practical issues with developing a policy along these lines. It would not lead to an overall reduction in takeaways, and it would be difficult to identify the appropriate upper limit on number. Despite some of the early policies of this nature being a good number of years old, we have been unable to find evidence that such a policy actually reduces health inequalities over time.</p> <p>However, we tested what such exclusion zones around schools would look like and discovered that given the compact nature of the city, they would mean that several of our district centres</p>		
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		would be affected despite the wider strategy aims for location of town centre uses. The alternative approach proposed would mean applying a different and more restrictive policy approach in those more deprived parts of the city than elsewhere. We consider that reducing choice in an arbitrary way is inappropriate. There is no requirement in government policy to include such a policy in Local Plans, and we have a range of other policies in place to address health inequalities; we do not consider there to be a soundness issue.		
Appendix 1	<p>Amend Appendix 1.1 to add emphasis on soft landscape considerations.</p> <p>Amend M2 of Appendix 1.1 to reference the Local Transport and Connectivity Plan.</p> <p>Amend L3 of Appendix 1.1 to make it flexible so that future innovations can be taken up.</p> <p>Amend M2 of Appendix 1.1 to indicate that priority is given to pedestrians and cyclists in the design of all roads.</p>	It is agreed these changes would be helpful and modifications are proposed.	<p>Following amendments to Appendix 1.1:</p> <p>In L.3: Well-designed spaces are adaptable to the changing needs of users and to evolving technologies <u>and innovations</u>.</p> <p>In M.2: On secondary and tertiary streets, tThe street user hierarchy should prioritise children, pedestrians, cyclists over motor vehicles and the built form and</p>	<p>The proposed modifications are appreciated.</p> <p>Status: Green</p>

			street design should reflect this. Oxfordshire County Council's <u>Local Transport and Connectivity Plan</u> should be referred to and its Street Design Guide provides useful advice.	
Appendix 7	<p>Amend Appendix 7.4 to so that the bicycle parking standards are clear and consistent with the Oxfordshire County Council parking standards.</p> <p>Amend Appendix 7.6 to so that the vehicular parking standards are clear and consistent with the Oxfordshire County Council parking standards.</p>	See response to Policy C7 and C8		<p>We appreciate that there will be proposed modifications on the bicycle parking standards and we accept that the vehicular parking standards appear sufficiently clear and consistent.</p> <p>Status: Green</p>
IDP	Short list of corrections and updates provided.	Agree that changes can be made	Changes to be made to IDP.	<p>We appreciate the agreement to make the changes.</p> <p>Status: Green</p>
HIA	City Health Baseline should be included within the main report. Each topic area needs to provide detail of the health and wellbeing needs and priorities, using data identified in the health and wellbeing topic paper. A robust HIA needs to identify the impacts (positive, negative or neutral) of all the policies in the Local Plan against the key issues. We would anticipate that some	<p>We will add some extra cross references to the topic paper into the HIA.</p> <p>The point about a summary table of all policies and their potential health impacts is noted and it is acknowledged we could perhaps have set this out in more detail.</p>	Changes to be made to the HIA for submission.	<p>We appreciate the agreement to make changes. This resolves the concern.</p> <p>Status: Green</p>

	<p>policies might have negative impacts and in those cases mitigation or comments would need to be identified, with key actions listed in the conclusion.</p>	<p>However, we do not think this would have affected any outcomes in the plan. Whilst we intended the LP HIA to be a separate body of work, it is supported by the Sustainability Appraisal of course, which does touch on the impacts of every policy (table 6.1 assess all the policies against the SA framework which includes as a topic 5. inequalities and health). The wording essentially pulls out some of the key policies to help give a flavour of how the LP as a whole addressed the topic of health and weaves it throughout the policies/chapters.</p> <p>We are happy to try and improve the HIA by addressing some of the contextual data that has been suggested here.</p>		
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