

# **Statement of Common Ground between Oxford City Council and Historic England**

## **Submission Draft (Regulation 19) Oxford Local Plan 2040**

**March 2024**

### **1.0 Introduction**

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and Historic England for the Oxford Local Plan 2040. This SoCG reflects and confirms the current position 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. The area covered by this Statement is Oxford, which is the area covered by the Local Plan. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

### **2.0 Background and duty to cooperate**

2.1 Historic England are the public body that helps people care for, enjoy and celebrate England's historic environment. They are a statutory consultee and a key stakeholder for the Council to work with as part of its Duty to Cooperate on the preparation of the new Local Plan.

2.2 Oxford City Council and Historic England have been engaging closely together throughout the formulation of the Local Plan 2040. Historic England have provided feedback at each of the key stages of Local Plan consultation process, including the Issues and Options consultation (2021), Preferred Options consultation (2022), Proposed-Submission Draft Local Plan Regulation 19 consultation (2023). The relevant consultation summary reports detail summaries of this feedback. Officers have also engaged with each other at key points outside of the formal consultation cycle via face-to-face or virtual meetings in order to discuss the shaping of policies, the drafting of supporting evidence, and to collaborate and seek to resolve areas of disagreement wherever possible.

2.3 The Proposed-Submission Draft Local Plan Regulation 19 consultation saw Oxford City Council publish its full Local Plan and supporting evidence base which it proposed to submit for examination to Central Government in early 2024. As per the relevant legislation/regulations, this version of the Local Plan was one that the City Council considered to be 'sound' for adoption, meeting the specific requirements for soundness as are outlined in the National Planning Policy Framework. Following the consultation, feedback from Historic England indicated there were a number of areas in relation to the draft policies and supporting evidence underpinning them which they considered did not meet the tests of soundness for adoption without additional modification.

2.4 Following the end of the consultation on the 5<sup>th</sup> January 2024, Oxford City Council and Historic England have been engaging together on the issues which Historic England have identified with the Local Plan and supporting evidence. This further engagement between the City Council and Historic England has included two direct meetings to discuss the identified issues (taking place 22<sup>nd</sup> January 2024 and 26<sup>th</sup> February 2024) as well as engagement via email. The aim of this collaboration has been to identify

means of resolving these issues, either through modifications to the Local Plan itself or further evidence work that would help to address Historic England's concerns, and ultimately result in a Local Plan submission that could be supported by Historic England without objection.

### **3.0 Strategic matters**

3.1 There were a number of overarching strategic issues which Historic England have identified through the Proposed-Submission Draft Local Plan Regulation 19 consultation. Reference should be made to their letter dated 5<sup>th</sup> January 2024 for full details; however, in summary, these were focussed on four key points:

1. Contribution of heritage to economy - Continuing concern expressed about lack of attention to the contribution made by heritage to the city's economy and a view that achieving a positive strategy for the conservation and enjoyment of the historic environment will be harder if the plan offers an incomplete picture on heritage.
2. Housing site allocations - Most site allocations are sound or can be made sound with minor amends suggested in appendices to HE's submission. Four sites are not considered to be supported by sufficient evidence and should be subject to proportionate heritage impact assessment – policies SPS2 (assuming the site boundary is amended as suggested), SPE17, SPCW3 and SPCW6.
3. Employment site allocations - Concern that policy E1 risks conveying an unconstrained view of the scope for intensification and modernisation of employment sites.
4. High buildings - Are of view that LP2040 needs to be clearer on issue of high buildings with a stronger approach to the spatial strategy for high buildings. The criteria-based HD9 means that the location of new large-scale buildings may be informed by evidence but would not be planned. Proposed a couple of key changes which involved amendments to policy HD9 and strengthening the evidence base with a further heights and massing study.

3.2 In addition to the above, Historic England identified a number of soundness concerns flagging various issues that they felt needed to be addressed for submission. Primarily, these were focussed on the Heritage and Design policies of Chapter 6 but also included a few other policy areas as well as a number of allocations policies. Very helpfully, Historic England's comprehensive response also included suggestions for modifications which have facilitated the subsequent discussions between them and the City Council and have served as a basis for identifying the required modifications that would resolve these objections.

3.3 Discussions between the two parties since the Regulation 19 consultation have been focussed on seeking to clarify and understand the key issues and then to proactively put forward ways to overcome these. This ongoing dialogue has resulted in a number of proposed main modifications to the policies in question which Oxford City Council and Historic England have come to agree would be beneficial changes that could be made to the Local Plan in order to resolve Historic England's identified concerns.

3.4 A full list of these proposed modifications agreed between the two parties is included in the Table at Appendix A of this statement – as well as listed in the Schedule of Main Modifications submitted separately with the full Local Plan submission. The appendix also includes a limited number of

proposed changes from Historic England's initial feedback which, upon further discussion, the two parties have agreed are not required.

3.4 In relation to the overarching concerns highlighted under para 3.1 and 3.2, the parties agree that the proposed modifications set out in the appendix will address the majority of concerns raised. In addition to the agreed modifications, the Council has completed heritage impact assessments for the four sites of particular concern flagged by HE, which have led to some additional modifications that are documented against the relevant sites in the appendix, which the parties agree will strengthen justification for these allocations. These assessments are included in the examination library for reference.

3.5 At time of the submission of the Local Plan, there remain some areas where common ground has not been reached. As set out above, the Council has undertaken Heritage Impact Assessments for four sites and considers this to be a proportionate and sound assessment to inform allocations at Local Plan stage; however, Historic England consider that there is need for additional detail and analysis in these assessments. Historic England also have remaining concerns about some elements of the allocation policy SPCW6 (Nuffield Sites), particularly in relation to potential impacts from development on the historic environment. Again, the Council considers that a proportionate level of detail is included in the allocation, which has been proposed to include modifications to reflect the work of the Heritage Impact Assessment for that area.

3.6 Common ground has not been reached in relation to the approach to the Grade II\* Minchery Farmhouse. Whilst Historic England welcome the stronger wording proposed by the Council as part of the modifications outlined in Appendix A, they are of the view that a more positive outcome is more likely if the eastern land parcel within SPS5 were instead to be included through a change to the site boundaries as part of the SPS2: Kassam Stadium and Ozone Leisure Park allocation. The Council has set out that it does not consider that amendments to the boundaries of allocations SPS5 and SPS2 are justified or necessary and asserts that the proposed policy is soundly based.

3.7 In addition, whilst Historic England again welcome the changes the Council has proposed to policy HD9 and now broadly support this, they have ongoing concern about the level of detail included in the Council's spatial approach to high buildings. They consider that there is scope to modify certain allocations policies (where large scale development is anticipated) to reflect potential additional evidence that may be forthcoming relating to the Cowley area and have encouraged the Council to consider this as part of 'plan-led' development. The Council consider that the approach of policy HD9 does not restrict applicants from considering future evidence, and indeed has been prepared in a way to allow for flexibility to accommodate new evidence as it comes forward. The Council consider that further modification of the policy, or allocation policies elsewhere in the Local Plan, or delay to await further evidence, is unnecessary and not proportionate.

#### **4.0 Other matters**

4.1 In addition to the main modifications to strategic policies highlighted above, Historic England's feedback helpfully also identified a number of smaller modifications that would help with improving the clarity of the Local Plan. These included the correction of a limited number of typos, some additional definitions of terms to aid the reader, as well as a number of policy cross-references (particularly to aid in the understanding of requirements on particular site allocations).

4.2 Wherever possible, the City Council has sought to agree these changes because they are helpful and have implemented them via minor modifications in advance of submission of the Local Plan. Again, there are a limited number of modifications which were ultimately concluded not to be required. The table at Appendix A details all of the minor modifications the two parties have agreed to implement (as well as those that were not implemented), the minor modifications made are also listed in the Schedule of Minor Modifications submitted separately with the full Local Plan submission.

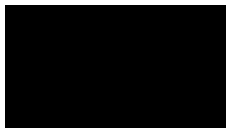
## **5.0 Concluding remarks**

5.1 Oxford City Council and Historic England have worked closely together throughout the Local Plan preparation process and the subsequent discussions between January and March 2024. The discussions have been productive and the City Council is appreciative of the comprehensive and constructive feedback that officers at Historic England have provided in a timely and positive manner. This Statement of Common Ground and the accompanying Appendix set out the changes that the two parties have agreed to in order to overcome the majority of issues Historic England had initially identified.

5.2 The statement sets out in paras 3.5 to 3.7 where it has not been possible to find a resolution to an issue raised, with both parties' positions outlined. To summarise, these relate to the detail of Heritage Impact Assessment the Council has undertaken and, in particular, the assessment of heritage impacts on the Nuffield sites; the continued inclusion of the Grade II\* Minchery Farmhouse in the red line area of allocation Policy SPS5 instead of SPS2; consideration of the historic environment within the Nuffield Sites allocation policy (informed by the above impact assessment); and the level of detail in the spatial strategy for high buildings.

5.3 Whilst this additional work and engagement between the two parties has allowed us to find common ground on nearly all issues, notwithstanding those set out earlier, both parties will continue to work together on issues that arise during the examination process, but also in preparing supporting guidance (such as Technical Advice Notes) in order to help implement the new Local Plan in due course.

### **Signed on behalf of Historic England**

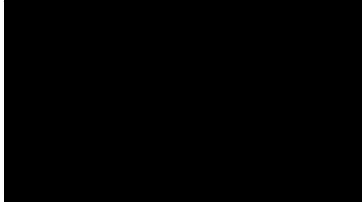
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**Title:** Guy Robinson, Historic Environment Planning Adviser, Historic England

**Date:** 21 March 2024



**Signed on behalf of Oxford City Council**



**Title:** David Butler, Head of Planning & Regulatory Services, Oxford City Council

**Date:** 26 March 2024

## Appendix A - Historic England Regulation 19 feedback and City Council responses

The table in this appendix sets out the City Council’s responses and proposed amends to the Local Plan agreed with Historic England to address their Reg 19 comments in following order:

- Comments on Local Plan chapters 1-7 (any comments that suggest policies are unsound or need to be amended for other reasons);
- Comments on Site allocations in chapter 8 (any comments that suggest policies are unsound or need to be amended for other reasons);
- Policies/allocations which HE found sound or had no comment – thus no further action

Type of feedback and where			HE Reg 19 comments	HE Reg 19 suggested changes	Oxford City Council response/proposed modification	Type of modification or action
7	Vision	Comment	There is much in the vision that we support, and we welcome its reference to heritage. However, ‘respecting’ heritage arguably focuses more on ‘having regard to’ than truly ‘making the most of’. We suggest a minor change that would embed a positive approach in the vision, tied to the city’s economic growth, which could drive heritage-sensitive development in the future.	“In 2040 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects <u>and values</u> our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper...”	Minor modification to paragraph 1.2 on page 7 as follows:  “...Oxford will be a city with a strong cultural identity, that respects <u>and values</u> our heritage, whilst maximising opportunities...”	Minor
8 & 15	Built environment & paragraphs 1.23 – 1.27	Comment	While we are not entirely comfortable with the delineation made in Table 1.1 between the natural environment and built environment (heritage is not a subset of the built environment), of greater importance is the need to acknowledge the contribution of the colleges within Oxford to the townscape. We advise adding wording on the significance of Oxford’s colleges to the city’s identity. The University is mentioned regarding spin-outs and contribution to the		Minor modification to paragraph 1.24 on page 15 as follows:  “...contribution to the character of the city’s built-up areas. <u>Oxford’s colleges make a significant contribution to the significance of the City’s identity.</u> The Local Plan includes policies that seek to protect...”	Minor

			knowledge economy, but not in terms of its heritage assets.			
20	Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development	Uns	The policy does not refer to the historic environment and thus fails to align with national policy (NPPF paragraphs 8 & 190). This should be a fundamental requirement in the Council's spatial strategy. Therefore, we advise adding a new criterion as suggested.	<p>"To help achieve this it will aim to ensure development is located to: ...  e) ensure new uses are in locations where they will not harm the amenity of existing neighbouring uses; <del>and</del> f) prevent new development in locations where it would damage important blue and green infrastructure networks, public open space, and flood plain. <del>and</del> g) <u>conserve and where possible enhance the historic environment.</u>"</p> <p>Also, is there a missing "of" before "district and local centres" in criterion a)?</p>	<p>The first set of criteria are entirely related to locational aspects of a spatial strategy, e.g. broad types of locations suitable for broad types of uses, and historic environment does not fit. The two final criteria and direct reference to the NPPF and presumption in favour mean that historic environment is encompassed.</p> <p>However, subsequent discussions with HE have flagged this is an ongoing concern, as such, following our catch up 26<sup>th</sup> Feb, <b>we will propose the following as a main mod, which is in greater accordance with the context of the policy:</b></p> <p><u>g) take account of local historic context and respond appropriately to heritage significance</u></p> <p><b>We will also amend the missing 'of' as you highlight, thanks.</b></p>	Main
21	Policy S2: Design code and guidance	Unsound	We support the inclusion of what is in effect a strategic heritage policy within the plan; however, the title does not accurately represent what is in the policy and may undermine its implementation. Might "Strategic approach to design and heritage" be considered as an alternative title? Furthermore, we advise two elements to be added to the supporting text: • a paragraph adapted from the Oxford Local Plan 2036 on heritage at risk; • wording on the contribution that Oxford's heritage can make to economic growth. We suggest wording for consideration.	<p>Suggested new title for the policy and subsection: "<u>Strategic approach to design and heritage</u>". In the supporting text:  "1.40. Oxford's heritage is a unique and irreplaceable resource, which has a fundamental role in shaping the city's character, <del>and</del> cultural offer <u>and economic prosperity. Contributing to its positive strategy for the historic environment, t</u>The City Council <u>will look for opportunities to better reveal heritage significance, promote heritage-led regeneration where appropriate, and prepare, review and adopt (as appropriate) is committed to preparing, reviewing, and adopting as appropriate)</u> conservation area appraisal and management plans, as well as other evidence base documents to help further understanding of the</p>	<p>Minor modification to paragraph 1.40 on page 21 as follows:</p> <p>"...Oxford's heritage is a unique and irreplaceable resource, which has a fundamental role in shaping the city's character and cultural offer. <u>The City council will seek to support proposals, where appropriate, that improve the condition of heritage assets that are identified as being at risk of being lost providing it is demonstrated there would be no harm to their significance.</u>"</p>	Minor

				significance and benefits of our heritage assets. <u>In addition, the City Council will support proposals that would improve upon the condition of heritage assets that are identified as being at risk of being lost as a result of neglect, decay or inappropriate development, providing it can be demonstrated that there would be no resultant harm to their significance.</u>		
23	Policy S3: Infrastructure Delivery in New Development	Unsound	NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ... " Given the importance of cultural infrastructure, it would be reasonable to expect the Council's approach to aim at least to maintain existing levels of cultural assets that exist within the city, and to seek improvements to secure the long-term future of assets classed as 'at risk'. We recommend minor amendment to Policy S3 to enable this to be considered, picking up on a related point about 'improving' on current levels made within the Council's own Sustainability Appraisal recommendations on this policy. This could be supported by relevant explanatory text.	Within policy S3: "Where appropriate, and where there is an identified shortfall across the city <u>or where impacted assets are at risk</u> , opportunities should be taken to maximise infrastructure provision on suitable sites."	The 'at risk' wording is usually reserved for heritage not community infrastructure. This change could be confusing and not clear. Protection of existing community assets is covered in detail in Chapter 7, and the IDP can also include new community infrastructure projects where these are identified, which is then referred to in this policy. After subsequent discussion with HE it is proposed to amend to the supporting text (in combination with a modification agreed with the EA) as follows:  Minor mod to para 1.43 (red are changes relating to HE suggestion, blue is EA):  <i>1.43 ...It is important to ensure that roads, local services <u>and facilities, as well as and supporting infrastructure such as energy supply, water supply and wastewater treatment</u> can cope with the increased demand resulting from development proposed in the Plan. <u>The development process can also aid in protecting and enhancing wider facilities that serve our communities and contribute to the city's environment including spaces for sport and recreation, cultural facilities and historic assets, particularly those whose future might otherwise be at risk.</u></i>	Minor
58	Policy E1: Employment	Unsound	The OLP2040 cites the 2023 Oxford Employment Land Needs (ELNA) Update Report (with estimated need of 269,000 -	"Planning permission will be granted for the intensification and modernisation of any Category 1 or 2 employment site. <u>Proposals must</u>	All policies in the Local Plan should be considered in the DM process, as such, it is unclear as to the additional benefit a cross reference to these specific	No action

<p>Strate gy</p>		<p>348,000m2). We have not identified the 2023 report in the supporting evidence base, only the 2022 interim report. Some of the employment sites are highly sensitive due to their heritage significance. We do not object to the principle of modernisation and intensification. But the doubling of employment need compared with OLP2036 (135,004m2) coupled with the wording of policy E1 and its supporting text gives little sense of the sensitivities of some of these employment sites, potentially compromising the plan’s ability to achieve its heritage aims and align with paragraph 189 of the NPPF. We highlight the following sites where their heritage significance should be a key consideration: • The University of Oxford Science Area and Keble Road Triangle • Oxford Centre for Innovation • 13-16 Magdalen St • University Student Hub, Turl St • Clarendon House (note this is in not on Clarendon Street, as stated) • 10A New Road • 17-33 Beaumont St • Jam Factory, 27-30 Park Street (is this a new allocation?) • Enterprise Centre, Standingford House, Cave Street • 27-28 St Clements St • Angel Court, St Clements • The Old Music Hall, 106-108 Cowley Rd • Former Blackwells Publishing, Marston St</p> <p>We advise at minimum adding in policy E1 a reference to policies HD1-9 to ensure these other</p>	<p><u>demonstrate compliance with policies HD1-9 as appropriate.”</u></p>	<p>policies would achieve (particularly as opposed to a variety of other relevant policies).</p>	
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			considerations inform decision-making.			
63	Paragraph 3.26	Comment	We recommend including a line about the contribution that Oxford's heritage makes to the visitor economy, drawing as appropriate from Oxford's Economic Strategy 2022-2032.		Minor modification to paragraph 3.26 on page 63 as follows:  "...are critical to the vitality and functioning of a city such as Oxford. <u>Oxford's heritage strongly supports the attraction of visitors, the retention of which will assist in ensuring the long term vitality of the city's economy.</u> Oxford has many short-stay visitors, often visiting for a day or only a few hours..."	Minor
73	Policy G2: Enhancement and provision of new green and blue features	Unsound	While we welcome reference to the setting of heritage assets in this policy, it may be more than an issue of setting. We advise stating the need to conserve the historic environment, noting in particular the potential for impacts on archaeological remains.	"g) <u>Conserving and, where possible, enhancing the historic environment</u> <del>Enhancing the setting of heritage assets</del> "	Main modification to Policy G2 (Enhancement and Provision of New Green and Blue Features), paragraph 2, bullet point G on page 73 as follows:  "g) <u>Conserving and, where possible, enhancing the historic environment</u> <del>Enhancing the setting of heritage assets</del> ".	Main
84	4.47	Comment	There is the potential for maladaptation from dry proofing measures if they are applied to traditionally constructed buildings. Maladaptation is mentioned in paragraph 4.63, which we welcome.	Once avoidance has been fully explored, consideration will need to turn to how to mitigate flood risk impacts which can't be avoided through careful design and layout of the site <del>which</del> . <u>This needs to take account of the age, construction and heritage significance of any existing buildings and structures, and</u> could involve a multitude...	Minor modification to add a footnote to paragraph 4.47 on page 84 as follows:  "to mitigate flood risk impacts which can't be avoided through careful design and layout of the site*, which...."  "* <u>This needs to take account of the age, construction and heritage significance of any existing buildings and structures</u> ".	Minor
90	4.63	Comment	We recommend being explicit about the risk of maladaptation of traditionally constructed buildings.	"Secondly, it requires applicants to demonstrate that the design of new development has been tailored to these risks both for the building itself, as well as occupants, incorporating a range of measures that can ensure resilience to existing	Minor modification to paragraph 4.63 on page 90 as follows:  "...whereby inefficient design results in inappropriate development for future climate and the increased risks for occupants that come with it. <u>When enhancing the resilience of historic buildings,</u>	Minor



				and future climate hazards. This is also important for avoiding 'maladaptation', whereby inefficient design results in inappropriate development for future climate and the increased risks for occupants that come with it. <u>When enhancing the resilience of historic buildings, the risk of maladaptation is reduced by taking a whole building approach as required by Policy R3."</u>	<u>the risk of maladaptation is reduced by taking a whole building approach as required by Policy R3."</u>	
106	5.42	Unsound	While we support and welcome the approach to peat conservation, there is a potential point of confusion. It would be helpful if the Council made clear if its strategic approach includes buried peat or not. Natural England's map covers only superficial peat reserves. Will the same conservation approach be adopted for buried peat too? The local plan should refer explicitly to both superficial reserves and buried peat. Buried peat does not usually support a live ecosystem but is equally important for holding carbon and would need to be mapped across application areas before construction plans are finalised.	"Though the mapping of these habitats in the UK is limited, there is evidence of peat deposits (which are especially beneficial as carbon sinks) in several locations across Oxford as highlighted by Natural England, particularly on greenfield sites. Where development comes forward in areas of known potential for <u>(superficial or buried)</u> peat deposits, any impacts on the natural and historic value of these reserves needs to be considered, including their important role as carbon sinks. Any harm or loss from a proposal which equates to removal or dewatering of 10m3 or more of peat will be refused."	The aim is to ensure the protection for peat set out in policy R6 is as effective as possible. It has been identified, alongside Natural England and other colleagues that the online mapping from NE was the most practical and publicly accessible mapping to point applicants to, helping to ensure they have clarity over which areas of the city are of concern and where development may be engaged by the policy requirements. The policy requires applicants within a reasonable buffer zone of the known deposits to undertake appropriate investigations-via borehole testing-to identify other potential deposits in the vicinity. Partly, this is in acknowledgement that the NE mapping may not be reflective of the full extent of deposits. It is expected that this testing would address 'superficial or buried' deposits. Requiring applicants elsewhere in the city to assess potential for deposits when there is limited publicly available mapping that could be utilised to help refine such assessments is likely to be overly onerous for applicants and could impede the effectiveness of the proposed policy. Therefore, no further action is to be taken.	No action.
111	Glossary	Comment	We query the rationale for defining conservation areas and listed buildings, but not also Registered Parks & Gardens and Scheduled Monuments.		Minor modification to add the definitions of Registered Parks and Gardens and Scheduled Monuments in the glossary at the start of the chapter on page 111.	Minor
112	6.1	Unsound	Ignoring the connection between Oxford's heritage and its economy is, in our opinion, unsound (failing to deliver a	A key theme of the Local Plan 2040 vision, which <u>connects with all three</u> <del>addresses both the social and environmental</del> pillars of	Minor modification to paragraph 6.1 on page 112 as follows:	Minor

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



				<p><del>plans these</del> exist these should be a starting point in creating good, contextually responsive new development.</p> <p>Full regard should be given to the detailed character assessments and other relevant information set out <u>in</u> any relevant conservation area appraisal and management plan.</p>	<p>these should be a starting point in creating good, contextually responsive new development.</p> <p>Full regard should be given to the detailed character assessments and other relevant information set out <u>in</u> any relevant conservation area appraisal and management plan.”</p>	
114-115	115 Policy HD1: Conservation Areas	Unsound	<p>Criterion a) focuses on understanding significance, which includes consideration of setting. To divorce setting from significance may undermine how the policy is implemented. We recommend deleting the separate paragraph on setting and integrating this consideration into criterion a). This would also help to streamline the policy. The policy is currently silent on the potential to enhance conservation areas, a point that is noted also in the Council’s Sustainability Appraisal. In this regard the policy fails to align with NPPF paragraph 206, requiring planning authorities to look for opportunities to enhance or better reveal the significance of conservation areas. We propose revised wording in criterion b.</p>	<p>“...A heritage assessment must include information sufficient to demonstrate:</p> <p>a) an understanding of the significance of the conservation area, including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring <u>and the extent to which its setting contributes to its significance;</u> and</p> <p>b) that the development of the proposal and its design process have been informed by an understanding of the significance of the conservation area, <u>the proposal integrates measures to enhance or better reveal the significance of the conservation area where possible,</u> and that harm to its significance has been avoided or where it’s not possible, any harm has been minimised through thoughtful design; and</p> <p>c) that, in cases where development would result in harm to the significance of a conservation area, including its setting, the levels of harm has been properly and accurately assessed and understood, that it is justified because alternative possibilities or design arrangements have been explored and that</p>	<p>Agree that the following changes to HD1 would be beneficial in response to your feedback, <b>we will propose these as main mod to the inspector:</b></p> <p>Planning permission will be granted for development that respects and draws inspiration from Oxford’s conservation areas, responding positively to their significance, character and distinctiveness <u>and enhancing it where possible.</u></p> <p>For all planning decisions for planning permission or listed building consent affecting the significance of a conservation area or its setting, great weight will be given to the conservation of that conservation area and to the setting of the conservation area where it contributes to that significance or appreciation of that significance.</p> <p><u>Certain features may be characteristic of a particular conservation area, as outlined in the supporting text, and planning applications should set out how these have been responded to sensitively to avoid harm.</u></p> <p>An application for planning permission or listed building consent for development which would or may affect the significance of a conservation area, either directly or by being within its setting, should be accompanied by a heritage assessment. This must be based on an understanding of the context and that includes a description of the conservation area and its significance and an assessment of the impact of the development proposed on the conservation area’s significance.</p>	Main

				<p>measures are incorporated into the proposal, where appropriate, that mitigate, reduce or compensate for the harm.</p> <p><del>Where the setting of a conservation area is affected by a proposed development, the heritage assessment should include a description of the extent to which the setting contributes to the significance of the conservation area, as well as an assessment that the impact of the proposed development would have on the setting and the setting's contribution to the significance of the asset.</del></p> <p>Where a development proposal would cause less than substantial harm to a conservation area..."</p>	<p><del>Certain features may be characteristic of a particular conservation area, as outlined in the supporting text, and planning applications should set out how these have been responded to sensitively to avoid harm.</del></p> <p>A heritage assessment must include information sufficient to demonstrate:</p> <ul style="list-style-type: none"> <li>a) an understanding of the significance of the conservation area, including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring <u>and the extent to which its setting contributes to its significance</u>; and</li> <li>b) that the development of the proposal and its design process have been informed by an understanding of the significance of the conservation area <u>including its setting</u> and that harm to its significance has been avoided or where it's not possible, any harm has been minimised through thoughtful design; and</li> <li>c) that, in cases where development would result in harm to the significance of a conservation area, including its setting, the levels of harm has been properly and accurately assessed and understood, that it is justified because alternative possibilities or design arrangements have been explored and that measures are incorporated into the proposal, where appropriate, that mitigate, reduce or compensate for the harm.</li> </ul> <p><del>Where the setting of a conservation area is affected by a proposed development, the heritage assessment should include a description of the extent to which the setting contributes to the significance of the conservation area, as well as an assessment that the impact of the proposed development would have on the setting and the setting's contribution to the significance of the asset.</del></p>	
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					<p>Where a development proposal would cause less than substantial harm to a conservation area, this harm must be weighed against the public benefits of the proposal. Clear and convincing justification for this harm should be set out in full in the heritage assessment. Substantial harm to or loss of significance of a conservation area should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a conservation area, planning permission or listed building consent will only be granted if all of the criteria in paragraph 201 (or equivalent in any update) of the NPPF (National Planning Policy Framework) can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.</p> <p>Conservation areas are listed in Appendix 6.1 and defined on the Policies Map.</p>	
116	Listed buildings	Comment	We recommend adding a short paragraph (potentially a new 6.11) that refers the reader to Policy R3 on the retrofitting of traditionally constructed buildings.		<p><b>Include an additional sentence within supporting text para 6.10 that cross refers to the retro-fit policy, this is in keeping with the recommendation.</b></p> <p>Minor modification to paragraph 6.10 as follows:</p> <p><u>“...and the reason it is protected. <b>Regard should be had to Policy R3 (Retro-fitting Existing Buildings).</b>”</u></p>	Minor
116-117	Policy HD2: Listed buildings	Unsound	Criterion a) focuses on understanding significance, which includes consideration of the setting of the asset. To divorce setting from significance may undermine how the policy is implemented. We recommend deleting what is currently the final paragraph of the policy and integrating consideration of setting into criterion a). This would also help to streamline the policy. We believe there is scope for	<p><i>Under criteria a) to c) of the policy suggest:</i></p> <p>a) a description of the listed building and information sufficient to demonstrate an understanding of the significance of the listed building including</p> <p>i. its rarity, group value and how it reveals its historic, architectural, archaeological and/or artistic interest and/or value for its associations to things that shape the identity and character of the area, the way it illustrates the past and</p>	<p><b>We will propose the following as main mod to the inspector the following:</b></p> <p>Add in additional sub criterion (iii) under a) which references the need to consider setting as part of significance. <b>New sub-criteria to be added in line with your suggested text under a) as follows:</b></p> <p><i>iii. <u>the extent to which its setting contributes to its significance</u></i></p> <p>Amends to criterion b) in order to more clearly set out the sequence of considerations that need to be followed in the assessment of impact on significance</p>	Main

		<p>improving the opening of criterion b) and we suggest alternative wording for consideration. The current structure of criterion b) combines two different ideas within part i), followed by use of the word “or”. This could imply that if avoidance is impossible, the proposal does not need to meet the first part of b) i), which we infer is not intended. So, we suggest splitting part b) i) into two. This would also give room also for aligning with paragraph 197 of the NPPF, which requires local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets – see our suggested new criterion b) ii). Criterion b sets a focus on avoiding harm, which is welcome. But this paragraph is silent on minimising unavoidable harm, which is the natural product of NPPF paragraph 199 “... great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).” We recommend use of the term “offset” rather than “compensate”. The latter implies giving the asset’s significance a monetary value, which would be a regrettable emphasis within Council policy. We welcome reference to change of use in the policy, but recommend amendments to clarify the focus of criterion d.</p>	<p>helps our understanding of it, its aesthetic contribution to the area, and its importance to the community; and</p> <p>ii. recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; and</p> <p>iii. <u>the extent to which its setting contributes to its significance.</u></p> <p>b) an assessment of the impact of the development proposed on significance of the listed building and its setting, including on the integrity of the building, <del>its the impact on group value and Oxford’s/the local area’s identity should be explained.</del> <u>The assessment should explain including:</u></p> <p>i. <del>that how</del> the development of the proposal and its design process have been informed by an understanding of the significance of the listed building; and</p> <p>ii. <u>any measures within the proposal to enhance the significance of the listed building (including its setting); and</u></p> <p>iii. <del>that how</del> harm to its significance has been avoided; or</p> <p>iv. in cases where development would result in harm to the significance of a listed building, including its setting, <u>that the extent of harm has been must be properly and accurately assessed and understood, minimised as far as possible,</u> and clearly and convincingly justified.</p> <p>Where a development proposal will lead to less than substantial harm to</p>	<p>of the listed building and setting, and to also ensure that applications minimise unavoidable harm where necessary. <b>Amends to be made in line with your suggestions as follows:</b></p> <p><i>b) an assessment of the impact of the development proposed on significance of the listed building and its setting, including on the integrity of the building, <del>its the impact on group value and Oxford’s/the local area’s identity should be explained.</del> <u>The assessment should explain including:</u></i></p> <p><i>i. <del>that how</del> the development of the proposal and its design process have been informed by an understanding of the significance of the listed building; and</i></p> <p><i>ii. <u>any measures within the proposal to enhance the significance of the listed building (including its setting); and</u></i></p> <p><i>iii. <del>that how</del> harm to its significance has been avoided; or</i></p> <p><i>iv. in cases where development would result in harm to the significance of a listed building, including its setting, <u>that the extent of harm has been must be properly and accurately assessed and understood, minimised as far as possible,</u> and clearly and convincingly justified.</i></p> <p>In relation to the suggestion at changing ‘compensate’ to ‘offset’, following our discussion, <b>we will not make this change</b>, as offset is typically used in the Local Plan with reference to financial contributions so would be counter to your intention.</p> <p>In relation to your suggested amend under criteria d) under the Change of Use section, we propose an alternative suggestion. <b>We propose instead to remove the word ‘extensive’.</b> In our discussion, this appeared to be the cause of your concern—and potential for it to be interpreted in different ways. Removing the word means the qualifier is simply if the reconstruction would be harmful.</p>	
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				<p>a listed building, clear and convincing justification must be provided within the heritage assessment. This should explain what alternative proposals have been considered and how measures have been incorporated into the proposal, where appropriate, that mitigate, reduce or <u>offset</u> <del>compensate for</del> the harm. Only then will the harm be weighed against the public benefits of the proposal.</p> <p><i>And then under criteria d) in relation to changes of use:</i>  d) <del>be suitable without harmful extensive reconstruction</del> <u>not require extensive reconstruction that would lead to unacceptable loss of significance.</u></p> <p><i>And also, then delete para beginning: "Where the setting of a listed..."</i></p>	<p><b>We will remove the separate para on setting which comes at end of policy, as this is now incorporated into criteria a).</b></p>	
118	Policy HD3: Registered Parks and Gardens	Unsound	<p>Currently the policy is focused solely on repeating what is in the NPPF. While this has the potential to lead to a sound approach, the proposed is bogged down by internal repetition. We recommend opening HD3 with a locally relevant commitment, that connects to the contribution made by Oxford's parks to its character and cityscape, including the potential to deliver enhancement where possible (aligning with NPPF paragraph 197) and ensuring that the policy also refers to setting. There is a significant level of repetition in the policy as mentioned above. The line midway through that "Any</p>	<p>See letter for detailed changes to policy and supporting text.</p>	<p>We will reword the opening para of the policy so that it is more consistent with the style of policies HD1 and HD2 and reduces the repetition you have identified, and includes connections between significance and setting as well as addressing enhancement. <b>We propose amended wording as follows:</b></p> <p><u><i>Planning permission will be granted for development that respects and draws inspiration from Oxford's Registered Parks and Gardens, responding positively to their significance, character and distinctiveness and enhancing it where possible.</i></u></p> <p><del><i>Where a development proposal will lead to less than substantial harm to a registered park and garden, clear and convincing justification must be provided within a heritage assessment. Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden or its setting requires clear and convincing justification in a Heritage Assessment. Substantial harm to or loss of Grade II registered parks and gardens should be exceptional.</i></del></p>	Main

			<p>proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden requires clear and convincing justification in a Heritage Assessment” makes the current opening line redundant. Given the wording of that line is broader than the current opening line, we suggest bringing that forward in the policy. The line on substantial harm in the second paragraph is not needed as it repeats what is currently in the first paragraph. The opening section of the third paragraph of policy HD3 repeats what is currently covered by the second paragraph.</p> <p>Returning to supporting text, we recommend articulating more clearly the distinctiveness of Oxford’s RPGs, which have a foundational role in compartmentalising the cityscape and in demonstrating the integrated design and development of the colleges. Their impact on how Oxford’s institutions are experienced is significant. We suggest revised wording as outlined, breaking the text into several separate paragraphs to aid the reader’s understanding of key points.</p>		<p><i>Substantial harm to or loss of Grade I and II* registered parks and gardens should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a park or garden, planning permission (or other planning consents where relevant) will only be granted if all of the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.</i></p> <p><del>Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden requires clear and convincing justification in a Heritage Assessment. Substantial harm to or loss of grade II Registered Parks and Gardens should be exceptional, and of grade I and II* registered should be wholly exceptional.</del></p> <p><del>Planning permission will not be granted for development that would lead to substantial harm to or total loss of significance of a Registered Park and Garden unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or the criteria in paragraph 201 (or equivalent in any update) of the NPPF can be demonstrated.</del></p> <p>The additional details you offer to make the supporting text more specific to the distinctiveness of Oxford’s RPGs is useful. Again, we propose to incorporate much of your suggestions though may do so in a slightly more concise way. <b>See row below for this change.</b></p>	
118	Policy HD3:	Unsound	Supporting text changes were suggested to accompany		Following on from our discussion 26 <sup>th</sup> Feb, we have compiled your suggested changes into a slightly	Main

	Registered Parks and Gardens		changes to the policy (row above).		<p>abbreviated form. <b>We propose to recommend as part of main mod to HD3 to replace current para 6.11 entirely and renumber current para 6.12 as follows:</b></p> <p><u>6.11 Many parks and gardens in Oxford contribute significantly to its townscape and are an important part of appreciating and understanding its heritage. Historic England’s National Heritage List for England includes 15 parks and gardens in Oxford, 5 of which are Grade I, 1 is Grade II* and 9 of which are Grade II. These are designated heritage assets. They represent a dense network of assets, a high proportion of which are highly graded, and they cover a significant proportion of the city, helping to frame the city’s relationship with the River Cherwell. Many more parks and gardens are not registered but nevertheless contribute to local significance.</u></p> <p><u>6.12 The majority of the Registered Parks and Gardens are related to colleges, conveying in rich detail the integrated way in which the colleges have been designed and developed. They have a pivotal role in shaping how the city’s institutions and the boundaries between the public and private realms are experienced, for example, because certain elements (such as some of the Quadrangles) are only glimpsed through entrances that are in near constant use. In addition to the colleges, Oxford’s Registered Parks and Gardens include High Wall in Pullens Lane, Park Town and St Sepulchre’s Cemetery.</u></p> <p><u>6.13 The Core Green Infrastructure Network includes both Registered Parks and Gardens and other parks and gardens. Protected under Policy G1, green spaces within the network perform a multitude of functions, ranging from flood control to biodiversity net gain. Some (such as Oxford Botanic Garden) have a particularly important educational role linked with botany, genetics and related research.</u></p> <p><u>6.14 The Registered Parks and Gardens all have associated listed buildings and form a significant</u></p>	
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					<p><u>part of the setting of those listed buildings, so the impact of any proposals on associated heritage assets will also be a key consideration (see policy HD2), as will the potential for impacts on archaeological remains if below-ground works are proposed (see policy HD5). Because the nature of Registered Parks and Gardens in the city is that they are not stand alone heritage assets, but part of a wider heritage asset including listed buildings, so of the criteria in paragraph 201 of the NPPF referred to in Policy HD3, those about viable uses, grant-funding and bringing the site back into use are unlikely to apply.</u></p> <p><del>6.12-6.15</del> The designation requires local authorities to consult Historic England on development affecting Grade I and II* Registered Parks. It also requires local authorities to consult the Garden History Society on works to all grades of parks and gardens. The effect of proposed development on a registered park or garden, or its setting, is also a material consideration in the determination of planning applications.</p>	
119	Policy HD4: Scheduled Monuments	Unsound	As with policies HD1 and HD2, there is scope to integrate a reference to setting within the overall approach on heritage assessment, rather than treating setting as an additional, separate consideration. We believe there is scope to streamline the policy, which would help its implementation. The opening paragraph summarises what is in a heritage assessment, which is covered by the criteria in the second paragraph, and so could be deleted. We believe the policy's references to listed buildings and listed building consent are not intended, though for the two references	See letter for detailed changes to policy and supporting text	<p>We propose to <b>amend the opening para of the policy, and criteria a) and b), in line with your suggestions as follows:</b></p> <p><i>An application for planning permission for development which would or may affect the significance of a Scheduled Monument, either directly or by being within its setting, should be accompanied by a heritage assessment <del>that includes a description of the Scheduled Monument and its significance and an assessment of the impact of the development proposed on the listed building's significance.</del></i></p> <p><i>The submitted heritage assessment must include information sufficient to demonstrate:</i></p> <p><i>a) an understanding of the significance of the Scheduled Monument <u>(including the extent to which its setting contributes to its significance)</u>, and including recognition of its contribution to the</i></p>	Main



		<p>to listed buildings the point is moot if the Council deletes the text suggested. Criterion b) would benefit from referring to the scope Comments Suggested Change for enhancing the significance / setting of a Scheduled Monument, as part of plan's positive strategy for the historic environment in accordance with NPPF paragraph 190 (especially criterion a). We recommend use of the term "offset" rather than "compensate". The latter implies attributing a monetary value to the asset's significance, which would be a regrettable emphasis with Council policy. In the supporting text, use of the term "designated" is more appropriate than "made". Also, Historic England does not designate, we can only recommend designation. We suggest minor modification to address these points. Also, we recommend including reference to notifying Historic England where SMC is required and encouragement for early engagement.</p>		<p><i>quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; and b) that the development of the proposal and its design process have been informed by an understanding of the significance of the Scheduled Monument, <u>that enhancements to the significance of the Scheduled Monument (including its setting) have been identified where possible, and that harm to its significance has been avoided or minimised; and</u></i></p> <p>For the reasons outlined against your comments on policy HD2, we propose <b>not to change the word 'compensate' for 'offset'</b>.</p> <p><b>We will remove the separate para on setting, which comes after criteria c) in the policy, as this is now incorporated into criteria a).</b></p> <p><b>We will remove the reference to Listed Building Consent in the final para of the policy.</b></p> <p>We will make minor modification to the supporting text to more accurately reflect HE's role in Scheduled Monument designation, and to signpost applicants to engage with HE early on applications that could affect these assets. <b>We will amend, as per your suggestions, as follows:</b></p> <p><i>6.13. Scheduled Monuments are a type of designated heritage asset. A heritage asset is only designated <del>made</del> a Scheduled Monument if it is of national importance and also if that is the best means of its protection. <del>It is a national designation, so designation is by Historic England.</del></i></p> <p><b>And add to the end of the para (or as a footnote) the wording:</b></p> <p><u><i>Historic England should be notified where SMC is required in addition to planning permission. Pre-application engagement with Historic England is strongly encouraged for all proposals that are likely to affect the significance of a Scheduled Monument.</i></u></p>	
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120	6.16	Comment	This is a helpful paragraph but currently omits Oxford and its surroundings' important pre-Holocene archaeological remains; for example, The Wolvercote Channel, Cornish's Pit in Iffley and several sites of Mesolithic flint artefacts. We suggest revised wording.	"A few of these are formally designated heritage assets such as Scheduled Monuments, however many assets of comparable significance are not currently designated and warrant appropriate protection through the planning system-; <u>for example, well preserved remains found in rapidly accumulating urban deposits or the waterlogged plains in and around Oxford, which have attracted human communities for millennia.</u> Notable assets include <u>Palaeolithic and Mesolithic flint working sites, Neolithic and later</u> prehistoric domestic, ritual, and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city...."	Minor modification to paragraph 6.16 on page 120 as follows:  "A few of these are formally designated heritage assets such as Scheduled Monuments, however many assets of comparable significance are not currently designated and warrant appropriate protection through the planning system-; <u>for example, well preserved remains found in rapidly accumulating urban deposits or the waterlogged plains in and around Oxford, which have attracted human communities for millennia.</u> Notable assets include <u>Palaeolithic and Mesolithic flint working sites, Neolithic and later</u> prehistoric domestic, ritual, and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city...."	Minor
120	6.19	Comment	Reference to archaeology (the study of archaeological remains) should be changed to archaeological remains.	"The City Centre Archaeological Area contains <u>archaeological remains that are</u> <del>it is</del> essential to preserve and understand."	Minor modification to paragraph 9.19 on page 120 as follows:  "The City Centre Archaeological Area contains <u>archaeological remains that are</u> <del>it is</del> essential to preserve and understand."	Minor
121	Policy HD5: Archaeology	Unsound	There's a word missing from criterion a) before "information". Criterion b) would benefit from a comma. Criterion c) has a typo. Criterion d) would benefit from referring to "archaeological remains" not "archaeology". The penultimate paragraph is unsound in that it conflates designated heritage assets with heritage assets more generally. We suggest a minor edit that would resolve this problem.	See letter for detailed changes to policy and supporting text	<b>We will make the minor amends to criteria a-d as follows:</b>  <b>Criteria a: Add word 'incorporating' before information</b> <b>Criteria b: Add comma after 'in situ'</b> <b>Criteria c: Amend word 'of' to 'or' so it reads 'deposits or features'</b> <b>Criteria d: Change 'archaeology' to 'archaeological remains'</b>  <b>We will amend penultimate paragraph wording as follows:</b> <i>Proposals which would or may affect archaeological deposits or features that are designated <del>as</del> heritage assets...</i>	Main

			<p>The final paragraph risks confusion on what is meant by mitigation. It seems to focus on circumstances where harm is unavoidable; but then it states that the preferred approach to mitigation is to preserve in-situ. This needs to be clarified and we suggest one way this could be done (relying also on the reference to preservation in situ in criterion b).</p> <p>We advise making the final line a separate paragraph, also referring to provision for conservation of remains, where that is needed. This could cover conservation work where preservation in situ is appropriate and where conservation work is needed before archiving.</p>		<p><b>We will also amend the final sentence of the policy and make this a separate para as suggested, additional wording to be added as follows:</b></p> <p><i>Appropriate provision should be made for investigation, recording, analysis, <u>conservation of remains</u>, publication, archive deposition and community involvement.</i></p> <p>In relation to the other changes you suggest against the final paragraph, <b>we have sought a view from the Council’s archaeologist, who has agreed, as such we will amend as you suggest by:</b></p> <ul style="list-style-type: none"> <li>- Insertion of reference to paleoenvironmental assets, and</li> <li>- Removal of reference to preserving in situ, and replacing: The aim of mitigation should be <u>to minimise harm</u>, <del>where possible to preserve archaeological remains in situ,</del>...</li> </ul>	
122	Policy HD6: Nondesignated heritage assets	Unsound	Neighbourhood plans provide another route through which non-designated heritage assets may be identified, which should be acknowledged in the policy.	“These assets may be identified through the Oxford Heritage Assets Register, conservation area appraisals, <u>neighbourhood plans</u> or the planning application process.”	<p>Minor modification to paragraph 6.20 on page 122 as follows:</p> <p><u>“...in determining planning applications. <u>Non-designated heritage assets may be identified through the conservation area appraisal, neighbourhood planning or planning application process</u>”.</u></p>	Minor
126	Policy HD8: Using Context to Determine Appropriate Density	Unsound	The list in criterion c refers to types of asset, but it does not cover all types of asset and including “etc.” leaves the policy open to interpretation. It would be more appropriate, clearer and more aligned with national policy for the criterion to be edited as suggested.	“is informed by an understanding of the impacts on <u>the significance of designated and non-designated heritage assets</u> , including their <u>setting</u> , and the potential for <u>archaeological remains</u> <del>presence of listed buildings or their setting, conservation areas or their setting, registered parks and gardens, likely or known archaeological deposits,</del> etc; and”	<p>Minor modification to Policy HD8 (Using Context to Determine Appropriate Density) on page 126:</p> <p>“b) is informed by an understanding of the impacts on <u>the significance of designated and non-designated heritage assets</u>, including their <u>setting</u>, and the potential for <u>archaeological remains</u> <del>presence of listed buildings or their setting, conservation areas or their setting, registered parks and gardens, likely or known archaeological deposits, etc; and...</del>”</p>	Minor

127-129	Policy HD9: Views and Building Heights	Unsound	<p>We have identified several instances in policy HD9 where more clarity is needed for it to deliver a sound approach e.g.</p> <ul style="list-style-type: none"> <li>the opening paragraph refers to “outside” but we are unclear what is meant. We suggest revised wording, linked with the historic core area.</li> <li>the structure of the opening set of criteria could be clarified, and its introduction needs to refer to views as well as character to provide a suitable umbrella for the criteria that follow.</li> </ul> <p>That said, our main concern relates to the policy’s lack of spatial steer on high buildings. Omitting this leaves the spatial strategy for high buildings somewhat fuzzy and not entirely aligned with the Council’s evidence (NPPF paragraph 31 refers). Currently plan users are unclear about the weight to be attributed to Areas of Greater Potential mentioned in the supporting text and the High Buildings TAN, and any design-related criteria to be used when shaping or determining proposals within such areas. We propose that policy HD9 refers to the Areas of Greater Potential, using design-related criteria drawn from policy CBLLAOF, adapting what was criterion g in policy CBLLAOF, plus suitable amendments to the supporting text.</p>	See letter	<p>The amendments you suggest for the opening two paragraphs of the policy are helpful and we are happy to accept these if it would improve clarity. <b>As such, we will propose to inspector amends in the following way:</b></p> <p><i>Planning permission will <del>only not</del> be granted for development that will <del>not</del> retain the special significance of views of the historic skyline, both from within <del>the historic core area Oxford</del> and from outside <u>the historic core area</u>.</i></p> <p><i>Planning permission will be granted for developments of appropriate height or massing. <u>If the Any proposal is for development for height that is above the prevailing heights of the area and that could impact on character or views, the application must demonstrate how all of should be fully explained by the following criteria have been met, all of which should be met:</u></i></p> <p>Following our discussion, Feb 26<sup>th</sup>, <b>we will also amend criteria g) of the policy as follows:</b></p> <p>g) <u>heritage impact assessment</u> if harm <u>would be is</u> caused to <u>the significance of</u> a heritage asset or its setting <u>(or a group of assets and their settings) informed by the methodology outlined in the Assessment of the Oxford View Cones report</u>, a full explanation of other options that have been considered that may be less harmful, <u>how that harm has been avoided or minimised</u>, a justification that the benefits outweigh the harm and open book viability assessment if relied upon in the explanation.</p> <p>However, as we discussed in our meeting (Jan 22<sup>nd</sup>), we have concerns about the other additional wording suggested against this policy.</p>	Main
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			<p>In addition, we suggest a further study is undertaken as outlined in our cover note, assessing the Areas of Greater Potential in more detail, potentially focused on the Cowley Branch Lane and Littlemore Area of Focus as a sub-area of greatest interest in the short- to medium-term.</p> <p>The current criterion g in policy HD9 (criterion n in our proposed revisions) would benefit from referring to significance. Also, it leaps from accepting harm to justifying harm without consideration of how to minimise harm, which is contrary to national policy. We propose alternative wording for consideration.</p>		<p>It is acknowledged that there is a significant pressure in the city for higher buildings and that there are various sensitivities in Oxford which constrain where this can happen appropriately. The policy as drafted sets out a framework for decision making which essentially seeks to ensure that applications are informed about by the relevant information e.g. areas of greater potential. Guiding applicants to draw upon correct studies and contextual information is key to ensuring an appropriate design rationale is instrumental in ensuring the right design comes forward for the location. The policy directs applicants to some of the key sources of information (e.g. the High Buildings Study TAN), and this also allows flexibility for the Council to add to its own evidence base in future to support applicants.</p> <p>The more specific criteria suggested to be moved into HD9 from the Areas of Focus policies was specifically drafted in response to our assessment of what would be acceptable in those locations. As such, whilst it may be appropriate to other parts of the city, we are cautious about applying it elsewhere without the appropriate evidence.</p> <p>Many of these design specific considerations are also already set out as part of the Design Guide in the Appendix, and as such would apply to development everywhere more generally, so we feel that these are already covered to a degree and would be engaged where necessary to an application.</p> <p>In relation to your comment about further study, we would be unable to commit to producing a new study in advance of the submission, but we do not consider this to have impacts on the scope of the policy in the meantime. Indeed, we have</p>	
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					<p>intentionally drafted the policy in a way that allows new studies and information to come forward to help inform applications and be factored into decisions in future. The policy is drafted to in a way that sets out a framework directing applicants to use the most applicable information at the time and these resources can therefore be updated by the Council over time.</p> <p>The potential additional information in the study is likely to be more appropriate applied to development of proposals and the decision making process. The policy sets out a framework that can be applied using more detailed available information. We consider that the policy should not be too prescriptive about what heights will be appropriate in particular areas. This would require an evidence base that could justify the precise drawing of boundaries on a policies map. It would also assume lower or higher heights were appropriate wholly dependent on the area of the city the proposal is in. This is certainly not the case, as local context is also key, and there are many other considerations guiding the height of a building. Buildings of any specified height will not universally be acceptable within any particular area.</p> <p>As such, on the basis of the above, we would propose <b>not to amend the policy further at this time, though would be happy to have a further conversation with you on this issue if you strongly disagree.</b></p>	
142	Policy C2: Maintaining vibrant centres	Comment	We support reference to heritage assets and their setting in this policy. In addition, the Sustainability Appraisal for this policy flags the opportunity to refer here to public art. In theory, we would support such a reference, informed by local context (including the historic		No change required to ensure repetition is avoided in the plan.	No action

			environment) and community engagement.			
147	Protection of existing cultural venues and visitor attractions	Comment	Many such venues and attractions are heritage assets. Therefore, it is worth flagging in the supporting text that relevant heritage policies will apply where appropriate in the decision-making process.		No change required to ensure repetition is avoided in the plan.	No action
158	Policy C9: Electric Vehicle Charging	Comment	The Sustainability Appraisal for this policy picks up on the potential impact on townscape due to increased "street clutter". We recommend the impact on local character is flagged as a consideration within policy or supporting text, especially within the most historic parts of the city.		Minor modification to paragraph 7.62 on page 158 as follows:  "... Considerations set out in Policy HD15 Bin and Bike Stores and External Servicing Features, <u>in addition to the cumulative impact on the townscape</u> should be referred to when consider the location of EV charging points."	Minor
166	Figure 8.4	Comment	Is Figure 8.4 showing the correct map?		Minor modification to correct Figure 8.4 on page 166 as follows:  Replace current map with a new map showing the Location of Cherwell site allocations for Oxford's Unmet Need.	Minor
317	Appendix 1	Comment	We broadly support Appendix 1 and offer the following few comments that would add detail or clarity: Page 318 (C.2): <ul style="list-style-type: none"> <li>• We assert the resources should refer also to the National Heritage at Risk Register</li> <li>• The bullet on OHAR mistakenly refers to "Oxford Heritage at Risk" rather than "Oxford Heritage Asset Register"</li> <li>• We strongly recommend referring to (archaeological remains via) the local Historic</li> </ul>	See letter	We are happy to make the majority of amendments, and have taken account of our agreed modifications to other parts of the Local Plan, will propose amends as follows: Page 318 Under C2 first bullet This may be standalone or form part of the design and access statement. Policies HD1-HD6 <u>and HD9</u> set out what is expected.  Under C2 extra sources of information list. - Amend Oxford Heritage at Risk so it instead reads: <del>Oxford Heritage at Risk</del> <u>Oxford Heritage Asset Register</u>	Main

		<p>Environment Record, supporting alignment with NPPF paragraph 194</p> <p>Page 319: should the bullets on views also refer to views identified in neighbourhood plans? Pages 320/321: might the section on heights and massing also refer to Vu City, given this is proposed for inclusion in policy HD9?</p> <p>Pages 326-328: we recommend a minor edit in subsection N.1 to acknowledge that green infrastructure can possess its own heritage significance, rather than simply contribute to the setting of heritage assets. Also, within N.2 there is importance scope to acknowledge the heritage benefits that can be delivered from a more holistic approach.</p> <p>Pages 329/330 within R.1: we recommend adding a line to the text on renewable energy generation that reinforces the need to consider local context. Also, we propose include a reference to our emerging Advice Note on climate change and historic building adaptation, which should be adopted in the first half of 2024. Page 331: as mentioned regarding paragraph 4.47, to avoid maladaptation we recommend adding a line to R.4. This could be a new bullet or integrated within the existing bullets.</p>		<p>- Add bullet to include reference to Historic England Heritage at Risk Register with web address: <a href="https://historicengland.org.uk/advice/heritage-at-risk/search-register/">https://historicengland.org.uk/advice/heritage-at-risk/search-register/</a></p> <p>Page 319 – add in reference to neighbourhood plans: <i>Locally important views that create or aid appreciation of the townscape and character of the area, <u>including those potentially identified in neighbourhood plans.</u></i></p> <p>Page 319 – add a short sentence to end of C.3 section after the four visual characteristics list, which will read as follows: <u>As set out in policy HD9, the methodology outlined in the Assessment of the Oxford View Cones report will support in assessing potential impacts of high buildings on heritage significance.</u></p> <p>Page 321 – we have noted that the bullet point formatting has gone awry and will have this amended. We will also flag the Vu city model and View Cones Assessment methodology via an amend to second bullet on this page, as follows:</p> <ul style="list-style-type: none"> <li>• <u><i>Vu City can be a useful resource for determining impacts of heights and reference should also be made to the methodology outlined in the Assessment of the Oxford View Cones report in accordance with policy HD9. In addition, <del>t</del>The high buildings TAN sets out four visual tests which should...</i></u></li> </ul> <p>Page 327 – we will amend to acknowledge GI can have heritage significance in of itself, as follows: <i>...as well as <u>being of heritage significance (e.g. Registered Parks) or contributing to the setting for heritage assets or for physical recreation.</u></i></p> <p>On the point in relation to N.2, this is not meant to be an exhaustive list - unclear on what we could say and therefore propose no amend.</p>	
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					<p>Page 329/330 section R.1 - After the bulleted lists, we will add wording as follows:  <u>Where proposals involve the retro-fitting of existing buildings (including traditional buildings), policy R3 sets out the importance of being guided by a Whole Building Approach, as well as other guidance that should be considered in design. Reference should also be made to the Council's Retro-fitting Technical Advice Note as well as Historic England's advice note.</u></p> <p>page 331 – under R4 add a new bullet:</p> <ul style="list-style-type: none"> <li>• <u>Taking account of the age, construction and heritage significance of any existing buildings and structures on the site. Where retro-fit is being proposed, follow the guidance of policy R3 in relation to Whole Building Approach.</u></li> </ul>	
358	Monitoring framework	Unsound	We believe it is unsound for the local plan to fail to connect the city's heritage with its economy. We suggest an additional indicator that would help to reveal this link and supplement the existing indicator linked with policy E1.	<p>Propose additional indicator under the longer term monitoring outcomes against the economy theme:</p> <p>Condition of designated heritage assets</p>	<p>The monitoring indicators set out in the framework have been carefully selected with consideration for availability of data; resource capacity for undertaking monitoring/analyzing data. To reduce replication, a spread of indicators to each LP theme is included – it is acknowledged there will be overlap and indicators can help to inform progress against other themes in the framework.</p> <p>There are a couple of indicators relating to heritage assets set out against (reporting on any applications permitted that result in the loss of listed buildings, registered parks and gardens, scheduled monuments; as well as updates on managing conservation areas and heritage at risk). These will naturally have relevance to other themes, e.g. how the LP is supporting the economy. As such, an additional indicator is not necessary.</p>	No action
<b>Site allocations comments</b>						
NEO AOF	Northern Edge of Oxford Area	Comment	While we support this policy's final paragraph regarding its references to taller buildings and policy HD9, we recommend that the bullets in paragraph	We suggest a new bullet within paragraph 8.12. Suggested wording for consideration: <u>"The impact of high buildings on the significance of and views from the city's historic core."</u>	The Policy NEOAOF cross-refers to Policy HD9 as a particularly relevant policy, and that contains details on view, so this is adequately covered.	No action

	of Focus		8.12 embed this as a key consideration.			
SPN 1	Northern Gateway	Unsound	Reference should be made to policies HD4, given its proximity to the Port Meadow Scheduled Monument, and HD9, given the site lies within an Area of Greater Potential for high buildings, drawing from similar wording in other site allocation policies. The Scheduled Monument should also be mentioned in the supporting text, potentially in paragraph 8.16 where Port Meadow is already referenced.	“...Development proposals must be designed with consideration of their impacts on the significance of <u>Port Meadow Scheduled Monument (in accordance with HD4)</u> and the Wolvercote Conservation Area (in accordance with HD1)... ...Development proposals that <u>exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9...</u> ”	Happy to accept the suggestion to cross reference to HD4 – <b>minor modification to be made as follows:</b>  <i>Development proposals must be designed with consideration of their impacts on the significance of <u>Port Meadow Scheduled Monument (in accordance with HD4)</u> and the Wolvercote Conservation Area (in accordance with HD1)</i>  The reference to addressing requirements of HD9 are set out in the overarching Area of Focus policy and would apply to the site (as it is within the AoF) so no change is required.	Minor and no action
SPN 2	Oxford University Press Sports Ground	Unsound	Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings, drawing from similar wording in other site allocation policies.	“ <u>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.</u> ”	As above, now we have reviewed, the reference to addressing requirements of HD9 are set out in the overarching Area of Focus policy and would apply to the site (as it is within the AoF) no change is required.	No action
SPN 3	Diamond Place & Ewert House	Unsound	Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings, drawing from similar wording in other site allocation policies. Also, there is a typo in the opening paragraph (where “of if delivered” we believe should read “or if delivered”).	“ <u>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.</u> ”	Minor modification to Policy SPN3 (Diamond Place and Ewert House) Urban Design and Heritage as follows:  “ <u>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.</u> ”  And  “...Ewert House, <u>or if delivered</u> ”.	Minor
CBL LAOF	Cowley Branch Line	Unsound	We consider the detailed text on considerations when large scale buildings are proposed, could be better incorporated into policy	We suggest moving the whole section of policy CBLLAOF on large-scale buildings into HD9, from the line beginning “When large scale	As per the reasoning set out under our response to your comment on policy HD9, and as discussed at our meeting (Jan 22 <sup>nd</sup> ), these criteria were devised in collaboration with design/heritage colleagues	Main

	and Littlemore Area of Focus		<p>HD9 and used as criteria when considering high building proposals across all Areas of Greater Potential, thus more clearly connecting with the Council's evidence base and High Buildings TAN. Criterion g does not currently make sense. We address this in an edited version of the criterion in our comments on HD9.</p> <p>Also, should the key to the map on page 178 be amended to show hatching for the area of focus?</p>	<p>buildings are proposed in the area" to the end of the policy.</p>	<p>based upon specific consideration of the characteristics of this location and the type of development that it may be able to support. As such, <b>we would propose to retain the criteria here rather than moving to HD9.</b></p> <p>Our subsequent discussion of Feb 26<sup>th</sup> flagged that you had a change to criterion g of the text for CBLLAOF, we are happy to propose this as a main mod as follows:</p> <p>g) Demonstrating consideration of the cumulative impacts of the proposal on views from <u>within the historic core area</u> <del>to the historic core area</del> and across the historic core area. <u>This will include the appropriateness, or otherwise, of clustering taller buildings, use of other design features to minimise harm to long distance views, and reference to the latest evidence on the potential impacts of high buildings in Oxford.</u></p> <p><b>We will double check the map and amend where necessary.</b></p>	
SPS 1	Arc Oxford	Comment	<p>While we welcome emphasis on the need to demonstrate potential impacts in paragraph 8.64, we are unclear what is meant by "strongly" demonstrate. We suggest alternative wording for consideration. Also note there's a missing full stop in the middle of this paragraph.</p>	<p>"While going beyond this threshold does not automatically preclude proposals from being acceptable, such schemes will be expected to <del>strongly</del> demonstrate that there has been <del>an</del> <u>detailed</u> understanding of the context and the impact of the likely effects with regard to the High Buildings TAN."</p>	<p>Minor modification to Policy SPS1 (Arc Oxford) as follows:</p> <p>"While going beyond this threshold does not automatically preclude proposals from being acceptable, such schemes will be expected to <del>strongly</del> demonstrate that there has been <del>an</del> <u>detailed</u> understanding of the context and the impact of the likely effects with regard to the High Buildings TAN."</p>	Minor
SPS 2	Kassam stadium and ozone leisure park	Unsound	<p>The following sentences in the opening paragraph are unclear and thus unlikely to be effective: "Within the proximity of the Ozone Leisure Park, larger plot sizes would be appropriate to ensure they are not dominated. Closer to the Northfield Brook</p>	<p>"Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Within the proximity of the Ozone Leisure Park, larger plot sizes would be appropriate to ensure they are not dominated. Closer to the Northfield Brook and existing lowrise</p>	<p>As we explained in our meeting (Jan 22<sup>nd</sup>), the site boundaries relate to land owner submissions and would be very challenging for us to amend. <b>We would therefore propose not to do this.</b></p> <p>Following our catch up Feb 26<sup>th</sup>, we proposed a main mod that could be made to address your concerns about the future of Minchery in relation to</p>	Main

		<p>and existing lowrise development of Greater Leys, development will need to be lower to avoid dominating this and to reflect the rural landscape fragments. In these locations, a smaller plot size will also be more appropriate.” That said, of greater importance from Historic England’s perspective, and as stated in our comments on SPS5 below, we believe that the site boundary for SPS2 should be amended to incorporate the eastern part of the Oxford Science Park, coupled with changes in wording of the policy and the inclusion of specific requirements linked with Minchery farmhouse and Littlemore Priory. Integrating the parcel of land that includes Minchery Farmhouse within site SPS2 we believe will provide greater potential to conserve the future of this Grade II* building, which is currently on the heritage at risk register. Currently the proposed policy commitment to consider impacts of development on the setting of the listed building indicates there has been insufficient consideration of how to conserve the building’s future within any planned scheme and bring it back into use. The approach to Minchery Farmhouse risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning</p>	<p>development of Greater Leys, development will need to be lower to avoid dominating this and to reflect the rural landscape fragments. In these locations, a smaller plot size will also be more appropriate. <u>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.</u></p> <p><u>A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan.</u> The form and layout of development should respond to the South Oxfordshire allocated development site to the south. A set-back may be necessary to minimise noise and air quality impacts from Grenoble Road, but there should be an opportunity to face and address the road, with relatively high-density development. More vulnerable development will be expected to be directed away from the small area of Flood Zone 3.</p> <p><u>Grade II* Minchery Farmhouse must be retained and its conservation and future use supported by integrating the building positively within the design of the scheme, responding to its significance in compliance with Policy HD2.</u></p> <p><del>The 15th Century (remodelled around 1600) Grade II* listed Minchery Farmhouse adjoins the site in the southwest corner by the edge</del></p>	<p>development occurring on this site, <b>we propose to amend via main mod as follows:</b></p> <p><i>The 15th Century (remodelled around 1600) Grade II* listed Minchery Farmhouse (formerly part of Littlemore Priory) adjoins the site in the southwest corner by the edge of the Ozone complex (within the Science Park, Policy SPS5). Development proposals must be designed with consideration of their impact on the <u>setting of Minchery Farmhouse listed building and its setting</u> and demonstrate compliance with Policy HD2. Development must take into consideration the potential presence of prehistoric, Roman and medieval archaeological remains. <u>In addition to the potential for physical impacts on archaeological remains, consideration should also be given to impacts on the setting of archaeological remains, including the buried remains of Littlemore Priory.</u> <del>Due to this potential</del> <u>these considerations,</u> development should demonstrate compliance with Policy HD5.</i></p> <p>Thanks for sharing the examples of best practice Heritage Impact Assessments from other authorities. We have included this site in our assessment in conjunction with SPS5 and we feel that the above change (along with change proposed for SPS5) reflects the findings of the assessment.</p> <p>In relation to the requirement for a masterplan, this is not considered a justified or reasonable requirement for this site to require in advance of an application. Individual parts of the site, such as the overflow car park or parts of it, could reasonably come forward and be developed independently of others and without need of an agreed masterplan. <b>We acknowledge that this was a topic of ongoing concern with HE however, and agree that following our 26<sup>th</sup> Feb discussion, we will amend the urban design and heritage section of the policy to add wording that ensures proposals take a</b></p>	
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			<p>(Listed Buildings and Conservation Areas) Act 1990. To support a positive response, we believe that heritage impact assessment of the site is needed, in accordance with the NPPF paragraph 31 (assuming that the boundaries are amended as suggested). Clearly such assessment may result in further changes to the policy and supporting text. Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings. Finally, given the site's complexity from a heritage and design perspective (especially regarding Minchery Farmhouse but also the remains of Littlemore Priory), we recommend a requirement for a masterplan within policy. Complimenting these changes to policy, we recommend relevant additional supporting text (adapting paragraph 8.96 as appropriate).</p>	<p>of the Ozone complex (within the Science Park, Policy SPS5). <del>Development proposals must be designed with consideration of their impact on the listed building and its setting and demonstrate compliance with Policy HD2.</del></p> <p>Development must take into consideration the potential presence of prehistoric, Roman and medieval archaeological remains. Due to this potential, development should demonstrate compliance with Policy HD5 and there should be no adverse impact on the remains of Littlemore Priory (above and below ground)."</p> <p>Alongside the above changes to policy, we advise adding a new paragraph to the supporting text:</p> <p><u>"The 15th Century (remodelled around 1600) Grade II* listed Minchery Farmhouse is within the site and any development should be sympathetic to the significance of this designated heritage asset. Details for the improvement, protection and maintenance of the farmhouse and its setting will need to be agreed with the Council as part of the planning process. The site is of archaeological interest as medieval and Roman remains have been recorded previously and there is high potential for further prehistoric, Roman and early Saxon archaeology. The remaining priory structures (above and below ground) and related features and burials should be preserved in situ."</u></p>	<p><b>masterplanning approach to informing design, wording to be added as follows:</b></p> <p><u><i>New development proposals should seek to improve both the place-making on this site, connectivity and the permeability and recognise its relationship to the wider area as part of a comprehensive masterplanning approach.</i></u></p> <p><b>Additional cross reference to HD9 to be added to urban design and heritage section, as follows:</b></p> <p><u><i>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9.</i></u></p>	
SPS 3	Overflow car	Unsound	Reference should be made to policies HD9, given the site lies	<u>"Development proposals that exceed the height that the High Buildings</u>	Minor modification to Policy SPS3 (Overflow Car Park, Kassam Stadium) as follows:	Minor

	park, Kassam stadium		within an Area of Greater Potential for high buildings.	<u>TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9."</u>	<u>"Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9."</u>	
SPS 5	Oxford Science Park	Unsound	Currently the site includes the Grade II* listed farmhouse. As stated in our comments on SPS2, we believe the policy is unsound in its approach to this highly graded asset, which is currently on the national heritage at risk register. Given the site includes the farmhouse, it is inappropriate simply to regard the land's development as a setting issue. The approach to Minchery Farmhouse risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990. We believe that the best way to do this is to amend the site boundaries so that the eastern part of the Oxford Science Park forms part of the Kassam Stadium site, coupled with a change in wording of the policy and the inclusion of specific requirements linked with the farmhouse. We suggest revised wording in our comments on the Kassam stadium policy (SPS2). Assuming this change is made, there is still potential for development on the larger parcel of land in SPS5 to impact on the setting of Minchery Farmhouse, so related text in	<p>Within the policy, add the following paragraph:</p> <p><u>"A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan."</u></p> <p>And make the following changes:</p> <p><del>"...Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and preserve the setting of the nearby listed building. Due to this potential, development should demonstrate compliance with Policy HD5 and there should be no adverse impact on the buried remains of Littlemore Priory."</del></p> <p>In the supporting text:</p> <p><del>"8.96. The 15th Century (remodelled around 1600) Development of this site has the potential to impact on the setting of Grade II* listed Minchery Farmhouse is within the site and any development should be sympathetic to the significance setting of this heritage asset. The site is of archaeological interest as medieval and Roman remains have been recorded previously and there is high potential for further prehistoric, Roman and</del></p>	<p>As we explained in our meeting (Jan 22<sup>nd</sup>), the site boundaries relate to land owner submissions and would be very challenging for us to amend. <b>We would therefore propose not to do this.</b></p> <p>This site allocation will therefore retain the Minchery farm site and as such we will not make changes that you suggest in response to moving it to the other allocation. Following our discussion on Feb 26<sup>th</sup>, we propose to amend with a variation on the suggested wording you proposed, which we feel is less ambiguous but will still require applicants to appropriately respond to the future of the farm in any proposal put forward and provides a strong hook at DM stage. Amended wording to be proposed as main mod as follows:</p> <p><u>Development proposals will be required to demonstrate how considerations for the conservation and future use of the Grade II* Minchery Farmhouse (formerly part of Littlemore Priory), have been positively integrated into the design of the scheme, responding to its significance and setting in compliance with Policy HD2. Development proposals must be designed with consideration of their impact on the setting of the Grade II* listed Minchery Farmhouse and demonstrate compliance with Policy HD2.</u></p> <p><del>Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and preserve the setting of the nearby listed building. Due to this potential, development should demonstrate compliance with Policy HD5 and there should be no adverse impact on</del></p>	Main

			<p>policy SPS5 can be retained. Given the likelihood of large-scale buildings proposed within Oxford Science Park, we recommend a policy requirement for a masterplan. Accompanying changes to the supporting text are also suggested, though these are indicative only and would need to be checked by the City Council's archaeological adviser.</p>	<p>early Saxon archaeology. <del>The remaining priory structures (above and below ground) and related features and burials should be preserved in situ.</del></p>	<p><i>the buried remains of Littlemore Priory. <u>The heritage significance of Littlemore Priory should inform the design of schemes including seeking opportunities to better reveal and appreciate it.</u></i></p> <p>We have also included this site within our heritage impact assessments in conjunction with SPS2 and consider the above change to reflect the assessment's findings.</p> <p>In relation to the requirement for a masterplan, the policy already references a comprehensive masterplan. <b>We would propose not to include this amend.</b></p>	
SPS 7	Unipart	Unsound	<p>Reference should be made to policies HD9, given the site lies within an Area of Greater Potential for high buildings. Does the policy have an unwanted apostrophe in its urban design and heritage subsection (before the word "proposed")?</p>	<p><u>"Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9."</u></p>	<p>Minor modification to Policy SPS7 (Unipart) as follows:</p> <p><u>"Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9."</u></p>	Minor
SPS 9	Blackbird Leys Central Area	Unsound	<p>We recommend a reference in policy to significance, rather than simply setting, mirroring what is in the supporting text.</p>	<p>In policy SPS9: "Development proposals must be designed with consideration of their impact on the significance <del>setting</del> of the Oxford Stadium conservation area and the Grade II listed Church of the Holy Family, and demonstrate compliance with Policy HD1 and HD2."</p>	<p>Minor modification to Policy SPS9 (Blackbird Leys Central Area) Urban Design and Heritage as follows:</p> <p>"Development proposals must be designed with consideration of their impact on the significance <del>setting</del> of the Oxford Stadium conservation area and the Grade II listed Church of the Holy Family, and demonstrate compliance with Policy HD1 and HD2."</p>	Minor
SPS 11	Cowley Marsh Depot	Unsound	<p>The Cowley Marsh depot partially intersects with a protected view cone. While the policy acknowledges this, it should also cross refer to policy HD9 as other similarly intersecting allocations have done (e.g. SPS13).</p>	<p>Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Heights should be compatible with surrounding residential streets and should avoid negatively impacting on the view cone, <u>in accordance with policy HD9.</u></p>	<p>Minor modification to Policy SPS11 (Cowley Marsh Depot) Urban Design and Heritage as follows:</p> <p>Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Heights should be compatible with surrounding residential streets and should avoid negatively impacting on the view cone, <u>in accordance with policy HD9.</u></p>	Minor

SPE 1	Government Buildings and Harcourt House	Comment	Reference should be made in the supporting text to the grade for St Clements Church.	"There are no listed buildings on the sites but the Grade II* Headington Hall sits within the park and St. Clements Church ( <u>also Grade II*</u> ) is nearby."	Minor modification to Paragraph 8.182 on page 232 as follows:  " <u>...of 1-3 storey buildings. There are no listed buildings on the sites but the Grade II* Headington Hall sits within the park and St. Clements Church (also Grade II*) is nearby.</u> "	Minor
SPE 2	Land surrounding St Clement's Church	Unsound	The policy needs to refer to Policy HD3, acknowledging the site's proximity to Magdalen College Registered Park and Garden (Grade I). Furthermore, given the site's complexity from a heritage and design perspective, we recommend a requirement for a masterplan within policy, which is already obliquely referenced later in the policy regarding parking provision.	We suggest the following additional wording for integration as appropriate in the urban design and heritage subsection of the policy: <u>"Proposals must demonstrate compliance with Policy HD3 to avoid or minimise harm to the significance of Magdalen College Registered Park and Garden (Grade I)".</u> <u>"A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan."</u> Recommended changes to the supporting text: "The site surrounds the Grade II* listed St. Clement's Church and its cemetery, <u>is within</u> the St Clement's and Iffley Road Conservation Area, and the setting of the Headington Hill <u>and Central</u> Conservation Areas <u>and the Magdalen College Registered Park and Garden (Grade I).</u> "	Minor modification to Policy SPE2 (Land Surrounding St Clements) Urban Design and Heritage as follows:  <u>"Proposals must demonstrate compliance with Policy HD3 to avoid or minimise harm to the significance of Magdalen College Registered Park and Garden (Grade I)".</u>  In relation to the requirement for a masterplan, again this is not considered a justified or reasonable requirement for this site. No change is required.	Minor
SPE 3	Headington Hill Hall and Clive Booth student village	Unsound	The policy rightly emphasises views from the historic core, but currently it fails to mention the protected view from Headington Hills allotment. The supporting text should also reinforce this point; for example, at the outset of paragraph 8.194.	"Development proposals must be designed with consideration of their impacts on the setting of the listed buildings, the character of the conservation area, and on views, particularly from the historic core <u>and the Headington Hills allotment protected view.</u> " In the supporting text: "Headington Hill Hall and Lodge House are both listed buildings and much of the site falls within the Headington Hill Conservation Area. <u>Part of the site</u>	Minor Modification to SPE3 (Headington Hill Hall and Clive Booth Student Village) Urban Design and Heritage as follows:  "Development proposals must be designed with consideration of their impacts on the setting of the listed buildings, the character of the conservation area, and on views, particularly from the historic core <u>and the Headington Hills allotment protected view.</u> "  Minor modification to paragraph 8.194 as follows:	Minor



				<u>intersects with the protected view from Headington Hill allotment.”</u>	“Headington Hill Hall and Lodge House are both listed buildings and much of the site falls within the Headington Hill Conservation Area. <u>Part of the site intersects with the protected view from Headington Hill allotment.”</u>	
SPE 4	Oxford Brookes University Marston Road campuses	Unsound	The opening paragraph within the subsection on Urban Design and Heritage needs work. Clearly the final sentence is incomplete. Within any such review, we recommend deleting the (strange) line “Attention should also be paid to the materiality of the adjacent conservation Area”, noting the policy goes on later to state: “Development proposals must be designed with consideration of their impact on the overall landscape setting and character of the adjoining conservation area, demonstrating compliance with Policy HD1”.		<p>Thanks for flagging, we have reviewed the text and propose the following:</p> <p><i><u>Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. It is expected that the form, materiality and significance of the existing school buildings is are-assessed and responded to appropriately in development proposals. Design choices such as layout and materials should be informed by and be sensitive to this existing context. Attention should also be paid to the materiality of the adjacent conservation area, and Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. materials selected that are sensitive to this and enhance it.</u></i></p> <p><i>Development proposals must be designed with consideration of their impact on the overall landscape setting and character of the adjoining conservation area, demonstrating compliance with Policy HD1</i></p>	Main
SPE 5	1 Pullens Land	Unsound	“Development proposals must be designed with consideration of their impact on the conservation area setting” implies the site is outside the conservation area. We recommend alternative wording. Also note typo “sand” in the subsequent paragraph.	Development proposals must <del>be designed</del> <u>respond positively to the significance, character and distinctiveness of</u> <del>with consideration of their impact on</del> the conservation area <del>setting and must demonstrate</del> <u>in</u> compliance with Policy HD1.	<p>Main modification to Policy SPE5 (1 Pullens Lane) Urban Design and Heritage as follows:</p> <p>Development proposals must <del>be designed</del> <u>respond positively to the significance, character and distinctiveness of</u> <del>with consideration of their impact on</del> the conservation area <del>setting and must demonstrate</del> <u>in</u> compliance with Policy HD1.</p> <p>And a minor modification as follows:</p> <p>“...backdrop and..”</p>	Main
SPE 6	Churchill	Comment	The non-designated heritage assets should be clearly explained in the supporting text,		Agree that this would be helpful clarification, we propose to make minor amend through additional sentence in para 8.212:	Minor

	Hospital		as in the adopted OLP2036 i.e. "Buildings from the original hospital used during the Second World War have been retained and these are non-designated heritage assets".		<i>The central part of the site comprises of the historical temporary hospital buildings <u>used during the Second World War, which are non-designated heritage assets</u>, and around which <u>the wider complex has grown, including various cabins.</u> The buildings themselves are rarely higher than two storeys and several of the older structures are in a poor state of repair...</i>	
SPE 8	Warneford Hospital	Unsound	While we welcome the policy commitment to retain the listed buildings, the policy needs also to refer to the significance of the listed buildings. We suggest wording for consideration.	"Development proposals must retain the listed buildings and be designed with consideration of their impact on the <u>significance</u> of the listed buildings ( <u>including their setting</u> ), the broader landscape and the adjoining Headington Hill Conservation Area. Proposals must demonstrate compliance with policies HD1 and HD2."	Minor modification to Policy SPE8 (Warneford Hospital) Urban Design and Heritage as follows:  "Development proposals must retain the listed buildings and be designed with consideration of their impact on the <u>significance</u> of the listed buildings ( <u>including their setting</u> ), the broader landscape and the adjoining Headington Hill Conservation Area. Proposals must demonstrate compliance with policies HD1 and HD2."	Minor
SPE 10	Hill View Farm	Comment	Though potentially not a matter of soundness, we wonder if naming the conservation area might be more helpful (as done in policy SPE12), rather simply describing it as "adjacent".	Development proposals must be designed with consideration of their impact on the character of the <del>adjoining</del> <u>Old Marston</u> Conservation Area and the landscape setting and must demonstrate compliance with Policy HD1.	Minor modification to Policy SPE10 (Hill View Farm) as follows:  "Development proposals must be designed with consideration of their impact on the character of the <del>adjoining</del> <u>Old Marston</u> Conservation Area and the landscape setting and must demonstrate compliance with Policy HD1."	Minor
SPE 15	Thornhill Park	Unsound	Reference is made to policy HD1; however, the site's development would not impact on a conservation area.		Minor modification to Policy SPE15 (Thornhill Park) as follows:  "...countryside (Policy HD7)".	Minor
SPE 16	Union Street car park and 159-161 Cowley Road	Unsound	Reference is made to policy HD1 when we believe what is meant is policy HD7. Also, there is a typo in the opening line of paragraph 8.277.	It is expected that the requirements for high quality design set out in Policy HD17 will be met in the following ways.	Minor modification to Policy SPE16 (Union Street Car Park) as follows:  "...set out in Policy HD7 will...".	Minor

SPE 17	Jesus and Lincoln College Sports Grounds	Unsound	<p>While we welcome encouragement in the policy for small-scale buildings, the section of policy that helps to protect the view cone might inadvertently encourage taller buildings closest to the Chapel (Grade I) and Bartlemas House (Grade II*), potentially harming their significance. To address this concern, we recommend:</p> <p>a) Minor amendment to policy wording to refer to eastern, rather than north-eastern as shown in the adjacent column; and</p> <p>b) heritage impact assessment to ensure the policy is underpinned by relevant proportionate evidence, in accordance with paragraph 31 of the NPPF.</p> <p>The approach to the Chapel and Bartlemas House risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>a) Minor amendment to policy wording to refer to eastern, rather than north-eastern as shown in the adjacent column; and</p> <p>b) heritage impact assessment</p>	<p>Thanks for sharing the examples of best practice Heritage Impact Assessments from other authorities. We have now completed this and share a copy of these for your info, which we will submit alongside the LP. <b>Following completion of Heritage Impact Assessment we propose to amend the policy and supporting text as follows:</b></p> <p>In policy SPE17, urban design section:  <i>A graduation of height, lower <u>on the southern and western edges of the site</u> <del>on the south western edge</del> and highest <u>on</u> <del>in</del> the north-eastern, would respond to the context of the Crescent Road view cone, <u>and the need to retain the rural feel of Bartlemas.</u></i></p> <p>In policy SPE17, movement and access section:  <i>If the playing pitches are shared and more development happens to the northwest, vehicle access may be required from Bartlemas Close, in which case the existing service vehicle access from Bartlemas Close would be most suitable as this would minimise intrusion into the existing treeline along Bartlemas Close. <u>It is important that any noticeable change to the rural character of Bartlemas Lane is minimised.</u></i></p> <p>Supporting text paragraph 8.280:  <i>The southern part of the site is adjacent to the Bartlemas CA and is within its setting, and also within the setting of the Grade I listed St Bartholomew's Chapel and Bartlemas House and the Grade II* listed Bartlemas Farmhouse (all located on the eastern side of Bartlemas Close). <u>Bartlemas hamlet retains the character of its rural origins, in part because of the still semi-rural character or the green space around it. It is important that a substantial buffer of green space is retained, and the appropriate amount of green space to retain for any development encroaching on the open part of the site towards Bartlemas Lane will need to be tested through scenarios and views from the heritage assets.</u> The southern part of the site also lies partially within the Crescent Road view cone.</i></p>	Main
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					Linked with the HIA findings, we will also update the GI network classification of the Oriel playing fields nearby to core status to reflect its heritage value.	
SPE 18	Ruskin College Campuses	Unsound	The policy does not commit to the retention of the listed buildings, an omission which needs to be corrected.	In policy SPE18: "Development proposals must be designed with consideration of their impact on the Old Headington Conservation Area and the setting of the listed buildings within the site <u>(which must be retained)</u> and demonstrate compliance with policies HD1 and HD2."  In supporting text: "There are nine buildings on site, including the listed Rookery and wall, set within landscaped grounds with some large trees. Any development would need to ensure that there was no adverse impact upon the setting of the listed buildings <u>and-wall (which must be retained)</u> or on Old Headington Conservation Area, and therefore should demonstrate compliance with Policy HD1 and HD2."	The listed building policy and NPPF set out the approach to heritage assets whereby harm should be first avoided, then reduced, mitigated and remaining harm weighed against benefits. Significant harm should be wholly exceptional. There is no justification for stating categorically that these particular heritage assets must be retained-that is not compliant with the NPPF or Local Plan approach to listed buildings. The policy would not be found sound and therefore no change is proposed.	No action
SPE 21	Rector y Centre	Unsound	We are not convinced it is clear what is meant by "adhering" to an existing building height. We suggest alternative wording for consideration, ensuring the policy is effective in accordance with paragraph 35 of the NPPF. Assuming this is what is meant, this calls into question if it is reasonable to expect a "minimum of 21 residential units". We recommend this be double-checked to ensure that this policy conveys a realistic expectation of what would be delivered without adding more height.	"The existing building height should also be respected and <u>not exceeded</u> <del>adhered to.</del> "	Agree that the wording is slightly unclear, it is proposed to remove the wording.  Minor modification to Policy SPE21 (Rector y Centre) as follows:  <del>"The existing building height should also be respected and adhered to."</del>  Minor modification to Policy SPE21 (Rector y Centre) as follows:  "Any development should respond to both the character of the <del>of the</del> East Oxford Victorian Suburb and <del>and</del> the vibrant Cowley Road District Centre".	Minor          Minor

NCC AOF	North of the City Centre Area of Focus	Unsound	<p>Criterion j implies a balancing exercise that lacks nuance, and we would argue contrary to national policy (specifically, paragraph 189 of the NPPF). It is open to abuse and misinterpretation and needs to be amended.</p> <p>The current wording could be particularly problematic for employment sites such as University of Oxford Science Area and Keble Road Triangle, which have a very high level of heritage significance.</p> <p>Also, reference only to historic buildings omits consideration of other types of asset, such as Registered Parks and Gardens e.g. The University Parks, Grade II.</p> <p>Also, note paragraph 8.312 is incomplete.</p>	<p>“any design should <u>take into account the significance of</u> <del>balance the existing heritage assets</del> <u>historic buildings onsite coupled with the celebration of</u> <del>while seeking to celebrate</del> cutting-edge science.”</p>	<p>Main modification to be proposed as per suggestion because expanding scope from buildings to assets more broadly.</p> <p>Main modification to Policy NCCAOF (North of the City Centre Area of Focus) as follows:</p> <p>“any design should <u>take into account the significance of</u> <del>balance the existing heritage assets</del> <u>historic buildings onsite coupled with the celebration of</u> <del>while seeking to celebrate</del> cutting-edge science.”</p> <p>Minor modification to paragraph 8.321 on page 285 as follows:</p> <p><del>Although the Banbury Road Triangle site is outside of any conservation area, although it is in the setting of several.</del></p>	Main and minor
SPC W3	Manor Place	Unsound	<p>While the policy does include welcome detail on heritage considerations, we recommend heritage impact assessment to ensure the policy is underpinned by relevant proportionate evidence, in accordance with paragraph 31 of the NPPF.</p> <p>The Sustainability Appraisal acknowledges the site is sensitive (on page 57); however, the supporting text for this allocation does not reflect the degree of its sensitivity, taking into account the site’s proximity to two Grade I listed buildings, the Grade I landscape at St Catherine's College, Grade I</p>	<p>“Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, <u>and the setting of the Registered Park and Garden</u> and demonstrate compliance with policies HD1, HD2, <u>HD3</u> and HD9.”</p>	<p>Thanks for sharing the examples of best practice Heritage Impact Assessments from other authorities. We have now completed this and share a copy of these for your info, which we will submit alongside the LP. <b>Following completion of Heritage Impact Assessment we propose to amend the policy and supporting text as follows:</b></p> <p>Within Policy SPCW3, amendments to Open space, nature and flood risk section as follows:  <i>Policies G1 and G3 require protection of existing green infrastructure features and enhancement of greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. <u>There are existing green</u></i></p>	Main



			<p>Magdalen College Registered Park and Garden and its Grade II* boundary wall.</p> <p>Further changes to the policy and supporting text may be needed, informed by such an assessment.</p> <p>The approach to adjacent highly graded assets risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>		<p><u>infrastructure features of some value, such as mature trees and hedgerows, including along the eastern boundary, and these should be retained because of their importance to biodiversity, the green setting and their importance in screening the site and thus acting as a buffer to the highly graded designated heritage assets within St Catherine's College....</u></p> <p>Amendments to first para of urban design section of policy as follows:  <i>Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, <u>and the setting of two Registered Park and Gardens (both Grade I) and demonstrate compliance with policies HD1, HD2, <u>HD3</u> and HD9...</u></i></p> <p>Amendments to the second para of urban design section of policy as follows:  The size, <u>massing</u>, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements...</p> <p>Supporting text paragraph 8.324</p> <p><i>This site consists of a mix of disused hard and grass tennis courts, abandoned private allotments and an orchard. It is a sensitive location falling within the Central Conservation Area, <u>and the open space reflects the historic separation of the walled town and northern medieval suburb and development has potential to impact on the understanding of this historic separation. The site is adjacent to and/or <del>and</del> forms part of the setting of many other heritage assets including the <del>several listed buildings,</del> and the Holywell Cemetery, Holywell Ford, Magdalen College Park and Garden (Grade I), St Cross College, the</u></i></p>	
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					<p><u>Church of St Cross and St Catherine's College (which also includes multiple highly graded assets). The site is in line with the Elsfield, Doris Field and Headington Hill Allotments view cones but may also appear in others as it is located in the Historical Core Area.</u></p> <p>Supporting text paragraph 8.325: ...These contribute to the green, semi-rural character of the setting which includes Holywell Cemetery, St Cross Annex and the Magdalene College Deer Park and <u>are likely have high biodiversity value.</u></p> <p>Supporting text paragraph 8.329: <u>The site is of archaeological interest with Civil War defences having been excavated previously, which would warrant substantive preservation in situ.</u></p>	
SPC W4	Canalside Jericho	Unsound	To conform with other site allocation policies, reference to Policies HD1 and HD2 is merited, as is reference to Policy HD3 given the proximity to Worcester College RPG (Grade II*).	<p>"... Finished design should respect the waterfront heritage of the site and, the conservation area and <u>conserve or enhance the significance of Grade II* listed St Barnabas Church in compliance with Policies HD1 and HD2.</u> A new public square should be created and to open up views of St Barnabas Church from the canal, the wall separating the church and the proposed new square could be demolished. The wall is curtilage listed and as it relates to an active place of worship, separate Faculty approval is required from the Diocese. Listed building consent is not required for such demolition. <u>Proposals should also consider the adjacent Registered Park and Garden (Worcester College, Grade II*) in compliance with Policy HD3.</u>"</p>	<p>Main modification to SPCW4 (Canalside Land Jericho) as follows:</p> <p>"... Finished design should respect the waterfront heritage of the site and, the conservation area and <u>conserve or enhance the significance of Grade II* listed St Barnabas Church in compliance with Policies HD1 and HD2.</u> A new public square should be created and to open up views of St Barnabas Church from the canal, the wall separating the church and the proposed new square could be demolished. The wall is curtilage listed and as it relates to an active place of worship, separate Faculty approval is required from the Diocese. Listed building consent is not required for such demolition. <u>Proposals should also consider the adjacent Registered Park and Garden (Worcester College, Grade II*) in compliance with Policy HD3.</u>"</p>	Main
WE AOF	West End and Botley	Comment	Paragraph 8.341 should refer also to policy HD9.	"Wherever high buildings are proposed (over 15 metres) they should be accompanied by a visual impact assessment which clearly	Minor modification to paragraph 8.341 on page 297 as follows:	Minor

	Area of Focus			shows how the proposal relates to Oxford's historic skyline, <u>in accordance with policy HD9.</u> "	"Wherever high buildings are proposed (over 15 metres) they should be accompanied by a visual impact assessment which clearly shows how the proposal relates to Oxford's historic skyline, <u>in accordance with policy HD9.</u> "	
SPC W5	Oxpens	Unsound	The supporting text in paragraph 8.357 refers to Oxpens being located "within the city's High Buildings Area". We are unclear what is meant. The term High Buildings Area does not appear to relate to any policy within OLP2040. The High Buildings Technical Advice Note refers to "Areas of Opportunity/Areas of Greater Potential" and "Dynamic Areas". This site would appear to be in a Dynamic Area but not in an Area of Opportunity/Area of Greater Potential. We suggest being clear that this site lies in a Dynamic Area. Inconsistent language may cause confusion.	In the supporting text: "...The Oxpens site lies within the Raleigh Park view cone and a <u>Dynamic Area identified in the High Buildings Technical Advice Note (TAN)the city's High Buildings Area.</u> The site forms a part of other important views out of the city (for instance, from St. George's Tower and the University Church of St. Mary's Tower) and from further views (such as the potential for visibility within other view cones e.g. Elsfield and Doris Field)..."	The text erroneously referred to the High Buildings Area, which was the name given to the area within a 1,200 metres of Carfax in the Oxford Local Plan 2001-2016. In the Oxford Local Plan 2036 and the Oxford Local Plan 2040 the term used is the Historic Core Area, and the text should be amended to this.  Minor modification to paragraph 8.357 on page300 as follows:  "...The Oxpens site lies within the Raleigh Park view cone and a <u>Dynamic Area identified in the High Buildings Technical Advice Note (TAN)the city's High Buildings Area.</u> The site forms a part of other important views out of the city (for instance, from St. George's Tower and the University Church of St. Mary's Tower) and from further views (such as the potential for visibility within other view cones e.g. Elsfield and Doris Field)..."	Minor
SPC W6	Nuffield Sites (Island / Worcester St Car Park/ South of Frideswide Square )	Unsound	More detail is needed on the spread of dwellings between the 3 sites that comprise the Nuffield sites to establish the acceptability or not of this allocation, rather than simply state a headline minimum figure of 59 dwellings across all three sites. The evidence supporting how this headline figure would be achieved needs to be made clear.  It is our understanding that South of Frideswide Square is a new allocation within the Central Conservation Area. Clearly this is in a sensitive location and merits proportionate heritage	We recommend clarifying the expected spread of dwellings across the three parts of the site.  We recommend adding the following line to the policy: <u>"A masterplan approved by the City Council should be developed prior to any development, and development should comply with the masterplan."</u>  We recommend the following changes to the existing text on views: "...Development proposals must also be designed with consideration of their impact on views, particularly from Hinksey Hill to the historic core, from views out of the historic core and from further views of the site.	In relation to the requirement for a masterplan, this does not seem to be a justified requirement to expect prior to an application. These relatively small sites could successfully come forward without one, especially as the sites are within the area covered by the West End and Osney Mead SPD, which guides design across the area, including outlining heritage considerations. <b>We acknowledge that this was a topic of ongoing concern with HE however, and agree that following our 26<sup>th</sup> Feb discussion, we will amend the urban design and heritage section of the policy to add wording that ensures proposals take a masterplanning approach to informing design, wording to be added as follows:</b>  <u><i>New development proposals should seek to improve both the place-making on this site, connectivity and the permeability and recognise its relationship to the</i></u>	Main

		<p>assessment. The detail in the text is insufficient in our opinion. Indeed, paragraph 8.379 is somewhat colloquial in tone, and is poorly integrated with earlier supporting text in paragraph 8.371.</p> <p>Furthermore, in our view the other two parts of the site (the island and Worcester Street car park) merit heritage assessment to ensure the policy for their development is clear and effective and informed by appropriate evidence.</p> <p>The approach to heritage assets risks not only failing to align with national policy on the conservation of heritage assets, but also the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The car park is located between Worcester College RPG (Grade II*) and Oxford Castle Scheduled Monument. The view from the Castle currently connects with the floodplain and this makes an important contribution to its significance. Also, the land currently used as a car park itself is of heritage significance linked with its former use as a Canal Wharf. Heritage impact assessment provides the mechanism through which connections with that past land use can inform the site's future. Clarity is needed about the buildings that would be retained (or not) across the Nuffield sites. The supporting text states that a masterplan should be developed, but this has yet to be</p>	<p><u>The open space of the Worcester Street car park currently allows the only view from Oxford Castle into the floodplain and thus contributes to the setting and significance of the Castle. This important view should be retained to conserve the significance of the Castle in accordance with policy HD4.</u></p> <p>Also, we recommend the following amendment:  “Development must be designed with consideration of its impact on the Central Conservation Area, <del>and</del> nearby listed buildings (Policy HD1 and HD2), <u>and Worcester College Registered Park and Garden (Policy HD3).</u>”</p> <p>In the supporting text:  “8.372 Some of the Nuffield Sites lie directly within the Raleigh Park View Cone and they are all within <u>a Dynamic Area identified in the High Buildings Technical Advice Note (TAN) the city's High Buildings Area.</u> These sites also form part of other important views out of the city...”</p>	<p><u>wider area as part of a comprehensive masterplanning approach.</u></p> <p>In relation to High Building Area text, thanks for flagging this, we agree the wording should be amended. The text erroneously referred to the High Buildings Area, which was the name given to the area within a 1,200 metres of Carfax in the Oxford Local Plan 2001-2016. In the Oxford Local Plan 2036 and the Oxford Local Plan 2040 the term used is the Historic Core Area, and the text should be amended to this.</p> <p>Thanks for sharing the examples of best practice Heritage Impact Assessments from other authorities. We have now completed this and share a copy of these for your info, which we will submit alongside the LP. <b>Following completion of Heritage Impact Assessment we propose to amend the policy and supporting text as follows:</b></p> <p>Amend within para 8.371: <i>The redevelopment of Worcester Street Car Park presents an opportunity to enhance the setting of the adjacent listed buildings at Nuffield College and must consider local views towards <u>and from</u> the Castle motte. The car park also contains fragments of industrial archaeology of significant interest which should be sought to be preserved or incorporated within development proposals.</i></p> <p>Add to start of para. 8.372: <u>Across the Nuffield sites there are a range of views (strategic and local) that must be fully considered in the design of proposals (Policy HD9).</u></p> <p>Add to end of para 8.370: <u>Any redevelopment of Land South of Frideswide Square presents an opportunity to enhance the setting of the adjacent listed buildings.</u></p> <p>Amends to policy: <i>Development must be designed with consideration of its impact on <u>the local historic environment, including the range of heritage assets</u></i></p>	
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			<p>required in policy. Also, it should be recognised in policy that there is potential for development to impact on Worcester College Registered Park and Garden (Grade II*).</p> <p>The supporting text in paragraph 8.372 refers to the Nuffield sites being located “within the city’s High Buildings Area”. We are unclear what is meant. The term High Buildings Area does not appear to relate to any policy within OLP2040. The High Buildings Technical Advice Note refers to “Areas of Opportunity/Areas of Greater Potential” and “Dynamic Areas”. This site would appear to be in a Dynamic Area but not in an Area of Opportunity/Area of Greater Potential. We suggest being clear that this site lies in a Dynamic Area. Inconsistent language may cause confusion.</p>		<p><i><u>in the area. These include the Central Conservation Area, and nearby listed buildings, registered park and garden and non-designated heritage assets (Policies HD1-HD6) and HD2.</u></i></p> <p>Additional amend to policy: <i>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says competition impacts may be possible from 15m and above) will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9. <u>Special attention will need to be paid to views from the Castle motte to avoid harm to the setting of Oxford Castle.</u></i></p>	
SPC W7	Osney Mead	Unsound	<p>Given the site’s proximity to and potential relationship with the remains of Osney Abbey, Scheduled Monument, reference should also be made to HD4 in the policy. We suggest a way of integrating this wording into one of the existing paragraphs using bullets.</p> <p>The supporting text in paragraph 8.385 refers to Osney Mead being partially located “within the city’s High Buildings Area”. We are unclear what is meant. The term High Buildings Area does not appear to relate to any policy within OLP2040. The High Buildings Technical Advice Note refers to “Areas of</p>	<p>In policy SPCW7: “Development should be designed to enhance:</p> <ul style="list-style-type: none"> <li>the relationship and connection between the site and the river,</li> <li><u>the setting of Osney Abbey Scheduled Monument (in accordance with policy HD4) and</u></li> <li><del>to enhance</del> the physical and visual permeability of the site.”</li> </ul> <p>In the supporting text (paragraph 8.385): “...Part of the site lies directly within the Raleigh Park view cone and part of the site lies within a <u>Dynamic Area identified in the High Buildings Technical Advice Note (TAN)</u> <del>the city’s High Buildings Area...</del>”</p>	<p>We agree that adding in a reference to the Abbey and cross-ref to policy HD4 would be helpful and propose the following modification to the bulleted criteria as follows:</p> <ul style="list-style-type: none"> <li><u>the setting of Osney Abbey Scheduled Monument (in accordance with policy HD4), including through design, interpretation and/or enhanced screening, and</u></li> <li><del>to enhance</del> the physical and visual permeability of the site.</li> </ul> <p>In relation to the High Buildings Area text, thanks for flagging this, we agree the wording should be amended. The text erroneously referred to the High Buildings Area, which was the name given to the area within a 1,200 metres of Carfax in the Oxford</p>	Main



			Opportunity/Areas of Greater Potential” and “Dynamic Areas”. This site would appear to be in a Dynamic Area but not in an Area of Opportunity/Area of Greater Potential. We suggest being clear that this site lies in a Dynamic Area. Inconsistent language may cause confusion.		Local Plan 2001-2016. In the Oxford Local Plan 2036 and the Oxford Local Plan 2040 the term used is the Historic Core Area, and the text should be amended to this.	
<b>HE Reg 19 feedback – responses to which the Council proposes no further action</b>						
98	Policy R1: Net Zero Buildings in Operation	Comment	Broadly we welcome this policy and support the Council’s work towards net zero. That said, the policy’s support for renewable energy generation may pose a challenge for achieving the heritage ambitions of the plan (a concern picked up in the Sustainability Appraisal). Mitigating factors are that the policy centres on <u>new</u> development only, which arguably reduces the risk of unwanted outcomes, and heritage policies HD1HD6 which include welcome detail. Also, we note relevant guidance in Appendix 1, on which we have commented below.		Additional guidance supporting implementation of the Local Plan e.g. Heritage TAN will support applicants/decision makers in ensuring the balance is approached carefully. Ultimately, the Local Plan needs to balance a range of priorities/pressures, we need to both support/enhance the historic environment, whilst also ensuring support for the move to net zero carbon to mitigate impacts on climate change.	No action
99-100	Policy R2: Embodied Carbon in the Construction Processes	Sound	We welcome this policy		Noted.	No action
101-102	Policy R3: Retro-	Sound	We support this policy and look forward to reading the retrofit TAN.		Noted.	No action

	fitting existing buildings					
125	Policy HD7: Principles of High-Quality Design	Sound			Noted.	No action
SPS 4	Mini plant; Oxford	Sound			Noted.	No action
SPS 6	Sandy Lane Recreation Ground	Sound			Noted.	No action
SPS 8	Bertie Place Recreation Ground	Sound			Noted.	No action
SPS 10	Knights Road	Sound			Noted.	No action
SPS 12/13/14/15/16/17/18	Tempers Square /Land at Meadow Lane/Formerly Iffley Meadow playing	Sound			Noted.	No action



	field/R edbrid ge Paddo ck/Cre scent Hall/E dge of Playin g Fields, Oxford Acade my/47 4 Cowle y Road (forme r Powell s Timber Yard)					
MR ORA OF	Marst on Road and Old Road Area of Focus	Sound			Noted.	No action
SPE 7	Nuffiel d Ortho paedic Centre (NOC)	Sound			Noted.	No action
SPE 9	Bayard s Hill Primar y School Part	Sound			Noted.	No action

	Playin g Fields					
SPE 12/ 13	Marst on Paddo ck/Ma nzil Way Resour ce Centre	Sound			Noted.	No action
SPE 14	Slade House	No comment				No action
SPE 19/ 20	Ruskin Field/J ohn Radclif fe Hospit al	Sound			Noted.	No action
SPC W1/ SPC W2	West Wellin gton Square / Land at Winch ester Road, Banbu ry Road and Beving ton Road Oxford	Sound			Noted.	No action
SPC W8	Botley Road Retail Park	Sound			Noted.	No action

