

**Oxford City Council**

**Consultation Statement**

**Local Plan 2040**

**March 2024**

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## 1. Introduction

The Oxford Local Plan 2040 will set out how we want the city to look and feel. It will guide new development to the right locations while protecting and improving the environment and people's quality of life. It will help deliver the new homes, businesses, jobs, shops and infrastructure needed to support the growth of Oxford over the next 20 years and it will be used in determining planning applications and to guide investment decisions across the city.

Oxford City Council is required (Regulation 22<sup>1</sup>) to produce a Statement of Consultation to accompany the submission of the Oxford Local Plan 2040 to the Secretary of State. This Statement will assist the Inspector at Examination in determining whether the Plan complies with the statutory requirements for involvement and government guidance. The report demonstrates how planning officers:

1. Have taken account of the public feedback to the preferred options as received during the Regulation 18 consultation.
2. How the proposed submission draft was shaped in response.
3. Summarises the responses received to the consultation on the proposed submission draft Local Plan 2040 in relation to Regulation 20.

The report covers the following:

- (i) An overview of the Proposed Submission Draft Consultation, including which bodies and persons were invited to make representations, how they were consulted, and how many comments were received.
- (ii) A summary of the main issues raised and officer responses in relation to the proposed submission draft.
- (iii) An overview of the Preferred Options (Regulation 18) consultation, including which bodies and persons were invited to make representations and how they were consulted.
- (iv) A summary of the responses to the preferred options part 1 and part 2 (housing need).
- (v) A summary of the proposed submission draft was shaped in response to the public feedback.

## 2. Local Plan Timeline

### 2.1. Engagement Throughout the Local Plan Process

Involvement of local communities and other stakeholders from the beginning of the preparation of the Local Plan has been a key priority for the council. The main stages of consultation on the Oxford Local Plan 2040 were as follows:

1. Proposed Submission (Regulation 20) Consultation (10<sup>th</sup> November 2023 – 5<sup>th</sup> January 2024)
2. Preferred Options (Regulation 18) Consultation Part 2 (13<sup>th</sup> February – 27<sup>th</sup> March 2023)
3. Preferred Options (Regulation 18) Consultation Part 1 (3<sup>rd</sup> October - 14<sup>th</sup> November 2022)
4. Issues Consultation (June-September 2021)

### 2.2. Proposed Submission (Regulation 20) Consultation

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<sup>1</sup> *Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)*

This section sets out how the City Council has complied with Regulation 20 (Proposed Submission Consultation) on public participation of a development plan document. It also summarises the representations received in response to the consultation, setting out how many representations were made and what the issues raised were. As this Consultation Statement highlights, by the time of the Proposed Submission Consultation extensive consultation and engagement had taken place on the emerging draft Local Plan as summarised in the list above.

### 2.3. Proposed Submission Consultation Period

The consultation period on the Proposed Submission Document and Sustainability Appraisal (SA) Report commenced on 10<sup>th</sup> November 2023 for a period of 8 weeks until 5<sup>th</sup> January 2024. This consultation period exceeds the requirements of the Town and Country Planning (Local Planning) Regulations 2012 and the City Council's usual consultation period identified in the Oxford City Council Statement of Community Involvement. Notice of consultation was communicated by email and letter on 10<sup>th</sup> November 2023 to those on the City Council's database and advertised on the council's website. More information on the methods used is provided in this report further below.

### 2.4. Who was notified?

The previous stages of Local Plan consultation focused on the broad issues, utilising a wide range of adaptable and interactive opportunities for engagement to increase the numbers of people involved and to maximise the benefits of the consultation. The proposed submission stage is a formal consultation stage which is required to focus on soundness and legal compliance with aspects of the Plan. Responding to the consultation inevitably requires a greater commitment of time and effort in order to frame responses in terms of the soundness and legal tests. Therefore, as well as statutory consultees, those registered on the City Council's database as having an interest in planning were key to consult. Direct notifications were sent to all those on the City Council's database, which includes those involved in previous rounds of Local Plan consultation, statutory consultation bodies and duty to cooperate bodies, and residents' associations and interest groups. Electronic notifications and letters were sent to individuals, groups or organisations that had not provided an email address. Please see Appendix 1 for a list of the statutory consultees and Appendix 2 for the additional local groups and organisations

### 2.5. Methods Use to Notify of the Publication Period

The publication period was publicised using a wide range of methods. Primary of these was direct notification or correspondence as identified above. Notice of the consultation was disseminated by other means, including:

- By notice in "Your Oxford", in the edition published on 22/3/2024 (7,636 recipients), 15/03/2024 (7, 611 recipients), 10/11/2023 (7, 246 recipients), 17/11/2023 to 21/12/2023 (consultations sector).
- By press release and extensive local press coverage including through articles and an interview with the planning Cabinet Member published on 10 November 2023 (for an example please see Appendix 3).
- Consultation Press Release Reminder (5/12/2023).
- Facebook: from 10/11/2023 - 48 posts, of which 31 were video led that produced the following results:
  - 239,124 impressions
  - an average of 4,876 people reached per post

- 1,922 engagements
- 135 shares
- 1,011 likes
- 776 comments
- 1,204 60-second video views
- 20,272 total click-throughs
- Twitter: from 10/11/2023 - 14 tweets that produced the following results:
  - 14 tweets
  - 16,198 impressions
  - 605 engagements
  - 31 retweets
  - 36 replies
  - 38 likes
  - 108 click-throughs
- LinkedIn: from 10/11/2023 - 35 posts that produced the following results:
  - 35 posts
  - 25 video-led
  - 54,602 impressions
  - 11,648 views
  - 1,943 click-throughs
  - 973 likes
  - 28 comments
  - 62 reposts
- Instagram: from 10/11/2023 (analytics not available).

## 2.6. Responses Received

The City Council received 1518 comments from 203 respondents. The responses received are summarised in Appendix 4. This provides an extensive summary of the comments received, as well as an officer response to the comments. Minor modifications to the Plan have been proposed in response to some of the comments. Where comments raised concerns, that the City Council has agreed could be resolved with an acceptable modification to the Plan, these modifications would be classed as a main modification that would therefore require consideration in the Sustainability Appraisal process and further consultation. These will need to be recommended by the Inspector as necessary to make the Plan sound.

## 3. Sustainability Appraisal (SA) Consultation Statement

This section of the consultation statement identifies how Oxford City Council has complied with Regulation 13<sup>2</sup> of the Environmental Assessment of Plans and Programmes 2004 with regard to the consultation on the Sustainability Appraisal report and process for the Oxford Local Plan 2040. The section addresses the consultation that took place on the SA Scoping Report, the SA Report for the Preferred Options document (Regulation 19 consultation) and the SA Report for the Proposed Submission document (Regulation 20 consultation).

### 3.1. Sustainability Appraisal Scoping Report

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<sup>2</sup> The Environmental Assessment of Plans and Programmes 2004

Once the need for a Sustainability Appraisal has been established, the first step that is often undertaken is a 'Scoping Report'. The Environmental Assessment of Plans and Programmes Regulations 2004 ('SA regs') do not require that a scoping report is prepared, but where one is produced it must be consulted upon with the relevant 'consultation bodies' according to the SA regs. The SA Scoping Report for the Oxford Local Plan 2040 was published alongside the Oxford Local Plan 2040 Issues Consultation in June 2021. The background papers produced for the First Steps consultation also formed the basis of the SA Scoping Report. Amongst those invited to comment were the following:

- Environment Agency
- Natural England
- Historic England
- National Highways
- Oxfordshire County Council
- Cherwell District Council
- South Oxfordshire District Council
- Vale of White Horse District Council
- West Oxfordshire District Council

### 3.2. Sustainability Appraisal of the Preferred Options Document

A Sustainability Appraisal that assessed the Preferred Options for the Oxford Local Plan 2036 was published alongside the Preferred Options documents for the preferred options consultation. Whilst most of the comments received at the Preferred Options stage were in relation to the options themselves, rather than the SA, so comments related to issues that the SA seeks to address so they were also reviewed through the SA process. The comments about sustainability issues were reviewed and a judgement made on whether the issues suggested were significant enough to warrant alterations to the SA framework of the earlier stages of the appraisal. The Local Plan Sustainability Appraisal summarised comments received from consultation bodies on the SA Scoping Report and comments on the SA from the Preferred Options Consultation respectively. These appendices also set out the actions taken in respect of these comments.

### 3.3. Sustainability Appraisal of the Proposed Submission Document

The SA Report was published alongside the proposed submission document as part of the consultation material for 8 weeks between 10th November 2023 and 5th January 2024. There were 23 respondents that raised 24 comments on the Sustainability Appraisal Report. Many of the comments related to the overall spatial strategy, in so far as the approach that the SA Report had appraised. Some comments were on more specific detail within the SA report. The comments can be briefly summarised here as follows:

- The Sustainability Appraisal is soundly based.
- The Sustainability Appraisal is flawed and not sustainable. The Sustainability Appraisal relies on decarbonisation of the grid and adoption of electric vehicles without any evidence regarding the viability of sharing renewable and low carbon energy between sectors. The Local Plan should therefore address these and other issues, such as retrofitting, not contributing to climate change, issues of embodied carbon and lack of delivery on the potential for supporting more renewable energy generation.
- A revised SA should show how a (revised) Local Plan would meet Oxford's zero carbon goals and how this would be monitored. It should show the impact of any exported housing

through so-called 'unmet need' on zero carbon and nature restoration for the districts. There is no carbon accounting done here. This must change.

- The Sustainability Appraisal is not sound because it should ensure all development deliver biodiversity gain, only build on brownfield land, not developing unbuilt land, increasing the biodiversity of unbuilt land and delivering sustainability. Lack of biodiversity and environmental targets. Lack of targets to assess and measure water use, sewage, flooding capacity and sustainable development goals.
- The Sustainability Appraisal is not sound because it has not complied with the duty to cooperate. Not positively prepared because it has not been informed by agreement from all other authorities. It relies on an outmoded and outdated growth model instead of steady-state planning. The Council should reconsider its trajectory with its neighbours and identify a more sustainable long-term approach. More land cannot be released for housing than necessary when it is also required for other vital issues such as climate mitigation, food production and the health and wellbeing of people and nature.
- A re-write of the plan and SA is required to ensure that Oxford creates only those homes that would provide for natural growth in the population. Forced economic growth is not the will of the people of Oxfordshire. Oxford should plan only for those homes that can be accommodated within the city as it is not sustainable to regard the surrounding Green Belt as an area for commuting from dormitory towns.
- The Sustainability Appraisal is not sound because it does not consider the reasonable alternative of using the standard method due to environmental constraints and traffic. Not effective because it does not assess the impact of a high housing requirement and economic requirements. Not consistent and not legally compliant because it fails to properly assess whether development outside of the city will be sustainable. To minimise carbon emissions (eg from cement and soil disturbance) and to protect land-use for nature and agriculture, housing units should be created as much as possible from the existing built-environment whilst simultaneously retrofitting these buildings for energy efficiency and renewables.
- The SA is flawed. Delete SPS13 and the Sustainability Appraisal may be sound.
- The Sustainability Appraisal is unsound as it has not identified that some green field sites, if within the Lye Valley catchment areas are vitally important for comprehensive water infiltration to recharge the limestone aquifer. Development should be directed away from green aquifer recharge areas to preserve the Lye Valley biodiversity to comply with Policy G6.
- The Council has failed its duty to cooperate, which also applies to the Sustainability Appraisal. Clearly the Duty to Cooperate test has been failed by Oxford for many reasons as outlined in a number of our representations.

The planning policy team has reviewed the SA assessment and conclusions in light of the comments made. On balance the objections would not have fundamentally altered the assessment made in the SA or in the way the SA has informed any of the policies of the local plan. Where relevant, modifications have been made to the proposed Local Plan 2040 to address objections raised.

## 4. Preferred Options Part 1 Consultation Process

### 4.1. Who was consulted?

The City Council conducted an extensive 6-week consultation exercise between October and November 2022 to publicise the project and engage the Oxford community in the Preferred Options Stage of the plan making process.

The Preferred Options consultation aimed to involve residents, workers, employers, students and visitors to Oxford as well as stakeholders and service providers. An extension of time was provided for responses until January 2023 to mitigate an issue with the postal delivery of some of the questionnaires.

The Preferred Options consultation aimed to involve the whole city by delivering a questionnaire door-to-door across the city (approximately 46 000 properties). Letters were sent to various organisations and individuals, which included the statutory stakeholders and a wide range of interest groups, developers and agents.

Direct contact with the following individuals or organisations was made either by email or letter:

- Door-to-door delivery across the city (approximately 46 000 households)
- Statutory consultees (42 statutory).
- Those on the City Council's online consultation database with an interest in Planning and Regeneration
- Additional local groups and organisations who were likely to be interested (250).
- Respondents from the First Steps Consultation who wished to be kept informed of further stages in the Local Plan process (250)

#### 4.2. Consultation Materials

At this stage in the Local Plan project the material that was published was focussed on presenting the preferred policy options, and providing the evidence base that had led to the development of the policy options and to the preferences for those options. The consultation focussed on asking consultees whether they agreed with the Council's preferences for the policy options. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind:

For people with 5-10 minutes to get involved:

- Leaflet (equivalent 2 sides of A3) with basic information, a simple 'Strongly Agree – Strongly Disagree' questionnaire and some space for additional written comments with a freepost reply.
- Online questionnaire based on the 3 themes of the consultation.
- Social media posts including links to 3 short surveys on specific themes to supplement consultation responses. Comments could also be left in relation to the posts.

For stakeholders and those with more interest/time:

- Local Plan Preferred Options Document.
- Draft Sustainability Appraisal.
- Background Papers.
- Green Belt Study.
- Structured online questionnaire (on the Council's Consultation Portal) to comment on Preferred Options Document (in addition to option of submitting written feedback on the council website, by email or by post).

The materials described above were available:

- On the Council’s website
- In 7 local libraries and the central library
- On request
- In addition to being delivered to every household in the city, the leaflet was made available in 7 local libraries and the central library and 30 community or leisure centre locations across the city.

### 4.3. Consultation Methods

#### 4.3.1.Promotion and Publicity of the Preferred Options Part 1 Consultation Period

The Preferred Options Consultation was publicised through the following channels:

- Publication of an updated Local Development Scheme (LDS) in June 2022; Attendance at local groups and forums: Oxford Strategic Partnership, Talk of the Town and the Inclusive Transport and Movement Group.
- Notifying those on the City Council’s online consultation database (all those interested in planning or other relevant topics- 400+).
- Notifying statutory consultees and Duty to Cooperate bodies.
- Notifying residents groups and amenity groups.
- Notifying all primary and secondary schools within the Oxford City administrative boundary (and surrounding areas including Botley, Kennington and Kidlington).
- Publishing information on our webpage (including introductory videos).
- The City Council’s social media channels (Facebook and Twitter including paid adverts on Facebook).
- A press release.
- Posters distributed to all community noticeboards in the city.
- A bus advertisement campaign inside Oxford Bus Company buses during the first four weeks of the consultation.
- Briefing to Local members.

#### 4.3.2.Preferred Options Part 1 Consultation Events and Meetings

The Preferred Options Consultation was publicised through the following channels:

- Publication of an updated Local Development Scheme (LDS) in June 2022; Attendance at local groups and forums: Oxford Strategic Partnership, Talk of the Town and the Inclusive Transport and Movement Group.
- Notifying those on the City Council’s online consultation database (all those interested in planning or other relevant topics- 400+).
- Notifying statutory consultees and Duty to Cooperate bodies.
- Notifying residents groups and amenity groups.
- Notifying all primary and secondary schools within the Oxford City administrative boundary (and surrounding areas including Botley, Kennington and Kidlington).
- Publishing information on our webpage (including introductory videos).
- The City Council’s social media channels (Facebook and Twitter including paid adverts on Facebook).
- A press release.
- Posters distributed to all community noticeboards in the city.

- A bus advertisement campaign inside Oxford Bus Company buses during the first four weeks of the consultation.
- Briefing to ward members.

Drop-in events were held at the following times and venues. These were widely advertised through the posters displayed on all community notice boards, as well as on our website, on electronic adverts inside Oxford Bus Company buses and mentioned at meetings held before and during the consultation.

Table 1 – Details of Drop-in Events for the Preferred Options Consultation

<b>Tuesday, 4<sup>th</sup> October 2022</b>	Barton Neighbourhood Centre, 2-4pm	<b>Tuesday, 25<sup>th</sup> October</b>	Oxford City Football Club, Marsh Lane 5.30pm - 7.30pm
<b>Friday, 7<sup>th</sup> October</b>	Westgate 12-2pm	<b>Friday, 28<sup>th</sup> October</b>	Gloucester Green Market – not a stall but a stand with leaflets
<b>Saturday, 8<sup>th</sup> October</b>	Oxford v Wycombe, Kassam Stadium, 1-3pm	<b>Saturday, 29<sup>th</sup> October</b>	Cuttleslowe Parkrun 8.30 - 10.30am
<b>Monday, 10<sup>th</sup> October</b>	St Mary and St Nicholas Church, Littlemore coffee and singing morning 11am – 12pm	<b>Tuesday, 1<sup>st</sup> November</b>	Lidl, Watlington Road, 12-2pm
<b>Wednesday, 12<sup>th</sup> October</b>	Blackbird Leys Community Centre 2-4pm	<b>Wednesday, 2<sup>nd</sup> November</b>	Sainsbury's Heyford Hill, 11am - 1pm
<b>Tuesday, 18<sup>th</sup> October</b>	Rose Hill Community Centre 2-4pm	<b>Thursday, 3<sup>rd</sup> November</b>	EMBS Community College, 12-12.45pm
<b>Thursday, 20<sup>th</sup> October</b>	Tesco Superstore, Blackbird Leys, 11am - 1pm	<b>Friday, 4<sup>th</sup> November</b>	Templars Square shopping Centre, 11am - 1pm
<b>Sunday, 23<sup>rd</sup> October</b>	South Oxford Farmers Market, New Hinksey 10am –12pm.	<b>Tuesday, 8<sup>th</sup> November</b>	Oxfordshire County Library, Westgate (Main Foyer) 12-2pm
<b>Monday, 24<sup>th</sup> October</b>	Ferry Leisure Centre, 12- 2pm	<b>Thursday, 10<sup>th</sup> November 2022</b>	Rose Hill Junior Youth Club, Rose Hill Community Centre, 5.30-7pm

## 4.4. Responses to Preferred Options Part 1 Questionnaire

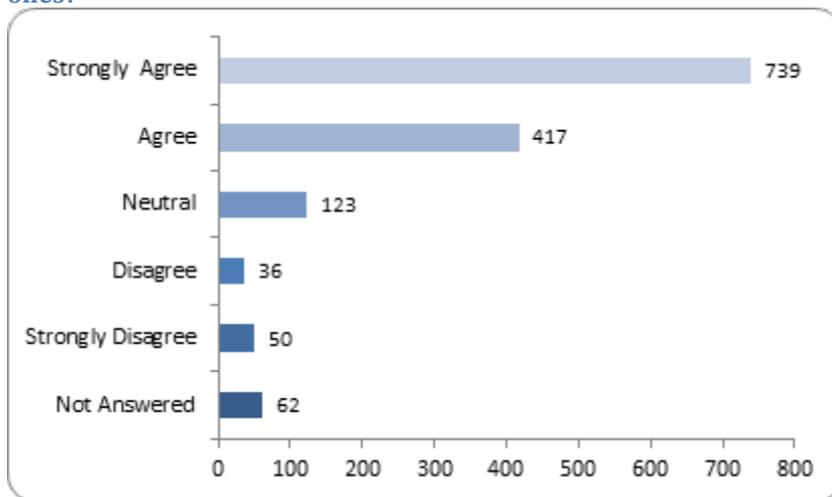
### 4.4.1. Responses to Consultation Questionnaire

The postal leaflets and online questionnaire are both based on the same set of questions, and so both sets of responses have been collated and analysed together. A total of 1427 combined responses were received over the consultation period.

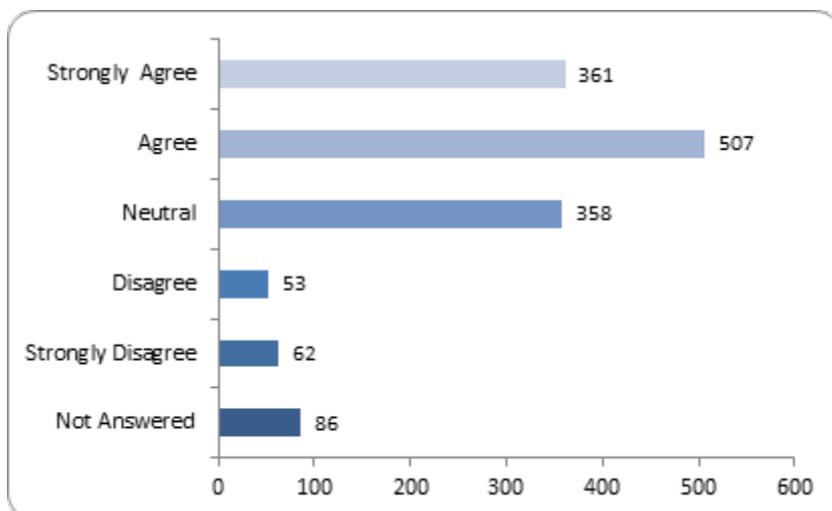
#### 4.4.2. Graphs of Responses

The graphs in the following sections show the numbers of respondents in strong agreement, agreement, disagreement, strong disagreement or neutral stances with the statements under each heading.

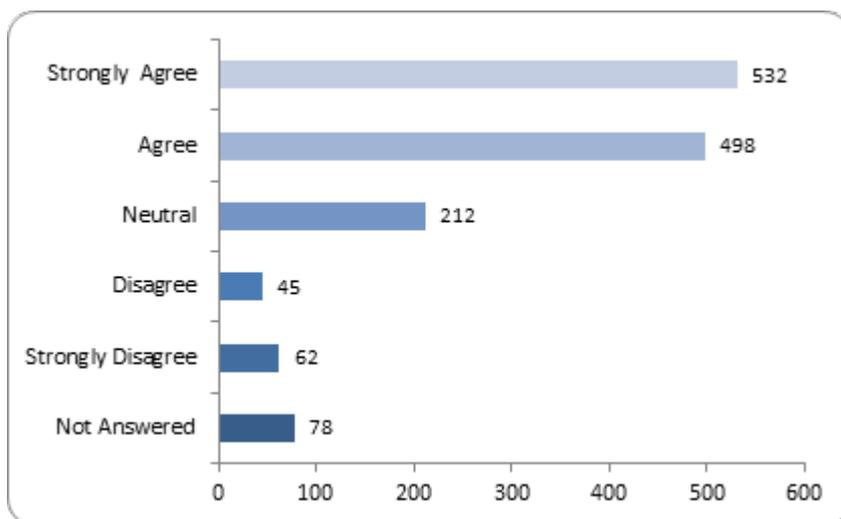
##### Should we continue to protect community, cultural and social facilities and set out criteria for new ones?



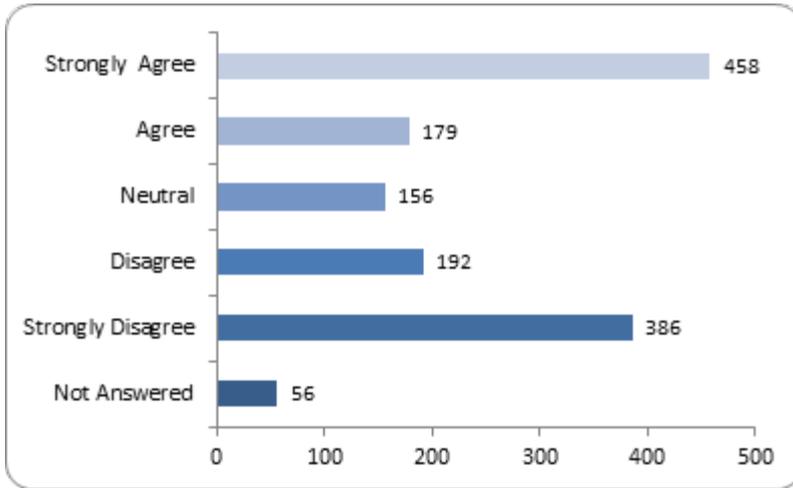
##### Should we set out guidance for our District and Local Centres?



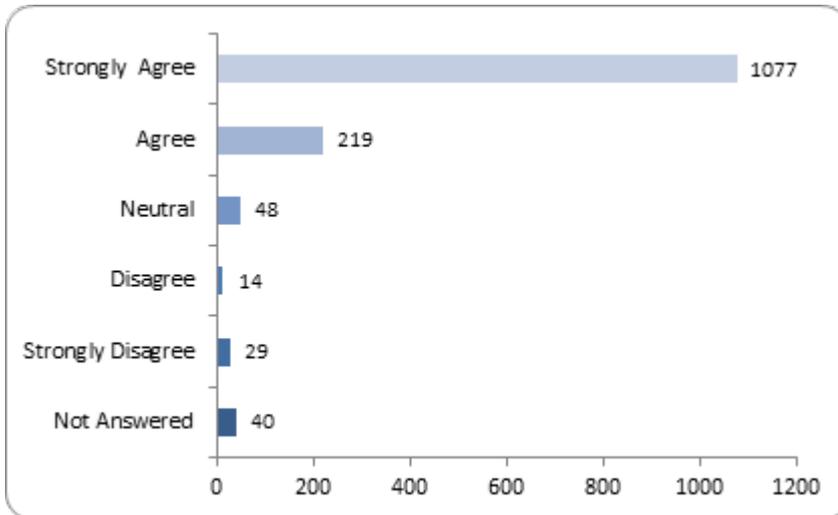
**Should we continue to promote the use of a design checklist, to improve the design, layout and architecture of new developments?**



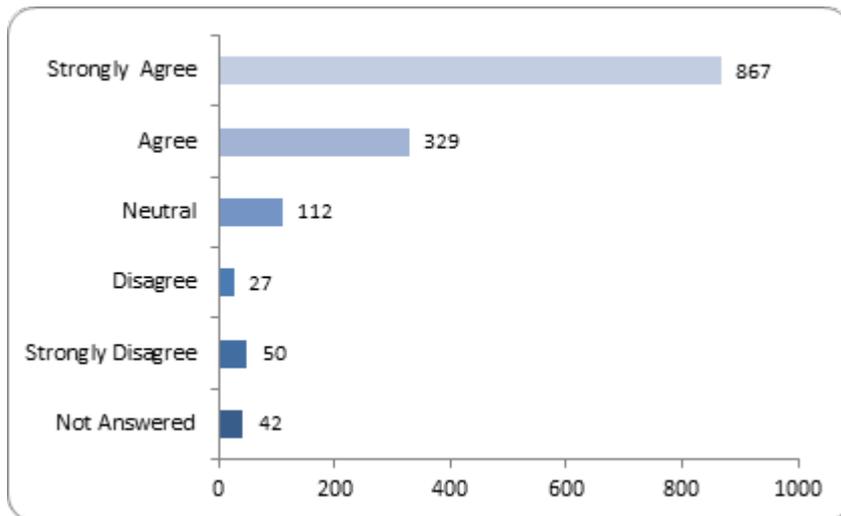
**Should we continue to prioritise travel by active and sustainable modes (walking and cycling) and discourage private car travel, by seeking to reduce public parking and parking in new developments (residential and non-residential)?**



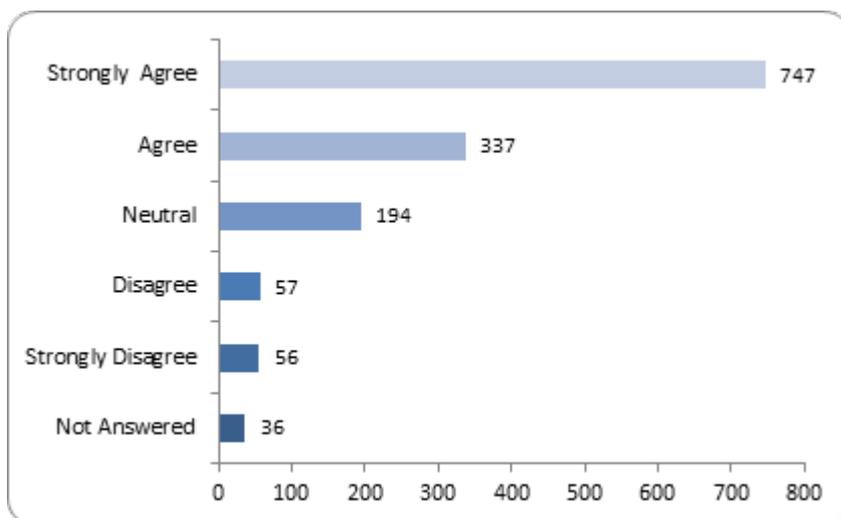
**Should we continue to protect a network of green spaces, including ecological sites, because of their value for health and wellbeing, biodiversity etc.?**



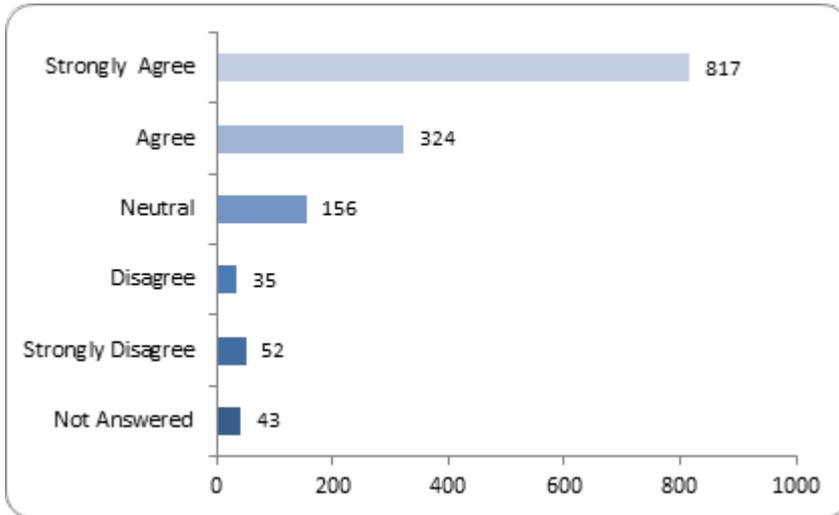
**Should we require greening of sites by requiring developments to include green features such as additional planting or green roofs?**



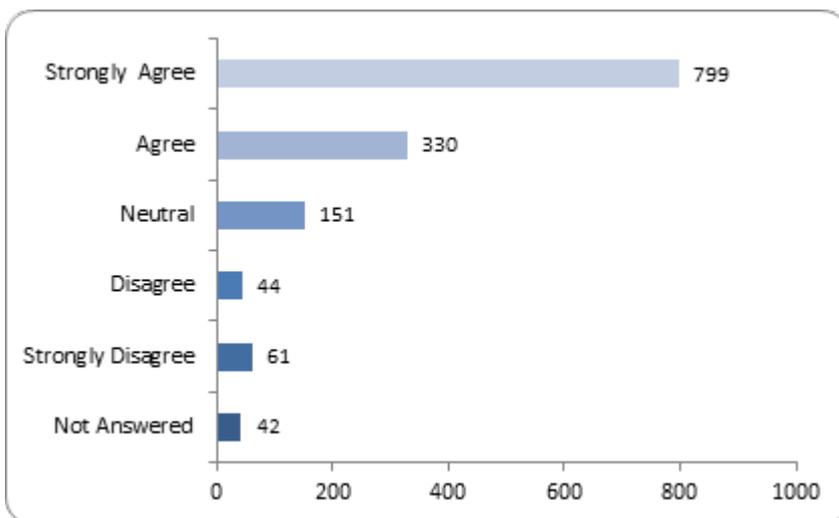
**Should we require new developments to include features to support wildlife such as bird and bat boxes?**



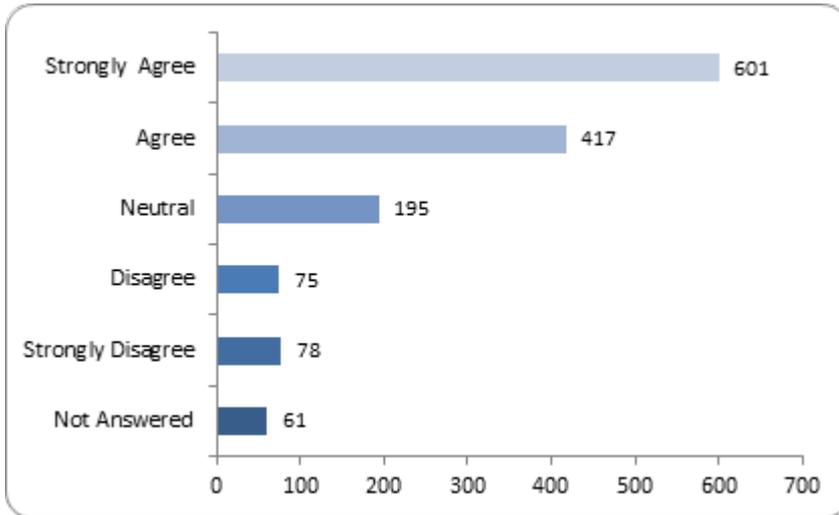
**Should we support the use of retrofitting (the addition of new features to an existing building) to reduce carbon emissions?**



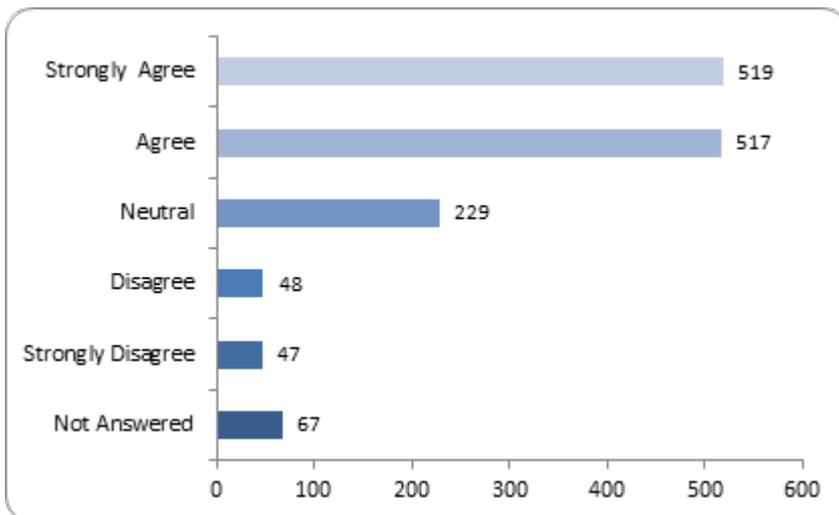
**Should we require planning applications to show how developments will be resilient to climate change?**



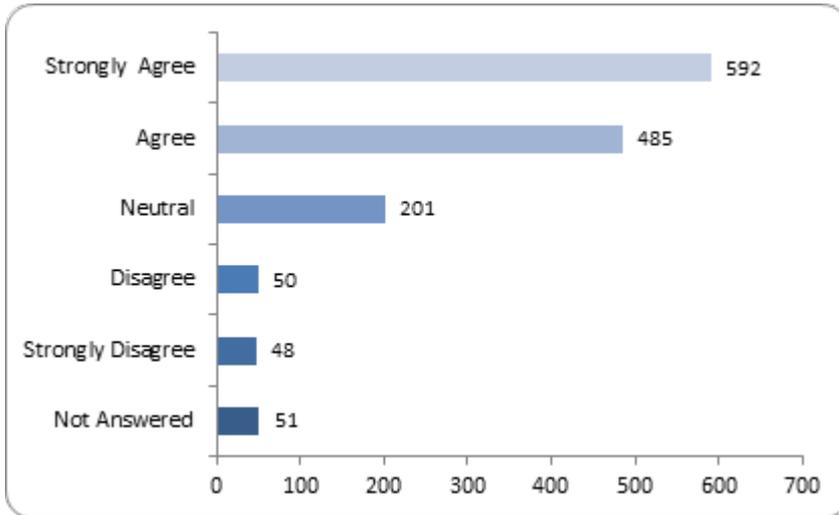
**Should we focus new development away from areas of flood risk but allow redevelopment of sites at risk from flooding where it will improve the current situation?**



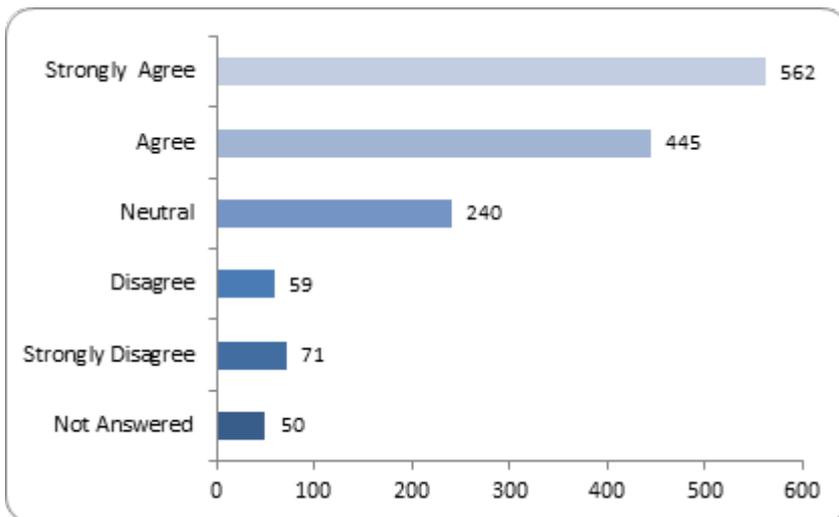
**Should we continue to encourage intensification and regeneration of employment sites that are already important to supporting the local and national economy?**



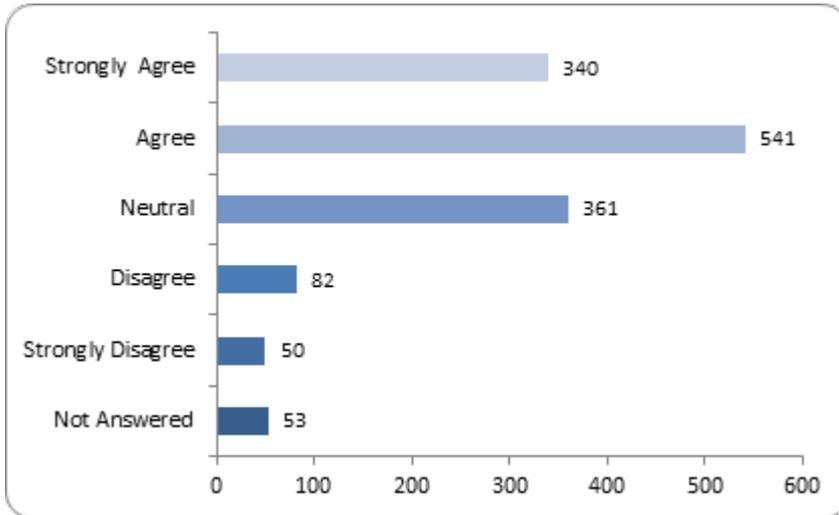
**Should we require major development projects to provide training and employment opportunities for local people?**



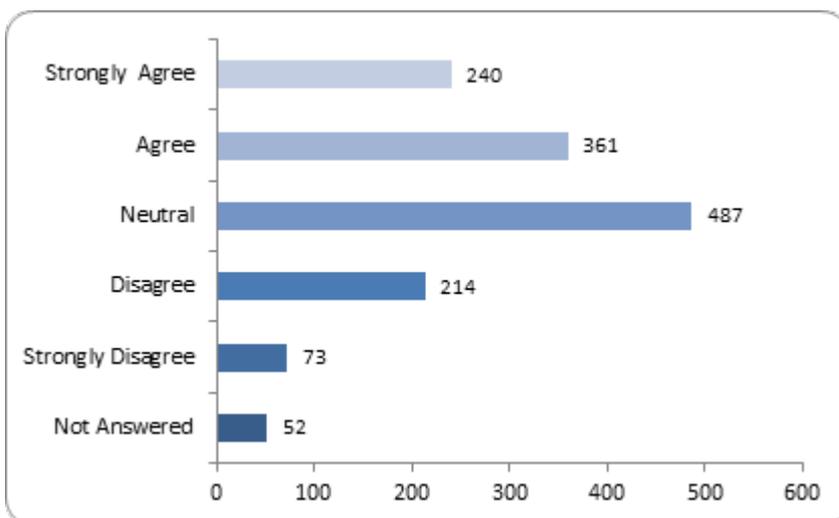
**Should we introduce a policy requirement for affordable workspaces (e.g. offering lower rent options) to be delivered as a percentage of all large commercial developments (affordable workspaces)?**



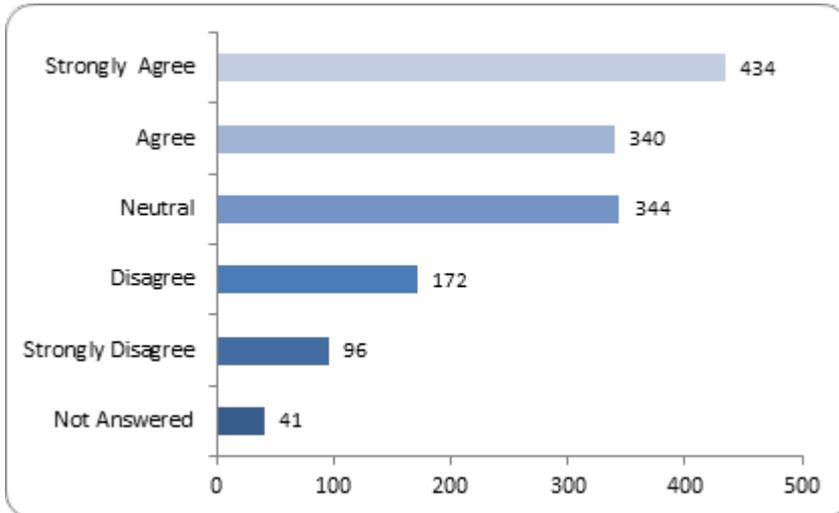
**Should we allow an element of housing to be introduced on existing employment sites?**



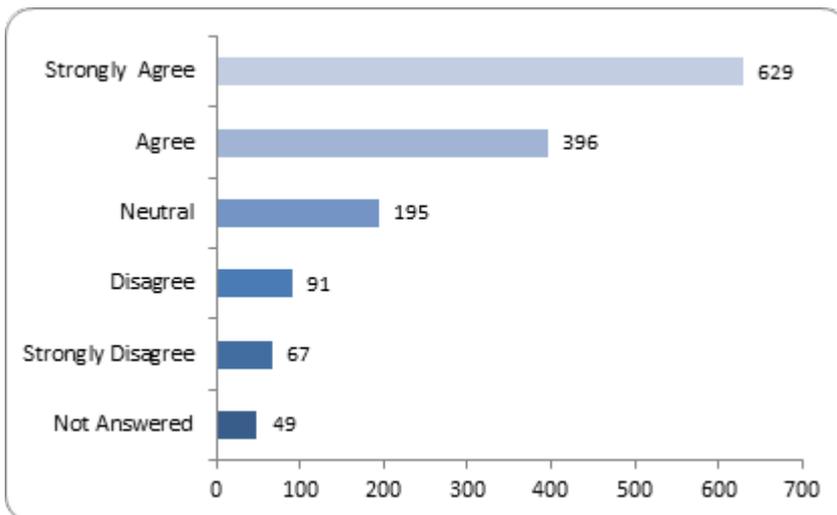
**Should we continue to meet as much of our housing need as possible by prioritising housing over employment where the space is available?**



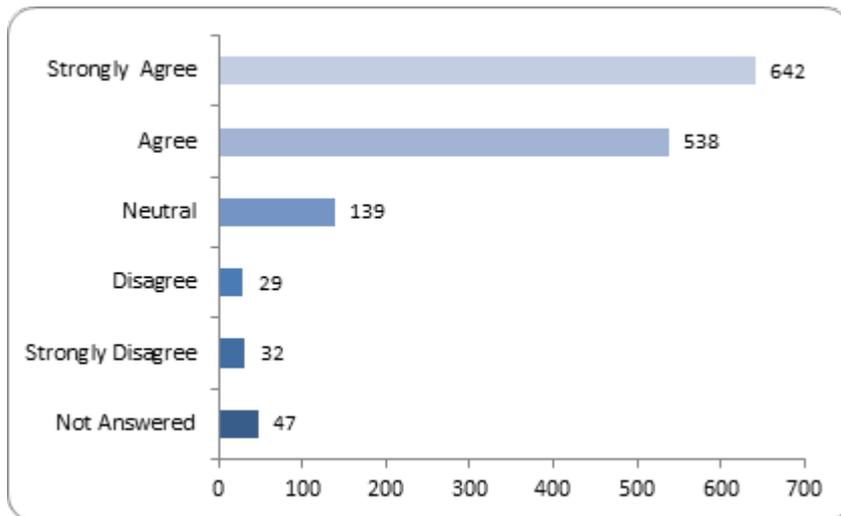
**Should we continue to prioritise the delivery of affordable housing that people can rent (e.g. social rent) over affordable housing that people can buy (e.g. Shared ownership or First Homes)?**



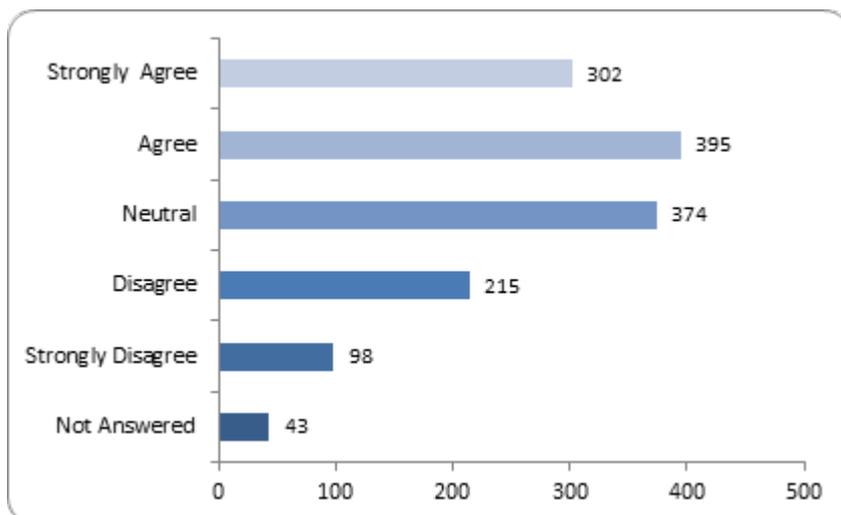
**Should we continue to prioritise affordable housing as the main community benefit from new developments, so that developers are required to provide as much as possible?**



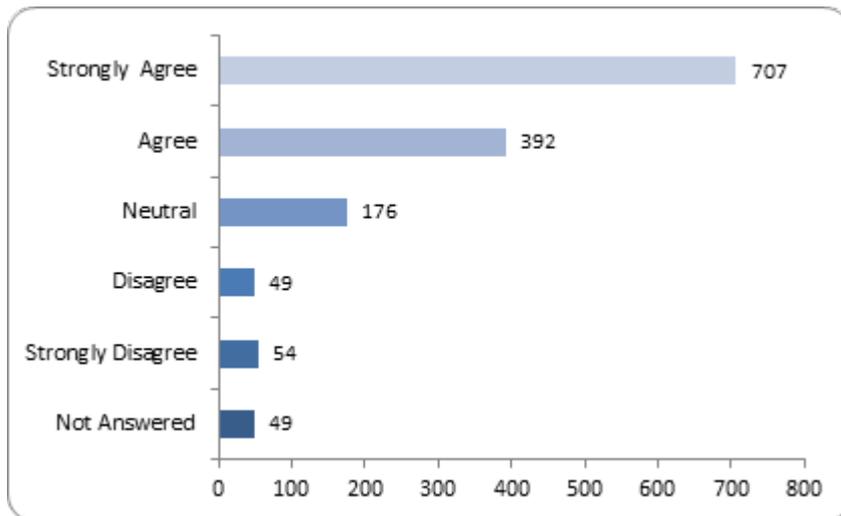
**Should we continue to deliver a mix of dwelling sizes (number of bedrooms) and types (housing for specialist needs, accessible homes) for different people's needs?**



**Should we prioritise smaller houses or flats, in order to provide more homes overall?**



**Should we continue to require Health Impact Assessments for all major new developments, to show how they are supporting healthy communities and tackling health inequalities?**



#### 4.4.3. Infrastructure Gaps

Responders were asked to describe what they considered to be infrastructure gaps that would hinder development in their local area. Relevant comments have been summarised and grouped according to the various themes that have emerged from the answers. Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. Where applicable, we have shown the number of comments received under each topic to indicate the level of interest.

Table 2 – General Comments on Infrastructure

Summarised Comments	Tally
Improved bus system/transport system more reliable/frequent/extend services	109
Make cycling safer / focus on cycling with cycle lanes / better segregation	81
Not everyone can cycle, elderly and disabled and carers must be considered	59
No more LTNs, bus filters etc.-	60
Public transport should be cheaper/free	27
Traffic needs addressing	27

Dentist/doctors/pharmacy provision is low	29
The 15 minute concept can't work for all areas-where not enough GPs, dentists, leisure facilities, schools and supermarkets, cinemas and post offices	24
Public transport needs to improve the 15 minute concept can work	21
Need more electric car charging points for cars-	20
LNTs are making traffic worse/moving traffic and pollution to ring road	18
People need their cars for work, everyday tasks, especially for outside of city	15
Increase parking (e.g. for hospitals and, vulnerable people)	15
Need more creative / direct bus routes to key locations	16
Need more covered bike storage	12
People will be trapped if they can't travel more than 15 mins	11
Mend lanes, pavements and roads (consider drainage)	18
Out of touch / listen more (City and County Council)	8
Need more affordable homes	8
Protect trees, woodland and green spaces important for mental health and well being	8
Need a tram system	7
Join bus companies together	7
Protect pedestrians and cyclists	7
LTNs should be more nuanced	6
Support car shares	6
Cycling is not practical e.g. with children / carrying heavy objects	6
Protect existing green spaces	6
Protect the green belt	6
Improve community centres	6
Need more opportunities and facilities for young people	6
Littlemore is overlooked in terms of infrastructure and resources.	6
Leading questions	5
Reduce parking	5
Water/ water pressure and sewage systems are inadequate - leading to localised flooding	5
15 minute concept too ambitious /not thought out / unrealistic	8
Would be impossible to travel into Oxford from outside without a car	4
Support LTNs / reduction in car use	4
Make park and ride free	4
Westgate traffic causes issues for public transport	4
Safe integration of scooters	4
need more street lighting	4
High speed internet	4
No development on the floodplain	4
Not all shops and facilities are 15 min walk for everyone	4
Better schools in Littlemore are needed	4
Better schools needed across the city	4
Poor transport infrastructure in Iffley Village and Old Marston	4

Please remove Bertie Park (site A) from the preferred options"	4
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Table 3 – Site/Location specific comments

Summarised Comments	Number of responses
Dentist/doctors/pharmacy provision is low (Littlemore, West Oxford)	24
Old Marston has poor public transport links	7
Littlemore is overlooked in terms of infrastructure and resources.	6
Water/ water pressure and sewage systems are inadequate - leading to localised flooding	5
Old Marston needs a GP/dentists	5
Better schools needed across the city	4
Poor transport infrastructure in Iffley Village and Old Marston	4
Please remove Bertie Park (site A) from the preferred options	4
Poor transport infrastructure in Iffley Village and Old Marston	4
Cycle infrastructure linking Eynsham / Farmoor/ Botley is needed	1
Green Road roundabout is a nightmare	1
GP surgery in Wolvercote	1
Need an LTN in Elms Drive in Old Marston	1
Joined bus route from Summertown to Oxford rail station	1
Need a pedestrian crossing on Green Road - very dangerous and needs to sorted	1
Need a new local GP in Oxford.	1
Viaducts would help with roundabout traffic	1
Jericho and waterside have no public transport	1
Iffley Meadow should be maintained	1
Mill Lane lack of shops	1
Pipe Bridge shows no sign of repair	1
No LTNs at Headington are causing traffic issues and not helping cycling	1
Developments in Old Marston won't make it a 15 minute neighbourhood, roads in Old Marston are too narrow.	1
Dangerous to cycle along the Cowley Road - Botley and Iffley Road are good	1
Barton needs better public transport or it could become car only.	1
Area near Bertie Park has limited amenities and bad smell.	1
Headington requires better access to the north via bus.	1

#### 4.4.4. Additional Comments

The questionnaires had a section allowing inputs for comments on topics chosen by the responders. These have been summarised and grouped according to the various themes that have emerged from the answers. Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. Where applicable, we have shown the number of comments received under each topic to indicate the level of interest. To aid broader comparison with the other consultation responses, these have been presented as categories under the 6 overarching themes under which the preferred options have been developed.

Table 4 – Healthy, Inclusive City

<b>Housing/Housing Need</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Prioritise housing on brownfield sites	15
Prioritise affordable housing.	12
Support high rise/ density buildings	7
Need more one bed properties for couples and singles. HMO's need regulation.	7
No more student housing	7
Decrease the number of landlords/second homeowners for private rental residences.	8
Lower rent for all.	6
Build less / there are too many homes	5
More housing needed	5
The term affordable is not truly affordable	4
Affordable housing for key workers	4
Put affordable housing on vacant central sites (replacing empty shops)	4
Need for more social housing / support	4
Private rents need to be capped	4
<b>Officer Responses</b>	
Agreed it is important that affordable housing is affordable to those in greatest housing need, and policies can aim to ensure this, and also that a range of types are available, e.g. for key workers also. The planning system is unable to cap private rents. HMOs are regulated. Attempts will be made to maximise delivery of housing, especially affordable housing. Student accommodation is restricted to certain locations currently and we will review the level of need for it and how it can best be accommodated.	

Table 5 – Prosperous City

<b>New/Existing Employment Sites; Employment Opportunities</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Don't let colleges/University rule /get their own way.	6
Shops and businesses are closing down and moving away	4
Can't get jobs with decent salaries near our city	4
<b>Officer Response</b>	
The planning system is unable to prevent shops from closing, but it can try to protect local centres and facilities from being lost. Planning permissions are granted on the basis of proposals and not landowners.	

Table 6 – Green, Biodiverse City

<b>Existing Green Spaces</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Nature is a top priority - protect it	16
Stop building on the green belt	14
Protect green belt	11
Need to preserve green spaces that already exist.	5
Prioritise biodiversity - trees, hedgerows, wildflowers and variety of native species.	5
Plant more trees	5

Are the council getting involved with and sorting pollution in the Thames	5
Green spaces are needed for mental health and recreation	4
<b>Officer Responses</b>	
The importance to people of green spaces is evident and will be a consideration in developing policies to protect our green spaces and features.	

Table 7 – Resources and Carbon

<b>Climate Change</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Need stronger commitment to mitigating damage which could result from climate change	5
The environment and climate change should be your first concern.	5
<b>Energy</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
All buildings should be energy efficient/self sufficient	13
More EV charging points / infrastructure / invest in energy saving tech	8
Solar panels should be included	4
All new developments should be carbon neutral/zero and include SUDs measures and EV charging points, insulation etc.	4
<b>Officer Responses</b>	
We will investigate what is feasible in new developments in terms of carbon efficiency and attempt to draft policies to achieve that.	

Table 8 – Resources and Carbon

<b>Flooding</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Do not build on flood plains	20
Don't encroach onto land at risk of flooding	12
Building on flood plains is too risky	4
<b>Officer Responses</b>	
A Strategic Flood Risk Assessment has been commissioned to help define areas of flood risk and develop the appropriate response to the flood plains in Oxford. A balance needs to be struck between preventing loss of flood storage areas and ensuring areas that are already developed can be	

Table 9 – Strong Communities

<b>Transport/Movement</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Do not support traffic control measures (LTNs, ZEZ, bus gates, filters)	60
Plans for traffic control measures are not inclusive for people with mobility issues - elderly and disabled	38
Traffic and noise need addressing	36
Make cycling safer (separate lanes) - Traffic measures make it more dangerous	23

Support traffic control measures (LTNs, ZEZ, bus gates, filters)	16
Enforce current transport methods (cycling) and schemes (ZEZ)	14
Public transport (bus services and trams) need to improve before changes are implemented	11
Businesses and livelihoods depend on cars	10
Disabled parking needs prioritising and better management, particularly in the centre	9
Areas are cut off but people need to move people between different zones	6
Parking is essential	10
<b>Officer Responses</b>	
Many of these responses relate to a County Council consultation on LTNs and traffic filters that took place around the same time. There was some concern (especially on social media) that the effect of those proposals was that people would be restricted to their local area of the city; this was not the intention but a misinterpretation which the County Council has clarified. The Local Plan sets parking levels, and we will be reviewing what is needed (including disabled parking) and what the appropriate parking standards are.	

Table 10 – Strong Communities

<b>Transport/Movement</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Do not support traffic control measures (LTNs, ZEZ, bus gates, filters)	60
Plans for traffic control measures are not inclusive for people with mobility issues - elderly and disabled	38
Traffic and noise need addressing	36
Make cycling safer (separate lanes) - Traffic measures make it more dangerous	23
Support traffic control measures (LTNs, ZEZ, bus gates, filters)	16
Enforce current transport methods (cycling) and schemes (ZEZ)	14
Public transport (bus services and trams) need to improve before changes are implemented	11
Businesses and livelihoods depend on cars	10
Disabled parking needs prioritising and better management, particularly in the centre	9
Areas are cut off but people need to move people between different zones	6
Parking is essential	10
<b>Officer Responses</b>	
Many of these responses relate to a County Council consultation on LTNs and traffic filters that took place around the same time. There was some concern (especially on social media) that the effect of those proposals was that people would be restricted to their local area of the city; this was not the intention but a misinterpretation which the County Council has clarified. The Local Plan sets parking levels, and we will be reviewing what is needed (including disabled parking) and what the appropriate parking standards are.	

Table 11 – Strong Communities

<b>Active/Sustainable Travel</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Public transport needs investment to be more affordable and frequent for 15 minute concept to work	56
Improve transport links (cycle and bus routes) around city, not just to centre	17
Mend pavements and cycle lanes	5
<b>Officer Responses</b>	

Agreed that the better the public transport and particularly walking and cycling routes are, the more easily people will be able to access services easily, close to their home, and without needing to drive. Opportunities to help enhance provision may be limited through the local plan process, but we will look at all possible opportunities to enable improvements through the planning process. Many of these comments relate to the highways network and transport strategy. The County Council is the highways authority, not the city council, and is responsible for these matters.

Table 12 – Strong Communities

<b>Community/Cultural Facilities</b>	
<b>Summarised Comments</b>	<b>Number of respondents</b>
Safer community facilities and training for young people, especially girls	7
Improved litter and bin management (underground bins)	4
<b>Officer Responses</b>	
Comments noted.	

Table 13 – Other Comments

<b>General</b>	
<b>Comment</b>	<b>Number of responses</b>
Out of touch / listen more (City and County Council)	8
Leading questions	5
<b>Officer responses</b>	
The questions were not intended to be leading, but we hope they did enable people to put across their thoughts, which will help to shape the consultation.	

#### 4.5. Summary of In-depth Consultation Responses to the Preferred Options Part 1

The Preferred Options Part 1 questionnaire was designed to allow respondents to leave in-depth comments on each set of preferred policy options, the supporting documents and overall evidence base. A summary table of responses to the Preferred Options Part 1 is provided in Appendix 5 for reference.

Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. A number of representations were made separately by email, and these have also been collated as part of the summary.

## 5. Preferred Options Part 2 Consultation Process

The City Council ran a 6-week consultation from 13th February to 27th March 2023. The responses to the consultation received on each of the questions are summarised in the table below with responses from statutory consultees summarised first followed by a summary of all other comments received on each of the questions. A summary of the comments and number of responses received on the consultation portal are appended to this report as Appendix 5. We received comments from some statutory and non-statutory consultees who responded with some general comments on the Plan. These comments have been noted and will be considered as part of the wider Plan comments.

Table 14 – Responses to the Preferred Options Part 2 Consultation Questionnaire

## **Q1 - Are there other ways of identifying housing need that should have been considered?**

### **Summary of comments from statutory consultees:**

- Standard method should be used to produce a need figure close to the requirement. City officers should identify more housing sites and increase densities in the updated housing and employment land availability assessment (helaa) and explore increasing the windfall allowance (Oxfordshire County Council – OCC).
- Disagree with the Hena and disappointed about the lack of engagement to discuss other methods of establishing housing need evidence. The exceptional circumstances stating Oxfordshire’s role in the local and national economy should be set out clearly. The need to plan collaboratively to meet the requirement to deliver 100,000 homes as part of Oxon Housing and Growth Deal no longer exists so there is no need to depart from the Standard Method to determine housing need (South Oxfordshire DC and Vale of White Horse DC – SODC and VoWH DC).
- Suggest further discussions needed to reach an agreed position on the level of identified housing need for Oxford, and the extent and apportionment of any need which is unable to be met within the City’s boundaries. Further justification needed as to why the City Council has departed from the Standard Method, the 2021 census does not provide enough reason to do so. 2014 based Standard Method should be used until such a time as the 2021 census is reflected in new household projections (West Oxfordshire District Council - WODC).

### **Summary of comments:**

- A collaborative approach with all Oxfordshire authorities is required.
- The scenarios developed by Cambridge Econometrics are based on the outdated premise of growth, whatever the long-term cost. Scenarios should be developed which consider and protect the well-being of future generations.
- Much of the predicted population growth can be accommodated by increasing the number of people who live in existing buildings and encouraging conversions and extensions to achieve this rather than just relying on building lots of new homes.
- Agreement that methodology needs to take account of the City’s economic needs and the pressures that arise from forecast economic growth.
- Methodologies provide a clear basis to establish scale of local housing need that responds to critical local factors. Scenarios provide a clear indication of balance between jobs and homes and identify the extent to which growth in labour demand will be satisfied by labour supply. Scenario metrics also provide a measure of extent to which labour originating outside of county is required to satisfy demand originating within.

- Housing requirement figure should be based on the 2021 Census- adjusted Standard Method calculation – this is the most robust analysis of housing need in the city.
- Unless there are proven ‘exceptional circumstances’ for not using it, then Standard Method should be applied.
- The council should pause and see what opportunities the government’s proposed planning reforms might offer OCC.

## **Q2 - Do you have any comments on the methodologies used in the HENA?**

### **Summary of comments from statutory consultees:**

- We support the methodology used in the HENA and as such the unmet need is likely to have to be provided by neighbouring authorities. (National Highways).
- We support the use of the jointly commissioned HENA (Cherwell DC - CDC).
- Oppose the HENA methodology and choice of scenarios, as well as the wider Oxfordshire geography that the evidence covers without our involvement or consent, and the distinct lack of evidence for Oxford City itself (SODC & VoWH DC).

### **Summary of comments:**

- Fully support economic led projection, any lesser housing target risks frustrating the achievement of this economic potential and the benefits that the research focused sector (life sciences, low-carbon energy, AI) generates.
- Standard Method does not yet reflect demographic data from the 2021 Census, nor does it account for actual economic trends or strategies that reflect the importance of Oxford and Oxfordshire to the regional and national economy. The mid-year population estimates that the Standard Method relies on underestimates what has happened in terms of population growth.
- Methodologies provide a clear basis to establish scale of local housing need that responds to critical local factors. Scenarios provide a clear indication of balance between jobs and homes and identify extent to which growth in labour demand will be satisfied by labour supply. Scenario metrics also provide a measure of the extent to which labour originating outside of county is required to satisfy demand originating within.
- Demographic modelling used fixed ratios instead of dynamic cohort models and as such may have underestimated housing need. Use of earlier age projections that influence household formation and the use of economic activity rates rather than blending data with forecasts from OBR may have impacted on figures. Concern about assumption made on home-working & potential impact it may have on other scenarios.

- The HENA fails to understand the very special demographics (connected with universities, hospitals etc.) which substantially influence housing provision and whose requirements are far more complex than those identified in the very broad realisation in the report. Given that there are so few of these large institutions, it would have been helpful to have sent a survey to them all, asking demographics of staff and students and their future growth plans.
- The core assumption that housing is employment led is false given the large student population in Oxford. Where it is a factor, the demand is not representative, due to many single key workers and temporary residents.
- Key inputs that would reduce the demand for housing are missed in the calculation. Examples include large housing developments such as Barton Park and Land North of Bayswater Brook; new student accommodation associated with Oxford Brookes and all the small householder development that create new dwellings or uplift the number of bedrooms.
- Large, high-density and car-free housing (particularly on brownfield sites) would obviate the need for new family housing and make better use of the land currently in Oxford, reducing its' unmet need.
- Agree that this is an exceptional circumstance that justifies a departure from the Standard Method but evidence of why the higher growth has been recorded is needed. (Is it because of population movement related to COVID or are higher rates of growth experienced in specific parts of Oxfordshire due to new housing/ employment opportunities).
- The Standard Method is the correct method for calculating housing need and there is no justification for arbitrarily adjusting this method for Oxford City. The projection of economic growth in the HENA is unreliable given the over-riding impact of macro-economic factors and it is therefore unreliable for use in forecasting housing need.
- More Census data is becoming available since the report was produced, e.g., details of the student population, therefore it would be preferable to take this into account.
- Assumptions are made that the propensity of the population to form households will increase – it won't happen if we keep building expensive new houses.
- Net migration is assumed to continue at the rate during the last five years. Would prefer to see a more prudent method that bases net migration on the last ten years and allows for tapering off in the second decade of the plan - would reduce it by almost 28%.
- Overall, the relationship between housing development, carbon budget and biodiversity must be recognised in the method used to calculate the required number of homes.
- Housing requirement figure should be based on the 2021 Census- adjusted Standard Method calculation – this is the most robust analysis of housing need in the city. The HENA is flawed in the same way as the OGNA and appears to manipulate housing need upwards.

### **Q3: Do you have any comments on the scenarios?**

#### **Summary of comments from statutory consultees:**

- Not helpful to only present as an Oxfordshire figure: it's not an Oxfordshire Plan. Do not agree with the 'census-adjusted SM' - Standard Method is not adjustable. The scenarios are not realistic or justified (SODC & VoWHDC)
- Any scenarios should have been applied to Oxford and Cherwell only, as they have not been agreed with the other Oxfordshire authorities. Do not agree with the adjustment to the SM which results in a 40% uplift of dwellings. The 2014-based approach should be used until government releases relevant 2021 Census data. Any uplift from the economic strategy scenario should be applied only to Oxford City and Cherwell, as they have not been agreed by the other authorities (WODC).

#### **Summary of comments:**

- The Economic Development-Led scenario is the only scenario that positively supports the economic growth expected in the City over the plan period and maximises the provision of affordable housing.
- The baseline trend economic method or economic led scenario more closely reflect the reality of housing pressures in the city and are more likely to respond to the economic role of the Oxford economy.
- Concern with the employment led scenarios is the economic uncertainty that currently exists and which could have an impact on the high levels of inward investment in Oxfordshire. The scenarios have demonstrably attempted to tackle this uncertainty, but recent events (such as the collapse of the SVB Bank) were not predicted and could have repercussions in the UK.
- The unprecedented rise of biotech and IT enterprises during the Covid pandemic is most unlikely to be repeated, and the future of financial investment in such companies is insecure to sustain such presumed growth. The projection of future housing need is therefore a gross over-estimate of the most likely actual housing need.
- The rate of housing delivery in the districts and the city is of concern and at the existing pace, the current rate of housing completions are likely to be unmet by the end of the plan periods. Neither of the HENA recommended employment led rate of completions will be possible to achieve unless measures are taken to make delivery more efficient and effective.
- Strongly disagree with the three scenarios resulting in the highest growth rates and consider they should be discounted. The two employment led scenarios would lead to housing need projections over the next ten years 50% and nearly 100% higher than achieved over the last ten years. The census adjusted scenario, based on preliminary and incomplete data, inflates projections of housing need to over 60% above the household increase 2011-2021.

- The high rates of population growth in these scenarios are unrealistic. They rely on increased rates of household formation which are unlikely given worsening conditions in the jobs market and the current cost-of-living crisis, all of which results in less demand for new homes. These scenarios would also require high rates of net migration into the county over the next 20 years. This is unlikely due to the UK's restrictive immigration policy and free movement from the EU having ceased.
- The scenario based on the standard method includes a very high uplift of over 40% for affordable housing resulting in household growth some 16% above the increase in 2011-2021. Although there are some misgivings about this scenario (particularly as annual monitoring reports from the city council indicate that less than 15% of homes built from 2016-2021 meet the government's definition of affordable), it is consistent with current government policy and is the scenario that should be used.
- Unless there are proven 'exceptional circumstances' for not using it, the Standard Method is the approach which Cambridge Econometrics and Oxford City Council should have taken, to conform with the NPPF and PPG, and until the release of the ONS household projections in 2024, the 2014 Census population data is the correct data base to be used.
- The Standard Method figure of 3,388 is rejected because it is based on inaccurate 2014 based household projections. It is then adjusted by considering limited data from the 2021 Census figures, but there are no exceptional circumstances that exist to justify this approach.
- The 2014 household projections showed fairly rapid growth between 2019-29 but this tails off rapidly between 2029-39. However, the HENA assumes that the second decade will see the same level of growth as the first – just one example of how the HENA inflates figures, thereby grossly exaggerating housing need.
- The Census adjusted Standard Method and the Cambridge Econometrics Baseline scenarios both give very high and similar figures which is not much of a choice. There should be a lower net migration option for example and/or other adjustments to the figures.
- The HENA standard method is unreasonable as the affordability allowance is 15.8% more than the amount of growth we experienced up to the 2021 Census. The Cambridge Econometrics Baseline Trend is even more unreasonable as it is 50.6% more than what was experienced.
- For the employment scenarios, HENA correctly observes that the OGNA estimate is a market signal of housing undersupply and thus should be reduced so that supply and demand are more balanced.
- The CE baseline scenario and 2021 Census Adjusted Housing Need Scenarios are suitable housing need estimates, if the target is c.490,000 workplace workers in 2040 with 2021 Census Scenario (4,271 dpa) preferable, as it delivers the best balance between housing supply and demand. Assuming the above workers target the Economic Led Housing Need Scenario is the only suitable housing need estimate for Oxfordshire.

- Each of the three alternative assessments represent appropriate assessments, which take account of demographic and economic trend- based projections to derive reasonable estimates.
- The selection of the CE baseline trend scenario does not look forward to accommodating the projected growth of the science and technology sectors, which has intrinsic links with the presence of the Universities in the city.

#### **Q4 - Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?**

##### **Summary of comments from statutory consultees:**

- City should not be determining levels of need for other local plans or making decisions on behalf of other councils. Current consultation does not reflect any changes since our previous response. The scenarios are not appropriate or realistic, and disagreeing with the SM is not an exceptional circumstance (SODC & VoWHDC).
- The most appropriate – as per the NPPF – is the standard method. Needs to be fully justified if departing, and any departure should only be applied to Oxford and Cherwell (WODC).

##### **Summary of comments:**

- Agree that this is the most appropriate scenario to use (as the fourth scenario is likely to be unachievable when considering environmental and social aspects of The Oxfordshire Vision in tandem with the economy), but a sustainability assessment of the scenario is essential.
- Support City Council’s decision to consider whether circumstances faced by Oxford require an alternative method for assessing housing need and conclude that a higher level of housing is needed. This aligns with PPG as a sound approach where it reflects current and future trends. Consultation document and HENA show acute housing shortfall in housing if only minimum/standard method is applied. Evidence shows underestimation in Oxfordshire's population growth and economic growth aspirations justify a higher housing figure. Economic baseline is less than Census adjusted for Standard Method and respects a ‘realistic expectation for economic development growth.’ But consider some unmet need has already been planned for in neighbouring Local Plans and therefore a higher housing level outside the city including Green Belt releases and focus on sustainable towns should be promoted.
- The suggestion that “the economic development-led scenario represents the highest realistic level of growth” is flawed as it does not take into consideration the special policy requirements for environmental protection and enhancement in Oxford and in the surrounding Districts, which must be a central part of any successful development plan for Oxford.
- It has been noted that one of the reasons for justifying the most appropriate scenario is because of the similarity between the figures calculated in this scenario and that of the Census adjusted Standard Method. However, a similarity between figures calculated on

entirely different bases does not give comfort that they are both robust, or provide any justification for using either of the figures.

- Conclusion that Oxon's housing need should be aligned to CE Baseline Housing Need scenario fails to recognise the more beneficial commuting balance achieved by the 2021 Census Adjusted Housing Need Scenario.
- Council's preferred scenario fails to provide enough homes to realise the economic growth ambition articulated by the Economic Dev. Employment growth projection.
- HENA identifies uncertainty (macro- economic events and public funding constraints may slow projects down or lead to some not progressing) and the realistic Economic Led employment growth scenario is completely abandoned – this is unnecessarily pessimistic and a disproportionate response. It would have been more prudent to arrive at a housing need estimate between the baseline and growth position – recommend at least 5,000 dwellings per annum, this would support an improved balance between housing supply and demand, retains a modest requirement of 1,000 daily inward commuters in 2040 against baseline demand and would also support some employment growth in excess of the CE baseline projection, without breaching the ceiling target of 9,000 daily inward commuters in 2040.
- Proposed housing needs figure using CE baseline trend scenario represents an uplift to the local housing need figure calculated using the standard method but it would be prudent to sense check the adjusted scenarios and the economic trend data against the latest (population and migration) census data (due to be published in Summer 2023).
- Confusing that Cherwell DC is using Standard Method for calculating Housing need, having received the HENA. City should confirm where each authority stand in relation to the HENA.
- Reasons for discounting the 'economic development-led' scenario would benefit from further explanation.
- Assumption other Districts in Oxfordshire will use the same method for calculating housing need, not the case. The economic development-led scenario is flawed since it does not consider environmental protection and enhancement in Oxford & neighbouring districts.

**Q5 - Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?**

**Summary of comments from statutory consultees:**

- We are not convinced that housing distribution should be based on jobs in different districts. Distribution should reflect the need to promote development patterns that support the Local Transport Connectivity Plan (LTCP). We would like to see where the unmet need for Oxford can be accommodated on the already allocated sites close the city (OCC).

- Attempting to divide Oxfordshire's housing need is beyond the City Council's remit or authority to determine the needs for the whole county or to unilaterally apportion that need. The HENA should only identify need for Oxford, which it fails to do (SODC & VoWHDC).
- HENA should not look at need on an Oxfordshire-wide basis, nor be apportioning need. This is beyond the remit and authority of the City Council and its planning function (WODC).

**Summary of comments:**

- Current local plans in Oxfordshire have already identified enough sites to meet Oxford's housing need until the mid-2030s. Therefore, the additional unmet need will be for the last four-five years of the new local plan. New sites coming forward in Oxford (although likely to be small), additional capacity from windfall sites and increased density will all result in a new unmet need figure for Oxford and needs to be calculated as part of the HENA.
- The unmet need figure should be lower as it doesn't consider delivery of strategic sites in other districts whose full capacity is not accounted for as some delivery is expected beyond the end of the plan period. Some of these sites have density policies which is lower than appropriate for edge of city sites so policy adjustments to increase density need to be factored into the calculation.
- More housing could be planned for in the city. The housing shortages in Oxford are due in part to the city council's continued promotion of employment growth; this despite the historic imbalance between jobs and economically active residents. Maximising the delivery of housing within Oxford's boundaries could involve promoting the redevelopment of all or part of employment sites for housing and enabling the high-quality conversion of under-used office and retail space for housing.
- Oxford City Council seem to be exceeding their remit by seeking to determine the housing needs for the whole county and then apportioning that between the District Councils
- This housing need figure calculated for Oxford is around double than if the Standard Method for calculating housing need was used. There is no explanation of how this need could be delivered in a sustainable way, therefore it is unjustified.
- The housing need distribution to the other districts change depending on which of the three options is used, (2014 based Standard Method, 2021 Employment figures or 2040 Employment Figures) with the 2040 option giving the highest percentage to Oxford (30%). However, when this translates to an actual figure for Oxford, this figure (457) remains unchanged, meaning that Oxford's contribution is the same, no matter which option is picked but differs for all other districts. That means that the total pressure on other districts is the same, it is just spread around differently. Only by reducing the overall total and reducing estimated need in Oxford can the total pressure on other districts be reduced.
- Support proposed distribution of employment and subsequent housing across Oxfordshire authorities.
- Should be assessed through the 2021 Census adjusted Standard Method calculation.

- Other factors, including environmental and infrastructure capacity need to be considered alongside employment led distributions – therefore encourage discussions between Oxon authorities to ensure that the collective housing need identified is met in a way that achieves optimal sustainable arrangement.
- The HENA should not be part of the Local Plan as it impinges on the democratic rights of residents in other parts of the county to make their own decisions.

## **Q6 - Do you have any comments about the housing mix including the need for specialist housing and affordable housing?**

### **Summary of comments from statutory consultees:**

- We don't accept the HENA correctly reflects the scale of affordable housing need to meet future social care needs (OCC).
- The HENA makes a claim about affordable housing need for all other districts, without consultation or engagement with us. This is unreasonable and unjustified (SODC & VoWHDC).
- HENA should report figures only for Oxford and Cherwell ( WODC)

### **Summary of Comments**

- Support HENA approach which continues to identify a substantial need for affordable housing both in Oxford and throughout the County.
- Surprising that hospitals, teaching and students are of such little importance that they were not even included, given their very special demographics and needs, whereas the relatively small industrial, lab tech and general office sector are addressed in depth.
- Concerned that there is no housing provision to protect key staff who work in the healthcare sector in Headington and who are forced to commute to work each day.
- Concerned that the proposals do not appear to make sufficient provision for affordable housing within the city. It is a myth that building more houses will see prices fall. Priority should be to provide genuinely and permanently affordable social housing to meet existing need. Table 2.2 should cover social rented housing need as set out in Table 9.11 of the HENA to add clarity.
- There must be a focus on the need for smaller social dwellings, as the definition of affordable at 80% or market value means that these are still unaffordable to the less well off, first-time buyers and average income families.
- Given the increasing number of elderly home-owning residents, the provision of high-density, high-quality apartments could free up under-occupied family homes. Government household

projections also indicate this increase, and more attention needs to be focused on this trend when considering plans for new estates.

- Support the housing mix that provides affordable and specialists housing.
- The affordable housing need is high and higher housing requirements maximise affordable housing delivery. Use of 2021 Census adjusted Standard Method calculation is more robust and will result in a higher rate of affordable housing delivery.
- Consideration could be given to research undertaken by DLP which is emerging as an industry standard (utilised in Local Plan examinations and endorsed through appeals). The Older Persons Housing Needs Model considers that the minimum level of future provision should be based on a prevalence rate of 275 units per 1,000 of the population who are 75 years or over, alongside providing tenure specific prevalence rates and older person accommodation needs projections more responsive to local circumstances ([https://www.dlpconsultants.co.uk/wp-content/uploads/2022/04/DLP-SPRU\\_Older\\_Person\\_Housing\\_Need\\_Research.pdf](https://www.dlpconsultants.co.uk/wp-content/uploads/2022/04/DLP-SPRU_Older_Person_Housing_Need_Research.pdf))
- Student housing – using census data taken during covid lockdown could be unreliable so cross reference with other data sources to ensure there is no under provision of student housing in the future.
- There is no mention of securing increased mooring in the assessment.

## **Q7 - Do you have any comments about the assessment of housing capacity?**

### **Summary of comments from statutory consultees:**

- Support the City Council's commitment to maximising capacity within the city and the need to increase the supply of affordable housing (CDC).
- The updated HELAA should reflect new policies and initiatives. As the County Council referenced in the Nov 2022 response development patterns need to support the Oxfordshire Local Transport and Connectivity Plan and ensure that fewer car journeys are made. Press releases and local actions to deliver affordable housing are positive initiatives in the City, and this momentum could also be reflected in the HELAA. The ambitions for zero carbon should influence the HELAA too with more accessible sites and efficient use of land being promoted. It is therefore concerning to see its unlikely the HELAA will see significant changes to the capacity estimate when new policies are applied. The exceptional circumstances for Green Belt review and release of Green Belt should be clarified. Wolvercote Social Club could be an opportunity to make more efficient use of land. Green Belt base layer map and map extracts are out of date – parcels were released in the South Oxfordshire Local Plan eg Land North of Bayswater Brook (SODC & VoWHDC).
- City must leave no stone unturned and seek to maximise delivery of housing within the city boundaries before looking to adjoining districts to assist with any unmet housing requirement figure. Providing more homes in Oxford will have the most benefit for people who want to live and work in Oxford, it is where the best transport connections are and encourages the

maximum use of previously developed land in preference to sensitive, undeveloped greenfield sites, including those within the Oxford Green Belt (WODC).

### **Summary of Comments**

- Density should be looked in more detail. A lot could be gained by incrementally increasing average residential densities (not tower blocks!) which would increase housing capacity.
- Sites in the city should be prioritised for social rent housing rather than employment. The proposed Oxpens development will deliver 3,000 new jobs but only a few hundred homes.
- Dispute the projections for office floorspace that will be needed. If the tendency to work at home (37.9% in the 2021 Census, not the 30% mentioned in the HENA) continues and maybe even grows, then need for office workspace in Oxford could reduce and free up space for housing. Similarly, retail floorspace need seems to have reduced as more goods are delivered direct to customers.
- The City Council will need to work with neighbours through duty to cooperate to distribute housing or else the economic aspirations of the area will not be achieved.
- City Council should not limit itself to GB review when revisiting HELAA. GB release is only one of several potential sources that need to be fully assessed. Opportunities to review land already excluded from the GB should also be investigated, as reinforced by proposed Central Gov's reforms to planning system (which indicates urban areas provide most sustainable locations for growth and development opportunities). A comprehensive Green Belt review undertaken under the auspices of the Future Oxfordshire Partnership Strategic Planning Advisory Panel is recommended. Comprehensive review will need a joint approach with all DC's. The GB Assessment of Additional Sites – falls short of a comprehensive review of the GB around Oxford because land outside administrative boundary is excluded.
- Urge Oxford City Council and its neighbours to address cross boundary matters pro-actively and constructively. Would be useful to understand what discussions and buy in the City Council has had on the HENA with other authorities.
- Operational sites and campuses should be dedicated to meeting the teaching, research and innovation needs of the Universities. Identifying residential targets on university sites will detract from the teaching and research missions of the Universities. Balance of housing provision v teaching and research space must be at discretion of University, rather than other policy objectives. Key operational sites should be protected for (intensified) academic teaching and research uses.
- Address housing capacity through using empty homes and retail units.
- Land available as vacant on industrial sites should be allocated for high density low-cost homes.

## **Q8 - Do you have any comments about this conclusion to our approach to assessing housing need and setting a housing requirement in the Oxford Local Plan 2040?**

### **Summary of comments from statutory consultees:**

- Support the City Council's commitment to work closely with neighbouring authorities to continue to refine proposals for respective local plans (CDC).
- Ideally evidence should be jointly commissioned by all the Oxfordshire authorities so agreement could be reached, and we can be confident that the figure of unmet need is realistic and achievable and agreed with district councils (OCC).
- Should use Standard Method to calculate housing need. In the absence of exceptional circumstances should not use the economic baseline scenario by Cambridge Econometrics. The approach also does not assess the need for Oxford City. Concerned about the low capacity in the interim HELAA, the inflated housing need, and the resultant gap between housing need and capacity is greater than it should be. Clarify any windfall assumptions. Clarify the rationale for a stepped trajectory if applied (SODC & VoWHDC).
- Going above the standard method in terms of housing delivery may have potentially harmful impacts on the environment and Oxford's heritage. But acknowledge constraints and importance of working with neighbouring authorities to help meet Oxford's housing need. Keen to see historic interest given due consideration in seeking to meet housing capacity target (Historic England).

### **Summary of comments:**

- Circumstances faced by Oxford & Oxfordshire remain the same, acute shortage of housing to meet economic aspirations of city and county, scenarios considered therefore to be reasonable and supported. Support approach to meet the needs of those in high need & those, particularly the young, who may struggle to remain in the city.
- Welcomes statement by the City that 'the delivery of housing is a priority' and its commitment to 'work closely' with neighbouring authorities so that housing needs of Oxford can be met in full. But consider actual need for housing could be even higher.
- This assessment impacts the whole county, and it is unclear as to what extent district councils have been involved in the drafting. Council to pursue active and constructive engagement with its neighboring authorities on provision of identified housing needs across the Oxfordshire Housing Market Area (HMA) and publish evidence of this engagement at the earliest opportunity.
- Housing need should not be based on a projected economic growth in response to an outdated Cambridge led study which ignores the Green Belt, NPPF, climate change awareness and an economic reality post-Brexit.

- The HENA fails to provide a detailed analysis or separate section on Oxford, the main target of the report. The Growth Board required 650 homes per annum to be provided in Oxford's administrative boundary between 2011-2031. This has been reduced to 457 homes per annum and is not explained clearly in the HENA.
- Almost meaningless to analyse historical housing trends as this is influenced by cost and availability of housing – analysis of past trends is not a predictor of future need.
- The HENA needs to be publicly discussed and reviewed for consistency with climate change / environmental and social / inclusivity priorities and for consistency with the Oxfordshire Vision overall.
- Move away from an old-fashioned pursuit of GDP 'growth' to the more socially and environmentally aware 'doughnut economics', which aims to ensure that no one lacks life's essentials, and that development does not compromise the planet's ability to support life.
- There is no Sustainability Appraisal of the environmental, social or cultural impacts of these proposals, or even acknowledgement of such impacts.
- As recently as 2018, the objectively assessed need for Oxford City was 93 dwellings per annum, with any figure above this being a 'policy choice'. This consultation fails to make clear what has changed so dramatically since 2018 and fails to distinguish adequately between 'need' and 'requirement'.
- The CE figures are automatically presented as the housing 'requirement' but there has been no balancing exercise undertaken to assess the environmental and social impacts of this approach.
- Ox City is facing a growing housing and employment need. Need to plan for both future housing and employment needs.
- The assumption that households rent because they cannot afford to buy is tenuous at best when so many are in temporary residence.
- Housing need is understated, should be higher than the HENA recommended scenario - at least 5000 dwellings per annum.
- HELAA Table B capacity info does not align with the interim assessment of capacity suggested within the PO documents; therefore it would be useful for greater clarity on the deliverable sites in future iterations. Also, be helpful if the council could publish info relating to how the unmet need of City will be delivered, the role of the council in determining and identifying sites to meet this need and how the relationship to the city will be considered.
- Local plans which sought to meet Oxford's unmet need have an end date of 2031/2 - Further work needed to ensure period to 2040 is addressed as well as any under-provision arising from the period to 2031.

## 6. Conclusion – Consultation Statement on the Oxford Local Plan 2040

This statement has demonstrated how Oxford City Council has prepared the proposed Oxford Local Plan 2040 in accordance with consultation regulations <sup>3</sup>. Extensive community engagement and stakeholder consultation has been undertaken across each of the main stages of plan preparation including main issues, preferred options and proposed submission. The submitted plan has taken account of this community engagement and stakeholder consultation alongside the material in the submitted evidence base. Comments have been received on the plan, Sustainability Appraisal and the plan’s evidence base, resulting in amendments where necessary. The result is a comprehensive and sound local plan, which may be subject to modifications, in accordance with all legal requirements.

## Appendix 1 – Statutory Consultees

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<sup>3</sup> *Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)*

Three
Vodafone and 02
Beckley & Stowood Parish Council
Elsfield Parish Council
Garsington Parish Council
Gosford and Water Eaton Parish Council
Horspath Parish Council
Kennington Parish Council
Littlemore Parish Council
North Hinksey Parish Council
Sandford on Thames Parish Council
South Hinksey Parish Council
Stanton St John Parish Council
Woodeaton Parish Council
Wytham Parish Council
Blackbird Leys Parish Council
Cherwell District Council
Canal and River Trust
Civil Aviation Authority
Environment Agency
National Highways
Historic England
Homes England
Integrated Care System (ICS) for Buckinghamshire, Oxfordshire, Berkshire West
National Grid UK
National Health Service Commissioning Board
Natural England
Network Rail
NHS Oxfordshire Clinical Commissioning Group
Office of Rail and Road
Old Marston Parish Council
Oxfordshire County Council
Oxfordshire Local Enterprise Partnership (OxLEP)
Risinghurst and Sandhills Parish Council
Scottish and Southern Energy
South Oxfordshire District Council
Thames Valley Police
Thames Water

The Coal Authority
The Office of the Police and Crime Commissioner for Thames Valley
Vale of White Horse District Council
West Oxfordshire District Council
Wild Oxfordshire

## Appendix 2 – Additional Local Groups and Organisations Contacted Directly

Bartholomew Road Allotments Association	Oxford Historical Society
Barton Fields Allotment Association	Littlemore Local Historical Society
Cripley Meadow Allotment Association	Iffley History Society
Town Furze Allotment Association	Wolvercote Local History Society
Trap Grounds Allotment Association	Oxfordshire Buildings Record
Barns Court Allotment Association	Build a Dream Self Build Association
Barracks Lane Allotment Association	Diamond Cottages Residents Association
Bartlemas Close Allotment Association	Feilden Grove Residents Association
Bullstake Close Allotment Association	Iffley Fields Residents Association
Cuttleslowe Allotment Association	South Oxford Residents Association
East Ward Allotment Association	Hinksey Park Area Residents Association
Fairacres Road Allotment Association	St Margaret's Area Society
Fairview Allotment Association	Pullen's Lane Association
Ingle Close Allotments	Oxford Waterside Residents Association
Kestrel Crescent Allotment Association	Residential Boat Owners' Association
Lower Wolvercote Allotment Association	Co-ordinating Committee of Headington Residents' Associations (CCOHRA)
Marston Ferry and Blackhall Allotment Association	Apsley Road Residents Association
Mill Lane Allotment Association	Central Ward Residents Association
Osney, St Thomas & New Botley Allotment Association	New Marston South Residents Association
Ramsey Road Allotment Association	Central North Headington Residents' Association
Risinghurst Allotment Association	Harberton Mead Residents' Association
Rose Hill (Lenthall Road) Allotment Association	Headington And St Clements Residents' Associations
South Ward Allotment Association	Highfield Residents' Association
Spragglesea Mead and Deans Ham Allotment Association	Hill Top Road Residents' Association
St Clement's Allotment Association	Hobson Road Group
Upper Wolvercote Allotment Association	Horspath Road Area Residents' & Tenants' Association
Van Diemens Lane Allotment Association	Jack Straw's Lane Residents Association
Watlington Road Allotment Association	Jordan Hill Residents' Association
Oxford and District Federation of Allotment Associations	Moreton Road Residents' Association
Blackbird Leys Allotment Association	Polstead Road Residents' Association
Binsey Lane Allotment Association	St John Street Area Residents' Association
Headington and District Allotments Association	Wood Farm Area Tenants' & Residents' Association
Friends of Old Headington	York Place Residents' Association
Friends of North Hinksey	Divinity Road Area Residents Association (DRARA) Planning Action Group
FOXCAN	Osney Island Residents Association

CPRE Oxfordshire	Falcon Close Resident's Association
Friends of Cutteslowe and Sunnymead Park	East Oxford Residents Association Forum
Friends Of Iffley Village	Headington Hill Residents Association
Friends Of Quarry	London Place Residents Association
Friends Of Warneford Meadow	Middle Cowley Action Group
Iffley Fields Community Nature Plan Group	Northway Action Group
North Oxford Association	Stoke Place Residents' Association
Oxford Civic Society	Alhambra Residents and Tenants Association
Oxford Green Belt Network	Argyle Street Residents Committee
Oxford Preservation Trust	Aston Street Residents Association
Park Town Trust	City of Oxford Bed and Breakfast Residents Association
Rescue Oxford	Beauchamp Place Residents Association
Summertown Riverside Group	Barton Howard House Residents Association
Wolvercote Against Masts	Benson Place Residents Association
Friends of Bury Knowle Park	Bainton Road and District Residents Association
Friends of Holy Trinity Church	Bridge East Street Residents
Barton Community Association	Bath Street Residents Association
ENGAGE Oxford	Binsey Village Residents Association
East Oxford Action	Cunliffe Close Residents Association
Residential Landlords Association	Cordrey Green Residents Association
Headington Action	Chalfont Road Residents Association
Jericho Wharf Trust	Canal Walk Residents Association
BOAT Boaters of Oxford Action Team	Dorchester Court Residents Committee
Cutteslowe Community Association	Dove House Close Residents Association
South Oxford Community Association	Donnington Residents Association
Littlemore Community Association	Easiform Tenants Association
Wolvercote Neighbourhood Forum	Evenlode Tower Residents Association
Headington Neighbourhood Forum	Fairacres Road Residents Association
Summertown St Margaret's Neighbourhood Forum	Fitzherbert Close Residents Association
Blackbird Leys Community Association	Iffley Road Area Residents Association
Bullingdon Community Association	Ferry Hinksey Road Residents Association
Donnington Community Association	Granville Court Residents Association
East Oxford Community Association	Gipsey Lane Council Tenants Association
Florence Park Community Association	The St George's Park Residents Association
Headington Community Association	Gladstone Road Tenants and Residents Association
Jericho Community Association	Heron Place Residents Association
Northway Community Association	Hayfield Road Residents Association
Regal Area Community Association	Jeune Street Residents Association
Risinghurst Community Association	Lathbury Road Residents Association
Rose Hill Community Association	Laurel Farm Close Residents Association
West Oxford Community Association	Little Oxford Residents Association

Friends of Aristotle Recreation Ground	Linton Road Neighbourhood Association
Friends of Florence Park	Leafield Road Residents Association
Friends of Headington Hill Park	Mileway Gardens Residents Association
Friends of Kendall Copse	Old Marston Residents Association
Friends of Aston's Eyot	Norton Close Residents Association
Friends of Lye Valley	New Headington Residents Association
Friends of Raleigh Park	Norham Manor Residents Association
Friends of South Park	Northway Tenants and Residents Association
Friends of the Trap Grounds	North Parade Residents Association
Freemen of the City of Oxford	Nursery Close Residents Association
North Oxford Green Belt Preservation Group	Old Friars Residents Association
Save Port Meadow	Oxford Pegasus Residents Association
Wolvercote Commoners Committee	Plowman Tower Residents Association
Headington Heritage	Paddox Residents Association
Friends of Oxpens Meadow	Park Town Residents Association
St Margaret's Church	Rose Hill Tenants Association
St Aldate's Parish Church and Centre	Richards Way Estate Residents Association
Oxford Quakers	East Oxford Residents Association
Oxford Muslim Community Initiative	Stephens Road Residents Association
Oxford Hindu Temple & Community Centre Project	St Ebbes New Development Residents Association (SENDRA)
The Oxford Buddha Vihara	Stockmore Street Residents Association
Thrangou House Oxford	South Summertown Residents Association
Gurdwara Sri Guru Singh Sabha Oxford	St Anne's Road Residents Association
Advisory Council For the Education of Romany and Other Travellers	St Thomas Residents Association
Oxfordshire Unlimited	Old Temple Cowley Residents Association
Oxford Access Forum	St Aldates Residents Group
Oxfordshire Association for the Blind	Upper Wolvercote Association
Deaf Direct Oxford	Victoria Road Group
Showman's Guild of Great Britain (London and Home Counties)	Webbs Close Action Committee
Age UK Oxfordshire	Woodstock Close Residents Association
Friends, Families & Travellers Community Base	Walton Manor Residents Association
The Travellers Movement	Whitworth Place Tenants Association
Oxford Irish Society	Windmill Road Residents Association
Oxfordshire Youth Support Services	Summertown Riverside Group
Oxford Youth Works	Harefields and Marriott Residents Association
Thames Valley Gypsy and Traveller Association	Wingfield Residents
The Gypsy Council	West Quarter Residents Association
Oxford Asian Cultural Association	Waterways Residents Association
	Waterside Residents Association

Oxford Archaeology South	Templars Square Residents Association
Oxfordshire City and County Archaeological Forum	St Mary's Road Residents Association
Oxfordshire Architectural and Historical Society	North Oxford Estates Residents Association
The Twentieth Century Society	Marston Street Residents Association
The Garden History Society	Lye Valley Residents Association
The Georgian Group	Hurst Street Residents Association
The Society for the Protection of Ancient Buildings	HART Residents Association
The Ancient Monuments Society	Essex Street Residents Association
Oxfordshire Gardens Trust	Churchill Residents Association
	Harefields Residents Association

## Appendix 3 – Submission Publicity Article Example

3/14/24, 1:47 PM

Oxford council opens consultations on Local Plan 2040 | Oxford Mail

# Oxford Mail

## Oxford council opens consultations on Local Plan 2040

10th November 2023

LOCAL GOVERNMENT

OXFORD



<https://www.oxfordmail.co.uk/news/23915914.oxford-council-opens-consultations-local-plan-2040/>

1/10

The first is on the document itself which sets out where 9,612 homes will be built across the city by 2040 to help ease Oxford's housing crisis.

The council is asking people for their final views on whether the submission draft and its accompanying policies map meet the tests of soundness set out in the National Planning Policy Framework.

## Oxford Mail



The CIL is a fee councils charge for development, which pays for infrastructure.

A charging schedule lists how much the CIL charges are per square metre for different types of development.

## Oxford Mail

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The value of developments for uses like office and lab space, industrial and logistics has increased significantly in the last 10 years.

The council is proposing to increase the amount of CIL for these types of development only.

Councillor Louise Upton, cabinet member for planning and healthier communities, said: "Our Local Plan 2040 aims to find the right balance to help us tackle the housing crisis and climate emergency, support our communities and residents and make Oxford a better place for everyone.

"We also want to make sure businesses that benefit most from our growing economy pay a fairer share towards the infrastructure that supports them.

"We need to know if you think our plans are sound.

"This is the last opportunity for people to give their views before the Planning Inspectorate examines our plans.

"I'd encourage everyone with an interest in a better future for our city to take part."

The council will send its draft plans and all comments received during the consultation period to the Planning Inspectorate for approval in early 2024.

3/14/24, 1:49 PM

Oxford council opens consultations on Local Plan 2040 | Oxford Mail

A public inspection will then take place. If planning inspectors approve the draft plan and CIL charges, they could be adopted in summer 2025.

Residents can find the draft Local Plan 2040 and all supporting documents on the council's website.

A copy of the CIL draft charging schedule and supporting documents are also available on the council's website.

Copies of consultation documents are available for viewing at Oxford Town Hall and Blackbird Leys, Botley, Cowley, Headington, Littlemore, Summertown and Oxford Westgate libraries.

Both consultations are now open and run for eight weeks until Friday January 5, 2024.

Comments can also be emailed to [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk) or in writing to the Planning Policy Team, Oxford Town Hall, St Aldate's, Oxford OX1 1BX.

The online questionnaires will close at 23.59 on Friday January 5. All other responses must be submitted by 4pm on the closing date.

As part of the consultation process, residents will be able to request the right to be heard by government planning inspectors when the Oxford Local Plan 2040 is publicly examined.

## Appendix 4 – Submission Draft Consultation Responses and Officer Response

CHAPTER	1				
All respondents	8.5	16.3	33.2	37.4	46.1
supporting chapter	124.1	127.1	149.1	171.2	196.4

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted
Activate Learning fully supports the Council’s ambitions and the plan’s objectives. There are many opportunities to regenerate and renew parts of the city in order to meet these ambitions however it should be recognised that there are and will continue to be competing demands which will need to be carefully balanced to ensure the best outcome for the city in the long term. Furthermore Activate Learning support and welcome the opportunity to continue to work closely with the City Council on the delivery of Community Employment Plans particularly supporting the delivery of apprenticeship training and future employment support to help meet the needs of the local community.	Noted
We support the principle behind supporting biodiversity and protecting the green infrastructure and resources in the city.	Noted
We support the vision for the city to provide a healthy and inclusive city with strong communities that benefit from equal opportunities, including support for research and development in the life sciences sectors which will provide solutions to global challenges. The overarching themes and threads of the Plan are acknowledged and supported including the need to address climate change and to create a more healthy, equal, inclusive and prosperous city.	Noted
The Oxford Science Park welcomes the Vision’s support for “research and development in the life sciences and health sectors which are and will provide solutions to global challenges.” It is considered that this is consistent with national planning policy, notably Paragraph 85 of the NPPF but the Vision should not be undermined by other proposed policy changes that act both individually and in aggregate to weaken Oxford’s competitive position.	Noted
The Oxford Science Park supports the inclusion of the objective that Oxford will be a fair and prosperous city with a globally important role in learning, knowledge and innovation. Paragraph 1.11 specifically references The Oxford Science Park as a well-established area for the knowledge economy which is further supported.	

COMMENT SUMMARY	OFFICER RESPONSE
... the word "fair" can be interpreted in different ways and it is therefore important that this objective translates into concrete proposals which can be considered on their own merits.	

CHAPTER	1					
All respondents raising objections on this chapter	13.1	25.1	27.5	28.4	30.3	30.4
	40.5	40.9	44.9	58.1	59.2	59.3
	64.1	65.1	69.1	70.2	73.4	76.1
	81.11	84.5	85.1	86.1	89.3	89.25
	90.1	108.1	121.7	123.1	127.1	149.1
	170.2	172.1	173.1	174.5	179.1	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
I support the Vision statement I do not think that the Whole Plan adequately addresses primary healthcare infrastructure, especially in relation to South East Oxford. No changes to the Vision are required but rather to its implementation.	Noted	None
Paragraphs 1.14-1.17 are undermined by the allocation of SPS13 – Land at Meadow Lane. This site should be removed from the plan to ensure that its implementation is aligned with its vision, objectives and overall strategy	Noted	None
Broadly supportive of vision but have concerns about how it is implemented	Noted	None
The proposed vision does not afford sufficient weight to education and the knowledge-intensive economy in Oxford. This is a significant oversight and needs to be acknowledged and assessed by the Council.	Noted	None
The housing requirements that are the basis of the plan are unsound, having been unduly influenced by construction industry voices. The whole plan is unsound. Go back to basics on housing requirement, using	The housing land availability assessment which helps work out the housing	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
ordinary people rather than construction company directors as your source of advice.	requirement has an agreed methodology that has followed government guidance.	
<p>The vision of the Plan is in parts undermined by the specifics of certain of its policies, creating irreconcilable internal conflict which undermines the soundness and effectiveness of the Plan.</p> <p>Robust assessment of the site-specific policies against the vision in Ch1 and identification of conflicts. Where these cannot be resolved through minor adjustments to those policies, they should be deleted and/or recast.</p>	Noted	None
Our decision makers will be judged by future generations on how they address the Climate emergency now. This must be stated right up front.	The plan includes policies to help address climate change.	None
<p>The Plan fails to demonstrate how the city will achieve legally binding Government carbon emission targets starting with those due in 2030. The objectives must include how the City's own measurable targets will be set and monitored to achieve this. Without such a framework the plan risks challenge in the courts by activists.</p> <p>Add a new paragraph 1.2 and a new objective should be added to address climate change impacts clearly and transparently.</p>	Noted	None
<p>Oxford has set a goal for itself to be economically 'world-beating' (stated in consultation meetings of the Strategic Economic Plan) which is not shared by Oxfordshire. Residents would like to see the whole county run for the wellbeing of current and future generations.</p> <p>Oxford's desire for economic growth conflicts with the Government's Levelling Up agenda which would take work to areas of lower housing cost and higher unemployment. It is not EFFECTIVE as joint working, on cross-</p>	<p>Noted</p> <p>Noted</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>boundary strategic matters, has not been achieved. It fails the DUTY TO COOPERATE.</p> <p>The plan, the employment and housing targets, and the Sustainability Appraisal (SA) are not POSITIVELY PREPARED or EFFECTIVE because they fail to account for the impact on the local economy of traffic generation from already-existing plans for development, nor from the extra housing in the plan itself.</p> <p>The re-opening of the Cowley Branch Line is unlikely to come to fruition because it will not be economic to run (according to Chiltern Trains) because of low passenger numbers - car trips are preferred! There is no scope for increasing the road space for all these extra cars within the City.</p> <p>A re-write of the plan will require agreement within the whole of Oxfordshire of a system based on Doughnut Economics, working for social and environmental goods for all. Sensibly distributed work (see also the comment on Chapter 3, Paragraph 3.6) and housing for people not for profit is the way forward.</p>	<p>The SA is not a development plan document. It forms part of the evidence base. As such it forms part of the examination library rather than part of the plan being examined.</p> <p>Noted</p> <p>Noted</p>	
<p>The cascade methodology to accommodate viability of developments fundamentally undermines many of the most laudable policies [housing, biodiversity and protection of the environment, net zero and climate resilience] in such a way as to render the Plan ineffective. It is essential that developments do not receive permission if they do not fulfil the vision of the Plan and a methodology needs to be developed to determine such a threshold.</p>	<p>National policy requires that the policies in development result in viable development.</p>	<p>None</p>
<p>Paragraph 1.7 is not effective. The plan does not meet objectively defined “need” of Oxford city within its boundary. As such, the city’s unmet need will continue to be met through urban extensions outside the city and</p>	<p>Background Paper 1 discusses Housing need and makes the case for the exceptional</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>without the agreement of neighbouring SODC. As such the city's unmet need will have to be met by building more urban extensions. Numerous respondents consider that the exceptional circumstances for the use of a methodology for calculating housing need other than the "standard method" have not been explained nor justified.</p> <p>The HELAA does not adequately assess all potential development sites within the city for their use for housing. By failing to provide a variety of sites for housing within the City the plan is not consistent with national Planning policy.</p> <p>Numerous respondents consider that the Plan fails to meet the Duty to Co-operate. The Plan does not mention any cross-boundary agreements for the export of Oxford City's unmet housing need to the adjacent Districts, because no such agreements exist, at least with SODC.</p> <p>This Oxford Local Plan 2040 does not mention the need to protect and enhance the city's Green Belt.</p>	<p>circumstances for using an alternative methodology other than the standard need.</p> <p>The HELAA capacity assessment follows the required guidance. Chapter 8 includes the site allocations which provide numerous allocated housing sites.</p> <p>Demonstrating how the requirements of the DtC have been met forms part of the evidence.</p> <p>Green Belt policy already exists in the NPPF. No need to duplicate national policy.</p>	
<p>The city has nearly full employment. Employees living in the outer districts must commute, and it is most often by car. To plan for more employment sites, with the number of jobs not being met by an equal number of houses, makes everything worse for all of us.</p>	<p>Noted</p>	<p>None</p>
<p>In the Local Plan 2036, the Council mainly allocated land for employment not housing. The Council exported their inflated 'unmet' housing need to surrounding district councils and insisted under the 'duty to co-operate' that new houses should be built on the edge of Oxford in the Green Belt. In SODC this resulted in the loss of nearly 2,000 acres of Green Belt land/</p>	<p>Background Paper 1 provides a clear narrative about the previous plan's housing need and any agreements that were reached between neighbouring district councils about how that unmet need would be apportioned.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>countryside given up for the development of over 7,000 houses and cars. Nearly 700 acres of Green Belt have been destroyed in Cherwell to make way for development to help meet Oxford City's 'unmet housing need'.</p> <p>Paragraphs 1.4 onwards: CPRE has carried out research to show that Oxford City Council plans to create over 14,000 new jobs but provide only 714 new homes. It plans to export its deliberately created 'unmet' housing need to surrounding councils as before without any proper evidence or assessment of need. The Plan does not solve this problem or how commuters will travel to work without a reliance on the private car.</p> <p>New jobs should be created outside the city centre. Some employment sites are not fully developed (e.g., Oxford Business Park should be made available for housing). Redevelopment of Botley Road Retail Park should include housing.</p> <p>Housing should be the priority and although stated in the Plan the policies do not bear this out. The priority for the City Council is to continue to deliver employment land.</p> <p>We do not agree with the employment need figure or how that figure has been calculated. Many shops and business premises in the city are empty. The city needs to use the standard method to calculate housing need and plan for new employment land accordingly. It should make its calculations clear and publicly available.</p>	<p>Noted</p> <p>Noted</p> <p>Employment need has been calculated by independent consultants using a recognised methodology, which was consulted upon as part of a specific and focused consultation in early 2023 and this forms part of the evidence base for the plan.</p> <p>Policy E1 takes a permissive approach to residential development on employment sites and includes assessment criteria.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Allow housing on development land zoned for employment and make assessment criteria for this transparent and fair to implement the policy on as many sites as possible.</p> <p>Calculate transparently realistic employment figures, but only increase employment within Oxford city when a solution can be found be efficient commuting with the provision of more public transport from outside Oxford into it to accommodate all commuters and students with short commuting times.</p>	Noted	
<p>No strategic overview that will require and ensure:</p> <ul style="list-style-type: none"> <li>- the urgent need for housing is addressed before further employment encouraged.</li> <li>- brownfield sites will be used before greenfield.</li> <li>- the climate crisis will be front and centre of all policies e.g. Biodiversity Net Gain will result in net gain, rather than simply no loss.</li> </ul>	Noted	
<p>Several respondents considered that the consultation undertaken was not consistent with SCI.</p> <p>E.g., Oxford has seven community organised local markets but these markets were not directly invited to participate in the consultation process. This failure to consult in accordance with its own provisions means that the Plan is not informed by the knowledge, contacts and insights of the organisers and committees of these markets, nor of the growers, producers and farmers (from outside the City) who supply them.</p> <p>The Plan fails to address the matter of food production and provision or the benefits that can be brought about from local food growing.</p>	Consultation at various stages of the plan took place including consultation events at some of the locally organised markets.	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Local food production is an environmental, services, and land-based issue that has not been addressed in the Plan. Failure to consult properly in accordance with the SCI and the Consultation and Engagement plan has resulted in a Plan that is ineffective in achieving its vision.</p>		
<p>Is the 'economic dynamism' and 'growth' that supports the economy beneficial to the city and its residents? The whole basis of the assessment of housing need is based on this growth. New homes should be built in Oxford but the draw to incomers should be curtailed to allow the long-standing shortfall to be eliminated.</p> <p>At present, and for decades, the council has been running to stay in one place, never solving the housing shortage as new people are sucked in by both the growing economy and desirability of Oxford over London as a place to live.</p> <p>It is the context of the discussion that needs to change, the actual policies are largely OK if the demand from growth and incomers was explicitly treated as negative and unwanted as discussed under other paragraphs and policies.</p>	Noted	None
<p>There are potentially significant local grid constraints which could limit the ability of Oxford to electrify its heating systems. Paragraph 1.20 of the Plan references these upgrades, however there is little mention of the issues elsewhere in the Plan. There is no recognition of how to increase local grid capacity or reference to the most efficient net zero heating systems - GSHPs.</p> <p>Given the cost and timescales involved with upgrading the local grid, is Oxford's local electricity grid able to support the mass installation of air</p>	Noted	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>source heat pumps? GHSPs are more efficient, and consideration should be given to their installation alongside the delivery of modern centralised district heating networks, which can result in reductions in peak electricity demand.</p> <p>GHSPs should be considered in the Local Plan as they deliver more energy efficient heating (and hence cost less to run). Indeed, GSHPs use approximately 40% less energy a year than ASHPs to heat the same home.</p>		
<p>The City Councils definition of Sustainability and Sustainable Development should be made more explicit. The three pillars of sustainability do not cover the key areas of sustainability holistically. A holistic sustainability framework should be mentioned.</p> <p>The chapter should refer to the biodiversity crisis, as well as climate change.</p> <p>The Local Plan should encourage the improvement of existing urban routes (streets) in relation to health and wellbeing by encouraging edible landscaping and communal food growing on streets.</p> <p>Add the following to after the first sentence in Table 1.1, Natural Environment, under the Opportunities heading:</p> <p>Green Infrastructure is essential to adapting to climate change, for example as flood storage and by creating shade. <u>It is also essential for addressing the biodiversity crisis, for example through urban food growing and creation of habitats for flora and fauna.</u> Green Infrastructure...</p>	<p>National Policy defines sustainable development.</p> <p>Noted</p> <p>Noted</p> <p>Do not consider that the underlined text is required for soundness reasons.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Add the following to after the first sentence in Table 1.1, Built Environment, under the Opportunities heading:</p> <p>The compact nature of the city and the wide range of facilities and services mean that there are great opportunities for sustainable and healthy lifestyles, which can be enhanced further by improvements to existing routes, <u>such as integrating edible landscaping and community food growing in streets (Edible Streets)</u> or new connections, such as new bridges.</p> <p>Add the following under the “environment” heading in Figure 1.1:</p> <p>2. ENVIRONMENT A green, biodiverse city that is resilient to climate change <u>and helps mitigate the biodiversity crisis.</u></p>		
<p>The Plan's vision, its soundness and effectiveness are undermined in parts by certain specifics of its policies, creating irreconcilable internal conflict that weaken the overall Plan.</p> <p>In order to make the plan sound, assess site-specific policies ROBUSTLY against the vision in Ch1 and identify conflicts. Where these are unresolvable through minor adjustments to those policies, they should be deleted and/or recast.</p>	Noted	None
<p>The document fails to allow space for Oxford Sewage Treatment Works to expand sufficiently to treat all the wastewater that currently arrives, still less expected future volumes.</p> <p>It is not possible to move or re-route Sewage Treatment Works. Any Oxford sewage works must discharge into a river, and the existing STW borders green fields and discharges into Potters Stream. So, the obvious</p>	As Oxford STW is located within the administrative boundary of South Oxfordshire District Council and given the fact that TW don't own adjacent land within Oxford, it is highly unlikely that “off-site upgrades” will be delivered in Oxford City.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>place to expand Oxford STW's secondary treatment capacity is on the green fields adjoining the current site.</p> <p>Our main recommendation is to include a reference in text and on maps to the need to reserve space near the current STW for potential expansion of an STW which is already overloaded whenever it rains.</p>	Noted	
<p>Magdalen is not raising an objection on the grounds of the Duty to Cooperate, but it does suggest that more evidence is required to demonstrate that all strategic matters have been effectively engaged with, and there is an agreed way forward in meeting the County's housing needs, and in particular, the very important need for affordable housing for key workers.</p>	Noted	None
<p>Significant concerns about approach to addressing the evidenced housing needs of the city (including affordable housing). A lack of affordability undermines economic growth and prosperity and works against the vision and objectives.</p> <p>A Plan that does not deliver sufficient homes, whether that be within its own boundaries, or by securing a robust strategy through which needs can be met cross boundary, will not deliver on a Plan vision that strives to achieve social inclusion and support communities that benefit from equal opportunities including as referenced – opportunities for access to housing. Currently the level of growth planned for will not achieve the vision as drafted.</p>	Background Paper 1 discusses housing need and how the city and neighbouring districts are working to address that unmet need.	None
<p>The vision and its six themes are supported. We welcome the intention to support research and development in the life sciences and health sectors and the economic objective to create a prosperous city with a globally important role in learning, knowledge and innovation.</p> <p>Furthermore, the supporting text for the environment/economy theme should be expanded to acknowledge that the opportunity to maximise the intensification of the most sustainable sites within Oxford would also contribute to the sustainability objectives of the emerging Local Plan.</p>	<p>Noted</p> <p>Noted</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The preservation of the historic environment of Oxford needs to be balanced against the potential for modern, floorspace and high-quality architecture to meet commercial requirements and contribute positively to the City Centre. The emerging Local Plan should not unnecessarily stifle innovation and should be flexible enough for matters to be dealt with on a site-specific basis.</p> <p>Specific areas of the city should be identified as being appropriate for greater levels of change and intensification. E.g., the West End is acknowledged to be less sensitive in terms of heritage assets and has the greatest level of accessibility. It should be more overtly recognised as having the greatest capacity for change if the Council is to meet the competing mix of needs for housing, employment space, economic growth.</p>	<p>The plan includes policies to both support the economy and protect the heritage of the city.</p>	
<p>Paragraph 1.2: The vision for the Plan is not effective as it does not set out a vision for addressing housing need. In order to make the vision sound it should include additional effective and proactive elements in the vision relating to the aims to meet housing needs and tackling the key issue in the city of affordable housing.</p>	<p>Noted</p>	<p>None</p>
<p>The plan talks about prioritising housing, which we support. The plan and the accompanying evidence do not demonstrate how these issues have been effectively tackled.</p> <p>The Local Plan's overarching objective to prioritise housing is not consistently supported by the various policies relevant to housing supply. These, when considered together, introduce restrictions either in terms of suitable locations for higher density housing, or that are not especially proactive or flexible in the criteria they establish to allow land for housing to come forward.</p> <p>HELAA: There are numerous sites in the HELAA where the potential for development for residential use has not been assessed. Given the priority for housing, all sites should be properly assessed in the HELAA for their potential for</p>	<p>Noted</p> <p>The plan prioritises housing and allocates no new strategic employment sites.</p> <p>HELAA assessment methodology underpinning the plan is robust and defensible.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>housing, including those allocated for employment uses. Taken together the draft policies with the approach in the HELAA has served to under-explore or promote potential housing delivery opportunities.</p> <p>This is not Positively Prepared, because there is no demonstrable effort to 'meet the areas objectively assessed needs' in the city. This results in the creation of more unmet need, and hence it diverts growth from the city, making this approach not consistent with achieving sustainable development.</p> <p>The plan does not comply with NPPF (September 2023) paragraph 60. The plan doesn't provide for a sufficient amount of housing in the City, which is where the need is generated. The plan does not comply with NPPF paragraph 76. The plan and supporting evidence lacks urgency or strategies to resolve past delivery failures and attempt to resolve them.</p>	<p>Noted</p> <p>Noted</p>	
<p>The vision does not articulate in spatial terms how the city is expected to evolve up to 2040. A key diagram would help.</p> <p>The vision does not fully express or address the anticipated role of the city within the County context, particularly the key role it plays in terms of employment opportunities and associated patterns of movement across Oxfordshire.</p> <p>It would be helpful if the vision were to more strongly emphasise the importance of maximising the delivery of new homes within Oxford's administrative boundaries including being more creative around the use of sites and building heights and densities. Could secure positive benefits to heritage as well as protecting it.</p>	<p>These comments are addressed as part of a Statement of Common Ground with West Oxfordshire District Council.</p>	<p>Refer to Statement of Common Ground with West Oxfordshire District Council for response.</p>
<p>General support for vision but it does not address the important role that the two Universities play in Oxford and the acute housing need in the city.</p>	<p>The Local Plan 2040 recognises throughout the importance of Oxford as a global city. The</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Plan already notes the importance of the contribution that Universities at Paragraph 3.4, but the vision should also include these points.</p> <p>The vision acknowledges the chronic undersupply of housing but does not set out any meaningful approach to addressing it.</p> <p>The plan period should look ahead over a longer timeframe (e.g., 30yrs) in case of any slippage in the timetable for production of the plan.</p> <p>Suggested amendments:            To address the Soundness issues the following changes are:            - Include reference to University of Oxford and Oxford Brookes University in the Vision as below: “....to innovate, learn and enable businesses, the University of Oxford and Oxford Brookes University to prosper....”            - Amend the Vision to refer to “addressing the housing needs in Oxford by making efficient use of land in the City and working collaboratively with neighbouring authorities to address any shortfalls in housing delivery and supporting infrastructure.”            - Extend the Vision to consider Oxford beyond the plan period, for example up to 2050 to provide a longer-term vision for dealing with housing, economic, infrastructure and environmental issues. Cross border joined up thinking/ co-operation is required.</p>	<p>vision for the plan seeks to set a vision for the future rather than continuing the current situation. The plan will help maintain the status of the city is locally, regionally and globally important. The plan also recognises the importance of the university and other stakeholders, as well as local communities.</p> <p>The plan is sound.</p>	
<p>Not effective:</p> <p>Where the vision could be strengthened is in more clearly recognising the special nature of Oxford as a global city of national and international</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>importance. The plan-making process should reflect the exceptional role that Oxford plays within the UK and internationally and establishing a clear narrative behind this is important.</p> <p>Suggested amendments to the vision could be made as below: “In 2040 Oxford will continue to be an internationally important city, globally renowned as a centre of excellence in learning, innovation, heritage and culture. It 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...”</p>		

<b>POLICY/ CHAPTER</b>	<b>S1</b>		
All respondents <b>supporting</b>	8.1, 37.1, 71.13, 170.1, 171.1, 178.1, 189.1, 193.1		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>	
The policy is sound as it consistent with the objectives of the NPPF and ensures that sustainable development is embedded in the plan.	Noted and agreed.	No action.	
<b>POLICY/ CHAPTER</b>	<b>S1</b>		
All respondents <b>raising objections</b>	10.1,17.1, 22.1, 25.3, 26.1, 27.1, 30.1, 32.1, 40.1, 41.1, 44.1, 50.1, 53.1, 59.11, 63.1, 66.1, 70.1, 71.2, 73.1, 74.1, 80.1, 80.2, 81.1, 84.1, 89.1, 91.1, 92.1, 113.1, 126.1, 129.1, 132.1, 133.1, 148.1, 162.1, 165.1, 174.1, 176.1, 177.1, 196.1, 199.1, 200.1, 202.1, 204.1		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>		<b>PROPOSED ACTION</b>
Not justified and not effective because it will not make a difference. Every household should be put onto the cleanest energy. All new buildings should have strict targets that they are required to meet with no loopholes in the policies.	The Oxford Local Plan 2040 includes policies on environmental sustainability in accordance with the National Planning Policy Framework and relevant legislation. The background papers explain the planning judgement exercise in the preparation of the policies. The spatial strategy seeks sustainable development and is sound.		No action.
There is no explanation of how the housing need has been calculated. The housing need calculation is out of date.	The Oxford Local Plan 2040 includes policies which provide details of the housing target being planned for. The evidence base studies including Housing and Employment Needs Assessment provides a robust methodology and calculation of housing need. The spatial strategy is sound.		No action.
Not positively prepared, not justified and not effective because the policy does not address unmet economic or employment needs outside of the city. The policy should be	The Oxford Local Plan 2040 includes policies which provide details of the housing target being planned for. The evidence base studies including Housing and Employment Needs Assessment provides a robust		No action.

<p>amended to capture how adjoining authorities have an important role in the delivery of the spatial strategy.</p>	<p>methodology and calculation of housing need. The duty to cooperate has been met through regular discussions with adjacent Local Planning Authorities and agree Statements of Common ground. The spatial strategy is sound.</p>	
<p>Oxford City housing remains largely unaffordable for young people and families, who should be just the sort of people that need to be attracted to ensure that Oxford thrives. Much more emphasis should be put on developing a thriving city, rather than on economic growth. Far more needs to be included in the plan to ensure there is affordable housing in all developments, and that this is genuinely affordable through good quality, well regulated social housing.</p> <p>Not positively prepared, not justified and not effective as the strategy should focus on delivering more affordable housing not housing units. It should plan for more housing development in the city.</p> <p>The Meadow Lane, Iffley allocation is unsound and should be removed.</p>	<p>The Oxford Local Plan 2040 includes policies which provide details of the housing target, affordable and market housing. The evidence base studies including Housing and Employment Needs Assessment provides a robust methodology and calculation of housing need. The spatial strategy is sound.</p>	<p>No action.</p>
<p>Not positively prepared, not justified and not effective as climate change and the climate emergency is unfounded. The council should explain what it means and that it is based on an outdate UN action plan (Agenda 2030 and UN 17 Sustainable Development Goals), which have not been agreed by the residents of Oxford. Sustainable development is a flawed idea.</p>	<p>The Oxford Local Plan 2040 includes policies on environmental sustainability in accordance with the National Planning Policy Framework and relevant legislation. The background papers explain the planning judgement exercise in the preparation of the policies. The spatial strategy seeks sustainable development and is sound.</p>	<p>No action.</p>

<p>Not positively prepared, not justified and not effective as the plans policies contradict the spatial strategy. The policy is inconsistent, self-contradictory and anti-environmental. It should limit development on farmland and open space if these are to be protected. It should safeguard the natural world. It is not legally compliant with regards to biodiversity.</p>	<p>The Oxford Local Plan 2040 includes policies on biodiversity in accordance with the National Planning Policy Framework and relevant legislation. The background papers explain the planning judgement exercise in the preparation of the policies. The spatial strategy seeks sustainable development and is sound.</p>	<p>No action.</p>
<p>Not positively prepared, not justified and not effective as the Green Belt is not adequately protected and the emphasis is not sufficiently on brownfield. The plan will destroy Green Belt. All green field land and open space should be protected. The only new build allowed should be genuinely affordable housing on brownfield land.</p>	<p>The Oxford Local Plan 2040 includes policies on developing brownfield sites and site allocations in chapter 8 in accordance with the National Planning Policy Framework and relevant legislation. The background papers explain the planning judgement exercise in the preparation of the policies. The spatial strategy seeks sustainable development and is sound.</p>	<p>No action.</p>
<p>Not positively prepared, not justified and not effective as the strategy is unsustainable because it plans for economic growth and it should not.</p> <p>The assumption of a need for growth is wrong. The plan has artificially inflated housing figures.</p> <p>The plan is unsound because it does not use a Government approved method for calculating housing need.</p>	<p>The Oxford Local Plan 2040 includes policies on supporting new development in accordance with the National Planning Policy Framework and relevant legislation. The policies allow housing development on all employment sites and makes a range of mixed use and residential allocations which are in accordance with the requirements of the NPPF. The background papers explain the planning judgement exercise in the preparation of the policies. The spatial strategy seeks sustainable development and is sound.</p>	<p>No action.</p>

<p>Not positively prepared and not effective because the policy contradicts itself and does not use a government approved method to calculate housing need.</p>		
<p>Not positively prepared and not justified because the vision and Policy S1 do not recognise the role of the universities and colleges make to social value, education and tourism. Suggest including a specific reference to the universities and colleges in the supporting text.</p> <p>Policy S1 and Policy E1 do not recognise the potential of the knowledge intensive economy. There is going to be competition between housing and employment. This is contrary to the NPPF paragraph 81.</p> <p>The policy should be reworded to recognise the role of research and development to allow sufficient flexibility and to avoid it precluding development coming forward. The policy should support research and development on employment sites.</p>	<p>The Oxford Local Plan 2040 includes policies on supporting new development in accordance with the National Planning Policy Framework and relevant legislation. The strategy seeks to provide an overarching vision for the city including the role of all stakeholders. The background papers explain the planning judgement exercise in the preparation of the policies. The plan strikes a balance between all constraints and opportunities facing the city in planning for future development. The spatial strategy seeks sustainable development and is sound.</p>	<p>No action.</p>
<p>The plan should quantitatively explain what is meant by key terms in the glossary including sustainable development, net zero carbon and sustainable growth. All policies should refer to biodiversity gain not just net gain.</p>	<p>The Oxford Local Plan 2040 includes policies on environmental sustainability in accordance with the National Planning Policy Framework and relevant legislation. A climate emergency has been declared by the Council which the Local Plan has had regard to. The background papers explain the planning judgement exercise in the preparation of the policies. They are a proportionate response to environmental sustainability in accordance with national policy and</p>	<p>No action.</p>

	legislation. The spatial strategy seeks sustainable development and is sound.	
The policy does not set out a spatial strategy. A spatial strategy should set out how the proposed development will be delivered in the plan period and beyond.	Policy S1 provides for a spatial strategy in the policy which is given context by the supporting text to the policy. The background papers explain the planning judgement exercise in the preparation of the policies. They are a proportionate response to environmental sustainability in accordance with national policy and legislation. The spatial strategy seeks sustainable development and is sound. The plan has taken into account long term trends but the policy can only relate to the plan period.	No action.
Not justified as Templars Square site can make a contribution to the spatial strategy.	The Oxford Local Plan 2040 includes policies which provide details of the housing target being planned for. The evidence base studies including Sustainability Appraisal and Housing and Employment Needs Assessment provides a robust methodology and calculation of housing need and assessment of options. The spatial strategy is sound.	No action.
Not sound as the City Council has failed to comply with the duty to cooperate. Oxford City has not communicated properly with realistic figures to the surrounding councils of the balance between commercial zoning and housing.	The Oxford Local Plan 2040 includes policies which provide details of the housing target being planned for. The evidence base studies including Housing and Employment Needs Assessment provides a robust methodology and calculation of housing need. The duty to cooperate has been met through regular discussions with adjacent Local Planning Authorities	No action.

	and agree Statements of Common ground. The spatial strategy is sound.	
Not positively prepared, not justified and not effective. Oxford is space and traffic constrained and further growth within its boundaries threatens its viability. There is no explicit means to identify cumulative impact of individual development.	The background papers explain the planning judgement exercise in the preparation of the policies, having regard to the evidence base. The policies are a proportionate response in accordance with national policy and legislation. Each planning application will be determined on its merits in accordance with the policies of the development plan and relevant material planning considerations. The spatial strategy seeks sustainable development and is sound.	No action.
Policy S1 needs to be sufficiently flexible to ensure that appropriate developments, for example demolishing old buildings and replacing them with new housing, can be found to be compliant with policy.	The spatial strategy is sufficiently flexible to allow development to come forward outside site allocations. The spatial strategy seeks sustainable development and is sound.	No action.
Add a reference to 'safe' in supporting text paragraph 1.37 ("strong, safe, sustainable, cohesive, inclusive") (74.1, 132.1).	The Oxford Local Plan 2040 includes policies on design in accordance with the National Planning Policy Framework and relevant legislation. The background papers explain the planning judgement exercise in the preparation of the policies. The spatial strategy seeks sustainable development and is sound. The decision maker will assess each proposal on its merits having regard to the relevant material considerations.	No action.
Policy wording: missing 'of' before 'district and local centres in criterion a.	Noted.	Amend policy S1 to add missing 'of' before 'district and local centres in criterion a.

The policy is unsound and should be amended to make it clearer that it seeks to ensure development will protect important blue and green infrastructure.	Noted. This has been considered further and a main modification can be agreed.	Amend to criteria f) to improve clarity as follows: f) prevent new development in locations where it would damage have a negative impact on important blue and green infrastructure networks, public open space, and result in loss of flood plain.
Amend criterion f to include “unless mitigated” at the end of the sentence.	The suggested change relates to the need to protect blue and green infrastructure. Proposals will be determined in accordance with the development plan as a whole. The Oxford Local Plan 2040 includes policies on design in accordance with the National Planning Policy Framework and relevant legislation. As such, the proposed spatial strategy is sound.	No action.
The policy is waffle and should be explanatory text.	Noted. The proposed spatial strategy is sound.	No action.

<b>POLICY</b>	<b>S2</b>			
All respondents <b>supporting</b> policy	8.2	44.2	49.1	84.2
<b>COMMENT SUMMARY</b>		<b>OFFICER RESPONSE</b>		
General support – no comment				
General support – but only if it is actually followed in practice. Examples of recent developments flagged		Noted. The Local Plan policies will be a material consideration in the determination of an application. In practice, the planning process is one of judgement and often requires the		

<p>where it appears a ‘presumption to develop’ sometimes trumps good design despite presence of a policy. Also flag that para 1.42’s wording on design being a collaborative process should be strengthened to ‘<i>design must be a collaborative process</i>’ and clear policy added to ensure much greater public information, publicity and participation in all public facing developments, large and small.</p>	<p>balance of multiple considerations (and multiple policy requirements) in the process of trying to ensure the best outcome when determining whether permission will be granted. The process of engagement with the community should always be collaborative, though the specifics of that engagement/consultation will always vary with the type and scale of the proposal.</p>
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POLICY	S2									
All respondents raising objections on this policy/chapter	22.2	23.6	25.4	27.2	30.2	40.2	71.1	74.2	81.5	89.2
	132.2	174.2	178.2	26.2						

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy and supporting appendix does not comply with NPPF updates (Sep 23 mentioned)/government guidance - specifically:</p> <ul style="list-style-type: none"> <li>-aiding decision makers with proposals to improve existing renewable energy sites.</li> <li>-appendix does not emphasis compliance with net zero targets as top priority instead dealing with it further down considerations in list – needs to be aligned more closely with gov guidance and made top of list.</li> <li>-diagram in appendix 1.1 needs to be replaced by Doughnut Economics Framework.</li> </ul>	<p>Whilst the resources section of the checklist does not come first, it is no less a priority than the sections that are listed previous in the checklist. The diagram in appendix 1.1 highlights the components of what government considers to be good design as published in the National Design Guide. It has been used to structure the checklist at a high level, before adding locally specific considerations. (It also shows how no one component is of higher priority than another, instead, each element is part of a holistic approach to good design.)</p> <p>NPPF guidance (including updates), such as those in relation to enhancing existing renewable energy sites, are a material consideration alongside the Local Plan and do not need to be replicated in local policy.</p>	<p>No action</p>

Reference should be made to the National Model Design Code including part 2 guidance notes.	It is not necessary to cross reference to the National Model Design Code. This is a national piece of guidance as part of a wide range of relevant documents.	No action
The current plan is insane. It needs to be re-thought from scratch.	Noted.	No action
Appendix fails to include Gov guidance published 21 <sup>st</sup> Dec in relation to housing needs for different groups in community. Needs to set guidance on more guidance on assessing/addressing needs of different groups (e.g. affordable housing, families, older people, students, disabilities etc).	All the policies of the Local Plan need to be read as a whole. The design checklist sets out the key requirements that applicants need to address in informing the physical design and function of their proposals and is structured around the components of good design laid out in the National Design Guide. Separate policies address housing need in detail and set out the requirements applicants need to follow which will also need to be met.	No action
We think Oxford should apply a tourist levy as well as the CIL. A tourist levy could be used to improve infrastructure and amenities for residents and visitors alike, making Oxford City a much more pleasant destination for all.	Noted. This falls outside the scope of the Local Plan.	No action
Support at is in effect a strategic heritage policy but title is not accurately reflective of policy content – better title suggested as <i>Strategic approach to design and heritage</i> . Furthermore, advise two elements to be added to the supporting text: <ul style="list-style-type: none"> <li>• a paragraph adapted from the Oxford Local Plan 2036 on heritage at risk;</li> <li>• wording on the contribution that Oxford’s heritage can make to economic growth.</li> </ul>	These comments are addressed as part of Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.

Consider that allocation of SPS13 is in conflict with this policy and allocation should be removed	The requirements of the Local Plan policies need to be read and addressed as a whole, this will include where development is proposed on an allocated site.	No action
Good design is a fundamental element in the prevention of crime and ensuring public safety and recommend a point is added within the design code guidance requiring crime to be a factor.	Secure by Design guidance is a reference point that is highlighted in the supporting text of the overarching policy HD7. There is also discussion about ensuring safety of people and seeking opportunities to reduce crime/fear within the movement section of the checklist. Secure by Design will be a relevant material consideration to be dealt with in the planning balance.	No action
The following policy is muddled as statutory duties are as below anyway, and implies English Heritage listed assets will not be protected.	The policy is clear that it will protect heritage assets in accordance with National Planning Policy Framework and it is soundly based.	No action
Whilst we have no concerns with the purpose and intention of this policy and the emphasis on achieving good design, we note that parts of the policy read more as statements of intent than policy per se and could therefore potentially be moved to the supporting text.	These comments are addressed as part of Statement of Common Ground with West Oxfordshire District Council.	Refer to Statement of Common Ground with West Oxfordshire District Council for response.

<b>POLICY</b>	<b>S3</b>					
All respondents supporting policy	8.3	37.3	148.3	177.3	186.1	
	196.3					
<b>COMMENT SUMMARY</b>				<b>OFFICER RESPONSE</b>		
Yes				Noted		
Supports necessary infrastructure to address the impacts of developments delivered to an appropriately phased timescale which will be development specific.				Noted		
Support Policy S3 and welcome proposed engagement with developers to discuss infrastructure requirements. Appropriately timed discussions with the Council and potential developers can support the provision of new infrastructure in a timely manner.				Noted		
<b>POLICY</b>	<b>S3</b>					
All respondents raising objections on this policy	22.4	25.5	26.2, 26.3	27.3	40.3	
	44.3	49.2	53.2	59.12	74.3	
	81.6	84.3	89.27	91.2	95.1	
	152.1	174.3	178.3	202.3	203.2	
	189.2	200.2				
<b>COMMENT SUMMARY</b>			<b>OFFICER RESPONSE</b>			<b>PROPOSED ACTION</b>
Need to re-think the whole plan.			Noted			None
Not convinced of need for excessive new development in Oxford			Noted			None
Insufficient consideration of drainage and flood protection measures. The Plan must insist that the local water company fulfils its			Discussions with Thames Water are on-going about upgrades to the Oxford WWTW.			None

<p>legal obligations regarding sewage discharge and flood mediation.</p> <p>Suggests an addition to the policy to set out examples of infrastructure and the inclusion of the following statement: <u>“No occupation of new dwellings will be permitted until a formal review shows that all the above elements are in place.”</u> Respondent sets out that infrastructure is often an afterthought, and that local services and sewage facilities are not able to cope with increased demand from new developments.</p>	<p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP) which sets out the infrastructure needed to support the development in the Plan. The IDP was produced in consultation with other key stakeholders including Thames Water, BOB ICB (Doctor’s surgeries), and the County Council (school provision). We are working with all infrastructure providers to ensure appropriate infrastructure is delivered in a timely manner to support development.</p>	
<p>Concerned about current approach to infrastructure delivery relying on third party providers.</p>	<p>Noted</p>	<p>None</p>
<p>Respondent supports principle of the policy but suggests that specific reference to the consideration and mitigation of the impacts of development include refence to the impact on healthcare and that the use of S106 and CIL be explored where impacts are identified.</p>	<p>Do not consider that specific reference to healthcare is required to make policy sound. The IDP sets out the infrastructure required to meet the plan and the Infrastructure Delivery Schedule documents specific projects.</p>	<p>None</p>
<p>Oxford is styled as 'a cycling city'. This is not reflected in this policy which fails to address the need to work with the County Council to ensure comprehensive safe connectivity for</p>	<p>Other policies (e.g., Area of focus policies) and evidence (IDP) already reference the LCWIP. No need to duplicate reference here.</p>	<p>None</p>

<p>cycling with surrounding neighbourhoods as a requirement of significant developments.</p>		
<p>Given the importance of cultural infrastructure, it would be reasonable to expect the Council’s approach to aim at least to maintain existing levels of cultural assets that exist within the city, and to seek improvements to secure the long-term future of assets classed as ‘at risk’. 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.</p>	<p>These comments are addressed as part of a Statement of Common Ground with Historic England.</p>	<p>Refer to Statement of Common Ground with Historic England for response.</p>
<p>The downside of infrastructure delivery should be mentioned in the plan (e.g., construction related impacts). The plan should include provisions for compensating businesses for losses caused by the works.</p> <p>The re-opening of the Cowley Branch Line should be justified as a desirable public transport improvement rather than on the basis of policy that promotes employment (S1). Policy S3 should state that not just businesses but local residents should be accommodated in the decision to establish new stations.</p>	<p>Infrastructure is needed to mitigate the impact of development. The changes suggested are outside the remit of the local plan, which needs to operate within legal and national policy requirements.</p>	<p>None</p>

Lack of parking facilities at rail stations will impact their usage. There should be some parking close to the station	Noted	None
ARC is a major stakeholder and has already made significant contributions to CBL. It is considered that this should form a material consideration with regards to the level of any further contributions that is sought towards the CBL. Suggests a minor change to the policy wording. Add <u>“These will be tested in accordance with Paragraph 57 of the NPPF.”</u> to the final paragraph of the policy.	Contributions should be in line with the NPPF.  Modification should also apply to Policy CBLLAOF to ensure consistency.	Main Mod
Policy could potentially be strengthened perhaps by requiring a site-specific IDP for major sites. Some general statements in the policy could be supporting text.	These comments are addressed as part of a Statement of Common Ground with West Oxfordshire District Council	Refer to Statement of Common Ground with West Oxfordshire District Council for response.
The County Council will continue to provide updates and corrections on transport schemes for the IDP as information becomes available.  Additional text is needed to make it clear that Oxford Railway Station should be a place where the public realm is prioritised.  Amended text is also needed to allow for contributions from developments taking place	These comments are addressed as part of a Statement of Common Ground with Oxfordshire County Council.	Refer to Statement of Common Ground with Oxfordshire County Council for response.

more than 1,500m away from CBL stations where justified, and after the line opens as it will be necessary to claw back forward funding.		
<p>The final paragraph of policy S3 relating to the Cowley Branch Line is not enforceable as it does not wholly and exclusively relate to the development and would not be justified, especially for householder applications. BMW for example (at the end of the line) may benefit but so may others who use it as a transit point to go to Oxford Central.</p> <p>Remove requirement unless there is a clear relationship to the proposed development, this should in any case provided by CIL City Wide.</p>	Additional work is being undertaken to support the delivery of the Cowley Branch Line by the County Council. It is anticipated that this work will conclude shortly.	None
<p>As water supply and wastewater/sewerage infrastructure is such an important issue it should be covered in a separate Policy.</p> <p>Suggest inclusion of additional policy text to support the development/ expansion of water supply or wastewater facilities.</p>	While the TW facility is close to Oxford, it is located within neighbouring SODC. As such we do not consider it necessary to include additional text within the Oxford City Local Plan 2040	None
No additional allowance is made for the delivery of draft policy S3 specifically, the cost implications of the Cowley Branch Line have not been assessed as part of Local	Additional work is being undertaken to support the delivery of the Cowley Branch Line by the County Council. It is anticipated that this work will conclude shortly.	None

<p>Plan Viability Testing. The assumptions considered appear to be only in relation to CIL and S106 costs. Consider that the financial contributions applicable to infrastructure delivery under draft Policy S3 are not yet known (and likely to be underestimated).</p>		
<p>When people hear the word 'infrastructure' they think it means physical and social facilities and provision such as transport facilities, water, energy, schools, hospitals and community and leisure facilities. The IDP references smart infrastructure. The council needs to be transparent about the need for this increasing and excessive surveillance on the residents of Oxford, what data is being collected, for what reasons and giving people the opportunity not to be part of this in the interests of their rights to privacy.</p>	<p>Infrastructure is needed to mitigate the impact of development. The changes suggested are outside the remit of the local plan, which needs to operate within legal and national policy requirements.</p>	<p>None</p>
<p>Any changes have been agreed with the Environment Agency under a separate Statement of Common Ground.</p>		

POLICY		S4				
All respondents supporting policy	8.4	75.3	176.2			
COMMENT SUMMARY		OFFICER RESPONSE				
Policy is Sound [reason not stated]		Support welcomed				
Welcome the need for pragmatism in decision making where development is not financially viable. The new requirements for development including building performance and ecology, are important but must be considered within the economic realities. Inclusion of the policy is critical to the plan being found Sound.		Support welcomed				
POLICY		S4				
All respondents raising objections on this policy/chapter	22.5	25.6	26.4	28.3	27.4	
	40.4	44.4	59.13	59.13	71.3	
	73.2	81.7	84.4	89.28	133.2	
	136.1	151.1	165.2	174.4	178.4	
COMMENT SUMMARY		OFFICER RESPONSE			PROPOSED ACTION	
Not justified, there is no need for any net zero carbon policies or targets. (26.4)		Applies more to R1			None.	
Not consistent with national policy [no reason stated]		Noted			None	
Fails all Soundness tests, whole plan needs rethinking. Policy exports the problems, will plunder the environment and does not think of future generations (44.4)		Noted			None	
Not justified [no reason stated]		Noted			None	

Not effective [no reason stated]	Noted	None
<p>Not effective, policy should be deleted, it is an excuse to develop profitable housing and ignore needs for affordable housing.</p> <p>Not justified to give exemptions to developers. Affordable housing should be prioritised over other housing. Anything that is not affordable housing should be the exception and have to be justified.</p> <p>Fails all Soundness Tests, in a city with chronic shortage of affordable housing, there is no justification for reducing affordable housing numbers. Policy should set out that the needs of local residents for zero-carbon and affordable housing will be prioritised over profit.</p> <p>Not justified, effective, better to have no development temporarily than to have watered down policy intentions</p>	<p>NPPF requires that development contributions policies should not undermine the deliverability of the Plan, so Policy S4 is important to retain flexibility to respond to exceptional circumstances that could result in a site being unable to deliver a viable development.</p>	None
<p>Not justified, effective, the low car policy restrictions are too severe. Would improve plan viability to soften this part of S4 to focus only on areas with a severe parking space problem</p>	<p>S4 reflects the parking standards set out in Policy C8 Motor vehicle parking design standards, so comment relates more to C8 which establishes the standards and where they apply.</p>	None
<p>Not justified, effective, policy needs to be tighter. Too much relies on council's subjective</p>	<p>S4 requires that robust evidence must be in the form of an independent viability appraisal. It</p>	None

<p>judgement of ‘robustly proven’ which is too easy for a developer to argue a reduced level of affordable housing. Need to explicitly require an independent expert opinion to verify developers’ claims.</p>	<p>also sets out that developers will be expected to negotiate on an “open book” basis which relates to the particular site circumstances that have resulted in the development’s non-viability.</p>	
<p>Not effective, disappointing that important policies on net zero carbon and low parking, are at risk due to this policy and national policy on viability. Low parking should not be included in the viability cascade of S4.</p> <p>Not justified or effective because the cascade approach sets no limits about how far down the policies and standards in the plan can be negotiated. It makes all the policies on affordable housing, biodiversity etc conditional on viability assessment, so the strategy is undeliverable and unsound.</p> <p>Not justified, effective – concern that carbon offsetting and parking restrictions might be ‘given away’ before any compromise on affordable housing.</p>	<p>S4 is very carefully worded to limit the extent to which other policy requirements may be flexed before affordable housing is reduced. Firstly, the policy only applies if it can be clearly demonstrated by the developer that the policy requirements make the scheme unviable. Secondly, there are only small adjustments that can be made: Offsetting is only accepted in exceptional circumstances anyway, and only when as much as possible is done to make a development zero carbon, so Policy R1 is not weakened by this approach. Similarly, any adjustments to parking are only up to maximum standards, so there is not the option for large swathes of parking.</p>	<p>None / Addressed in Statement of Common Ground with Oxfordshire County Council</p>
<p>Not justified, effective - The assumption about S106 and S278 in the viability study appears low: developments must be mitigated by conditions,</p>	<p>It is agreed that the impacts of development, including on the need for infrastructure, will need to be met by a combination of developers</p>	<p>Addressed in Statement of Common Ground with Oxfordshire County Council</p>

<p>undertaking works and providing contributions towards infrastructure as needed</p>	<p>undertaking works and also through contributions to infrastructure. These contributions may be from CIL as well as S106 and S278. The assumption in the viability assessment has been considered carefully and reflects the importance of CIL to delivering infrastructure in Oxford, where most developments are relatively small sites and the infrastructure needs generated are very much cumulative.</p>	
<p>Fails all Soundness tests, inconsistent with NPPF paragraph 8(b). Should not prioritise homes over well-designed, beautiful and safe places with accessible services and open spaces”, as all of these are important and should be considered equally.</p>	<p>The Plan as a whole seeks sustainable and balanced development, so the policies combined seek to balance all of these important issues, as set out in Policy S1 Spatial Strategy and Presumption in Favour of Sustainable Development.</p>	<p>None</p>
<p>The BNP Viability study which informs policy S4 is not robust. Dispute many of the inputs and assumptions, so the Policy is not justified.</p>	<p>The Viability study has been undertaken following national guidance in the NPPF and RICs guidance.</p>	<p>None</p>
<p>Not justified in the cascade to increase parking provision (which will reduce space for homes onsite) before affordable housing. Also policy doesn't define viability.</p>	<p>S4 is very carefully worded to limit the extent to which other policy requirements may be flexed before affordable housing is reduced. The evidence base (viability study) includes an input for developer profit at a sufficient rate for developers to be incentivised to proceed, in accordance with national guidance.</p>	<p>None</p>
<p>Not consistent with national policy, The policy could more clearly reflect the PPG assumption that where up-to-date policies have set out the contributions expected from development,</p>	<p>As explained in the SoCG with WODC, Paragraph 1.50 does already set out types of circumstances that may lead to viability problems, referring to examples such as land contamination and transport or education infrastructure needs. It is agreed that</p>	<p>Main mod</p>

<p>planning applications that fully comply with them should be assumed to be viable. The supporting text could also perhaps reflect the type of circumstances which can lead to viability problems e.g. where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent).</p>	<p>the statement that developments should generally be assumed to be viable could be stronger. Amendment to wording in S4 proposed</p>	
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CHAPTER	2	
All respondents supporting policy	8.22	197.2

COMMENT SUMMARY	OFFICER RESPONSE
Chapter is Sound [reason not stated]	Support welcomed
Support the steps taken to increase housing supply in Oxford, including establishing the housing company [Ox Place], and seeking innovation in the types of homes both to reduce costs and ensure a mix of housing sizes and types to meet local need.	Support welcomed

CHAPTER	2				
All respondents raising objections on this policy/chapter	9.3	40.8	60.2	164.5	172.4 & 173.4
	205.1				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound because the Housing Strategy should include an assessment of the upfront or embodied carbon emissions, because that will be a cause of global warming before any benefits from reducing operational carbon will be realised.</p> <p>Unsound and not legally compliant, because too many homes will use up the City's carbon emission budget and net zero carbon targets</p>	<p>It is acknowledged that new development will have an embodied carbon cost. The assessment of embodied carbon is complex and depends upon many design variables which make it challenging to reliably quantify at the high level Local Plan stage (e.g. types of materials used, where they are sourced from etc). Alongside the net zero carbon in operation policy, the Local Plan includes a new embodied carbon policy that seeks to ensure new development reduces these emissions, and requires larger development to quantify and demonstrate reductions through design process. It is intended as a stepping stone to more rigorous policy in future as national guidance and assessment methods improve.</p>	<p>No change proposed</p>
<p>Fails the Duty to Cooperate because the HENA figures were developed in isolation from 3 of the district councils in the County.</p> <p>Concern that the neighbouring authorities were not part of the HENA process or input into the assessment: Need an agreed joint strategy to agree the level of need and how this can be fairly distributed across the County. Paragraph 2.7. Add; The HENA figures were constructed in isolation from South Oxfordshire, the Vale and</p>	<p>Applies to H1.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
West Oxfordshire; These Districts are unlikely to agree to build any overflow of the number of homes that can be constructed within Oxford City.		
Unsound because does not reflect Government guidance about the number and sorts of accommodation needed. Paragraph 2.5 should simply read: The housing need figure for Oxford can be calculated by using the Government's Standard method as set out in National Planning Policy and guidance.	The Plan is compliant with the NPPF and Government Guidance both in how the overall housing target has been identified, and the types of homes. The only departure from national policy is that First Homes are not included in the affordable housing tenure split set out in H2 because Oxford has exceptional circumstances in terms of housing need and affordability. so in order to prioritise Social Rented and regain control of delivering the size of homes the city needs, First Homes are not included in the affordable housing tenure split.	None.
Unsound because does not emphasis the need to increase density of homes within already developed areas (eg use of empty buildings, additional dwelling units, and 15 minute neighbourhoods)	Policy HD8 Using context to determine appropriate density, requires proposals to make best use of site capacity and efficient use of land. It also requires that sites in high accessible locations should seek higher densities, indicatively 100dph.	None
Unsound because the HENA figure is not the right number to use. The economic assumptions ignores policy constraints in the districts, the districts' opinions should be sought concerning	Relates more to H1 Policy E1 does not allocate any new sites for employment, only intensification of existing sites.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
their projections (60.2). Also the plan does not account for new employment space causing new demand for housing, new employment should only be permitted if accompanied by sufficient new housing.		
Reasons for departing from the Standard Method are not exceptional	The Background Paper on Exceptional Need explains the reasons.	None
Concerned that the strategy is too tilted towards economic and employment growth at the cost of residential opportunities.	The target for the number of new homes in the plan period is a capacity-based target, reflecting the evidence in the HELAA about the capacity for new homes in Oxford. It is not constrained by employment growth because no new sites are allocated for employment growth, any employment growth will be through intensified use of existing sites.	None
Glossary needs to define “existing university or college campus or academic site” (for policies H3 and H9)	Clarify glossary	Minor mod

<b>POLICY</b>	<b>H1</b>					
All respondents	177.5	175.12	179.2	186.2	198.1	
<b>supporting policy</b>	121.8	71.14	8.6	59.4		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
The policy meets the tests of soundness. There is an urgent need for new homes in the city. There are exceptional circumstances which justify a departure from the standard method in planning for new homes. The requirement to consider alternative scenarios is supported and sound. Given the recognised importance of Oxford to the national economy the proposed approach is justified.	Noted and agreed.
Consider housing requirement to be sound.	The support is welcomed.
Support, no reasons given.	The support is welcomed.

<b>POLICY</b>	<b>H1</b>					
All respondents <b>raising objections</b> on this policy/chapter	164.1	9.1	17.2	20.1	25.2	
	26.5	30.5	31.1	32.2	35.1	
	40.6	44.5	48.1	51.1	53.3	
	56.1	58.2	66.2	70.3	72.1	
	78.1	80.5	81.8	88.1	89.4	
	90.2	92.5	95.2	98.1	99.1	
	102.1	106.1	115.1	123.2	129.2	
	133.3	136.2	143.1	151.2	153.2	
	155.1	161.1	165.3	172.2	173.2	
	174.6	178.5	181.1	182.1	183.1	
	184.1	190.1	202.5	115.2	89.5	
	63.2					

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not positively prepared, not justified and not consistent with national policy as the plan has not adequately considered how the plan's objectives could be delivered through subdivision of properties. It is vital that the council leave no stone unturned in seeking to plan to meet its housing need.</p>	<p>The plan allows for subdivision to take place by setting a presumption in favour of sustainable development and through proposals being compliant with other proposed policies of the Local Plan. The proposed policies make site allocations to meet the need. The spatial strategy is sound.</p>	<p>None.</p>
<p>Not positively prepared, not justified and not consistent with national policy as too few homes are proposed within the City's boundaries. More ambitious densities and taller buildings should be proposed. There are additional sites which should be allocated. Oxford should do all it can to meet its own housing need with climate proof homes instead of urbanising the countryside which is not sustainable. There is additional capacity on allocated sites.</p>	<p>The plan allocates sites for development in Chapter 8, including mixed use and residential. The plan allows for increased densities across the City by setting a presumption in favour of sustainable development with proposals required to be compliant with other proposed policies of the Local Plan. This includes environmental sustainability. The plan balances a range of constraints and opportunities. The spatial strategy is sound.</p>	<p>None.</p>
<p>Not positively prepared, not justified and not consistent with national policy as the level of growth proposed is excessive and greater than the standard method with spurious exceptional circumstances. Housing need is inflated and exported. The housing need calculation is out of date. The housing need figure is deliberately calculated to pursue growth. The housing need is overstated and the evidence base</p>	<p>The plan seeks to support the economy of Oxford whilst planning for the homes the city needs. Oxford's economy supports a wide range of diverse jobs that make a significant contribution to the local, wider and national economy. Site allocations are made in the plan for new housing development and sets criteria against which development proposals should be considered. The evidence base demonstrates</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
manipulated. There is need to wait for census data before calculating need. The number of jobs in the city should be reduced to reduce housing need.	there are exceptional circumstances that supports the housing need calculated in accordance with the NPPF requirements. The spatial strategy is sound.	
The plan does not prioritise housing delivery. Building on the Green Belt will not solve the housing crisis because it will lead to road-based commuting into the city. Development should be in villages and towns with railway stations.	The local plan does not seek to plan for development outside of the city's boundaries. The evidence base demonstrates there are exceptional circumstances that supports the housing need calculated in accordance with the NPPF requirements. The spatial strategy is sound.	None.
The very big difference between need and capacity means that the assumption is that neighbouring authorities will accommodate the additional need. Without an agreed, joint strategy this will lead to increased pressure to release land from the Green Belt. The City must be able to demonstrate it has left no stone unturned.	Every effort has been made to find capacity for housing, as set out in the HELAA and Background Papers 15a and 15b. The spatial strategies for unmet need will be a matter for surrounding districts. Most of the unmet need for the plan period is already provided for in existing site allocations in surrounding districts.	None.
It is highly regrettable that the Oxfordshire Plan 2050 failed. The housing figure is calculated based on the Oxfordshire 2050 Plan which has been abandoned.	The local plan does not seek to plan for development outside of the city's boundaries. The evidence base demonstrates there are exceptional circumstances that supports the housing need calculated in accordance with the NPPF requirements. The evidence base that supports the plan is proportionate, robust and up to date. The spatial strategy is sound.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The duty to cooperate has not been met because the evidence base has not been agreed by all of the surrounding districts. The surrounding districts have not agreed to support the delivery of unmet housing need. The level of unmet need has been artificially inflated to support economic growth and this has not been supported by the surrounding districts.</p>	<p>The Duty to Cooperate has been met by the council in preparing the proposed Local Plan in accordance with the NPPF. There are exceptional circumstances demonstrating a departure from the standard method upon which housing need is calculated set out in the evidence base. The Council has been engaged in dialogue with the districts during the preparation of the plan in addition to carrying out of formal consultations. The district councils have agreed Statements of Common ground with the council on matters that have been agreed.</p>	<p>None.</p>
<p>South Oxfordshire District Council and the Vale of White Horse District Councils consider that Policy H1 fails the duty to cooperate and is not positively prepared, effective or consistent with national policy. Appendix 2 of their representation sets out their independent review of the HENA.</p>	<p>The key points of ORS's independent review of the HENA in relation to Policy H1 are summarised and responded to in a separate table below.</p>	<p>None.</p>
<p>The HENA is littered with mistakes (for example assuming only 77% of people of employable age will be employed, when the economic activity rate has never been that low and is generally over 80%. This inflates numbers). Oxfordshire's growth outstripped projections because the 2018 Housing and Growth Deal caused</p>	<p>South Oxfordshire District Council and the Vale of White Horse District Council commissioned ORS to analyse the methodology of the HENA. The key points raised are summarised and responded to in a separate table below.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>unprecedented number of new homes to be built, attracting inward migration. This circular argument for increasing housing growth takes us onto a circular argument for increasing housing growth out-of-kilter with the wellbeing of our population.</p> <p>Not justified, disagree with affordable housing need figure in HENA of 2767, more likely to be around 1000-1150.</p> <p>Housing need assessment must comply with standard method and not inflate it artificially</p>	<p>The affordable housing calculation has not informed the housing need figure or requirement in Policy H1.</p>	
<p>H1 relies upon allocated sites in chapter 8, including SPS13, a wholly unsustainable and unsuitable site. The soundness of the policy is therefore undermined by its reliance on unsound allocations.</p>	<p>See responses to individual sites, including SPS13. A thorough site appraisal process has been carried out, as described in the HELAA and background papers 15a and 15b.</p>	<p>None.</p>
<p>The City Council should re-write the whole plan and get a balance between employment and housing believable.</p>	<p>Background Paper 6c explains how employment sites have been considered for their housing potential.</p>	<p>None.</p>
<p>The HENA fails to collect evidence from the four top employers (hospital, universities, BMW) about their expansion plan, which are the main drivers from housing need, and to analyse growth factors in Oxford specifically. At the same time, underestimates capacity by not</p>	<p>The HELAA explains the approach to calculating capacity and represents a thorough analysis of capacity.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
including sites less than 10 and not considering house extensions and subdivisions that add capacity.		
Not positively prepared. The plan accepts Oxford City Council's housing request without judging its legality and without weighing it against the other needs of both the city, the other districts, and the County as a whole.	The Oxford Local Plan 2040 has been prepared in respect of the Oxford City Council area. The plan explains the approach to calculating housing need supported by the evidence base.	None

S&V comment	City response
<u>In the HENA the jobs growth forecast is lower than the OGNA (684 fewer jobs per year, 18% less) but the housing need is higher (by 293dpa, 7% more). This is down to assumptions around economic activity rates and commuting:</u>	

**The assumed economic activity ratio is too low and not reflective of the evidence** The economic activity ratio assumption is that 77% of working-age people will be part of the labour force. The SE and Oxfordshire economic rates have never been below 77% since 2004 and in general are over 80%. July 22-June 23 81.6% in Oxon and 81.2% in SE. Given extent of the difference wonder whether consultants intended to refer to employment rate rather than economic activity rate. For SE could get 77% (although higher in Oxon). Oxon consistently out performs the SE average, and it's a rising trend. A natural assumption would be that employment rate for Oxford would be over 80%. Using this more plausible economic activity rate for Oxon brings the jobs-led housing need down to close to the figure identified by Government's SM calculation.

The lower this ratio is, the larger the non-working cohorts of the population are that need to be housed. If 100% of the local population worked, you could service a much bigger labour demand without needing to expand labour supply through housing.

The scenarios are using *employed* economically active as the measure of economic activity. This is because – taking the employment-led scenarios – it starts with a fixed level of forecast labour demand and then it must be calculated how much local labour supply will be available to meet that demand. To do this, it is necessary to make an assumption for what proportion of the resident population will be *employed* to meet that demand. The unemployed – even if technically active – will not go towards meeting the demand.

Paragraph is 7.4.13 of the HENA says: *“the economic activity rate... derives the number of **\*working\*** people from the population of working-age people.”*

The graph at 7.3 could have been the employed active rate rather than total active but its purpose was purely to show the volatility of local economic activity rates. The point is the same whichever measure you use.

Secondly, the reason 77% was selected is set out in paras 7.4.15 and 16. As mentioned, the *local* activity rates are far too volatile and have swung by more than 3 percentage points in a year. This would send the housing requirement shooting up and down in the space of a single year. So specific single year rates should not be used as inputs for the scenario models. Instead, more stable long term averages are needed. This is set out in the HENA, paragraph 7.4.16. The 20 year, regional average rate for employed, economically active people is 76.8%. Since Local Plans tend to

cover a 20 year period and we're making 20 year estimates, it can be said to be an appropriate time frame to use.

The regional rate also represents the wider geography that is more reflective of a powerful, growing labour market that reaches beyond Oxfordshire and will always draw labour from beyond its boundaries to an extent. It's not appropriate to rely on a very tight labour market indefinitely as a reason to provide minimal or less local labour/housing. There should be a degree of slack that allows for demand responsiveness and a decent accessible labour pool.

With respect to 'current rate' this just means the rate 'currently being used'. That said, the economically active employed rate for Oxfordshire was 77% at the end of 2021.

<p><b>The reduced net in-commuting figure is much lower than current rates, so is a target and therefore a policy-on decision.</b></p> <p>The HENA 2022 assumes that net in-commuting will be 9,000 workers in 2040. The most recently recorded level of net commuting into Oxfordshire is around 21,000, so 12,000 higher than this target. Reducing commuting is a policy decision. Therefore this assumption is not 'policy off'. This impacts on neighbouring areas outside Oxfordshire, so not discussing with them fails the duty to cooperate. Reducing in-commuting by 12,000 requires an additional 12,000 workers to live in Oxfordshire, and therefore it is likely at least 8,000 more dwellings would be needed. However, if 20% of all workers are working remotely this figure could increase to around 10,000 more homes needed overall. Therefore around 8,000-10,000 of the housing need in the HENA (200-500dpa) are associated with the assumption that net commuting will reduce.</p>	<p>The 9,000 assumption was originally used in the OGNA and there seemed to be no reason to change from this previously agreed approach. The 9,000 assumption is not a target or a 'policy on' assumption. Instead of looking at the forecast number of jobs and converting all of those to homes, an assumption must be made that some in-commuting will take place. The level of in-commuting is high at the moment, but there is no reason to assume that this is a natural level of in-commuting. The high level is because needs are not being met. To assume a continuation of very high in-commuting levels, which result from needs not being met, within a need calculation, would result in an acceptance of needs continuing to not be met within the area. We do not consider the assumed level of in-commuting within the need calculation in and of itself results in a duty to cooperate matter that must be discussed with districts neighbouring Oxfordshire. It is part of a needs forecast, still assuming a level of in-commuting. Clearly some of the needs to be met will arise outside of Oxfordshire (not just from surrounding areas).</p>
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<p><b>The apportionment is not a needs-based assessment but a policy choice.</b> The figures should not have been determined Oxfordshire-wide and then apportioned. The apportionment method used represents a decision that 30% of housing need should be associated with Oxford because 30% of the total jobs are forecast to be in the city. This fails to take account of established commuting patterns within the county. Any needs-based assessment would have to take account of existing evidence of in-commuting in to Oxford- if that evidence is ignored and a different assumption is made then that is a policy choice.</p>	<p>Oxfordshire represents a reasonable approximation of the Functional Economic Market Area (FEMA) and Housing Market Area (HMA). The scenarios used in the HENA are based on the HMA/FEMA for the reason that labour and housing markets function over this market area, rather than within the constrained boundaries of individual districts. The calculation of need using sub-national population projections that inform the standard method can be distorted by historic suppression of household formation and impacts which constrained housing supply has on migration patterns in all districts and particularly in constrained urban districts like Oxford. Looking at the whole county produces more robust and consistent outputs because the whole FEMA as covers the functional area where households will have formed beyond spatially constrained areas. So working out the overall need for Oxfordshire provides a far more realistic and robust approach. Looking only at Oxford data factors in the suppression that arises from the constrained boundaries of the city, and does not provide an accurate assessment of need. However, the individual districts that the need is arising from must be determined. The apportionment does not represent a policy choice to align forecast jobs with homes. The apportionment method says that that level of the need is arising in Oxford.</p>
<p><b>A genuine needs assessment for Oxford will produce a lower housing need than the 2018 SHMA (and the SM) based on jobs growth.</b> The 2018 SHMA did provide a needs-based assessment specific to Oxford. That identified a jobs-led housing need figure of 527 dpa based on a jobs growth of 852 jobs. The HENA identifies a growth of 784 jobs per year, so a genuine needs-based assessment for Oxford is likely to identify a housing need below the 527dpa identified in the 2018 SHMA.</p>	<p>The 527 quoted is not the agreed need for Oxford from the SHMA update. The need from affordable housing was greater and represented the agreed level of need for Oxford. Attempting to compare the number of jobs forecast for Oxford in the 2018 SHMA update to the 2022 HENA is not relevant, as the 2022 HENA uses an array of data that is more up-to-date than the 2018 SHMA update, and it does produce different levels of housing need.</p>

<p><u>Given the flawed assumptions in the jobs-led model the councils may instead seek to use the demographic modelling to justify their higher housing targets. However, this is also flawed. Three particular concerns raised are: adjusting migration trends in light of Census data, retaining the 2014-based household formation rates, apportioning the need from the Countywide figure:</u></p>	
<p><b>Any justification for not using standard method should have focused on errors with underlying data or alignment of jobs and workers, or affordable housing need (not Census data).</b> The Census adjusted scenario of housing need makes use of an alternative demographic baseline created by the consultants that uses 2021 Census data based on demographic projections produced by the consultants themselves. We do not consider this approach necessary or relevant as Standard Method is normally either accepted or rejected. The Government has made it clear that it does not doubt the accuracy of the ONS 2016-based and 2018-based projections, but still says these projections should not be used, but the 2014 projections should be; therefore, the existence of more recent projections do not qualify as an exceptional circumstance to warrant deviation from the SM. Exceptional local circumstances must be demonstrated to deviate, including new data. This must reflect demographic trends and market signals.</p>	<p>The NPPF gives limited detail on what may be considered reasons for diverting from the Standard Method. It does not provide any kind of exhaustive list, so it is up to individual authorities to decide whether there are exceptional circumstances existing that justify use of an alternative method. The City Council does not consider the Standard Method to be an accurate representation of housing need in Oxford. We consider that there are a number of exceptional circumstances, and these are set out in BGP1. The analysis of new demographic data from the Census 2021 is one of these circumstances, because in Oxford and Oxfordshire it significantly diverges from the projections. That the Government has rejected more recent projections but still says they are valid is not a reason to say that the Census data should also be rejected. The Census data is solid data of current circumstances that can clearly demonstrate the validity or otherwise of projections. ORS argue that because the Government in the SM continues to use an older population projection rather than two newer projections, this means that the availability of newer Census data does not mean that the 2014 population projection should not still be used. However, using the Census data to show the projection is not accurate and should not be used is not the same as continuing to use an older projection rather than newer projections. The Census data shows the population projection to be inaccurate.</p>

	<p>The data used in the alternative approach does reflect current demographic trends and market signals.</p>
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**2016 household formation rates should have been used instead of 2014 because 2016 rates are likely to be the basis of the 2022 rates.** If the Census 2021 data is to be used to explore the potential change to migration which will be made in the forthcoming (currently scheduled for April or May 2025) 2022-based household projections, then the impact of changes to household representative rates should have also been considered. The 2022-based projections are currently expected to use a similar methodology to the 2016-based and 2018-based, and they will not revert to the legacy approach that was used for 2014-based projections that the ONS did not consider to be fit for purpose. The ONS sensitivity data showing the difference in household growth using 2014-based and 2016-based household formation methods shows that projected household growth in Oxford 2022-2023 would be 865 households fewer using the likely 2022 household formation rates than the 2014-based household formation rates.

Paragraphs 3.6.2 and 3.6.3 of the HENA explain why the 2014-based subnational household projections household representation rates are used. Whether the SM is updated to use different HRRs is speculation, but these rates are not chosen because they are the standard method rates. They are chosen because they are considered to be the most accurate representation. The 2014-based figures have generally attracted less criticism in terms of building in a suppression of household formation than more recent projections. The recent SNHP (since the 2014-based release) are based on data in the 2001-11 Census period and project forward trends in household formation in this period to 2021 – one in which housing affordability deteriorated significantly – with age/sex-specific household formation rates held constant thereafter. Oxford has had significant suppression of household formation over time, and across Oxfordshire, this suppression is particularly evident for the 25-34 age group where there was a notable drop in formation rates from 2001 to 2011, and ONS are projecting some continuation of this moving forward to 2021, after which the (lower) rate is held broadly stable. These issues inform why the latest household projections are not used in the standard method. Applying rates that have been criticised for building in household formation suppression in Oxfordshire where this is an evident issue would not be a logical choice.

<p><b>That the Census 2021 population is different to the 2014 population forecasts is not a valid reason to divert from SM.</b> The 2014-based projections and the SM modelled a need to increase housing delivery in Oxfordshire and the LPAs have successfully done so through the Growth Deal. The period that informed the 2014 projections was 2008-2014 when fewer than 1,700 homes were delivered. This increased to more than 4,300 annually 2014-2021. The higher level population growth follows the higher number of homes that were planned and delivered and should not be the baseline to justify another step-change in housing need.</p>	<p>The number of homes that were planned and delivered from 2014-2021 was based on the SHMA, which was an objectively assessed calculation of housing need, found sound at the examinations into local plans of all of the Oxfordshire districts. The SM for Oxford calculates a lower need than the SHMA did. That does not mean that the level of need calculated in the SHMA was an uplift or overstatement. It does not in any way automatically follow that because more homes were delivered from 2014-2021 than 2008-2014 (which is a period one year shorter anyway) that this was only a temporary need, or that a projecting from an older and lower rate of delivery is better reflective of current needs.</p>
<p><b>The difference between the 2014-based projections and the Census 2021 should be expressed only for Oxford and Cherwell and not only as an Oxfordshire figure.</b> It is evident that the analysis will have been undertaken individually for each local authority area. The HENA 2022 actually shows that Oxford City had a slower rate of growth than had been projected by the ONS 2014-based population projections, so it follows that any adjustment to the standard method would in all likelihood result in a housing need figure that was lower than the Government's calculation. By 2021 the 2014-based sub-national population projection had projected 166,400 persons resident in Oxford City, while the 2021 Census estimated the population to be around 162,100 persons, 4,300 persons fewer. Therefore, the approach adopted in the HENA 2022 would actually reduce the level of need in Oxford City.</p>	<p>The HENA does not hide the fact that the Census data shows a lower population than the ONS 2014-based population projections- this is clearly stated in paragraph 3.1.10. Population projections for Oxford alone are not considered to be a good basis for housing calculating housing need. A different approach to the Standard Method is very clearly needed in Oxford. The fact that the population in Oxford is even lower than that projected is itself a demonstration of the fact that needs can't be met within Oxford, and haven't been over a long period of time. If the suppressed level of delivery, that results in a suppressed level of population, is projected, this does not help to meet needs. The Oxfordshire SHMA considered the whole of Oxfordshire to be a housing market area. Individual housing needs were calculated, but this was based on very different methods to purely relying on demographic projections. In addition, it was agreed by all the LAs that Oxford has unmet need, and provision was made for this within the districts. Therefore, what has been delivered in Oxford cannot be said to in any way represent a reflection of what previous needs were.</p>



POLICY	H2				
All respondents supporting policy	8.7	59.5	136.3	164.2	174.22

COMMENT SUMMARY	OFFICER RESPONSE
Support the need for genuinely affordable homes to be delivered in the city	Support welcomed.
Policy is Sound [reason not stated]	Support welcomed.
Support the exclusion of First Homes as not genuinely affordable in Oxford	Support welcomed.
We note with interest the exclusion of First Homes from the policy despite there being a national requirement for such provision. Clearly this will be a matter for the City Council to justify to the Inspector at examination and could usefully be more clearly explained within the supporting text.	The position regarding First Homes is explained in Affordable Housing background paper

POLICY	H2				
All respondents raising objections on this policy/chapter	30.6	40.7	41.2	44.6	58.3
	70.4	71.4	73.5	78.2	89.5
	92.2	100.1	115.2	121.1	133.4
	136.3	153.3	174.22	175.1	178.6
	179.3	189.4			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound because applying clause (a) in Blackbird Leys, where there is already a higher proportion of social rent, will not achieve the aim of balanced communities, rather it will unbalance housing stock further. Need a different approach for this parish eg to increase	There is a pressing need for more affordable housing across Oxford, in particular for social rent because other forms of affordable housing (including shared ownership) are out of reach for many people. As such, the plan aims to maximise delivery of affordable housing, and prioritises delivery of social rent homes	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
First Homes and/or cap the level of affordable homes.	across all qualifying sites (ie those of 10+ dwellings) to help contribute to meeting these needs.	
Fails all Soundness tests [no reason stated]	Noted	None
Intermediate housing (20%) is not explained, could be usefully illustrated.	Explained in the Glossary and in Affordable Housing background paper	None
<p>Not effective, the requirements of the policy risk rendering mixed use brownfield sites unviable, contrary to NPPF, and risk delivery of regenerated sites. Reword the project specific viability assessments wording.</p> <p>Not effective, consistent with national policy – the requirements risk the viable delivery of hospital sites at the proposed levels of obligation. Need to recognise the need for project-specific viability assessments.</p>	Policy S4 sets out the cascade for sites where viability is a challenge.	None
<p>Not effective, the open book caveat is too flexible, remove this route for developers to avoid delivering affordable housing targets.</p> <p>Not justified, the cascade gives developers too much flexibility and loopholes. Viability assessments should be independently verified.</p>	NPPF requires that policy must not render developments unviable, so it is important for the plan to include the flexibility to respond.	None
Not justified, effective, disappointed that the ambition to achieve 50% affordable housing has been reduced to 40%. Affordable housing need is extreme and target should be reconsidered.	As noted in the County Council SOCG, the implications of the viability report to support the LP2040 have been carefully considered, with the aim of maximising affordable housing but ensuring the whole plan approach is viable without negotiation	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not effective, 40% target is inadequate, need more social rent and key worker homes</p> <p>At least 80% of new homes should be affordable.</p> <p>Too few developments to date have provided sufficient affordable housing. New developments should be 70-80% affordable housing.</p> <p>Policy could go further, 40% will do little to address housing crisis.</p> <p>Concern that 40% does not go far enough.</p> <p>Oxford has a housing crisis so a far higher % would be justified: should be 80% or 100% affordable. With only 40% plan is not positively prepared.</p> <p>Not justified, effective, should prioritise affordable housing over all other types of housing and make any other types of housing the exception to the rule, rather than the way it is currently set-out in the plan. More affordable</p>	<p>needed for most applications. Within the overall 40% requirement is a need for 80% social rented housing.</p> <p>It was a difficult balance to achieve in this policy, and the ambition and priority for delivering affordable housing has long been a principle of the council. However in recent years there have been significant changes in the viability context, many of which are much wider than Oxford. This is explored in more detail in the Viability Study and Background Paper 2 Affordable Housing. Ultimately fewer sites were likely to be able to viably achieve 50% affordable housing than in previous local plans.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>housing will mean more lower wage earners can live in Oxford rather than having to commute in, which is currently the case. New developments should be 70% to 80% affordable housing and 20%-30% other types of housing.</p>		
<p>Uncertain what the reduced target of 40% means for unmet need sites</p>	<p>As noted in the SoCG with County Council, the tenure split requirement is not built in to the affordable housing requirement of the unmet need site policies. Therefore there is scope for these to remain viable whilst maintaining a 50% affordable housing requirement. The tenure split has continued to be a point of negotiation between councils and developers and that will continue to be the case.</p>	<p>None</p>
<p>The proposal for 32% social rent (80% of 40% affordable housing) does not match needs or the Council commitment to focus on those in greatest need.</p> <p>80% social rent is laudable but illegal because 25% should be First Homes.</p> <p>35% social rent (80% of the 40%) does not reflect the acute need for social rent or the commitment of the council to focus on affordable housing.</p> <p>Not justified, effective, policy should be more flexible, reflecting the recommendations in the HENA. Increase intermediate tenure from 20% to 30%.</p>	<p>The proposed split of tenures reflects both viability evidence and also local evidence including the housing register. If the requirements pushed up to 90 or 100% social rent of the affordable element then it may reduce the overall number of affordable homes on a site.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The University Hospital Trust consider that, given that it is acknowledged by Policy H2 and Policy S4 that there may be exceptional viability circumstances, the Policy should state 'where' circumstances exist, rather than 'if'.</p>	<p>It is agreed that this change would reflect the situation.</p>	<p>Minor modification.</p>
<p>Rent at 80% or shared ownership is not affordable to many</p>	<p>Noted and agreed, as recognised in the supporting text for Policy H2 (paragraph 2.11)</p>	<p>None</p>
<p>Should include a requirement to ensure university student accommodation developments do not displace affordable housing delivery</p> <p>Concern that university developments should not be excluded.</p>	<p>Policy H3 seeks a financial contribution towards affordable housing, from proposals where the site could otherwise have been delivering mainstream residential. The calculation is applied at the same rate as H2 (ie 40%). University developments are only excluded on the sites listed in Policy H3 Affordable Housing Contributions from Purpose-Built Student Accommodation.</p>	<p>None</p>
<p>Not effective, zoning of land for employment (and pushing housing out into suburbs) has resulted in increased house prices and affordable housing crisis. Need more balanced distribution of housing and employment</p> <p>Fails all Soundness tests, zoning land has increased prices. Make the new policy on allowing housing on employment land effective by making the assessment for housing suitability fair and transparent with an aim of increasing housing on employment land.</p>	<p>The affordable housing policies are not locational policies</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not effective, questionable assessment of development land will result in increased prices		
<p>Not effective or consistent with national policy, because does not reflect guidance about number and sorts of accommodation needed. At least 80% of homes should be to meet local identified needs for the groups identified in national policy</p> <p>Ensure the definition of affordable fully reflects the breadth of housing needs identified and the range of tenures best suited to meeting those needs (amend glossary).</p> <p>Not positively prepared, justified, or effective. Housing model is outdated. Need realistic housing to meet individual needs not just market preferences on size and quality limitation. Need to review evidence.</p>	The HENA assessment of housing need has been undertaken consistent with national policy/guidance, and data is as up to date as possible	None
Not justified, Viability study inputs are not robust or correct for a number of reasons, evidence needs reviewing	The Viability study is compliant with the NPPF, PPG and RICs guidance.	None

<b>POLICY</b>	<b>H3</b>					
All respondents <b>supporting</b> policy	8.8	17.3	34.5	124.2	138.1	
	138.3	193.3				

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Policy is Sound [no reason stated]	Support welcomed
Support the reference that financial contributions are not required on existing university/campus sites and existing university/college-owned PBSA sites, and that contributions will only be required on net increase in units.  Without the exemption, campus developments would not be viable.	Support welcomed
Policy is legally compliant and Sound	Support welcomed
Welcome the introduction of proposed policy H3 which confirms that on-site affordable housing will not be required from Purpose Built Student Accommodation (“PBSA”) developments where said development is either a redevelopment of an existing PBSA development owned by a university, or where it is to be delivered within an existing or proposed university campus.	Support welcomed.

<b>POLICY</b>	<b>H3</b>					
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	17.3	18.1	26.6	71.5	80.3	
	91.3	95.3	138.1	176.3	199.2	
	202.6	89.29				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not justified, effective, because Policy refers to definition in glossary for “existing or proposed university or college campus site” but this is missing in glossary	There is a definition within Policy H9 but will also add to Chapter 2 glossary for clarity.	Minor modification
The exempted sites must include Marston Road Campus (SPE1), retaining the exemption afforded under OLP2036 policy H2.	Marston Road Campus (SPE4) is exempt as an existing campus. SPE1 Harcourt House is not an existing campus so does not meet the exemption criteria.	None
Where is the evidence for growth in the student population /need for more accommodation?  Not justified, there are already many student properties and more planned. We do not need more students we need more residential homes.	An assessment of the accommodation needs for Students was undertaken in 2023, working closely with the universities. This is published on the website along with the other Regulation 19 documents. It is also explained in a section in the Background Paper Specialist Housing Need.	None
Fails all Soundness Tests because the policy excludes already-planned developments and developments within existing student communities from the affordable housing requirements. All new housing, including planned and new student villages should include affordable housing.	This requirement for contributions only applies to sites where residential development including affordable housing provision could have been otherwise anticipated. The requirement does not therefore apply to development within university campus sites or redevelopment of existing PBSA that is currently and will continue to be owned and/or managed by the universities. This is in recognition of the onus placed on the universities by Policy H10 to provide accommodation for their students, and because development on those sites would not displace mainstream residential development or result in lost opportunity to achieve affordable housing.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not consistent with national policy because the balance between housing and commercial is distorted	The overall priority use for new sites is to deliver homes to meet housing needs (including on some employment sites), whilst also ensuring that the infrastructure, employment, education, and health needs for the city are met (overall objectives and strategy)	None
Not justified because mixing general/student accommodation in the same unit is inappropriate and poses safeguarding risks	Policy H3 allows that the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate, but it is not required.	None
Not justified or effective because a policy cannot be dependent on applicant identify. Should not give universities preferential treatment.	The requirement does not apply to development within university campus sites or redevelopment of existing PBSA that is currently and will continue to be owned and/or managed by the universities. This is in recognition of the onus placed on the universities by Policy H10 to provide accommodation for their students, and because development on those sites would not displace mainstream residential development or result in lost opportunity to achieve affordable housing.	None
Fails all Soundness tests because Policy H3 seeks affordable housing contributions on the uplift of new student rooms provided they are not owned by a university. There is no logical rationale for this because all existing or allocated sites are not in competition with the general housing market, and the identity of the developer has no bearing on the planning question.	If a site is not owned and/or managed by the universities then the development could be considered as mainstream residential development (and as such, the normal affordable housing contributions policy requirements in H2 would apply). No non-university owned sites are allocated solely for student accommodation.	None

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Policy is Unsound [reason not stated]	Noted	None

POLICY		H4	
All respondents supporting policy	8.9		

COMMENT SUMMARY	OFFICER RESPONSE
Support policy [no reason stated]	Supported welcomed

POLICY		H4	
All respondents raising objections on this policy/chapter	61.1	81.9	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
It is unclear to have the calculation method in the appendices, amend policy to set out the requirement more clearly.	Noted that it would be helpful to have the calculation wording within the policy, but the calculation in Appendix 2.1 applies to several policies regarding contributions, so to avoid repeating the calculation in all of those policies, it is presented just once in the appendix with cross-references in all the relevant policies.	None
Fails all Soundness tests because policy does not reflect the evidence base (viability assessment) and viability concerns in the study, especially paragraphs 6.28 and 6.29 about values. The	Policy sets out sufficient and appropriate flexibility to respond to variations in viability across sites.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
surplus residual land value varies across sites so a fixed amount per unit is not appropriate.		
Fails all Soundness tests [reason not stated]	Noted	None

<b>POLICY</b>	<b>H5</b>				
All respondents <b>supporting</b> policy	8.10	136.4	175.2	178.7	199.34
	179	197.1			

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Policy is Sound [reason not stated]	Support welcomed.
Support that the policy specifies which sites the policy applies to, to avoid risk of the policy being used to avoid providing affordable housing.	Support welcomed.
Support that policy is consistent with NPPF in including homes “for essential local workers” in definition of affordable housing	Support welcomed.
Welcome the innovative approach to delivering homes	Support welcomed.
Support the principle of helping to increase much-needed affordable housing for key workers such as NHS staff	Support welcomed
Support that the policy enables employers to provide subsidised affordable housing for rent for its staff on its own sites.	Support welcomed
Support that the policy could help address shortfall of housing for OUH staff, in particular as part of the Trust’s own masterplans	Support welcomed
Welcome recognition of the need for employer-linked affordable housing in order to provide for some key workers	Support welcomed
Support policy, it plays a vital role in providing housing that is needed in Oxford, although is limited in scope by the limited number of sites in the policy	Support welcomed

<b>POLICY</b>	<b>H5</b>				
All respondents <b>raising</b> <b>objections</b> on	26.7	49.3	81.2	153.4	175.2
	176.4	179	192.1	202.7	

this policy/chapter	
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<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Not effective, sites on Marston Road (Marston Road Campus and Harcourt House sites) should be included in the policy as suitable for employer-linked housing	Policy H5 refers to university campus sites, as such Marston Road Campus falls within the criteria, whilst Harcourt House does not.	None
Not effective, sites listed need Environmental Assessment, particularly for drainage value	Relevant environmental assessments have been undertaken for all site allocations, and further assessment would be carried out at planning application stage, including drainage.	None
Not effective, concerned to see two schools on the list with a growing population in Oxford	The County Council, as education authority, and the River Learning Trust, have identified that these parcels within the school sites could be available.	None
Not effective, concerned about lack of low cost housing in Osney Mead proposals	Applies to site allocation SPCW7 Osney Mead	
Does not meet any Soundness tests because employees need affordable housing close to their place of work, not long commutes on busy roads	The sites reflect the land owned by the relevant employers, and also the sites where the employer has identified there may be some scope to introduce residential development, and that they are willing to get involved in providing housing for employees. In addition all of the sites are currently places of work, and in the majority of cases would remain as places of work with employer-linked housing only being one element of use on the site. For example hospital uses will be retained on hospital sites even if housing is additionally introduced. sub	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>City Council has pushed up land prices by designating land to businesses instead of combination of homes and businesses</p>	<p>Policy E1 is permissive of intensifying use of brownfield sites and existing office space for mixed use residential and employment</p>	<p>None</p>
<p>Support principle of identifying specific sites for this policy but need flexibility to enable employer-linked housing on other sites where a need is demonstrated, such as windfall sites.</p> <p>Broaden the policy to allow sites on a case by case basis, where this is justified by evidence of specific needs of different groups within the community across the whole city, rather than on specified key worker sites only</p>	<p>The policy is restricted to specified sites as listed in the policy, which have been chosen for their suitability, availability and potential capacity to cater to the housing needs of essential workers, whilst also not prejudicing the potential supply of new Social Rent homes. If the policy was broadened to include unidentified windfall sites then there is a risk that the policy would be used by developers to circumvent the usual affordable housing requirements of policy H2, and particularly would impact on the supply of social rent homes.</p> <p>We have worked closely with key employers in Oxford in developing this policy to identify and consider sites within their ownership which might be suitable for this policy, and the list of identified sites has already been extended from the version in OLP2036.</p> <p>If an additional site opportunity were to become available post-adoption, which has not been specified, the landowner could either put it forward for consideration in the next Local Plan, or the plan does allow for sites to be developed as 100% affordable under policy H2 (which would mean 40% social rent, then 60% of whichever affordable tenure the developer wished (50% plus the 10% intermediate)).</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Amend policy to include flexibility on tenure where need for a tenure other than affordable rent is demonstrated.	It is important that the homes are retained as Affordable Rent in perpetuity to ensure that the benefits truly outweigh the compromises. There was also feedback that in practical terms there was likely to be mortgage and re-sale complications, if any purchase models were included in the policy. If a tenure other than affordable rent is sought then policy H2 would apply.	None
Not effective, because whilst it can help solve recruitment/retention issues, it may present problems for tenants: if they change employer or location and make them feel trapped, and as parking provision is unlikely, people will have to give up their cars which could also restrict their life choices and freedoms.	The employer-linked housing model may not suit everyone's lifestyle choices, but employers and the City Council feel it will provide a further means of access to affordable housing, to supplement the affordable homes delivered via Policy H2.	None
Not justified, concern about the viability of bringing forward employer-linked affordable housing. Request further discussion between the Trust and the City Council to test viability.	If viability is a challenge then the Plan includes flexibility to respond in Policy S4 Viability, so that sites are not prevented from coming forward. The sites listed in H5 are not required to be delivered as employer-linked, it is simply saying they would be suitable for that if the landowner wishes to pursue that. The landowner could also choose to develop as mainstream residential, in which case Policy H2 would apply instead of H5.	None
Concerns about the operation of the criteria and obligations in the policy. Would welcome continued joint working and monitoring of this policy, and potential option to review it during the plan period if necessary.	Policy H5 allows an exceptional approach to affordable housing, to be applied only in exceptional circumstances. The criteria in the policy are necessary in order to ensure that the affordable housing that comes via this route is	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not justified, concerned about criteria (f) and (g), criteria are too onerous.	genuinely affordable to staff, and that this policy cannot be applied in a way that bypasses the need for affordable housing.	
Not justified, Rectory Centre and Littlemore Mental Health Centre (if allocated) should also be included in policy	Littlemore Mental Health Centre to be added to suitable sites listed in H5 Subsequently agreed with Health Trust that Rectory Centre is not a suitable location for employer-linked, so no change needed to H5 for that site.	Main modification
Fails all Soundness tests, expansion of the main employers are the root cause of housing need in the city. Employers should provide housing or pay mandatory contributions to build homes. Policy is too complex, restrictive. Allow market to incentivise delivery.	The policy is intentionally limited to specified sites, in order that the policy is not used to circumvent the affordable housing contributions policies of mainstream residential developments.	None

POLICY	H6					
All respondents <b>supporting</b> policy	192.2					

COMMENT SUMMARY	OFFICER RESPONSE
Support, recognising the need for a mix of dwelling sizes and a balanced community.	Support welcomed.

POLICY	H6					
All respondents <b>raising objections</b> on this policy	28.5	71.6	136.5	178.8	202.8	199.3

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy is not considered to be positively prepared. No further comments made.	N/A	None
Affordable housing should be the majority, not the minority as in the plan at the moment.	The affordable housing requirement is set carefully based on viability evidence. Background Paper 2 and the responses to Policy H2 explain more fully.	None
There should be criteria for a mix across all sites, including homes for market sale.	The mix of units for the market element of the scheme needs to be explained. However, the policy is flexible because there are a large number of factors which may legitimately influence the mix of sizes in a particular area and of a particular type of scheme, and this is not considered something it is important to prevent. Responding to market factors in determining mix, for example, will help ensure	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	affordable housing can be delivered to the maximum, and is responding to what people want in a particular area.	
Would like to see a requirement on larger sites for all housing to be tenure blind.	Agree that this is a desirable outcome. However, it is not written as a policy requirement because it may be difficult in practice to achieve, for example it is generally easiest to provide a whole block of flats as one tenure, rather than spreading them around, and that may have clear signage and so on identifying who manages it.	None
The policy is not effective, because it is not clear if a one bedroom apartment would be a 'home' or not.	There is nothing in the policy or text to suggest that only houses are considered homes. The policy applies to all homes or dwellings (flats or houses).	None
The University of Oxford object to the policy on the basis that staff housing schemes will need their own mix specific to the needs of the university community, and this should be acknowledged in Policy H6.	Already in the text of Policy H6 is an exemption for employer-linked housing (which it is expected any university 'staff housing scheme' would be delivered as). <i>The policy already says: Proposals for 25 or more homes (gross) (C3 residential) or sites of 0.5ha and greater, and which are outside of the city centre or district centres, will be expected to comply with the following mix of unit sizes for the affordable housing element, unless it can be shown not to be feasible (this does not apply to employer-linked affordable housing):</i> There is no need for any further clarification.	None



POLICY		H7	
All respondents supporting policy	8.12		

COMMENT SUMMARY	OFFICER RESPONSE
Policy is Sound [reason not stated]	Support welcomed

POLICY		H7	
All respondents raising objections on this policy/chapter	59.15	202.9	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not justified, expansion of the education sector frequently results in loss of dwellings which undergo change of use to a variety of school/college uses. This issue is not addressed in the Plan. This lack of relevant control of dwelling use makes this policy unsound as it fails to address one of the City's key deficits as identified in the Plan. Add to policy: Change of use from C3 dwelling house to secondary school, college or university use will not be permitted unless supported by the local community in which it is located.	Policy H7 generally covers any proposals involving loss of dwellings. Policy H16 addresses development relating to new boarding school accommodation.	None

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Not effective, as policy does not cover abandoned or vacant properties. Add to policy or add a new policy.	Use of a vacant residential building would continue to be for residential use, unless planning permission was sought for an alternative use. The City Council also has strategies outside of the planning system to bring back into use vacant homes.	None

POLICY	H8
All respondents <b>supporting</b> policy	8.13

COMMENT SUMMARY	OFFICER RESPONSE
Supportive of policy: 1 respondent with no further comments	N/A

POLICY	H8							
All respondents <b>raising objections</b> on this policy	58.4	71.7	78.3	133.5	172.3	173.3	192.3	202.10

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not positively prepared or effective – H8 is too restrictive on creation of new Houses of Multiple Occupation (HMOs) and may serve to dampen the ability of small and larger (sui generis) HMO's to be created to help meet housing needs. It is not positively prepared as it reduces the capacity of Oxford to meet its housing need. Not effective as it causes more unmet need to spill into surrounding districts where no effective joint working on cross-boundary strategic matters has taken place, thus failing also the duty to cooperate.	HMOs are recognised as important in meeting housing needs in Oxford with the policy approach setting out criteria to manage how and where they are allowed and restricting further growth in areas that already have high concentrations. This restriction does not affect the capacity of the city to meet its housing need as an HMO counts as a dwelling.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as has not met the requirements of the Duty to Co-operate. The Council has not prepared the Local Plan following on-going, constructive, and active engagement with either SODC or VWHDC.</p>		
<p>Unsound as not positively prepared or effective. Whilst it's good that the plan includes maintaining the 20% of HMOs within 100 metres of a proposed new HMO, enforcement is lacking in some areas. Furthermore, there is no provision made for proposals to expand existing HMOs. Thus, we have seen increases in the number of residents in existing HMOs which can be problematic in areas with large concentrations of existing HMOs. Therefore, request that the policy include a need for planning permission for the expansion of existing HMOs so that these are subject to the same process as any proposed new builds or conversions to HMOs.</p>	<p>The Article 4 Direction introduced in February 2012 means that planning permission is required to change the use of a C3 dwelling house to a shared rented house (C4 HMO). Planning permission is also required to increase HMO from six to seven or more tenants as large HMO are in their own distinct use class 'sui generis'.</p>	<p>None</p>
<p>Unsound as not effective: Parking provision for HMOs is inadequate, resulting in on street parking further away when the development itself should allow for more parking spaces.</p>	<p>Parking standards for HMO's are decided on a case-by-case basis as identified in Appendix 7.6. Other parking controls can influence this, including a Controlled Parking Zone.</p>	<p>None</p>
<p>Unsound as not positively prepared, justified or consistent with national policy: Although supportive of HMOs as a means of accommodating individuals not on the housing ladder, fear that the policy in its current form will lead to an excessive density of HMOs which</p>	<p>The threshold based approach applies equally in all parts of Oxford allowing flexibility for new HMO in suitable locations whilst capping further creation in others. The approach will have a greater material impact where there are already high concentrations of HMO.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>can harm the ambience of residential streets, and result in changes to the character of the local area.</p> <p>Feel that the street length referred to in the policy should be increased from 100m to 150m or more and that the policy should be further strengthened by reducing the maximum proportion of HMOs allowed from 20% to only 5% or 10% at most.</p>		
<p>Unsound as not justified.</p> <p>Consider criterion (a) of the policy (relating to the proportion of HMOs in a 100 metre street length) should not apply to the Trust's sites. The Trust requires complete flexibility to provide staff accommodation on its sites and it's considered that criterion (a) as currently drafted could unacceptably limit the supply of new HMO accommodation on the Trust's sites.</p>	<p>Refer to Statement of Common Ground.</p>	<p>None</p>
<p>Unsound as not effective - "Unrelated individuals" is not explained, does this mean a family with two unconnected students must now be classified as an HMO? This would be ineffective as it would have a negative effect on student housing provision, discouraging families from renting bedrooms.</p>	<p>Appendix 2.2 (page 335) provides further information on HMO calculation. This states at bullet point iii. "Buildings NOT counted as a HMO include all single dwellings that are occupied by a family, a homeowner together with up to two lodgers....."</p>	<p>None</p>

<b>POLICY</b>	<b>H9</b>				
All respondents <b>supporting</b> policy	8.14	124.3	126.3	193.4	

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Support, no reasons given.	The support is welcomed.
Increased student accommodation can release private market dwellings back into the market place. Also support continued allowance for the use of bedrooms outside term time as it supports the local economy and colleges. Acknowledge not all locations are suitable for student accommodation.	The support is welcomed.

<b>POLICY</b>	<b>H9</b>					
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	34.1	136.6	17.4	26.8	53.5	
	71.8	91.4	113.2	199.4	202.11	
	118.1					

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
There is a tendency to assume that students are only those of Oxford and Oxford Brookes universities. The University of West London has bought Ruskin College and there are further providers in the city that the LP needs to be inclusive of. There are also pressures generated by international education for young adults and adults who need accommodation- assumptions that these students are living with families need	Policy H9 applies to accommodation of all student accommodation (for students 18+). Policy H15 applies to boarding accommodation for school children.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>to be tested. A sustainable location, as has been determined for hostels, should apply here.</p>		
<p>Arterial roads are generally sustainable for public transport and active travel, and these busier locations can be more suitable for young people than families. Students can also be very beneficial for local shops on arterial roads, such as Iffley and Cowley Roads.</p> <p>Suitable locations should also be expanded so that adjacent to an existing campus means within a 15 minute walk. Many colleges own sites which are not available to the general housing market and may not be directly adjacent to an existing campus. These sites should be free to come forward for student accommodation.</p>	<p>The current local plan Policy H10 does not allow student accommodation on arterial roads. Arterial roads vary very much in character. Outside of the district centres, they do tend to have a more suburban character. Arterial roads are the basis of all the district centres, and along these relatively long stretches, student accommodation is allowed by Policy H9. Within a 15 minute walk of a campus would cover the majority of the city. It would also cover the kind of quiet suburban location where student accommodation has been found to cause problems previously.</p>	None
<p>H9 is not positively prepared or effective. The city has a significant shortfall of quality accommodation, which is set to get worse. Student satisfaction levels are far higher where students live in professionally-managed purpose-built accommodation compared to HMOs etc. The Oxford Students Needs Assessment (Iceni, 2023) projects accommodation needs could rise by 9,800-14,800 over the plan period. There should be</p>	<p>There will always be some students who do not wish to live in purpose-built student accommodation, or for whom that accommodation type is less suitable. The policy allows for student accommodation in locations that it is suitable, but even then, student accommodation is not expected in many locations, because at the current time it is often not a priority use for land owners. There is no evidence that the locational policy is restricting</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>reference to meeting 14,800 beds over the plan period. There should be less restriction by location, as long as it is accessible by walking, cycling and public transport. The locational restriction threatens to significantly constrain the supply.</p>	<p>supply at the current time, or that it will constrict supply. Landowners of sites outside of the suitable locations are rarely coming forward to say that they would have liked to bring forward student accommodation. The restriction on locations is in place because student accommodation can have negative impacts (for students and existing residents) if brought forward in the wrong way and in the wrong locations.</p>	
<p>Where is the evidence for a growth in student population and hence the need for more accommodation?</p> <p>There is too much emphasis on accommodation for students in a city already overwhelmed with new student accommodation and facilities.</p>	<p>The Oxford Student Needs Assessment (Iceni, 2023) has looked at the need for student accommodation. The universities anticipate growth in the number of students requiring student accommodation. The NPPF requires policies to try to meet identified needs of all groups, including students (para 63).</p>	None
<p>While understanding that the proposed growth in university student numbers in Oxford suggests more purpose-built student accommodation is required, it would make more sense to locate outside of the city centre. The centre needs more affordable housing and housing for longer-term residents who could help support a vibrant economy. Increasing the concentration will only exacerbate the problems for local communities living near these areas.</p>	<p>There is a difficult balance to strike in term of the location of student accommodation. There are only a limited number of locations that it is suitable, which does mean the concentration will be high in those locations. Allowing no more would still leave a very high concentration, but would also lead to student accommodation needing to be located in a more spread out way in locations where it will have a more negative impact. Much of the city centre is college</p>	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>campus, which will not come forward for standard market housing in any event. Student accommodation mixes well with commercial uses, for example on upper floors of shops and mixed in a block with offices.</p>	
<p>Brookes is trying to reduce provision and staffing drastically and wants to become a one-site university. This should be reflected in the policy.</p>	<p>The Universities have provided information on their predicted growth, although have said this is always difficult to forecast and is especially so in the current uncertain climate. However, the universities have said they are anticipating significant growth.</p>	<p>None.</p>
<p>No new sites have been identified outside of the universities' estates, and various policies restrict future supply. In Oxford Brookes' case, gains on sites such as Crescent Hall and the delivery of the second phase of Clive Booth hall will be offset by redundancy elsewhere. Pressure on both universities' operational estates mean that there are few substantive opportunities on a scale such as at Clive Booth. The City Council is not seeking to allocate any substantive third party PBSA sites, which might also make a difference, particularly in respect of Oxford Brookes University.</p>	<p>Student accommodation is allowed for in site allocation policies outside the university/college estates, for example on some of the hospital trusts' sites and at Oxpens. The thresholds set in Policy H10 reflect the anticipated limited amount of new student accommodation expected to come forward. Speculative sites are not being put forward for student accommodation. The changing priorities of the universities for their estates is recognised, for example Brookes consolidating in Oxford and the University of Oxford needing to prioritise opportunities for investment in academic facilities. That is reflected in Policy H10 thresholds, but Policy H9 is not the cause of these issues.</p>	<p>None.</p>

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Schools are not included, neither are any institutions that don't have a campus. The policy is dependent on the identity of the applicant, which favours existing institutions.	On an existing campus is only one of the possible locations allowed for. Sites in the city and district centre are also acceptable on principle. The policy does not depend on the identity of the applicant.	None.
There is no restriction on students bringing cars to Oxford, only to the site.	The policy can only have requirements that it is possible for the institutions to manage and have control over.	None.

POLICY	H10	
All respondents <b>supporting</b> policy	8.15	34.2

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	The support is welcomed.
Support given for approach, but questioned whether Oxford Brookes consolidating in Oxford affects its operation. Also says new providers ought to be controlled.	The support is welcomed. The thresholds have been set based on information provided by the universities. The policy applies to all higher education institutions that create a need for accommodation for students in the city. It is only the thresholds as a measure that apply to just the universities.

POLICY	H10							
All respondents <b>raising objections</b> on this policy/chapter	175.3	17.5	113.3	136.7	153.5	193.5	199.5	202.12

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
There should be a positive strategy in the plan to try and identify the scale of need and then allocate sufficient university and college sites, with some flexibility to meet that need.	The thresholds set in Policy H10 are based entirely on what is achievable according to the information provided by the universities to inform the Oxford Student Needs Assessment (Iceni, 2023). The institutions are encouraged to use their own sites for student accommodation (which is allowed by Policy H9).	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The proposed threshold of 1,300 represents a further lowering of previously stated thresholds, i.e. 2,500 then 1,500. This consistent downward trend in the threshold could have adverse implications for the operation of the university and colleges, particularly as the availability of land for this form of development is limited, including by Policy H9.</p>	<p>The thresholds have been set carefully, based on information provided by the universities (more fully explained below).</p>	<p>None.</p>
<p>Would like to see this expanded to include the language schools, as well as the universities, given the expansion of these schools in recent years.</p> <p>It is unjust because it depends on the identity of the applicant and excludes University of West London and Ruskin and others.</p>	<p>The policy applies to all higher education institutions that create a need for accommodation for students in the city. It is only the thresholds as a measure that apply to just the universities. The accommodation needs of language schools were considered in the Oxford Student Needs Assessment (Iceni, 2023) but were found to be limited beyond what is already provided for in student accommodation, because of the continued use of homestay and student accommodation outside of term times by these groups.</p>	<p>None.</p>
<p>Note that postgraduate students are not being counted as needing to be in dedicated accommodation, and this is wrong. Dedicated accommodation for students is not flexible and there are fluctuations, so previous number should be provided to ensure they are not just speculative and to meet aspirations of</p>	<p>Postgraduate students on taught courses are included in the policy. It is only those on research and vocational courses who are not. Those groups of students are likely to have different accommodation needs that will often be met outside of student halls. The numbers in the thresholds reflect the forecasts of the</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>developers. Oxford Brookes' projections may be over-estimates.</p>	<p>universities, for both delivery of student accommodation on their sites and changes in student numbers. Oxford Brookes forecasts growth, and the threshold in the policy must respond to that.</p>	
<p>The Oxford University Health Trust has responded and their presentation is summarised and responded to separately, with a modification proposed (193.5)</p>	<p>See SoCG with the Health Trust</p>	<p>None</p>
<p>Bidwells on behalf of the University of Oxford and Oxford Brookes in their representation (199.5) say that the 'student cap' presents different problems for both universities. Whilst the University of Oxford will be able to operate within the cap for most (if not all) of the Plan period, they will be unable to growth in the 2030s once all existing sites on the university's estate are delivered. The universities have looked at their growth projections in both student accommodation and numbers. Both universities are compliant within the student cap as expressed in Policy H9 of the OLP2036. Growth of the universities is dependent on a number of factors, many of which are not in control of the institutions. The projections are not the stated policy, but a forward projection of historic trends. The uncertainty of predicting</p>	<p>Draft Policy H10 does not set a cap on student numbers. The intention of the policy is that new academic facilities for 18+ students, which allows for an expansion of students requiring accommodation, does not go ahead without the housing needs of those students being met. In the case of the universities, that is to be measured by compliance with the threshold. If the threshold is breached, new academic facilities that create a growth in student numbers should not go ahead until a way for those accommodation needs to be met has been found. This is to manage the very significant impacts of student housing needs on the city.</p> <p>The thresholds have been set to be achievable, and not to constrain the growth of the universities. The Oxford Student Needs</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>is why two levels of growth (upper and lower) were considered. There is pressure on both universities' operational estates that limit potential for new student accommodation. The cap of 4,500 will soon be exceeded by OBU and the revised cap of 6,900 is supported by will need to be extended to 2040 if OBU is to remain compliant. The cap would need to be raised by a further 2,000 if not accounting for third-party student accommodation without nominations agreements.</p> <p>The University of Oxford's growth quickly outstrips the supply and the cap would be breached by 2026. By 2040 the cap would need to be set at 6,900. The change in counting of post graduate research rooms means that the university can comply with the revised cap until 2028, or 2037 under even a low growth scenario.</p> <p>The local plan is not identifying any significant locations for student accommodation, but is intensifying controls over new accommodation.</p>	<p>Assessment (Iceni, 2023) was commissioned to assess needs over the Plan period, and has been fully informed by information provided by the universities.</p> <p>The City Council understands that it is difficult to forecast the growth of student numbers, especially over the first 5 years. For this reason, the threshold is only set to 2028.</p> <p>In their representation, the universities actually make it clear that they consider that the threshold is achievable, even at the upper limit of predicted growth. That should be the case, because it was set to allow for that upper level of predicted growth in student numbers. The cap was also set to allow for student accommodation for Oxford Brookes that does not have nomination rights, which is why for Oxford Brookes the policy says the number of students requiring accommodation that 'exceeds the level of university owned or managed accommodation or <u>known purpose-built student</u> accommodation...'</p> <p>The University of Oxford say that if the change in counting of post graduate research rooms is accounted for, at the upper level of growth the university can comply with the threshold at least until 2028. That is the year that the threshold</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>runs to. The City Council has only ever required the universities to submit a list of qualifying accommodation rooms and the number of qualifying students and it compares the two to assess compliance with the threshold. The City Council was unaware the university had been discounting some student accommodation. The threshold is set on the assumption that, going forward, this accommodation will no longer be discounted, and, as acknowledged by the university, this makes the threshold achievable. The comments relating to provision of new student accommodation relate more to Policy H9. However, it is worth pointing out that there are not significant aspirations for student accommodation to be brought forward outside of the locations listed in the criteria of Policy H9. Furthermore, on many university and college sites that it was previously assumed would bring forward student accommodation, student accommodation is no longer expected to come forward. The universities have other pressures, needs and priorities for their sites.</p>	

<b>POLICY</b>	<b>H11</b>	
All respondents <b>supporting</b> policy	8.16	

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Support, no reason given.	Support welcomed

<b>POLICY</b>	<b>H11</b>			
All respondents <b>raising objections</b> on this policy/chapter	66.3	164.3	200.3	

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
We note that you will not be allocating any further land to travellers but would ask that the Council improves its provision for regular waste collection for this group.	There are currently no authorised traveller sites within Oxford City Council’s administrative area. Any unauthorised stay on land is limited in time and is dependent on Travellers complying with the code of conduct which is handed out to them. This includes not dumping or tipping waste. Any breach of the code should be reported to the Oxfordshire Gypsy and Traveller Service at the County Council.	None
This policy, like others in the plan, lacks reference to some key issues to ensure that any sites that come forward are appropriate and	Planning permission will only be granted where all of the criteria in Policy H11 are met. Criterion (f) states that proposals should not have an	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
sensitive to their surroundings. Reference to heritage assets or their setting in the policy or supporting text should be included.	unacceptable adverse impact on the appearance and character of the surrounding area. The policy is therefore already mindful of this issue, notwithstanding that any proposal would have to be consistent with all relevant policies of the Plan.	
This policy should be tied to others in the Local Plan, such as Policy G1, to ensure sites such as recreational areas, or public open space are not brought forward as possible sites.	It would make the Plan very cumbersome if every single policy that may be relevant to another were to be cross-referenced. The Plan is read as a whole, and any development proposal will be assessed against any relevant policy in the Plan. Policy G1 already sets out the hierarchy of green and blue spaces and what will and will not be appropriate in each category.	None
The inclusion of flood risk requirements are welcomed. However, this policy should be amended to reflect the requirements of the flood risk policy (G7), or this policy should adhere to it.	As above, the Plan is read as a whole and we do not think this amendment is necessary.	None

<b>POLICY</b>	<b>H12</b>				
All respondents <b>supporting</b> policy	8.17	136.8			

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Support, no reason given.	Support welcomed
Support – policy is sound. Many people wish to live on Oxford’s waterways, for both cultural and affordability reasons. These are sensible guidelines for the provision of new moorings and we encourage the council to continue its work with other agencies to find space for additional moorings.	Support welcomed

<b>POLICY</b>	<b>H12</b>				
All respondents <b>raising objections</b> on this policy/chapter	10.2	33.1	153.6	164.4	200.4

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Paragraphs 2.59 and 2.60 contain repetition and should be reconsidered.	Agree that the first sentence of paragraph 2.60 repeats the last sentence of paragraph 2.59. Propose to delete the repetition in paragraph 2.60 as follows:	Minor modification

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>Much of the boat dwelling community relies on the existence of residential moorings which are defined as having planning permission for long-term mooring in a fixed location and for occupation as a household's sole or main residence. There are also boat-dwellers whose transitory nature.....</p>	
<p>For clarity, paragraph 2.61 could be amended to explain that the Oxford Canal has no additional space for new moorings due to the presence of existing moorings and navigational safety requirements.</p>	<p>Whilst this may be the case, an Oxfordshire-wide assessment of boat dwellers is still being undertaken, with mooring space in each district/ the city being one of the issues assessed. It would be prudent to wait until the assessment's findings are published before reaching a conclusion.</p>	<p>None</p>
<p>In respect of paragraph 2.61, the Council should seek to maximise the number of secure moorings for the boat dwelling community. Oxford City Council should also approach neighbouring local authorities to see if there is willingness on their part to increase secure moorings in their areas of jurisdiction, according to whatever demand may exist.</p>	<p>An Oxfordshire-wide assessment of boat dwellers is still being undertaken, with mooring space in each district/ the city being one of the issues assessed. It would be prudent to wait until the assessment's findings are published before reaching a conclusion</p>	<p>None</p>
<p>As with Policy H11, it is not clear how this policy relates to other policies of the Local Plan. There is no reference to heritage assets or their setting, nor sensitive blue infrastructure corridors in the policy or supporting text.</p>	<p>There is reference to the historic and natural environment as Criterion b) of Policy H12 does state that new residential moorings will have to maintain or enhance the historical and ecological value of the waterway or nearby land.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Reference to these sensitive designations and considerations would prevent inappropriate sites being considered for new residential moorings.</p>	<p>Other policies in the Plan already address issues such as heritage assets and green infrastructure. It would make the Plan very cumbersome if every single policy that may be relevant to another were to be cross-referenced. The Plan is read as a whole, and any development proposal will be assessed against any relevant policy in the Plan.</p>	
<p>To ensure the safety of residents/people occupying these developments, access, and egress in the event of a flood and or evacuation plans should be considered. This could be included as a bullet point in the list of criteria that must be met if planning permission is to be granted. The supporting text could also highlight that all of this type of development should be in line with policy G7, particularly in relation to safe access and egress.</p>	<p>Agree that this should be included in the list of criteria in Policy H12 to ensure the safety of residents/people occupying these developments, access, and egress in the event of a flood and/ or evacuation plans:</p> <p><u>e) Proposals have investigated impacts of flood risk and addressed provision for safe access/egress and/or evacuation plans where appropriate.</u></p> <p>In terms of the amendment to include additional supporting text to refer to Policy G7, it is not necessary to cross-reference all other policies in the Plan that could be relevant to this policy.</p>	<p>Main modification</p>

POLICY	H13	
All respondents supporting policy	8.18	178.8

COMMENT SUMMARY	OFFICER RESPONSE
Comment of support with no reasons given	The support is welcome
<i>Oxfordshire County Council comment in support summarised in Statement of Common Ground.</i>	For response, see Oxfordshire County Council Statement of Common Ground.

POLICY	H13				
All respondents raising objections on this policy/chapter	95.4	186.3	61.2	14.4	178.9
	59.16				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
In general support, but reference to policy H2 should be removed as there is a separate policy H4 with respect to delivering affordable housing on sites delivering specialist housing for older people.	Agree the reference to Policy H4 could add confusion	Minor mod to Policy H13: e) Meets the affordable housing requirements of Policy <del>H2/</del> H4 as applicable.
A percentage of new housing should have ramps/wide doorways, etc. to make it suitable for wheelchair users.	This requirement is in Policy HD14: Accessible and Adaptable Homes.	None
The ICB agrees that this kind of specialist housing should be either near healthcare facilities or provide within. However, the policy	Consideration of this need and mitigations will be case-by-case, dependent on the location of the facility, existing primary healthcare in the	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>does not set out clearly how the demand for primary healthcare services can be met. The ICB considers that potential developers should provide robust evidence to identify appropriate mitigation measures to accommodation this extra demand.</p>	<p>area and whether any on-site provision is proposed.</p>	
<p>Oxford has an ageing demographic if the number of transients (students and their families) is excluded. This is not adequately considered in the Plan, which does not specify the need to include specialist/older persons accommodation in larger development. 20% of units of schemes of more than 25 units should be suitable for specialist older persons' accommodation.</p>	<p>The County Council in their own representation have agreed that sites in Oxford are not generally suitable for this approach. To be feasible, given the resources it needs to sustain it, extra care accommodation needs to have a certain number of bedrooms. As a percentage of a relatively small site, this can't be achieved.</p>	<p>None.</p>
<p>As there are more old people there should be more housing for them, close to where they already live.</p>	<p>The approach of the Plan is based on the need identified in the HENA (which is limited) and also the ability and suitability of sites in Oxford to deliver this use. The Policy allows this use to come forward, but does not require it on any particular site, as that is not justified given the limited need, and no sites are large enough for it to come forward as part of the housing element.</p>	<p>None.</p>

POLICY		H14	
All respondents supporting policy	8.19		

COMMENT SUMMARY	OFFICER RESPONSE
Support with no reasons given	The support is welcomed.

POLICY		H14				
All respondents raising objections on this policy/chapter	196.5	148.4	136.9	104.1	9.2	
	105.1	59.17				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The plan is unsound as it does not have adequate policies to meet the need for self and custom build- which itself it underestimated. Surveys carried out by Ipsos Mori for NACSBA have shown a far higher demand for custom-building. The Council does not explain as part of its register that the register is used to evidence demand that the Council must provide for, and therefore people may not feel the need to register that they otherwise would if that was clear.	The register is the standard way for measuring demand. The relative lack of people on the register is considered to show a relatively low demand in Oxford. Background Paper 5 explains how the demand has been calculated and will be met <a href="https://www.oxford.gov.uk/downloads/file/1906/bgp5-specialist-housing-need">https://www.oxford.gov.uk/downloads/file/1906/bgp5-specialist-housing-need</a>	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Paragraph 73 of the NPPF requires LPAs to support entry level exception sites and ‘should comprise community-led development that includes one or more types of affordable housing...’</p> <p>There is a supportive but weak policy in the LP2036. The wording supporting community-led housing should be reinstated into the policy.</p>	<p>Paragraph 73 of the NPPF is referring to sites that would not otherwise be suitable as rural exception sites, and is not applicable to Oxford. The wording in LP36 about community-led housing does not set any requirement or criteria to help consideration. There is no requirement to assess need or provide for community-led housing and referencing it in the policy is not of particular benefit and may be confusing.</p>	<p>None.</p>
<p>No explanation or justification is given for only supporting the small sub-section of community-led housing where people commission homes for themselves (that is self-build). Community-led housing is more diverse and inclusive, housing people who do not have the money and energy to commission homes for themselves and to wait years for them to be built (and may recruit residents for affordable housing from the housing register after planning permission has been achieved.</p>	<p>The plan allows for community-led housing to come forward as long as other policies of the plan are met. Text does express support for this housing type (2.70, 2.71), and that is more appropriate in supporting text than the policy.</p>	<p>None.</p>
<p>The small brownfield sites and infills in Oxford are particularly suitable for self-build and there should be statement in the plan recognising Oxford’s specific character and suitability for community-led housing.</p>	<p>These sites may be suitable, but would only come forward for self-build on an ad hoc basis. The policy sets a requirement, for suitable sites, to ensure some comes forward. That is only for a small part of large sites.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy not effective on high density schemes including flats as it is not practical to have self-builders. A caveat is needed in the policy.	It is acknowledged that flats are unlikely to be suitable for self-build. Brownfield sites where only flatted development is proposed are already excluded from the policy. The policy only applies to large sites, so on many schemes, it will be quite possible to have high density development but also to provide 5% of the site area for self-build plots.	None.
More clarity is needed on how to measure the 5% to avoid ambiguity. It may be easier to refer to a % of units.	A very similar policy has been in operation since the adoption of the Oxford Local Plan 2036 in 2020, and it has not caused difficulties in calculating the requirement. It may be more confusing to change it in the new policy.	None.
Sites for self-build are often small, which limits options for those wanting to use them.	Unclear if this refers to plots or sites. There are not large sites in Oxford for any purpose. The plot sizes are not set by the policy.	None.

<b>POLICY</b>	<b>H15</b>		
All respondents <b>supporting</b> policy	8.20		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Comment of support, no reasons given.	The support is welcomed.

<b>POLICY</b>	<b>H15</b>		
All respondents <b>raising objections</b> on this policy/chapter	178.10		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
The County Council have commented on the soundness of this policy. Their comment is summarised in the Statement of Common Ground.	An officer response is provided in the Statement of Common Ground.	None

POLICY		H16	
All respondents supporting policy	8.20	59.10	

COMMENT SUMMARY	OFFICER RESPONSE
Support with no reason given	The support is welcomed

POLICY		H16			
All respondents raising objections on this policy/chapter	13.2	145.1	140.1	116.1	60.1

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The existence of the policy reflects the fact the Plan does not fully acknowledge the importance of educational facilities in promoting the economy of the city and wider region, therefore it is not consistent with NPPF para 95, which says local authorities should take a proactive and positive approach to promoting availability of school places.	A positive and proactive approach has been taken to school places through the IDP and discussions with the County Council, and there is not a suggestion from the County Council that there will be an issue with school places over the plan period. The knowledge economy is key to Oxford and the region's success, and the plan is supportive of it. However, allowing expansion of boarding accommodation for schools across residential areas and detached from the schools is not considered necessary to supporting education and the wider knowledge economy.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The Plan is unsound because it is not effective, justified or deliverable. The Plan suggests many boarding schools are on relatively large sites and campus-based so have scope for accommodation on site, and it says that boarding accommodation outside of the main school site could have a variety of negative implications, but this is generalised and so misinformed. Many sites are not large campuses so it is important there is the option to identify sites for boarding accommodation which is not located at or adjacent to the main school site (e.g. Wychwood School, d'Overbroeck's. It is extremely unlikely that suitable properties (already in C2 use) would become available adjacent to existing teaching sites within the context of a highly competitive property market, and there will be detrimental impacts on the schools' ongoing operations. Schools should be able to make their own judgements about safety and security of pupils travelling to lessons under their own safeguarding responsibilities.</p>	<p>Many boarding schools in the city are on relatively large sites and are campus-based. However, a minor modification is made to the supporting text in paragraph 2.74 to say that many (rather than most) are campus-based. It is considered that the spread of boarding accommodation across Oxford has impacts that do need to be managed. These impacts may be impacts on the roads, and neighbouring communities and on the ability of sites to come forward to delivery much needed housing.</p>	<p>Minor modification: <del>Most</del> <u>Many</u> of these schools are campus-based, so that the children live in accommodation on the teaching campus.</p>
<p>The policy is unsound because it is not justified, effective or consistent with national policy. Criteria b and e relating to the safety of students is unnecessary because this is already effectively and robustly achieved by existing regulatory</p>	<p>Criteria b and e are reasonable things to consider within a planning application, whether or note they are covered by another regime. Criteria c and d are very standard considerations</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
requirements relating to boarding standards, independent of the planning process. Criteria c and d are relevant but are not needed in this policy as they are covered by policy R7, and this can be covered by condition rather than needing a management plan.	to set out for particular consideration in a planning application.	
Supporting text in para 2.74 refers to children aged 16 and under, while the policy itself refers to children aged 18 and under, the latter being correct.	A minor modification to paragraph 2.74 is needed for clarity	Minor modification to para 2.74: There are many boarding schools in Oxford with children aged <u>18</u> <del>16</del> or under. Most of these schools are campus-based, so that the children live in accommodation on the teaching campus.
The policy is not in agreement with DfE guidelines about provision of amenity space for pupils. Although the guidelines are for state schools, we feel that all pupils in Oxford should have access to good amenity space close to any residential accommodation	The policy is specifically about boarding accommodation, rather than the schools themselves.	None.

CHAPTER	3				
All respondents supporting chapter	8.28	14.3	59.6	157.3	

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted

COMMENT SUMMARY	OFFICER RESPONSE
Overall seems very sensible. New sites won't be allocated for business use and may be converted to housing. We've had too many new sites created on the edge of the city – exacerbating housing and transport problems	Noted
There is severe pressure on the city's housing market. Chapter 3 does not explicitly acknowledge recognise the land use requirements of the city's education establishments, which continue to grow. The educational establishments put pressure on the availability of housing in the city. As a result, there are recruitment difficulties in education and health services. The plan needs to include a clear policy for managing the expanding land-use requirements by the universities, private colleges and schools. Without it, the plan will not be able to deliver the objective 'There is access to affordable, high-quality and healthy living accommodation for all'. The Plan is therefore unsound in this omission.	Other policies in the plan address this including bespoke site allocations, Policy H9 - Location of new student accommodation, H10 – Linking new academic facilities with the adequate provision of student accommodation etc.
It should be considered that where flexible employment use (whether Class E, B2 / B8) is proposed that for the purpose of future year forecasting, and any subsequent individual planning applications that may arise from the Local Plan, there is an expectation that this would be modelled with a worst-case scenario land use trip rate when determining potential impact on SRN.	Transport Modelling undertaken to assess the impacts of development in the city on the A34 for HRA purposes. This used appropriate trip-rates and took a precautionary approach which assumed higher trip-rates.

CHAPTER	3					
All respondents raising objections on this chapter	20.2	20.4	58.5	73.6	84.6	
	129.3	164.8	170.4	172.7	173.7	
	197.3					

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Do not support the approach to move away from the private motor car. People are needed to support the city. Making it difficult for them to drive into the city will not support the city's high street and retail.</p>	<p>Noted</p>	<p>None</p>
<p>The Oxford Employment Land Needs Assessment Oxford Employment Update Report (2023) is cited in paragraph 3.8 of the Draft Plan as the source for the employment need for Oxford being between 269,000 and 348,000 sqm. We are unclear about the source of this number as the Evidence Base list only appears to include an Interim Report (2022) which does not include this range.</p>	<p>Noted. This reference will be corrected.</p>	<p>Minor modification to correct referencing of the correct document.</p>
<p>A real climate adaptation response requires three broad types of jobs (and workers):</p> <ul style="list-style-type: none"> <li>i) Tradespeople and builders to retrofit homes;</li> <li>ii) Organic horticulturalists/ workers for regenerative farming; and</li> <li>iii) Land-workers to restore natural habitats/ flood plains; planting of trees etc.</li> </ul> <p>The aim to create new areas of employment in the city, unrelated to the extreme needs demanded by earth systems collapse, runs counter to Levelling Up and ignores the resource we need in every place where people live, or where people manage land.</p>	<p>Chapter 3 includes Policy E4 - Community Employment and Procurement Plans which includes support for the opportunity for local people to work in the building industry (through apprenticeships/ skills/ training and making links with schools and colleges).</p> <p>Noted</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>As detailed in response to H1, Oxfordshire is seeking to follow a Doughnut Economics model which will look at growth only for the purpose of improving sustainability and well-being. Growth for growth's sake (as evident in Chapter 3) is not sustainable. New housing requirement is far lower for Oxford if forced economic growth is not pursued.</p>	<p>Noted</p>	
<p>This chapter is unsound because it omits a necessary policy for a key driver of housing insufficiency, the single largest problem faced by the City. While educational establishments continue to use up land that could be used for housing, this problem will not be resolved.</p>	<p>Other policies in the plan address the expansion of educational establishments including H9 – Location of new student accommodation, and H10 – Linking new academic facilities with the adequate provision of student accommodation</p>	<p>None</p>
<p>We must start leading by example to reduce wealth inequalities and address the climate crisis urgently, rather than exacerbate them.</p>	<p>Noted</p>	<p>None</p>
<p>Entire premise of the chapter is in contradiction to the need to end the housing shortage, increase biodiversity, reduce traffic etc.</p> <p>No need to create new jobs in Oxford when there are large parts of the UK with high unemployment and would genuinely benefit from an inclusive economy.</p>	<p>We need to plan for new homes and new jobs. The plan's employment strategy restricts the locations for new employment development to the existing employment site network and does not propose new employment site allocations.</p> <p>Noted.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The hi-tech job creation envisaged in the plan is only likely to increase inequality in the city.</p>	<p>The plan's suite of policies (including E3 and E4) are designed to ensure that inclusivity benefits are enabled through "hi-tech job creation"</p>	
<p>Introduction and wider context section to business policies does not take account of the fact that Oxford is an integral part of a wider housing, commuting and business economic area covering Oxfordshire and parts of nearby counties. It needs to take account of the this.</p> <p>It needs to acknowledge the between 70,000 and 100,000 trips by car into Oxford.</p> <p>The scope to transfer growing businesses to the wider region and to places with lower housing costs and more road capacity such as Swindon and parts of Northamptonshire also needs to be acknowledged.</p> <p>The introduction needs to take account of the economic limitations of the capacity of roads within Oxford's ring road. Peak-time traffic congestion on the ring road and approach roads are leading to ever longer commute times.</p>	<p>Paragraph 3.1 acknowledges that Oxfordshire has a wider economic vision and strategy and makes reference to relevant documents produced by partner organisations. These documents recognise the role of the city within the wider economic area. As such it was not considered necessary to duplicate that work.</p> <p>Source of data and timeframe are unclear.</p> <p>Noted</p> <p>Noted</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Any population and businesses growth must be located where it will not increase car commuting. The most sustainable option is to put employment and housing in places far from Oxford. Highly accessible by rail and fast bus services, and match business growth with neighbouring housing.</p> <p>Section on Employment Strategy 3.8 to 3.15 needs to be rewritten in the context of our most likely car-dominated travel over the next 16 years, and the inadequate powers and political will to require no-car development.</p> <p>Policies E1, E2 and E3 need to be amended to include the need for adjacent housing dedicated to the employees required for the growth restricted to existing land allocated for employment development.</p>	<p>Paragraph 3.6 sets out that the city is the most sustainable location for employment in the County and highlights the fact that is easier to strengthen and develop the public and active transport systems to take people to jobs in the city rather than scatter employment to less sustainable locations.</p> <p>Noted.</p> <p>This is beyond the scope of what planning can do. People can choose where they live and how they travel to work.</p>	
<p>Concerned about the strong demand for life sciences and its potential impact on the city. More importance should be given to heritage matters in this chapter.</p> <p>A better balance should be struck in planning for new homes on suitable sites. More homes</p>	<p>The plan should be read as a whole. Chater 6 discusses heritage and design while site allocations and areas of focus include a more bespoke approach.</p> <p>All city centre site allocations include numbers for new homes expected to come forward as part of mixed-use developments.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>should be provided in the city centre. New homes can help create balanced communities</p>	<p>The employment strategy allocates no new strategic sites for employment-generating uses, while it allocates new sites for housing. The plan's employment strategy also allows for an element of housing to be delivered on any category of employment site. Oxford is an important employment centre with links to research through universities. The Plan strikes the right balance between employment and housing.</p>	
<p>Beaver House is not listed as a Category 2 employment site. This means it is a Category 3 site as such the Local Plan should recognise the importance that Category 3 sites can make the economy. Suggest amendments to paragraph 3.12 to reflect that new employment floorspace on Cat 3 sites is appropriate in the West End</p>	<p>Beaver House should be listed as a Category 2 employment site. It was omitted in error. Add Beaver House to Appendix 3.2 which lists the Category 2 sites in the city.</p>	<p>Minor</p>
<p>OxLEP SEP (2023) and Advanced Oxford OIE (2023) reports should be referenced in Chapter 3.</p> <p>It is not clear that the draft LP2040 has gone far enough to respond to the guidance on planning for economic need and inward investment.</p>	<p>SEP (2023) was only in draft when Chapter 3 was being written and is mentioned as such. Advanced Oxford's OIE (2023) Report is referred to in Background Paper 6a, which forms the evidence base for the plan.</p> <p>Noted. However, no text suggested in relation to how to overcome this.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The LP2040 does not sufficiently consider specific sector needs, or the opportunity for strengthening existing clusters or creating new clusters or science and innovation-based industries and how that will be supported.</p> <p>Chapter 3 could be strengthened to be more explicit about the barriers to investment that are being addressed and the place of inward investment and the support that will be provided to capture it.</p> <p>The Local Plan does not show how all the barriers to investment are being tackled, though as noted earlier Policy Option Set DS1: Digital Infrastructure is an important policy in this regard.</p> <p>The draft Local Plan does not include policy to support economic needs that arise during the life of the Plan and enable the City to flexibly</p>	<p>The plan needs to be flexible and while support for specific employment sectors is important, the plan’s overarching employment strategy seeks to strengthen existing clusters as opposed to allocating new strategic employment sites. This is because of the limited land supply in the city and the need to also deliver new homes to help reduce barriers to economic growth.</p> <p>The plan’s employment strategy - not allocating new strategic employment sites and modernising and intensifying existing employment sites and sustainable locations allows the rest of the city to deliver new homes, which reduce barriers to investment.</p> <p>Noted. Also, concerned that this respondent is referring to “Policy Option Sets” as these featured in the Regulation 18 (Preferred Options) Consultation Document rather than the Draft Plan (i.e., Regulation 19 (Proposed Submission)).</p> <p>Policy E1 does this. It is supported the relevant site allocation policies which allocate several key existing Category 1 employment sites (i.e., TOSP</p>	



<b>POLICY</b>	<b>E1</b>					
All respondents	8.23	12.1	125.1	130.1	144.1	
supporting policy	162.2	168.1	175.4	187.1	204.2	

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Yes	Noted
Welcomes policy approach to enable housing on employment sites	Noted
Support the intensification and modernisation of Cat 1 and 2 sites such as ARC Oxford	Noted
Support Policy E1 which recognises the demand for R&D laboratory spaces.	
Support the intensification and modernisation of Cat1 and 2 sites such as Botley Road Retail Park. Encourages Oxford City Council to apply flexibility to bulk scale and massing to help meet employment land needs over the plan period	Botley Road Retail Park is not a Cat 1 or 2 employment site.  Oxford City Council has sufficient land supply to meet employment land needs within the plan period for office/ R&D uses (see BGP6a). Ensuring good quality well designed buildings that respect local context and the setting of Oxford is important.
Policy should ensure it is responsive to market demands to allow delivery employment types in accordance with needs of local market needs	Noted
Support E1. The aspiration to protect and make the best use of existing employment sites is positive given the importance of the three hospital sites in the city.	Noted
Support approach to employment sites in particular, that Category 3 sites can be considered for other uses (e.g., housing)	Noted

<b>POLICY</b>	<b>E1</b>					
All respondents raising objections on this policy/chapter	26.9	54.1	70.5	74.4	92.3	
	102.2	106.2	118.2	136.10	148.5	
	149.2	151.3	152.2	163.1	164.6	
	165.4	171.3	172.5	173.5	174.7	
	178.11	179.5	193.6	194.1	196.6	
	199.6	202.13				

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Some people like to drive to work and would not be able to do this in the city/ district centres with limited parking spaces.	Noted	None
The City Council is prioritising employment land over land for housing as the residential potential of many development sites has been rejected (in the HELAA). Housing should be made a priority over employment land	Oxford needs to provide both new homes and jobs. By protecting the city's network of category 1 and 2 employment sites and restricting new employment-generating uses to these locations, the City Council's strategy enables housing to be delivered outside of the key employment locations and makes better use of existing employment land and inherently sustainable locations (i.e., the city and district centres).	None
Some Category 1 and 2 employment sites are highly sensitive due to their heritage significance. Given the plan doubles employment need (from circa 135,000sqm in OLP2036 to between 269,000-348,000sqm for LP2040), Policy E1 and supporting text gives little sense of sensitivities of some of these sites. HE advises adding a reference to policies HD1-9 into Policy E1 to ensure these considerations are taken into account in decision-making.	These comments are addressed as part of a Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Several respondents expressed concern about how the second paragraph of policy E1 lacked clarity and did not properly align with the supporting text.</p> <p>The Policy (as drafted) can be read as ruling out other uses on Cat 1 and 2 employment sites by limiting new development on these sites to employment uses only.</p>	<p>Minor modification proposed to clarify that Policy E1 is a locational policy and clearly state where new employment-generating uses are acceptable in the city. The previous text could be interpreted in two ways and this minor modification seeks to address this</p> <p>Delete 2nd paragraph of policy:</p> <p><del><i>Planning permission will only be granted for new employment generating uses within Category 1 and 2 employment sites or within the city and district centres.</i></del></p> <p>Replace with the following text:</p> <p><u><i>The only locations that are suitable for new employment-generating uses are existing employment sites and the city and district centres.</i></u></p> <p><u><i>Planning permission will not be granted for proposals for employment-generating uses outside of these locations.</i></u></p> <p>Add the following minor modification to the final sentence of Paragraph 3.13 of the supporting text in order to clarify that any site in Use Class E can lawfully come forward as “employment-generating uses” through Permitted Development Rights:</p>	<p>Minor</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<u>Additionally, employment-generating uses may come forward lawfully on existing sites in Use Class E.</u>	
<p>Considers that the Council should provide more housing in the city. Questions the assessment methodology and why so many sites are assessed as rejected for housing. The City Council should review the assessment criteria for assessing the suitability of housing sites.</p> <p>The Council should strive to balance employment growth and housing within the city and shouldn't have to resort to greenfield development outside the city boundary which will only result in increased car traffic.</p>	<p>The HELAA methodology and assessment process is prescribed in national guidance. As such we have followed due process when assessing the potential of sites for housing.</p> <p>Noted</p>	None
<p>Do not believe that Oxford's employment land needs are between 269,000-348,000sqm.</p> <p>Lots of vacant property in the city. In 2022 there was 26,000sqm of office space available in Oxford City. Current figure is about the same. Oxford North will deliver an extra 14,000sqm in 2024, which will also be available to rent.</p> <p>Numerous sites have stood empty for decades and await redevelopment. The fact that businesses fail or move out of the city is not discussed in the ELNA/ HENA nor was it in the previous OGNA workstream.</p> <p>Request changes to this policy. Policy E1 includes barriers and hurdles to release employment land for housing. These barriers/ hurdles do</p>	<p>The Council has produced evidence to support the approach to calculating employment land needs.</p> <p>Noted</p> <p>We consider that the permissive approach outlined in Policy E1 strikes the right balance</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
not exist on greenfield sites. Development on employment sites should not be subject to the normal planning rules. It should be easier to release employment land to housing.	between housing and employment on employment sites.	
Intensification of employment sites to support housing delivery has not been considered. Where employment sites can be intensified, it should be strongly considered whether the space freed up can be used for housing (especially in sustainable locations).	While the policy does not explicitly set this out, the intensification of an employment site could deliver both housing and employment if the landowner wishes to bring this forward.	None
Consider that the Category 1 employment site boundary shown on the proposals map for Northern Gateway should replicate the extant OLP2036 site boundary.	Amend Cat 1 to incorporate the eastern parcel as well, in line with the parameter plans in the hybrid permission for Oxford North, to show the parcels within Northern Gateway with authorised use for employment.	Minor
Eastpoint Business Park should be a Category 2 employment site given it shares similar characteristics to the adjacent Nuffield Industrial Estate.	Site omitted in error. Update Policies Map and Appendix 3.2 of Plan	Minor
Policy E1 encourages development on the Oxford Green Belt and fails to see developed land which has sat vacant and undeveloped for decades (e.g., Oxford Business Park and Osney Mead). Government Policy sets out that these sorts of sites should be developed rather than greenfield sites.	Policy E1 includes a permissive approach to delivering residential development on the city's network of employment sites. We consider this approach strikes the right balance between delivering new homes and jobs on employment sites in the city.	None
Several respondents considered that the policy text supporting the upgrading and re-use of existing buildings did not properly align with Policies R2 and as such suggested modifications to align policy with Policy R2.	Amendments to Policy E1 to address this issue have been proposed as a main modification as follows.	Main

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It should be made clearer that upgrading and re-use of existing buildings is not the only route to successful delivery of new employment development.</p> <p>Part of first paragraph of Policy E1 duplicates draft policies R1-R3 which already provided more detailed requirements to deal with ensuring that redevelopment opportunities deliver net zero objectives.</p>	<p>All new development on employment sites needs to show that is making the best and most efficient use of land and premises, <del>and</del> positively promotes sustainable development <del>through the upgrading and re-use of existing buildings</del> and does not cause unacceptable environmental impacts.</p> <p>Delete 5<sup>th</sup> paragraph of the policy in its entirety:</p> <p><del>Re-development of brownfield Category 1, 2 and Category 3 employment sites in the city and district centres, with new buildings, must use sustainable methods of construction and materials and be operationally energy efficient.</del></p>	
<p>Concerned that Policy E1 will lead to unrestricted employment growth with the city and district centres. There is high demand for R&amp;D uses in the city. Concerned that only employment uses will be delivered in preference to residential.</p> <p>Does not this acceptable in a city where there is a significant housing crisis. A threshold consideration should be included in the policy to ensure that, if several sites come forward within close proximity to one another, that the LPA is able to ensure a mix of uses is delivered.</p>	<p>The demand for employment land (particularly in the office/ R&amp;D sector) is significantly higher than employment need. As such, we are in a strong position to be able to reflect heritage/ design considerations where schemes are being brought forward in sensitive areas (i.e., city centre/ district centres) and across the city's network of employment sites more generally.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Design guides/ broader design guidance should be produced to cover employment areas to ensure that the scale/ massing of any proposed development is appropriate.</p>	<p>All allocated sites in city/ district centres include a minimum number of homes representing the importance of delivering a mix of uses in these sustainable areas.</p>	
<p>Do not support the approach in Policy E1 to allow residential uses on employment sites</p>	<p>Policy provides criteria for assessment of residential development on all categories of employment sites. It is important that the city council supports housing delivery in the city in recognition that its continued delivery helps to reduce barriers to economic growth.</p>	<p>None</p>
<p>Paragraph 3.8 of the employment strategy notes that "Oxford's employment land needs over the plan period have been calculated by Lichfields in the Oxford Employment Land Needs (ELNA) Assessment as 269,000 - 348,000m<sup>2</sup>".</p> <p>Readers also need to go to a Background paper (BGP6a) to understand the related supply position. There is a clear disconnect between evidence and background papers and the local plan content, which isn't correctly displaying the need and supply information, sending readers on a document search.</p> <p>There is an issue with how deliverable and effective the approach is (set out in Para 3.15). It is hailed as a flexible policy, but we have previously noted in earlier Background Papers from Oxford that the yield of homes delivered to date was meagre (5 units). Maintaining this approach and wording does not provide enough flexibility to make</p>	<p>This is an error. The HENA calculates the employment land needs for the city. Minor amendment proposed to address this.</p> <p>The Interim ELNA was produced using the previous land needs assessment work (OGNA). BGP6a sets out the relationship between these studies.</p> <p>BGP6c sets out the number of homes delivered on Cat 3 employment sites since the start of the plan period.</p>	<p>Minor</p> <p>None</p> <p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>this policy effective enough to respond to changes in market conditions.</p> <p>There is also a question as to the realistic potential for Category 1 and Category 2 sites to be re-used or re-developed even in part, for residential purposes. The draft Policy E1 indicates support for this, but sets restrictive criteria for re-development or change on these sites.</p> <p>Policy E1 includes a section about residential development on employment sites. This approach treats all Categories in the same way, and it is also inconsistent with the rest of the plan's intentions to provide more flexibility for Category 3 sites.</p> <p>The draft policy has a supposed permissive approach to allow an element of residential development on employment sites where this would not prejudice the employment or operational use of the site. What is the realistic potential for Category 1 and Category 2 sites to be re-used or re-developed even in part, for residential purposes. Draft Policy E1 indicates support for this but sets restrictive criteria for re-development or change on these sites.</p> <p>While the draft policy appears permissive for the re-development of existing employment sites for residential use, there is little further proactive support in the Plan to deliver on this, as there is no identified list of Category 3 employment sites published and no evidence that an employment land release strategy or study has been undertaken to support the release of such land. Put simply, release of employment land for residential is left to the market to deliver.</p>	<p>This is backed up by the supply position presented in BGP6a. The plan's employment strategy is clearly stated in the plan and supporting text.</p> <p>Minor amendment proposed to clarify meaning of 2<sup>nd</sup> paragraph of policy and align it with supporting text. See above.</p> <p>Addressed through additional background paper 6c.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>There is also no clear evidence as to the realistic capacity for residential development within the Category 1 and Category 2 employment sites assessed and in many cases such sites are rejected for residential development through the HELAA analysis on the basis of landowner intentions and therefore lack of availability. Category 1 and 2 employment sites are referenced as a policy constraint in the HELAA, despite Policy E1 indicating a possibility of re-development / intensification to include residential use in the future. This inconsistency between the Policy and the HELAA should be addressed.</p> <p>The HELAA states that all employment sites with the potential to deliver housing have been included in the assessment, but there is no publicly available evidence that the Category 3 sites have been assessed (the Interim ELNA assesses Category 1 and Category 2 employment land). There is no clear evidence that a systematic analysis of the constraints (and mechanisms to overcome these) have been considered for sites that are, or have previously then rejected from the HELAA.</p> <p>Policy E1 is therefore not effective. This exacerbates unmet need and ignores concerns about not dealing with cross boundary matters.</p> <p>Policy E1 is also not Consistent with National Policy, specifically paragraph 123 of NPPF. Oxford is clearly an area of high housing demand, and the plans' strategy outlines a desire to take the positive approach advocated by national policy, but our submissions show that the policy has not gone far enough.</p>	<p>Addressed through additional background paper 6c.</p> <p>Addressed through additional background paper 6c</p> <p>Noted</p> <p>Noted</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It is essential that Oxford does all it can to meet its own housing needs and therefore some flexibility on all category of employment sites should be provided. Conversely, there may be circumstances where employment retention on some Category 3 sites should be considered.</p> <p>Whilst we note that demand for employment space has remained strong, it is likely that less office space is required by some businesses located in the city than prior to the pandemic, creating opportunities for conversion of sites from commercial to housing, and thus more accommodation of housing need within the city than otherwise considered.</p>	<p>These comments are addressed as part of a Statement of Common Ground with West Oxfordshire District Council.</p>	<p>Refer to Statement of Common Ground with West Oxfordshire District Council for response.</p>
<p>It is unclear how the Council has gone about categorising employment sites and what account has been taken for the potential to change category through intensification and/or modernisation? A change in occupier on a category 3 employment site could, for example, elevate it to a category 2 site. However, there appears no mechanism in the LP40 to change category outside of a review of the Local Plan. Suggest an annual review of employment site categories</p>	<p>BGP 6c sets out how sites categorised. Review process undertaken to support each Local Plan every five years. Every year is too intensive. Need sufficient time to allow sites to evolve and develop. every 5 years is appropriate timescale to review employment sites</p>	<p>None</p>
<p>It is unclear how the requirement for no overall loss of jobs on a site can be justified when the 'number' of jobs is often quite fluid and changeable with market conditions and rarely would stay as a constant specific number. The policy wording is quite restrictive and potentially unachievable/unenforceable. A <u>percentage</u> threshold number based on existing job numbers is proposed as a better approach.</p>	<p>These comments are addressed as part of a Statement of Common Ground with Oxfordshire County Council.</p>	<p>Refer to Statement of Common Ground with Oxfordshire County Council for response.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The Plan as currently drafted is unlikely to mee the Oxford and Oxford Fringe (in neighbouring districts) employment land requirement.</p> <p>This suggests that there is a need to maximise the employment uses delivered on already allocated sites both within the City and in neighbouring sites such as Begbroke Science Park. It is likely that there will also need to be a review of site allocations in and around Oxford during the Plan period with a view to identifying additional capacity.</p>	<p>While the Interim ELNA Report (2022) showed a potential undersupply Background Paper 6a updates the supply position for the city. The updated 2023 employment land supply position clearly presented in BGP6a clearly shows Oxford has a potential surplus supply of office/ R&amp;D.</p> <p>Plan sets out that Oxford is in a strong position to meet employment land needs for the plan period within the city’s administrative boundary.</p>	<p>None</p>
<p>Suggest widening the definition of ‘employment’ uses from traditional E(g) and B class uses to also include university research buildings (Use Class F1) which are akin to R&amp;D uses.</p> <p>Suggest that employment supply is monitored to ensure that the city’s employment needs can be met and appropriate unmet employment needs conversations happen to ensure sufficient supply is delivered to meet identified need. Text suggested to this effect.</p>	<p>Noted</p> <p>Background Paper 6a provides a clear employment land supply position detailing that Oxford is in a strong position to meet its employment land needs (in particular for office/ R&amp;D uses) for the plan period).</p>	<p>None</p>
<p>The HENA report, which has both high and low growth scenarios, suggests that Oxford and the Vale of White Horse will only require an additional 1.3 to 1.5 million square feet of office space by 2040 and an additional 1.6 to 2.4 million square feet of laboratory space. It is clear that existing employment sites cannot absorb this demand, particularly if the Draft Plan imposes general height restrictions across</p>	<p>Background Paper 6a shows that Oxford is in a strong position to meet its employment land needs for office/ R&amp;D within the plan period with a likely significant surplus of supply.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
the City and allows for residential uses to compete on employment sites (Policy E1)		
Policy E1 is unjustified as there is no requirement for extra employment to provide extra housing, only permission to do so.	Noted	None
Work from home leads to reduced need for space with different workgroups having office days on different days of the week. This is an economic decision taken by the employer. OCC has no role in this.	Noted	None

POLICY	E2				
All respondents supporting policy	8.24				

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted

POLICY	E2				
All respondents raising objections on this policy	168.2	174.8			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<i>Keep succinct with a focus on the reason for unsoundness</i>	Succinct summary	<i>Insert either 'main/ minor modification' or 'none'</i>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Recommended that Policy E2 is amended to ensure sufficient flexibility is retained to reflect potential for a diverse range of significant employment uses and sites in the city. B8 uses are essential to the local economy as the enable an additional range of direct/ indirect employment opportunities cannot provide.</p>	<p>See below for proposed modification to expand the categories of employment sites where B8 uses are supported to include Category 2 as well as Category 1 sites.</p>	<p>Main</p>
<p>It is recognised that land use for warehousing and storage should be prioritised for more efficient uses in most cases. However, there is an identified need for B8 land in the city. Traditional distribution warehouses should not be displaced to the districts unless appropriate.</p> <p>The policy only supports B8 uses where these are essential to support the operational use of Category 1 sites but this may be overly restrictive as online shopping requires local storage and distribution if it is to be sustainable.</p> <p>We question whether the policy could be tightened up to make it clearer that where a use meets a Category 1 employment <b>use</b> rather than <b>site</b> (assuming that some sites have a mix of employment categories), this will be supported.</p>	<p>Suggest modification to Policy E2 expand the categories of employment sites where B8 uses are supported to include Category 2 employment sites as well as Category 1 sites.</p> <p>Suggested change to first paragraph of policy:</p> <p>Planning permission will only be granted for new or expanded warehousing and storage uses if it is within an existing employment site (of any category) and where it can be demonstrated in the planning application that the use is essential to support the operational requirements of a Category 1 <u>and/ or Category 2</u> employment sites.</p> <p>This modification would not work as employment sites fall into one of the three categories rather than having a mix of</p>	<p>Main</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The last sentence of the policy could be expanded to refer to potential impacts on the amenity of existing and future users and residents.</p>	<p>employment categories. See proposed modification above on widening the range of sites where B8 uses are supported.</p> <p>Noted</p>	

POLICY		E3		
All respondents supporting policy	8.25	174.9		

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted
Affordable workspaces tend to be found in older buildings which have been converted and therefore it may not be difficult to viably incorporate these into larger commercial developments. If this approach is viable, we support it to assist businesses who would not normally be able to afford to rent in the City, provided that this policy doesn't result in vacant units.	Broad support providing it does not result in vacant units.

POLICY		E3				
All respondents raising objections on this policy	125.2	136.11	144.2	148.6	152.3	
	163.2	168.3	171.4	172.6	173.6	
	194.2	196.7	202.14			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Within the 'Glossary' an example of a reduction in commercial rent is provided "(e.g., 50% of	The example of a 50% reduction in market rent in the glossary was purely illustrative. If it is	None (but will keep under review until all responses on this topic are reviewed).

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
market rent)". It is not clear whether this is expected to be a blanket approach. Consider that the level of rent should be determined on basis of size and scale of a particular building, taking into account level of demand and deliverability/ viability considerations.	causing confusion, the City Council can remove it through a minor modification. Will re-review once all responses have been considered.	
Could this approach also be applied to retail units in order to provide affordable premises for local independent retailers.	We are not looking at this at the moment through the Local Plan 2040, but the Council are exploring more widely how to encourage affordable premises for independent retailers.	None
<p>Provision of affordable workspaces on sites identified in Policy E3 should not prejudice owners of plots who are not party to Masterplans which may/ may not be prepared by third parties. Any provision of affordable workspaces should be subject to viability assessment to ensure it does not prevent appropriate development coming forward. Suggest the following amendment to the policy:</p> <p><i>Development proposals delivering commercial development on the following sites are expected to deliver (subject to viability) affordable workspace as part of their masterplans:</i></p>	Suggest that amendment is not required as it is likely that a small amount of AW would be able to be delivered within most development opportunities.	None
Rents in Oxford are high and increasing due to the supply/ demand imbalance of R&D/ lab space – i.e., insufficient supply to meet demand.	There is already a significant supply of office/R&D floorspace coming forward within the plan period in the city. While this will go	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>This should be addressed by increasing the overall supply of employment floorspace which will ultimately address this supply/ demand imbalance. Policy approach in E1 supporting the loss of Cat.3 sites to residential is counter intuitive as these sites could be converted (through the re-use and refurbishment of existing buildings) to provide affordable workspaces. This is particularly relevant on Cat.2 and Cat.3 sites.</p>	<p>some way to addressing the supply/demand imbalance, given Oxford's situation with two world-class universities contributing to research/ spin-outs etc., and Oxford's constraints (small city/ green belt/ flood risk/ heritage), it is likely that the city will continue to be a desirable location for businesses to locate to, or spin out from. As such, simply allowing employment floorspace to grow without supporting the inclusive economy is unlikely to deliver wider economic benefits.</p>	
<p>Viability testing currently shows that for office/ R&amp;D developments outside the core city centre area that it is unviable for the delivery of affordable workspaces.</p> <p>Suggest a more appropriate approach would be to encourage consideration of AW in CEPP policy</p>	<p>Viability Study did show that at the threshold and percentages tested (i.e., 10% floorspace over 1,000sqm) at the lower rental bracket (£340/sqm) that affordable workspaces were unviable. However, all of the sites in question are looking to bring forward an element of R&amp;D to meet demand which is able to command significantly higher rents (recent lease data (November 2022) from ARC Campus shows rents for laboratory space in excess of £680/sqm).</p> <p>The policy does not prescribe an amount of AW to be delivered only that the sites in question are "expected to deliver affordable workspace as part of their masterplans".</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Support overall principle of policy but concerned that policy lacks clarity on certain concepts and the definition of particular references. The Council must provide appropriate and robustly justified evidence to validate its requirements</p>	<p>Noted</p>	<p>None.</p>
<p>This policy should not apply to The Oxford Science Park (TOSP), and we request that it be deleted from the list of sites included under Policy E3.</p> <p>It is essential that TOSP has complete flexibility to determine the rents and terms provided for space on so it can respond to market conditions and meet tenant and occupier needs.</p> <p>TOSP has 'The Magdalen Centre,' - one of the largest innovation centres in Europe. A range of lab and office space is provided, some already fitted, with shared lab equipment suites, management and support services. Planning permissions recently granted by Oxford City Council provide for a range of differing occupier needs, including Plots 16 and 23-26 and an application is pending determination at Plot 27 for a development specifically designed for start-up accommodation.</p>	<p>It appears as though TOSP would be able to demonstrate compliance with the policy as it seems to be already supporting the delivery of affordable workspace on site.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy E3 lists the 'Kassam Stadium and Ozone Leisure Park'. This conflicts with the Policy for this site (Policy SPS2) which promotes Kassam Stadium redevelopment for residential use, with commercial being only applicable for the Ozone Leisure Park. The stadium is therefore not applicable for delivery of affordable workspace, making this policy not Justified because it is not an appropriate strategy for is not consistent with the evidence. Suggest changing Kassam Stadium and Ozone Leisure Park to just Ozone Leisure Park.</p>	<p>Policy E3 only applies to commercial development so it would only be any commercial development that came forward at the site that had to apply with it. The residential development allocated as part of Policy SP2 would not be expected to deliver affordable workspace as part of Policy E3.</p>	<p>None</p>
<p>Policy E3, in the absence of any detail, should make clear that the nature of such workspace will be agreed on a site-specific basis and that the amount and terms for what can be provided will be subject to development viability.</p>	<p>Noted</p>	<p>None</p>
<p>It is unclear how a larger company should be expected to support a smaller rival, as policy that only included social enterprises justified, seems to be too much interference in normal market operation.</p>	<p>Noted</p>	<p>None</p>

<b>POLICY</b>	<b>E4</b>				
All respondents <b>supporting</b> policy	8.26	124.4	148.7	149.3	177.7
	178.12	196.8			

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Yes	Noted
Stong support for inclusion of policy E4 (OxLEP)	Noted
How would proposals for student accommodation be considered?	Currently the ratio for student accommodation to residential development is 2.5 student units per residential dwelling. As such proposals for student accommodation would be considered as follows using the current ration: $2.5 \times 50 = 125$ . As such, the policy would apply at present to schemes of 125 student rooms or more.
Supports the approach to CEP's and has established such Plans at Oxford North with great success.	Noted
Supports the requirements for Community Employment and Procurement Plans and the associated benefits.	Noted
Support approach to CEPPs	Noted

<b>POLICY</b>	<b>E4</b>				
All respondents <b>raising objections</b> on this policy	125.3	130.2	152.4	168.4	170.3
	171.5	174.10	187.2	194.3	202.15

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy E4 (as drafted) is too prescriptive and includes certain requirements outside the scope of planning. Suggest policy is softened and requirements amended to ensure deliverability.</p> <p>Numerous representations request that Policy E4 introduces more flexibility. Concerns are related to the viability of schemes, ensuring that the criteria are within the scope of planning etc. Several criteria will be wholly dependent on specific property ownership / lease structures and are commercial property matters.</p>	<p>Main modification proposed to policy to clearly show that the policy should include some flexibility within policy. The word “address” in the final sentence of the first paragraph can be interpreted too broadly. Suggest this is altered to “considered” to provide clarity about the intended flexibility of the policy and align it to the sentiment of the supporting text.</p> <p>Final sentence of 1<sup>st</sup> paragraph to be amended as follows:</p> <p>CEPPs will be expected to <del>address</del> <u>consider</u> all the following criteria:</p>	<p>Main</p>
<p>Policy would be difficult for R&amp;D development to comply with as R&amp;D uses draw on a wide range of skills, many of which are highly specialised and rely on an international talent pool.</p> <p>Policy does not distinguish if the CEPP would apply to tenants as well as the developer. It would be wholly unreasonable to require the developer to enforce tenants to commit to the CEPP criteria, including commitments to paying all employees Living Wage, potentially</p>	<p>Flexible approach to policy has been made clear through a main modification – see above.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>undercutting Oxford's ability to remain competitive comparative to other life science clusters in the UK and abroad.</p> <p>It is not considered that this mandatory planning requirement is justified. It does not account for the nuances between different non-residential uses. It is requested that the policy wording excludes specialist commercial science.</p>		
<p>Unjustified, as too much government interference in the operation of business.</p>	<p>Noted</p>	<p>None</p>

<b>POLICY</b>	<b>E5</b>		
All respondents <b>supporting</b> policy	8.2	124.5	177.8

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Yes	Noted
Policy identifies the importance of tourism as an important contributor to the local economy and identifies locations where it is to be supported. It also recognises the role that university provided accommodation can play in meeting out-of-term time demand for bedspaces in the city, which can also support the local economy	Noted
Support Policy E5  It is important that tourist and short-stay accommodation is provided in Oxford to support the economy and maximise the length of time visitors stay in Oxford.  The policy should include a reference to change of use in the first sentence. Currently it only covers new development but change of use of existing buildings is also key, for example the former Boswells store.	Noted

<b>POLICY</b>	<b>E5</b>				
All respondents <b>raising objections</b> on this policy	6.1	28.6	71.12	118.3	136.12
	164.7				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy too restrictive to allow for suitable short stay accommodation. Allocate the site at 2 New High Street and alter the boundary of the Headington District Centre	The policy is drafted to ensure that new tourist accommodation is located in city/ district centres and other suitably accessible sites.	None
Short-term accommodation should be subject to a tourist tax, along with other types of hotel/ B&B/ etc. accommodation to help maximise Oxford's local income.	The implementation of a tourist tax is outside the scope of a Local Plan	None
<p>LP2040 should be more positive in addressing the identified need for hotel beds so the city. Suggest that Policy E5 makes specific reference to the number of hotel rooms required to meet the need. A more positively worded policy approach is required which states:</p> <p><i>'The Council will take a positive approach to meeting the significant need for hotel rooms, by supporting the development of new hotels and short-stay accommodation, subject to the following criteria....</i></p>	<p>We have produced an evidence base including a study which has worked out demand for bedspaces in the city. We recognise that delivering hotel and short-stay accommodation is one aspect of helping the visitor economy. However, we also have to balance a lot of other competing interests in a small land area (i.e., homes/ jobs/ shops). Restricting the locations for hotel spaces to accessible locations means that we can encourage non-car modes and ensure that hotels are located in locations with good public transport links, or good access to a range of shops and local services.</p> <p>Development management officers need to know the conditions when planning permission will be granted or not. As such policy is worded policy (planning permission will only be</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	granted), rather than will not be granted (negatively).	
Policy should be more open to larger hotels (more than 10 bedrooms) being converted to residential use. These sites could provide much-needed homes. Given the number of new hotels being built in the city, it is likely that hotel provision will remain acceptable	Policy E5 already allows the loss of larger hotels to residential uses provided evidence of non-viability can be demonstrated (criteria e).	None.
<p>Policy E5 is considered unsound because it is not coupled with a positive strategy to manage and enhance tourism.</p> <p>Policy E5 is ineffective since it is not balanced with proposals to allocate tourist facilities and accommodation. It is also considered therefore, that the lack of policies or strategies to promote tourism is unjustified, because the City Council has identified the importance of the issue, but not planned appropriately to engage with it.</p>	<p>City's Economic Strategy 2022-2032 stresses the importance that the visitor economy plays in the city and provides a clear strategy for developing the visitor economy – in fact it is one of the three elements that the Delivery Plan of the Economic Strategy focuses on.</p> <p>The City Centre Action Plan also focuses on Visitor and Tourism Management setting out a set of progress and actions to help enable a healthy visitor economy.</p>	None

CHAPTER 4			
All respondents supporting policy	8.38	75.5	84.7

COMMENT SUMMARY	OFFICER RESPONSE
Chapter considered sound (no reasons given)	Noted.

COMMENT SUMMARY	OFFICER RESPONSE
<p>The policy seems largely sound in principle, but as with the design policy (S2), the proof of the pudding is in the eating. It is difficult to see, in the places where building is to be allowed on playing fields/grazing fields, how any biodiversity gain is to be meaningfully achieved. Whereas 'change of use [on 'other green spaces'] will be accepted where it is accompanied by sufficient reprovion, ideally onsite, and to the same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements [para 4.7.3], the council has it appears itself deliberately subverted this policy in purchasing for development traditional grazing fields in the Iffley conservation area where biodiversity retention is impossible and 'reprovion' is essentially implausible due to lack of alternative sites. In addition this field and another grazing area known as Redbridge Meadow have been removed from the Green Belt in advance of the Plan in order to free them up for development - what is then the purpose of having a green belt ? There are also several serious issues with green belt removal and development outside the northern boundary of the city.</p>	<p>Support welcomed. It should be noted that the current plan does not involve allocations in Green Belt land or reviews of Green belt boundaries. The local plan will be used to assess development proposals irrespective of the ownership of the site.</p>

CHAPTER 4				
All respondents raising objections on this policy/chapter	28.12	30.15	38.4	53.2
	73.7	164.11	180.3	181.7
	182.4	183.4,	184.4	202.20

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Keeping green belt is Good. All the climate change parts are complete nonsense	Comment noted.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>A major failing of LP2036 was the disconnect between lip service paid to biodiversity conservation and combating climate change in the Plan wording, and the reality of how its policies have worked and been implemented. I fear the same mistakes are about to be made again to the detriment of Oxford's natural and historic/heritage environment and its ability to make a just transition toward net zero, which is tantamount to sacrificing all that makes Oxford great on the altar of growth for growth's sake.</p> <p>There needs to be much better integration between the objectives and high level strategic policies, which are generally laudable, and the practical working of site specific policies and planning decisions which so often work against delivery of the Plan objectives, except at the most basic level. One could start by deleting policies that have been left behind by events and which should never have been adopted in the first place, if any value is to be placed on evidence-based decision making. SPS13 for starters.</p>	<p>Comment noted. Matters relating to SPS13 are addressed in the relevant summary.</p>	<p>None required.</p>
<p>A green biodiverse city that is resilient to climate change needs to be acting far more urgently and with much more vision than is displayed in this plan. You are pussy footing around the edges of the planet collapsing. With the runaway changes to our climate and weather patterns and natural disasters, you are ignoring any opportunities to make significant changes that will contribute to our survival as human beings. Wake up and take action.</p>	<p>The local plan's remit is to provide a framework based that development schemes may be assessed against. Broader changes may require statutory or legislative action that are beyond the</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It compromises the ability of present and future generations to meet their own needs.</p> <p>It does not 'require' but suggests and hopes for the sustainable use of resources.</p> <p>There are no specific targets or measures of e.g. present carbon emissions or over-use of resources such as green space or water; the likely impact of the Plan on these; or how that impact will be measured or mitigated.</p> <p>There is no policy on water use or contamination! Water (in the natural environment and for domestic use) is already under stress and this plan will exacerbate the situation.</p>	<p>The plan includes a monitoring framework which sets out the proposed approach for monitoring the effectiveness of the Local Plan, as well as its impacts in line with the requirements of Sustainability Appraisal and Strategic Environmental Assessment.</p> <p>There are other data collection methods and reporting mechanisms where developments need to meet legal duties required as part of environmental health/ sustainability responsibilities (e.g. in relation to contaminated land, air quality, biodiversity net gain).</p> <p>Once the plan is adopted developments proposals will be statutorily required to be compliant with the policies contained in it.</p>	<p>None required.</p>
<p>1)</p> <ul style="list-style-type: none"> <li>•Parks and gardens, accessible greenspace and amenity greenspaces – these spaces often play a role in supporting people to socialize, take part in informal recreation (particularly where facilities like children/youth play and outdoor gym equipment are present), and generally provide an escape from the urban environment. Where relevant, applicants will have to demonstrate consideration of how any loss can be mitigated, especially if this is located in an area which already suffers from a deficit of such spaces according to an up-to-date green infrastructure/open space study.</li> <li>•Greenspaces integrated on streets – streets can</li> </ul>	<p>The plan contains policies that address all these areas: policies G1 to G6 relate to policies relating to the protection of green infrastructure, standards for new greening in new development, and enhancing and protecting biodiversity. Other policies in the plan relate to good quality design and the provision of local community facilities.</p> <p>The remit for developing a strategy for improvements, enhancements and management of green spaces (including allotments) in the city lies with a dedicated directorate/service area in the council. These would inform the development of local plan policies as and when they emerge.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>provide critical links, connections and corridors for biodiversity. They can also provide spaces for neighbours to connect. We encourage greenspaces in streets to have multiple functions, including edible landscaping and community food growing.</p> <p>2) A separate policy should be developed that emphasises:</p> <ul style="list-style-type: none"> <li>•No planning permission will be granted to any development which causes reducing the number of allotments or community gardens.</li> <li>•The City Council precisely explains how new allotment spaces can be created within existing neighbourhoods as well as new developments. This should include suggesting a concrete figure to be achieved during the Local Plan period.</li> <li>•Providing more support (financial and institutional support) for local people to develop new community gardens (local farms) in nearby open spaces or left over spaces (if any).</li> </ul>		
<p>The policies G1-G9 are ineffective, unjustified and unsound the Policy Map and supporting Green Space Oxford City Council Green Infrastructure Study 2022, and therefore Local Plan has:</p> <ul style="list-style-type: none"> <li>• No evidence or methodology as to how each green space type (in the Plan, eg “Core”, “Supporting” ) is determined.</li> <li>• Green Infrastructure is marked incorrectly, both in area, description, and accessibility on Policies Map.</li> </ul>	<p>The methodology and rationale for the green space designations are set out in the policy wording and supporting text for G1.</p> <p>Site allocation policies note green spaces within their boundaries and include requirements for their protection or enhancement. Features that are of particular importance in terms of local amenity, character or ecological function, are specified and highlighted for particular consideration.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<ul style="list-style-type: none"> <li>• Accessibility – restricted, semi-restricted, open is not visually marked, which would show much space is in fact wholly unusable.</li> <li>• Green space in allocated sites is not marked or protected</li> <li>• The 2022 Study is fundamentally flawed in methodology and input data.</li> <li>• The Local Plan has no overall assessment of green space need per “Urban Village”, per habitant, or deprivation, therefore allocation is site by site with no strategic overview how much remains in each.</li> <li>• No comprehensive strategy for sports provision when most sites are earmarked for development piecemeal.</li> <li>• No allowance for population growth although four times the predicted rate in 2007 or assessment of local need or green deprivation</li> <li>• Playgrounds are not marked</li> </ul> <p>The Green Space survey 2020 must be rejected as fundamentally flawed. The Green Space Survey of 2007 (Oxford City Green Space Study, Report For Oxford City Council, 2005, updated 2007) needs to be rerun to identify the per capita deprivation of green space in each suburb or “Urban Village” of Oxford. The OLP Policies Map and Local Plan must be updated to:</p> <ul style="list-style-type: none"> <li>• Correct incorrect and sloppy boundary markings.</li> <li>• Add missing green areas with correct designations as above.</li> <li>• Visually mark restricted, semi-restricted and fully accessible green spaces</li> <li>• Add Development outside OCC’s boundary.</li> <li>• Add playgrounds with a policy to resist removal With</li> </ul>	<p>The Green Spaces Study is comprehensive and includes data on accessibility, levels of deprivation, playgrounds/sports facilities etc.</p> <p>The Council has a dedicated directorate with the remit for developing strategies for provision of specific facilities or enhancement of green spaces that are beyond what can be addressed through the local plan or through planning.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>close community consultation and review, a review of per community green space remaining and a strategic view taken of loss for each, with resolution of specific examples above. Accessibility of green space must be correctly marked to avoid developer challenge and marked clearly on the Policies Map with red (inaccessible, brown (some accessibility), green (public access) as per the Green Space Survey of 2005/2007. Playgrounds must be included with a reversion clause – this is currently only for specific site policies.</p>		
<p>Any further development of green areas in the Lye Valley catchment we consider UNSOUND because it conflicts with policies such as G6 'Protecting Oxford's Biodiversity including the Ecological Network' as it does not protect the biodiversity of Lye Valley by not protecting the spring water supply which insures the fen remains wet. Such development also conflicts with Policy R6 'Soil Quality' as it does not help maintain enough spring-flow which generates peat (sequestering carbon) and critically protects peat from oxidation and liberation of carbon dioxide, a greenhouse gas, the emission of which works against the City Council's Net Zero ambitions for 2040. The concept of severe off-site impacts outside a red line development boundary and that biodiversity on one area can be affected by what happens in a green area at some distance away, does not yet seem to have really sunk in. This comment applies not only to SSSI areas but also to Local Wildlife Site and Oxford City Wildlife Site areas which do not seem considered worthy to</p>	<p>See comments on Policies G6 and R6.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>get any protection from offsite impacts. The whole section of Green Infrastructure policies G1-G6 is full of fine words and aspirations about protection of wildlife, but this is not reflected in actual wildlife protection when you examine the policy wording in detail – there is too much reliance on ‘mitigation’ for damage and for example translocation of reptiles away from any development site with an uncertain survival for them in future.</p>		
<p>[The] Trust has concerns that the policies and supporting text of this part of the Local Plan are generic and in particular, do not pay sufficient regard to the wider green setting of Oxford, and its diverse species.</p> <p>The Trust is very concerned that there is no specific policy relating to the Oxford Green Belt within Chapter four. It is concerning that the Council have not included a specific policy to protect this specially designated land.</p> <p>The Trust is not convinced that the policies are capable of being both scaled for smaller developments across the city and applied to larger major development. It is difficult to see how genuine networks will be protected and enhanced, or how the wider landscape has been considered (including views).</p>	<p>The policies contained in the plan have been developed on the basis of evidence collated specifically for the Oxford context. As a planning document the level of detail and analysis would not necessarily extend to what may be found in an ecological survey or assessment. The policies provide a framework by which development proposals may be assessed, and specific matters will be addressed at application stage.</p> <p>The Core GI network designation set out in policy G1 bestows the highest level of protection on green spaces included in this category, including Green Belt land. The policy is considered comprehensive enough to protect such sites from inappropriate development.</p>	<p>None required.</p>
<p>Insist that local water company fulfils its legal obligations with regard to sewage discharge and flood mediation.</p>	<p>Comments noted</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Develop a greater understanding of what constitutes workable natural environment. Just planting a tree or grass will not do, especially if you have taken down established trees to do so. It takes 25 years for a tree to make a substantial contribution to combating global warming, and we don't have 25 years to get it fixed. Long-established species-rich grassland is actually 4 times better at it, but very rare, and even moderately good grassland is difficult to replace.</p>		

<b>POLICY</b>	<b>G1</b>					
All respondents	8.29	32.3	82.1	133.6	164.9	
supporting policy	193.1					

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
<p>Strongly support this policy, in particular</p> <ul style="list-style-type: none"> <li>- the protection for existing green infrastructure;</li> <li>- specific protection for ancient woodland or ancient or veteran trees and important hedgerows;</li> <li>- presumption to retain existing trees;</li> <li>- and a robust compensation framework where trees are unavoidably lost.</li> </ul> <p>It will also make a positive contribution to requirements for biodiversity net gain and nature recovery networks, as well as reflecting the aspirations of national policy in the England Trees Action Plan and National Model Design Code.</p>	Support welcomed.
<p>We applaud the explicit inclusion of hedgerows in the draft plan. Wolvercote has many ancient hedgerows that need preserving, and we are disappointed the Oxford North development has been allowed to destroy so many hedgerows. Greater emphasis needs be given to protecting or creating wildlife corridors to encourage biodiversity. (see WNP Policy GBC1).</p>	Support welcomed.
<p>The Trust strongly supports the protection of the existing green and blue infrastructure networks in the city although there are concerns that the Green Belt is not specifically referenced within the policy text nor the supporting text.</p> <p>The Trust feel it is of critical importance that the wording within Policy G1 and its supporting text provide a strong level of protection for all green spaces regardless of size and type to ensure they are not lost to development or alternative uses.</p>	Support welcomed.

COMMENT SUMMARY	OFFICER RESPONSE
OHFT welcome the recognition that, for supporting green and blue spaces (G1B), planning permission will be granted if harm or loss to these spaces is mitigated by re-provision, ideally on site. The identification of the types of green spaces labelled as G1A, G1B and G1C is not very clear on the policies map and this should be addressed.	Support welcomed.
I think that some of the sites proposed for development actually ought to be assigned blue/green infrastructure status (especially 'Land at Meadow lane' and 'Redbridge Paddock'). All unbuilt-on land contributes to blue-green infrastructure, eg sequestration of rainwater - and if the land is non-biodiverse, the council should prioritise it for planting/rewilding.	Support welcomed.

POLICY	G1				
All respondents raising objections on this policy/chapter	23.5	44.7	70.6	79.1	113.4
	122.1	136.13	151.4	153.7	160.1
	168.5	189.5	59.18	41.3	33.3
	180.1 (181.2, 182.2, 183.2, 184.2)	177.9	196.9	152.5	153.7

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(23.5) Only covers green and blue infrastructure. The 'Built Environment' is an extremely important habit in its own right and should be covered as a separate entity. There are species who need a built environment such as cavity nesting birds (swifts, house sparrows, both red listed) and there are those that can adapt to one, all should be encouraged with ecological enhancements such as integrated bird bricks, hedgehog highways, bat bricks and bee bricks.	This is incorrect. The features listed in the biodiversity points list at Appendix 4.2 include features that will support building dependent species, for example, bat boxes and bird boxes (including consideration of building-dependent species.), these were included in recognition of the fact that Oxford has several notable species that rely on built environment to support their life cycle. Guidance such as the BS standards could be flagged	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	as part of supporting guidance that will be included in the Technical Advice Note envisaged to be produced to support the policy in future.	
<p>(33.3) Para 4.6. It is not clear why the Oxford Canal is not mentioned alongside the two rivers, as it fulfils all of the functions suggested for Core GBI.</p> <p>It is not clear if the Oxford Canal is considered core GBI. Policy G1 is not effective in that it relies on a policy map to identify which GBI assets fall within G1A or G1B.</p> <p>The interactive policies map seems to indicate that the Oxford canal at Jericho (as an example) is not considered to be GBI.</p>		
<p>(41.3) Policy G1 – Protection of Green Infrastructure It is not possible to take these aspirations seriously when the development policies of Oxford City Council of prioritising development land for employment, inflating housing demand and ‘unmet need’ and exporting inflated ‘unmet housing need’ to neighbouring districts has resulted in the destruction of so much Green Belt countryside, biodiversity and habitats, which can never be rectified or enjoyed by future generations. In SODC alone nearly 2,000 of Green Belt countryside has been destroyed to make way for ‘Oxford’s unmet housing need’. All other neighbouring districts have been similarly adversely affected, with substantial</p>	The plan does not allocate new employment land and does not involve any reviews of current Green Belt boundaries or site allocations with the Green Belt.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
losses in Green Belt countryside to feed Oxford City's empire expansion plans.		
(44.7) The plan relies too much on simply exporting into the Green Belt where few pieces of analysis have been used to provide justification for the proposals. Create a plan based on evidence of Renewal and Redevelopment of areas within the city.	The plan does not include any site allocations in the Green Belt, or involve any reviews of current Green Belt boundaries.	None required
<p>(59.18) The hierarchy of value of green/blue spaces does not reflect the nature of the City's exceptional environment of numerous waterways and conservation areas, whose back gardens are vulnerable to overdevelopment and loss to nature networks, and whose front gardens are offered no protection from conversion from gardens to car parks. Such incremental developments will lead to significant loss of UGF.</p> <p>Failure to recognise these threats fails to fulfil the Plans objective 'The city has a green and blue network that is protected and enhanced'</p> <p>Suggested changes:  Add  <u>[d] building on residential garden land in designated Conservation Areas will only be permitted if it does not in any way harm the specific character and features of the Area</u>  <u>[e] Removal of front boundary walls or use of impermeable surfaces in front gardens will only be permitted in exceptional circumstances</u></p>	Applications for development on residential garden land will not be assessed in isolation but will be subject to meeting the requirements of various policies in the local plan as appropriate/relevant, including impacts on local character and appearance, quality of living conditions, impact on neighbouring amenity, protection of existing green infrastructure, and biodiversity and greening factor requirements.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(79.1) The detailed assessment of green spaces and infrastructure are inconsistent and carry forward inaccuracies and fail to update based on new information available to the planning department as evidenced by the continues inclusion of SPS13 as a site for development when the adjacent field (HELAA site 388), presenting the same conditions in terms of wildlife sanctuary and flood risk is excluded because of flood risk.</p>	<p>Specific matters relating to SPS 13 are addressed in the relevant summary.</p>	<p>None required.</p>
<p>(70.6) It is not possible to take these aspirations seriously when the development policies of Oxford City Council of prioritising development land for employment, inflating housing demand and ‘unmet need’ and exporting inflated ‘unmet housing need’ to neighbouring districts has resulted in the destruction of so much Green Belt countryside, biodiversity and habitats, which can never be rectified or enjoyed by future generations.</p>	<p>The plan does not allocate new employment land and does not involve any reviews of current Green Belt boundaries or site allocations with the Green Belt.</p>	<p>None required</p>
<p>(86.2) This policy generally claims protection of green infrastructure. Taking into account the limited number of allotments as key urban green spaces and the long waiting list that requires several years for individuals to get access to a plot, the protection of allotment spaces must be clearly demonstrated.</p> <p>This policy should clearly emphasise that no planning permission will be granted to any type of development that may end up losing allotment spaces.</p>	<p>Allotments currently in use are already identified as forming part of the core green infrastructure network as defined in the policy. Formal allotments benefit from protection that can only be removed via application to the secretary of state.</p>	<p>None required.</p>
<p>(92.4) Oxford City Council's green aspirations are farcical.</p>	<p>Comment noted</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The greenwash being applied by the council in respect of its plans are of the same order of towering hypocrisy that one might hear from Vladimir Putin burnishing his democratic credentials.</p> <p>Like some ageing, anti-democratic tyrant, Oxford City Council is stuck in the past. It's stuck in a 1980s Thatcherite mould of predict-and-provide, promoting building on the countryside with no regard to carbon emissions, agricultural productivity, nor environmental sustainability. To say nothing of the basic impracticality of promoting housing outside the city while inhibiting car use and not providing sustainable transport alternatives. It's embarrassing that such a famous city, lovingly nurtured over the centuries by men and women of vision, is now being brought so low by the current incumbents.</p>		
<p>(113.4) Policy G1 designates several collegiate quadrangles as 'Core Green Spaces', and in doing so imposes inappropriate and unnecessary constraint. Not only does their designation as a 'green network' mischaracterise them, but these spaces are already afforded suitable protection by heritage considerations and the setting of Listed Buildings. The designation mischaracterises their urban function and fails to recognise how they often fulfil important operational requirements which could not be achieved if protected as Core Green Spaces.</p>	<p>The criteria for designating sites as 'Core GI' spaces include heritage significance, or contribution to the setting of a heritage asset. The policy does not preclude the use of such sites if they do not detract from their heritage significance or performing the key GI function as applicable.</p>	<p>None required.</p>
<p>(148.8) TWO welcomes the general approach to the policies set out in Chapter 4 of the LP40. However,</p>	<p>Supporting GI designation indicates that the site is carrying out an important GI function in its location,</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>there appear to be overlaps between the policies set out in Chapter 4 and also conflicts with the wider aspirations of the LP40. TWO suggests that there is a presumption to protect all green space unless it is demonstrated that there are benefits in its loss and that all efforts have been made to mitigate the loss, either on site or off-site.</p> <p>Policy G1 refers to protection of green infrastructure (GI). The LP40 defines core and supporting GI. This is difficult to differentiate on the interactive policies map and will result in difficulties in interpretation given the scale of mapping involved. In addition, it is questioned how the land has been identified and defined.</p> <p>The policy is very strict and does not allow any loss of or harm to any Core GI. This is too restrictive. In relation to Supporting GI, the policy requires re-provision ideally on site. It is hard to see how this can be achieved without demolition of buildings? The policy should be amended to provide some flexibility, especially given the inaccuracy in the mapping and assessment criteria and clarity provided around how the Council considers mitigation on site could be achieved.</p> <p>In relation to loss of trees on a site, it is not always possible to re-plant on the site and make efficient use of the land. As such, some cascade to planting trees nearby or providing financial contributions to fund compensatory tree planting elsewhere should</p>	<p>albeit with the possibility that such a function could be carried out at another location. The loss of sites designated as ‘supporting green spaces’ would be resisted and would only be considered if re-provision can be carried out to an equivalent standard or higher, ideally onsite.</p> <p>With respect to trees, the policy already includes provisions for situations where the loss of trees cannot be avoided.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>be considered.</p> <p>As drafted the policy is not effective and will impact on the wider development policies in the plan seeking to make efficient use of land. It would make sense to combine the criteria in this policy with those in policy G6.</p> <p>Suggested changes:</p> <ol style="list-style-type: none"> <li>1. Provide more detailed mapping to accurately define the location of the GI features and change the colour coding to better differentiate between the categories.</li> <li>2. Provide more flexibility in the policy to ensure it takes a positive approach to development.</li> <li>3. Consider combining the policy with Policy G6.</li> </ol>		
<p>(152.5) The below extract is taken from the draft Policies Map. This indicates that two undeveloped plots (Plot 2000 and Plot 3000) are identified within the existing GI network at ARC Oxford – classified under G1B.</p> <p>[see letter for map]</p> <p>ARC consider the identification of these sites as forming part of the existing GI network is unsound for two main reasons. Firstly, these plots form undeveloped land within a Category 1 employment site that is allocated for development within the draft Local Plan (see Policy SPS1). ARC Oxford is recognised as a key contributor to delivering the</p>	<p>We have reviewed the site and agree that the criteria has not met for inclusion as part of the GI network. A modification has been proposed to the policies map to make a correction.</p>	<p>Main modification:</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>draft Local Plan’s employment needs and it is therefore unreasonable to ascribe a level of protection that would prevent there coming forward, particularly under the requirement to achieve the same standard or higher – which would involve the re-provision of open space. This therefore risks the ability of development to come forward and compliance with Paragraph 35(a), (b) and (c).</p> <p>Secondly, the draft Local Plan already recognises that the knock-on effect from this designation would be difficult to achieve in combination with the provisions of draft Policy G3 and the need to provide a 0.2 increase above a baseline Urban Greening Factor (UGF) score.</p>		
<p>(153.7) Section 4.8 We reject the use of any Green Belt for housing or other development. All greenfield sites should be conserved for their various uses, for the very long-term. We are also concerned about the traffic implications of more housing where there are probably going to be limited facilities, as is common in new developments. We want full use of the existing built environment as well as dual use of car parks, and some car parks devoted solely to high-density housing.</p> <p>Section 4.9 Allotment space demand is bound to grow with increasing population, and with factors driving up food prices whether in the UK or globally – to which specialists in the area of food policy periodically refer. Allotments should be conserved.</p>	<p>The plan does not include any site allocations in the Green Belt, or involve any reviews of current Green Belt boundaries.</p> <p>Allotments currently in use are already identified as forming part of the core green infrastructure network as defined in the policy. They are recognised in the NPPF for their role in promoting healthy lifestyles and formal allotments benefit from protection that can only be removed via application to the secretary of state.</p> <p>Applications for development on residential garden land will not be assessed in isolation but will be subject to meeting the requirements of various policies in the local plan as appropriate/relevant,</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>p.69 4.11 We reject hedgerow and tree loss to development in principle. In terms of biodiversity, shelter from heat and as assistance to drainage management, we need these features of this City not to be attenuated by the whims of careless developers or planners.</p> <p>p.70 We reject new housing being sited on garden land. Rather than ‘cramming’, the City Council should be using car parks to support building up to the maximum that customary viewing cones permit. This allows planning to ensure good space in homes, including for home offices. p.71 We do not agree with finding excuses to reduce tree cover.</p>	<p>including impacts on local character and appearance, quality of living conditions, impact on neighbouring amenity, protection of existing green infrastructure, and biodiversity and greening factor requirements.</p>	
<p>(160.1) Headington Neighbourhood Plan Policy GSC1 Protecting Green Spaces seeks to protect the Lye Valley as a key Site of Special Scientific Interest in Headington.</p> <p>We note that several policies (SPE 7 Nuffield Orthopaedic Hospital; SPE 8 Warneford Hospital; SPE 14 Slade House) seek to protect the water systems which feed the Lye Valley. We suggest this would be best achieved through supplementary planning guidance for the Lye Valley and its water catchment. (LYE VALLEY)</p>	<p>Work is ongoing on a hydrogeological study of the Lye Valley which is due to complete this year. The expectation is that this will better inform an understanding of the natural process of the area, the influence of development on them, and will inform additional guidance that will supplement the Local Plan. At present, the Plan protects ecological sites such as Lye Valley through policy G6, requiring adverse impacts from development to be appropriately mitigated, this includes changes in surface/ground water flows.</p>	<p>None required.</p>
<p>(161.2) Allotments are not statutorily protected, and where they are demonstrably under used, not fit for purpose, or could be (re)provided elsewhere there can be a case to remove them.</p> <p>Whilst Policy G1 provides an overall strategy for</p>	<p>Sites designated as ‘Core GI’ spaces are considered to perform key green infrastructure functions that are specific to the location e.g. flood storage, ecological value, food production, community value etc, or form part of the setting of a heritage asset.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Green Infrastructure, and a 'gateway' to following more detailed policies on specific biodiversity, or flood management, issues etc, it covers too many types of GI including those that have national protection and some that can be allowed to be lost according to national policy. This approach brings a level of ambiguity to the policy, and it is unclear where allotments fit into the hierarchy, which makes the strategy ineffective and not fully justified.</p> <p>Most importantly, Policy G1 does not properly reflect the 'internal balancing exercise' set out in the Framework, at paragraph 103.</p> <p>Morrell proposes that the following is included in Policy G1:</p> <p><u>Existing open space, indoor and outdoor sports and recreational facilities should not be lost unless:</u></p> <p><u>a) an assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or</u></p> <p><u>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</u></p> <p><u>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use</u></p>	<p>Allotments currently in use are already identified as forming part of the core green infrastructure network as defined in the policy and it is not considered that there is any ambiguity in the policy wording. Allotments are recognised in the NPPF for their role in promoting healthy lifestyles and formal allotments benefit from protection that can only be removed via application to the secretary of state.</p> <p>The policy does not preclude the use of such sites if they do not detract from performing the key GI function as applicable e.g. outdoor sports pitches.</p> <p>The provision of sports and leisure facilities has been addressed in Policy C3 (Protection, Alteration and Provision of Local Community Facilities).</p>	
<p>(122.1) Whilst Policy G1 works well as an overall strategy for Green Infrastructure, and a 'gateway' to following more detailed policies on specific</p>	<p>See previous response</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>biodiversity, or flood management, issues etc., it covers too many types of GI including those that have national protection and some that can be allowed to be lost according to national policy. This brings a level of ambiguity to the policy, and it is unclear where sports pitches fit into the hierarchy, which makes the strategy ineffective and not fully justified.</p> <p>The Colleges suggest that the Plan could be made sound by reinstating current Policy G5, but with some additional amendments to ensure it remains up to date, and critically, that is promotes a positively prepared strategy for sports provision.</p>		
<p>(124.6) The Policy categorises spaces into 3 groups: A) Core; B) Supporting; and C) All Other. The grounds of Mansfield College are categorised as Private Open Space (group G1B). The justification behind this categorisation is unclear especially as many other smaller areas of space associated with other colleges are not categorised in the same way. The background paper sets out reasons why sites may be categorised as important Green infrastructure including biodiversity reasons, heritage reasons or climate change reasons. There is no assessment on the biodiversity of the site, it doesn't appear to be recorded as important from a heritage point of view (acknowledging that the adjacent buildings are listed), nor is the site within the floodplain. For Category G1B sites the policy allows for planning permission to be granted where any harm/ loss is mitigated through 'sufficient reprovion', although</p>	<p>Supporting GI designation indicates that the site is carrying out an important GI function in its location, albeit with the possibility that such a function could be carried out at another location. The loss of sites designated as 'supporting green spaces' would be resisted and would only be considered if reprovion can be carried out to an equivalent standard or higher, ideally onsite.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>this is not defined. The policy also identifies that this should be on site. There is no consideration in the policy for those sites which have restricted space and no other options for development opportunities, such as Mansfield. The competing need of the College and the Council's desire to retain green spaces which are not accessible to the public could be considered to sterilise the College's ability to meet the needs of its students, particularly in relation to student accommodation.</p> <p>[Suggested policy rewording]</p> <p>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient reprovion, ideally onsite, and to the same standard or higher, <u>OR where it can be demonstrated that reprovion is not possible with alternative forms of development.</u> These spaces are designated G1B on the proposals map</p>		
<p>(126.4) For Category G1B sites, the policy allows for planning permission to be granted where any harm/ loss is mitigated through 'sufficient reprovion', although this is not defined. The policy also identifies that this should be on site. There is no consideration in the policy for those sites which have restricted space and no other options for development opportunities, such as Wycliffe Hall.</p> <p>The suggestion is similar to the flexibility already allowed for in Policy G1 for extensions in residential</p>	<p>G1B designation indicates that the site is carrying out an important GI function in its location, albeit with the possibility that such a function could be carried out at another location. The loss of sites designated as 'supporting green spaces' would be resisted and would only be considered if reprovion can be carried out to an equivalent standard or higher, ideally onsite.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>garden land.</p> <p>The policy should ensure there is flexibility within point (f) to allow for a loss of tree canopy cover where the quality of trees and biodiversity of the site is improved. It is not considered that the Urban Greening Factor is the most appropriate method to do this and therefore an amendment to the policy is suggested below.</p> <p>Suggested Amendment: 1. Provide more flexibility in the policy to ensure it takes a positive approach to development. ...</p> <p>G1B: Supporting Green and Blue spaces Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher, <u>OR where it can be demonstrated that re-provision is not possible with alternative forms of development.</u> These spaces are designated G1B on the proposals map.</p> <p>G1C: All other Green and Blue spaces Planning permission will only be granted for proposals which affect all other Green and Blue spaces where any impacts are mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements, <u>OR where it can be demonstrated</u></p>	<p>G1C designation aligns with the level of protection required by the NPPF and it is not considered necessary to add further flexibility.</p> <p>The policy requirements for trees in G1 applies to all types of development, G3 (Urban Greening Factor) is only applicable to major development.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p><u>that re-provision is not possible with alternative forms of development.</u> ... f) where loss of trees cannot be mitigated by tree planting then alternative forms of green infrastructure should be incorporated that will mitigate the loss of trees, <del>[using the Urban Greening Factor to demonstrate no reduction in GI score as a minimum]</del> (as well as meeting any other requirements as set out in policy G3).</p>		
<p>(136.13) There are concerns about the consequences of the policy to allow building on residential garden land. We would like to see a requirement for consultation with surrounding residents, beyond what is generally required, as in some locations this may have a significant impact upon the amenity of nearby homes. We also believe that there is unlikely to be a circumstance in which ancient woodland, or a veteran/ancient tree, should be developed upon.</p>	<p>Applications for development on residential garden land will not be assessed in isolation but will be subject to meeting the requirements of various policies in the local plan as appropriate/relevant, including impacts on local character and appearance, quality of living conditions, impact on neighbouring amenity, protection of existing green infrastructure, and biodiversity and greening factor requirements.</p> <p>Exceptional circumstances for the loss of ancient/veteran trees or woodland are set by national policy and are not expected to be invoked as a matter of course.</p>	None
<p>(151.4) The Local Plan fails to reflect the importance of the Oxford Green Belt to the spatial planning of Oxford.</p> <p>A clear policy approach to the Oxford Green Belt should be established, that sets out the national planning context but also identifies how this is interpreted in the local context.</p>	<p>The plan does not include any site allocations in the Green Belt, or involve any reviews of current Green Belt boundaries.</p>	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(168.5) Logikor acknowledge the need for the redevelopment of the Unipart site (Site SPS7) to consider any existing Green Infrastructure (GI) features of the site and incorporate them into the wider masterplan and development strategy for the site. However, this needs to be clearly balanced with other ecological and environmental requirements to be implemented as part of any development of the site, specifically in the context of achieving a viable and developable scheme.</p>	<p>The policy sets out the criteria used to apply GI network designations, and in the case for Supporting (G1B) and Other (G1C) spaces, the criteria for mitigation for loss and reprovision as applicable.</p>	<p>None required.</p>
<p>(177.9, 196.9) Policy G1 refers to protection of green infrastructure (GI). The LP40 defines core and supporting GI. This is difficult to differentiate on the interactive policies map and will result in difficulties in interpretation given the scale of mapping involved. In addition, it is questioned how the land has been identified and defined, for example, areas within Christ Church that are shown as “core” GI are actually paths and compost bins.</p> <p>In addition, the policy is very strict and does not allow any loss of or harm to any Core GI. The policy should be amended to provide some flexibility, especially given the inaccuracy in the mapping and assessment criteria and clarity provided around how the Council considers mitigation on site could be achieved.</p> <p>In relation to loss of trees on a site, it is not always possible to re-plant on the site and make efficient use of the land. As such some cascade to planting trees nearby should be considered.</p>	<p>Sites designated as ‘Core GI’ spaces are considered to perform key green infrastructure functions that are specific to the location e.g. flood storage, wildlife corridors, ecological value etc, or form part of the setting of a heritage asset. The policy does not preclude the use of such sites if they do not detract from performing the key GI function as applicable.</p> <p>Each of the Green Infrastructure related policies in the plan addresses a bespoke element of greening/environmental gain which merit their standalone policy.</p> <p>With respect to trees, the policy already includes provisions for situations where the loss of trees cannot be avoided.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>As drafted the policy is not effective and will impact on the wider development policies in the plan seeking to make efficient use of land. It would make sense to combine the criteria in this policy with those in policy G6.</p> <p>Suggested changes:</p> <ol style="list-style-type: none"> <li>1. Provide more detailed mapping to accurately define the location of the GI features and change the colour coding to better differentiate between the categories.</li> <li>2. Provide more flexibility in the policy to ensure it takes a positive approach to development.</li> <li>3. Consider combining the policy with Policy G6.</li> </ol>		
<p>(180.1) [See letter for full rep with context and background]</p> <p>Some of these greenfield sites include Residential green garden land and these areas are also critically important for rainwater infiltration within the Lye Valley fen calculated rain catchments. We therefore object to the city council's stated aim that: 'Planning permission will be granted for new dwellings on residential garden land' ... with only certain biodiversity provisos. If the garden is within the known calculated rainwater catchment zones of Lye Valley fens, development should be directed away from it. Even with SuDS there is always loss of green area. Simply requiring the application of Policy G4 'Mandatory Biodiversity Net Gain' in developing</p>	<p>Applications for development on residential garden land will not be assessed in isolation but will be subject to meeting the requirements of various policies in the local plan as appropriate/relevant, including impacts on local character and appearance, quality of living conditions, impact on neighbouring amenity, protection of existing green infrastructure, and biodiversity and greening factor requirements.</p> <p>Work is ongoing on a hydrogeological study of the Lye Valley which is due to complete this year. The expectation is that this will better inform an understanding of the natural process of the area, the influence of development on them, and will inform additional guidance that will supplement the Local</p>	<p>None required</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>such green garden land is just not good enough when the higher and more important irreplaceable biodiversity of Lye Valley depends on water infiltration over the green area of such gardens.</p> <p>Our stance therefore is:</p> <ul style="list-style-type: none"> <li>· NO further urban development in any green area in the fen catchments should be planned to allow maximum ground-water supply to the fen to help it survive in the face of accelerating Climate Change</li> <li>· Redevelopment of any area already built should incorporate re-greening of previously impermeable surfaces to restore lost rainwater flow into the ground</li> <li>· Reduction of run-off to road surface drains which discharge to the Boundary or Lye brooks in any redevelopment of any built site</li> <li>· No new connections to road surface drains that pour water into Lye or Boundary Brooks</li> <li>· Innovative solutions to hold back and attenuate high water volumes in road surface drains which outpour damaging volumes of water to the Lye and Boundary brooks should be considered.</li> </ul>	<p>Plan. At present, the Plan protects ecological sites such as Lye Valley through policy G6, requiring adverse impacts from development to be appropriately mitigated, this includes changes in surface/ground water flows.</p>	
<p>(189.5) We would welcome clarity regarding the canopy cover calculations. It was stipulated in previous iterations of the draft plan that this has been replaced in favour of the Urban Greening Factor.</p>	<p>The UGF policy does not specify a certain level of canopy cover, G1 sets requirement for no net loss. It is envisaged that this will be set out in a forthcoming Technical Advice Note.</p>	<p>None required.</p>
<p>(202.16) The policy is unsound and ineffective, as it is mathematically impossible for a development which reduces green space, to “reprovision” elsewhere, which is also green space, further the</p>	<p>Reprovision considers not only the quantity in terms of footprint, but also in terms of the quality. The policy also indicates a preference for reprovision on site.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>term is not explained in the glossary. Green space in allocated sites is not even marked as such, it does not even officially exist. G1 - Green Space Policy v. Residential Gardens The conflict between Residential gardens in designated green space protections in Policy G1 must be resolved in favour of Green Space protection, or Core Green space could be lost where land is in both as in the Lye Valley example above. • G1 - It is unclear whether designated green space designation prevails over residential garden building in policy G1 • G1 - para b) is entirely redundant.</p> <p>Policy G1 Modification Requested:</p> <ul style="list-style-type: none"> <li>• Clarification that green space designation is more important than either residential garden policies, or Local Plan allocation either as Area of XXX or as Site</li> <li>• Inclusion and marking of ALL green space both in and out of allocated sites with commensurate protections</li> </ul>	<p>Allocated sites are only in areas that are determined to not lie within core green infrastructure network. The wording in allocation policies identifies important natural features if present.</p> <p>The plan is to be considered as a whole and development proposals would not be permitted where there policy requirements or the criteria for any exemptions are not met.</p>	

POLICY	G2				
All respondents supporting policy	8.30	136.14			

COMMENT SUMMARY	OFFICER RESPONSE
This is a positive policy. We are pleased that developers will be responsible for maintenance of GI for the first five years, but would like to see them required to set out a plan for the management of GI beyond this.	Support welcomed.

POLICY	G2				
All respondents raising objections on this policy/chapter	23.1	53.7	71.9	74.5	86.3
	133.7	164.10	189.6	194.4	168.6

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(23.1) Only covers green and blue infrastructure. The 'Built Environment' is an extremely important habit in its own right and should be covered as a separate entity. There are species who need a built environment such as cavity nesting birds (swifts, house sparrows, both red listed) and there are those that can adapt to one, all should be encouraged with ecological enhancements such as integrated bird bricks, hedgehog highways, bat bricks and bee bricks. Include reference to BS 42021: 2022 ( <a href="https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1/standard">https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1/standard</a> ).	This is incorrect. The features listed in the biodiversity points list at Appendix 4.2 include features that will support building dependent species, for example, bat boxes and bird boxes (including consideration of building-dependent species.), these were included in recognition of the fact that Oxford has several notable species that rely on built environment to support their life cycle. Guidance such as the BS standards could be flagged as part of supporting guidance that will be included in the Technical Advice Note envisaged to be produced to support the policy in future.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(53.7) I would in general support the principles outlined here. However, the assumption that green spaces will always have multiple beneficial features skates over the fact that some of the benefits of green spaces for people are in fact mutually exclusive. I see no recognition of this fact, nor do I find credible plans for dealing with it.</p> <p>To render the local plan more actively sound, you need to:</p> <ul style="list-style-type: none"> <li>-- recognize the widely differing uses of green and blue spaces and develop and sequester funding for appropriate management of those differences.</li> <li>--employ, enable, and actively put into action at regular intervals, staff able to assess the current biodiversity value of green and blue spaces within Oxford, develop plans to protect those various uses, and to recognize and prevent them.</li> <li>--mitigation should be a last resort, as it never copes with the whole suite of biodiverse species on a site, and,</li> <li>--if you think it does, publish figures of how much it would cost to conduct a complete biodiversity survey of sample green sites within the city that had real ecological value and go beyond the currently woefully inadequate national criteria for environmental assessment, protection and renewal.</li> </ul>	<p>The remit of the local plan is to provide a framework that development schemes may be assessed against. The remit for developing a strategy for improvements, enhancements and management of green spaces in the city lies with a dedicated directorate/service area in the council. These would inform the development of local plan policies as and when they emerge.</p>	<p>None required.</p>
<p>(71.9) The proposed policy mentions the enhancing of existing green or blue sites. At present there appears to be no statutory requirement on the</p>	<p>On adoption the enhancement of existing green/blue infrastructure according to the policy criteria will be a requirement of any applicable development</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>council to ensure the provisions in G2 are adhered to.</p> <p>The provisions in G2 should be made a statutory requirement so that there is legal enforcement to prevent the substantial damage to existing and proposed green spaces as part of the local plan.</p>	<p>schemes. Planning Authorities are empowered by existing legislation i.e., PCPA 2004.</p>	
<p>(74.5) While we welcome reference to the setting of heritage assets in this policy, it may be more than an issue of setting. We advise acknowledging the need to conserve the historic environment too, noting in particular the potential for impacts on archaeological remains.</p>	<p>See Historic England SoCG</p>	<p>See Historic England SoCG.</p>
<p>(86.3) This policy should emphasise blue and green infrastructure integration within streetscapes, in addition to patching of land. This should be made more explicit in the policy wording to encourage this creativity.</p> <p>POLICY G2: ENHANCEMENT AND PROVISION OF NEW GREEN AND BLUE FEATURES.</p> <p>Planning permission will be granted for proposals that include a variety of green infrastructure features as a fundamental component in the design of new development <u>and part of every streetscape.</u></p> <p>...</p>	<p>It is expected that the effect of a development scheme on streetscape will be a consideration during the design process, and the integration of green infrastructure features is expected to be demonstrated throughout. It is not considered necessary to highlight streetscape considerations separately.</p>	<p>None required.</p>
<p>(133.7) This policy states ‘For residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required’. In our view this is disappointingly</p>	<p>The level of provision for open space was determined by various factors, including housing requirements, urban design considerations and impact on overall local plan viability.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>unambitious. Given the huge benefit that open space contributes to quality of life in new developments, we urge the Council to increase the requirement from 10% to 15%.</p>		
<p>(164.10) Policy G2 as drafted, however, tends to focus on consideration of proposals that come forward for development which have the potential to impact upon GI sites, rather than an onus to protect and enhance sites in their own right regardless of whether further development proposals are involved.</p> <p>The City Council should also identify locations within the Green Belt that can be used for public benefit, and the details of these could be set out within the supporting text.</p> <p>The Trust would also welcome reference to improvements or enhancement to areas of green space for biodiversity or recreation, and key amongst potential opportunities could be the beneficial use of the Green Belt. It is felt this is a missed opportunity in the Local Plan.</p>	<p>Policy G1 sets out a framework for protecting sites that provides biodiversity, recreation and other benefits and these are indicated in the policies map. The locations are informed by national/regional designations, identification in the green spaces study, and the knowledge of officers within the Council.</p> <p>The remit of the local plan is to provide a framework that development schemes may be assessed against. The remit for developing a strategy for improvements, enhancements and management of green spaces in the city lies with a dedicated directorate/service area in the council. These would inform the development of local plan policies as and when they emerge.</p>	<p>None required.</p>
<p>(168.6) Logisor wish to emphasise their willingness to provide enhanced green features of the Unipart site (Site SPS7) through implementation of soft landscaping and other ecological features through a masterplan, as well as recognition of the Hollow Brook as a blue feature and its link to the Green Infrastructure (GI) network within and around the site.</p>	<p>Each policy addresses a bespoke element of greening/environmental gain:</p> <ul style="list-style-type: none"> <li>• G2 sets out standards for new greening, the quality to which it should be designed, the way it should be managed and monitored once planted.</li> <li>• G4 is focused on habitat creation to meet specific requirements of environmental net gain. It sets local criteria for off-site delivery.</li> </ul>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>[However they] are concerned that the significant and potentially duplicate requirements of Policies G2 to G5, whilst commendable, results in an unjustified and inappropriately prohibitive approach to achieving ecological enhancement and biodiversity gains on sites in Oxford.</p>	<ul style="list-style-type: none"> <li>• G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</li> <li>• G5 ensures development includes features that support species which are ignored by BNG metric.</li> </ul>	
<p>(189.6) The updated policy wording places emphasis on providing buffers against busy roads to improve air pollution, unsealing surfaces, and increasing canopy cover. This requirement should be developed as the draft plan progresses to provide further clarity on the level of setback that is typically expected. The requirement of public open space requires further consideration on the basis that no clarity has been provided as to whether this new space should comprise hard or soft landscaping.</p>	<p>The wording in the supporting text sets out examples of enhancement features and is not intended to be prescriptive or an exhaustive list. The use of such features would depend on the specific scheme and design, and should be guided by local context and opportunities on the site as well as in the surrounding area.</p>	<p>None required.</p>
<p>(194.4) Further clarification is required as to what type of residential accommodation this relates to e.g. does it also include student or graduate housing?</p>	<p>The policy is clear it applies to new residential development, which is considered to be sufficiently broad, clear and appropriate.</p>	<p>None required.</p>

<b>POLICY</b>	<b>G3</b>				
All respondents <b>supporting</b> policy	8.31	82.2	137.1		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Support the use of the Urban Greening Factor to deliver biodiversity net gain (BNG) and maximise the potential for nature recovery on smaller and more urban or previously developed sites. Such sites may already have a very low level of biodiversity and therefore a BNG percentage increase alone may not in practice deliver significant enhancements.	Support welcomed.	None.
We would like to see lower socio-economic areas specifically highlighted for use of the UGF tool, given that these areas have less access to green space in Oxford. For example, in these areas, non-major developments could be required to use the UGF tool.	The policy requirements were deemed to be too onerous to be made mandatory for minor developments, which may be of a small scale or very limited site footprint. However, all developers are encouraged to consider applying the methodology as set out in the policy and guidance notes in order to derive the benefits.	None.

<b>POLICY</b>	<b>G3</b>				
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	23.2	86.4	124.7	175.5	177.10
	53.8	89.8	133.8	193.2	171.6
	54.2	121.2	168.7	196.10	144.10
	126.5	148.9	178.15		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(53.8) Insufficient recognition of the difficulty and implausibility of replacing the complete value of green sites that are destroyed.</p> <p>I would support the principle of providing green infrastructure such as green roofs or walls (biodiversity, though probably not net gain, water retention and reduction in flood risk, temperature management, and also greening infrastructure such as solar panels) However, not all these uses are mutually compatible.</p> <p>Change the model of the plan to one informed by green economics (Dieter Helm, and Doughnut Economics can provide models).</p>	<p>Comment noted.</p>	<p>None required.</p>
<p>(23.2) Only covers green and blue infrastructure. The 'Built Environment' is an extremely important habit in its own right and should be covered as a separate entity. There are species who need a built environment such as cavity nesting birds (swifts, house sparrows, both red listed) and there are those that can adapt to one, all should be encouraged with ecological enhancements such as integrated bird bricks, hedgehog highways, bat bricks and bee bricks.</p>	<p>This is incorrect. The features listed in the biodiversity points list at Appendix 4.2 include features that will support building dependent species, for example, bat boxes and bird boxes (including consideration of building-dependent species.), these were included in recognition of the fact that Oxford has several notable species that rely on built environment to support their life cycle. Guidance such as the BS standards could be flagged as part of supporting guidance that will be included in the Technical Advice Note envisaged to be produced to support the policy in future.</p>	<p>No change proposed</p>
<p>(54.2) The requirement to 'green' sites and the tool to measure this is broadly supported. We support the reference to the UGF score not being mandatory for smaller-scale development.</p>	<p>The policy is considered to be clear with respect to the types of development that the requirements apply to, the scores required in order to be compliant with the policy, and how these may be demonstrated.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>However, the wording is unclear on the expectations of the policy and therefore not effective. For example there are phrases such as:  ‘Applicants are expected to assess’  ‘...proposals should demonstrate’  ‘...will need to be demonstrated’</p> <p>The policy should also acknowledge the limitations of brownfield manufacturing sites in providing urban greening and this policy should seek to elaborate on the weight to be given to the UGF score compared to the potential loss of Category 1 employment floorspace – the latter of course is protected under Policy E1.</p> <p>Improve clarity of policy wording and acknowledge the limitations of brownfield manufacturing sites in providing urban greening.</p>	<p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	
<p>(86.4) G3 must refer to G2 in order to be effective for encouraging the multifunctionality specified in G2.</p> <p>POLICY G3: PROVISION OF NEW GREEN AND BLUE FEATURES – URBAN GREENING FACTOR. An appropriate proportion of natural green surface cover, <u>that include multi-functional benefits as per Policy G2 – which may be comprised of both existing and newly installed features</u> – will need to be demonstrated on certain proposals (as set out below) and evidenced via submission of a completed Urban Greening Factor(UGF)assessment.</p>	<p>The Local Plan needs to be read as a whole. Whilst G3 sets out requirements for greening to meet minimum standards of the policy, G2 sets out the standard that should guide the design of new greening (i.e. multi-functional).</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
...		
<p>(124.7) It is recognised that the provision of new green spaces as part of development proposals is constrained however, this requirement puts significant pressure on applicants who have limited site areas and who have certain functions that also need to be achieved in those spaces. Mansfield College may seek to expand the provision of student accommodation on the campus and this may involve the loss of some of the current green space to enable this to happen. The use of the policy to prevent the loss of space would essentially sterilise the potential for development at the site which, if allowed, could achieve wider benefits such as the release of general housing back into the market. It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculations is required as where it has been introduced elsewhere this tends to have been prior to the introduction of the minimum net gain requirements of Local Plans. It is considered that this policy is not fully justified nor does it allow any scope for flexibility where circumstances indicate that it would sterilise development.</p> <p>[Suggested Policy wording]</p> <p>Applicants are expected to assess and submit the</p>	<p>UGF forms part of the recently adopted NE framework, which is expected to be taken into consideration in planning policies.</p> <p>Each of the Green Infrastructure related policies in the plan addresses a bespoke element of greening/environmental gain which merit their standalone policy.</p> <p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p> <p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>baseline score for the site pre-development, prior to any site clearance, as well as the proposal as built/post-development. The as built/post-development score required for development proposals will need to meet the following policy criteria: Major development: proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of: • 0.3 for residential or predominantly residential schemes • 0.2 for predominantly non-residential schemes</p> <p><u>Where it is demonstrated that meeting the above UGF cannot be achieved it should be demonstrated that all measures have been taken to maximise the UGF on site.</u></p> <p>All other forms of development – with the exception of householder applications – are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF tool, though this is not mandatory.</p>		
<p>(121.2)</p> <ul style="list-style-type: none"> <li>• There is a lack of balance in the proposed policy however, which omits the opportunity to properly consider the development of some redundant green spaces or how the requirements of the policy are considered alongside the further requirements of Policy G4 - Biodiversity Net Gain (BNG).</li> <li>• This policy is not effective and has significant</li> </ul>	<p>UGF forms part of the recently adopted NE framework, which is expected to be taken into consideration in planning policies.</p> <p>Each policy addresses a bespoke element of greening/environmental gain:</p> <ul style="list-style-type: none"> <li>• G2 sets out standards for new greening, the quality to which it should be designed, the</li> </ul>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>overlap with the requirements of G4 (but without the flexibility in Policy G4 to provide off-site mitigation).</p> <ul style="list-style-type: none"> <li>• Furthermore, Magdalen notes that where UGF has been introduced elsewhere (in London) this tends to have been prior to the introduction of the minimum biodiversity net gain requirements in Local Plans.</li> </ul> <p>Magdalen suggests that the Council gives serious thought to the operation of Policy G3, and how it overlaps with G4.</p> <p>The Council should consider deleting Policy G3 from the Plan, as it is currently performing a very similar function to G4.</p> <p>Alternatively, the Council must set out in policy, or supporting text, how UGF and BNG calculations will work in practice, and how an allowance will be made to count the multiple benefits of green assets both in 'greening' and in 'biodiversity' (and all the other public benefits that they bring). Perhaps this policy would be better framed considering types of urban greening, and how to deliver them in innovative ways, rather than a stark calculation which is required in the following policy.</p>	<p>way it should be managed and monitored once planted.</p> <ul style="list-style-type: none"> <li>• G4 is focused on habitat creation to meet specific requirements of environmental net gain. It sets local criteria for off-site delivery.</li> <li>• G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</li> <li>• G5 ensures development includes features that support species which are ignored by BNG metric.</li> </ul> <p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p> <p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	
<p>(126.5) this requirement puts significant pressure on applicants who have limited site areas and who have certain functions that also need to be achieved in those spaces. Wycliffe Hall seeks to expand the provision of student accommodation on the campus</p>	<p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>to allow for the release of private rented accommodation to the open housing market as well as address shortfalls in its academic facilities. This may involve the loss of some of the current green space to enable this to happen. The use of the policy to prevent the loss of space would essentially sterilise the potential for development at the site which, if allowed, could achieve wider benefits such as the release of general housing back into the market. It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculations is required as where it has been introduced elsewhere this tends to have been prior to the introduction of the minimum net gain requirements of Local Plans. It is considered that this policy is not fully justified nor does it allow any scope for flexibility where circumstances indicate that it would sterilise development.</p> <p>[Suggested wording]</p> <p>Applicants are expected to assess and submit the baseline score for the site pre-development, prior to any site clearance, as well as the proposal as built/post-development. The as built/post-development score required for development proposals will need to meet the following policy criteria: Major development: proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of: •</p> <ul style="list-style-type: none"> <li>0.3 for residential or predominantly residential</li> </ul>	<p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>schemes • 0.2 for predominantly non-residential schemes</p> <p><u>Where it is demonstrated that meeting the above UGF cannot be achieved it should be demonstrated that all measures have been taken to maximise the UGF on site.</u></p> <p>...</p>		
<p>It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculations is required as where it has been introduced elsewhere this tends to have been prior to the introduction of the minimum net gain requirements of Local Plans. It is considered that this policy is not fully justified nor does it allow any scope for flexibility where circumstances indicate that it would sterilise development.</p>	<p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p> <p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	<p>None required.</p>
<p>(126.5) It is recognised that the provision of new green spaces as part of development proposals is constrained however, this requirement puts significant pressure on applicants who have limited site areas and who have certain functions that also need to be achieved in those spaces. The use of the policy to prevent the loss of space would essentially sterilise the potential for development at the site which, if allowed, could achieve wider benefits such as the release of general housing back into the market.</p>	<p>See officer response above</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculations is required as where it has been introduced elsewhere this tends to have been prior to the introduction of the minimum net gain requirements of Local Plans. It is considered that this policy is not fully justified nor does it allow any scope for flexibility where circumstances indicate that it would sterilise development.</p> <p>[Suggested Policy wording]</p> <p>Applicants are expected to assess and submit the baseline score for the site pre-development, prior to any site clearance, as well as the proposal as built/post-development. The as built/post-development score required for development proposals will need to meet the following policy criteria: Major development: proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of: • 0.3 for residential or predominantly residential schemes • 0.2 for predominantly non-residential schemes</p> <p><u>Where it is demonstrated that meeting the above UGF cannot be achieved it should be demonstrated that all measures have been taken to maximise the UGF on site.</u></p> <p>All other forms of development – with the exception</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>of householder applications – are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF tool, though this is not mandatory.</p>		
<p>(144.10) The Urban Greening Factor policy requires developments to provide a level of green infrastructure on site with no ability for off-setting as would be the case with biodiversity net gain. RLMIS support the encouragement of the inclusion of green spaces but this would be considered in the normal realm of planning considerations. On sites where land ownership beyond the site is limited and the required levels cannot be achieved this policy could sterilise development opportunities at the site and limit how efficiently the land can be used. Given that the Draft Local Plan requires the provision of biodiversity net gain at a level of 10% and this enables off site provision to avoid the sterilisation of sites it is considered that this policy is surplus to requirements.</p>	<p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	<p>None required.</p>
<p>(148.9) It is recognised that the provision of new green spaces as part of development proposals is constrained however, this requirement puts significant pressure on applicants who have limited site areas and who have certain functions that also need to be achieved in those spaces. The use of the policy to prevent the loss of space would essentially sterilise the potential for development which, if allowed, could achieve wider benefits such as the release of general housing back into the market. For</p>	<p>UGF forms part of the recently adopted NE framework, which is expected to be considered in planning policies.</p> <p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>example, at Oxford North where the site was greenfield land it would seem impossible to recover this position through other greening features. As such the criteria to have “no reduction in baseline score” is unlikely to be achievable and the criteria should be deleted.</p> <p>It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a ‘simpler’ output. It is questioned why this additional layer of calculation is required as where it has been introduced elsewhere (mainly in London) this tends to have been prior to the introduction of the minimum biodiversity net gain requirements in Local Plans.</p> <p>This policy is not effective and seems to repeat the requirements of policy G1 and G4 but without the flexibility in Policy G4 to provide off-site mitigation.</p> <p>Delete Policy G3 as it is covered by policy G1, or as a minimum delete the wording: “...Major development: proposals should <del>demonstrate that there would be no reduction in baseline score and</del> achieve a minimum score of:....”</p>	<p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	
<p>(133.8) While Oxford is using UGF for “its simplicity”, it is also intended to produce an alternative biodiversity measure, to avoid prescriptiveness and to allow developers to freely choose their components to create an on-paper case for their biodiversity impacts. We consider this to be (a)</p>	<p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>confusing and (b) a risk to public accountability. We therefore urge the Council not to allow developers to use UGF calculations to evade meeting the DEFRA 10% biodiversity uplift requirement.</p>		
<p>The University Hospital Trust is concerned that it is not clear that interventions to achieve UGF may overlap with biodiversity net gain and other requirements of the chapter, rather than being required multiple times to achieve each requirement.</p>	<p>It is agreed that wording could be added to supporting text to clarify this.</p>	<p>Modification proposed.</p>
<p>(168.7) The delivery of large industrial schemes requires the use of artificial surfaces to allow for appropriate operation and function. Therefore, there is a risk that the requirements of Policy G3 could be unfairly prejudice the delivery of large, significant industrial sites such as at Unipart (Site SPS7).</p> <p>Logicor are concerned that the significant and potentially duplicate requirements of Policies G2 to G5, whilst commendable, results in an unjustified and inappropriately prohibitive approach to achieving ecological enhancement and biodiversity gains on sites in Oxford.</p>	<p>Each green spaces policy addresses a bespoke element of greening/environmental gain:</p> <ul style="list-style-type: none"> <li>• G2 sets out standards for new greening, the quality to which it should be designed, the way it should be managed and monitored once planted.</li> <li>• G4 is focused on habitat creation to meet specific requirements of environmental net gain. It sets local criteria for off-site delivery.</li> <li>• G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</li> <li>• G5 ensures development includes features that support species which are ignored by BNG metric.</li> </ul>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p> <p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	
<p>(171.6) We object to the requirement for Urban Greening Factor (UGF) assessment and to the introduction of minimum scores to be achieved. The NPPF state that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 181) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 186). UGF is used in The London Plan and in other major cities across Europe, but there is no evidence that its use is justified in Oxford.</p> <p>It is requested that this policy be deleted. The objectives of the policy would be met though other policies in the Local Plan, in particular Local Plan Policies, G2, G4 and G5 that seek a net gain in biodiversity.</p>	<p>UGF forms part of the recently adopted NE framework, which is expected to be taken into consideration in planning policies. Each of the Green Infrastructure related policies in the plan addresses a bespoke element of greening/environmental gain which merit their standalone policy. G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</p> <p>The required scores have been set at a level that are expected to be achievable with feasibility in mind, they are in fact lower than the Natural England Framework recommended minimum scores.</p>	None required.
(193.8) [See letter for full rep]	The current policy wording is considered to be appropriate.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Whilst the Trust support the intention of Policy G3, clarity is required. The policy as drafted states that for major applications, a UGF of 0.3 is required for predominantly residential schemes and a score of 0.2 for predominantly non-residential schemes. It then states that all other forms of development should show how UGF has been taken into account. It is assumed here that “all other forms of development” relates to minor applications but explicit wording should be included to make that clear, if indeed that is the intention.</p> <p>Suggested wording is included below:</p> <p><del>“[All other forms of development]</del> <u>All minor development</u> – with the exception of householder applications – are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF tool, though this is not mandatory”.</p>		
<p>(196.10) this requirement puts significant pressure on applicants who have limited site areas and who have certain functions that also need to be achieved in those spaces. The use of the policy to prevent the loss of space would essentially sterilise the potential for development which, if allowed, could achieve wider benefits such as the release of general housing back into the market. For example, at Oxford North where the site was greenfield land it would seem impossible to recover this position through other greening features. As such the criteria to have “no reduction in baseline score” is unlikely to be</p>	See previous responses.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>achievable and the criteria should be deleted.</p> <p>It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculation is required as where it has been introduced elsewhere (mainly in London) this tends to have been prior to the introduction of the minimum biodiversity net gain requirements in Local Plans.</p> <p>This policy is not effective and seems to repeat the requirements of policy G1 and G4 but without the flexibility in Policy G4 to provide off-site mitigation.</p> <p>Delete Policy G3 as it is covered by policy G1, or as a minimum delete the wording: "...Major development: proposals <del>should demonstrate that there would be no reduction in baseline score and</del> achieve a minimum score of:...."</p>		

POLICY	G4				
All respondents	8.32	82.3	121.3	175.6	30.10
supporting policy	75.4				

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A
General support – in particular encouragement of BNG delivery above 10% and aligning offsite BNG with Nature Recovery Network/emerging nature recovery strategy	N/A

COMMENT SUMMARY	OFFICER RESPONSE
General support – also support setting a higher target for BNG than 10% - this more ambitious target would increase chances of at least 10% net gain on average across Local Plan area given that some sites won't be able to deliver within city.	This is addressed later in the summary for this policy.
General support – recognise need for BNG and welcome flexibility to deliver BNG off-site.	N/A
General support – but reiterate concerns about potential double-counting between BNG and UGF requirements. Council needs to be clear on how each set of requirements will work in practice.	Noted – the topic of how the different policies work together is addressed in greater detail under the responses to policy G5, as well as the background papers.
General support – however note that Council appears set on defaulting to bottom of the hierarchy which appear in conflict with net gain – concern particularly in relation to allocation SPS13.	Specific comments on sites are addressed in the responses against the specific allocations policy.

POLICY	G4					
All respondents raising objections on this policy/chapter	20.3	89.9	136.15	137.2	151.5	
	153.8	155.2	168.8	174.11	181.3	
	191.1	81.3	28.8	38.2	58.6	
	180.2	181.3	183.3	184.3	178.16	
	202.53					

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Biodiversity already exists in these areas – development should not be allowed to destroy and then mitigate with features like bird boxes.	Policy G6 requires applicants to accord with the mitigation hierarchy where proposals could impact upon semi-natural habitats or protected species. Equally, there are other mechanisms within the Local Plan that seek to protect the green space we have (including habitats) for	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>example G1's green infrastructure network. Making best use of land can sometimes necessitate loss of existing features, where this happens, there are also mechanisms that require replacement to an equivalent value or higher (e.g. the UGF policy G3 and the requirements of BNG set out in national legislation and policy G4).</p>	
<p>Number of responses flag disappointment Oxford is not setting Biodiversity Net Gain target above legal minimum similar to other authorities (e.g. BANES and Kent). Meanwhile, OLNP state that going with minimum of 10% is a high risk approach and flag that Defra has indicated that 10% BNG is in fact the minimum needed to avoid net loss, rather than to deliver any actual gain.</p>	<p>We have set out in the background paper our reasoning for not exceeding 10% net gain and why we have instead opted to prioritise strong policies to ensure onsite delivery of greening (policy G3) and onsite features not recognised in the BNG methodology (policy G5) which are better suited to many constrained sites in city. Our reasoning is also set out within the statement of common ground with Natural England.</p>	<p>No change proposed</p>
<p>A BNG target of 20% should be set for Oxford. Whilst no longer moving forward, Oxfordshire Plan 2050 proposed a 20% standard across county and this was one of Oxfordshire Biodiversity Advisory Group's recommendations. OLNP have evidence base/rationale for local authorities justifying 20% minimum biodiversity</p>	<p>See response above. However, it should also be noted that policy G4 does not limit BNG delivery to 10%. The policy strongly encourages delivery that exceeds 10% and for sites where this is possible, applicants will be encouraged to explore this.</p>	<p>No change proposed.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
net gain and policy should be reworded to reflect this.		
BNG requirement should be increased to 30% or 50% preferably.	See above.	No change proposed
BNG requirement should not be subject to viability testing but be delivered as stated.	Noted. Viability testing is a requirement of the Local Plan making process. The 10% mandatory BNG target is set out in national legislation and not subject to viability arguments from applicants.	No change proposed
The stock of land lost to development is as much a problem for biodiversity loss (e.g. concreting over natural surfaces), and also exacerbates impacts of climate change on remaining features (e.g. increase in heat island effects).	This policy addresses habitat creation via the specific parameters of the national BNG requirement. The Local Plan includes other policies to protect and enhance the land in other ways (e.g. greening policies of G1 to G3).	No change proposed.
BNG is not an adequate proxy for total biodiversity as there is no assessment of invertebrates, fungi or any species other than vascular plants plus a few protected species. No loss of conservation status should be acceptable.	This is agreed and it is part of the reason that the Local Plan also includes additional requirements via policy G5 for providing other types of biodiversity enhancement (particularly in support of priority species), that are not accommodated via the national BNG metric. Policy G6 sets out the requirements for assessing/addressing existing biodiversity on site as well as protections for designated ecological sites.	No change proposed.
Council does not understand implications of BNG requirements and appears set on defaulting to bottom of the sequential hierarchy	The implications of BNG legislation are well understood by the Council. The Local Plan includes strong policies on protection of	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>for numerous sites. Delete policy SPS13 – can only deliver BNG on paper via off-site compensation measures likely to be outside Oxford without benefit to the specific attributes of the site.</p>	<p>biodiversity, including protection of a network of ecological sites, requirements for assessment of biodiversity on relevant applications, and standards for mitigation where necessary. Site allocations with specific local biodiversity concerns flag this within the policy requirements and these will need to be met alongside requirements of strategic policies before applications are permitted. See the relevant allocation summaries for specific responses to comments raised on those sites. <i>[Check the SPS13 bits are picked up in that analysis.]</i></p>	
<p>Concerns flagged about importance of ensuring monitoring of the policy and delivery of BNG elements including maintenance of new planting—though acknowledge Council’s limited resources on enforcement.</p>	<p>Maintenance and management expectations for general new greening are set out in policy G2. Delivery of habitat associated with BNG is associated with particular monitoring/management requirements set out in the national legislation (e.g. enforced by condition, managed for 30 years minimum, onsite delivery monitored by Council, recorded on National register where delivery is off-site).</p>	<p>No change proposed</p>
<p>Off-site BNG hierarchy fails to recognise that offsite mitigation in a National Character Area (NCA) is given the same weight in the Biodiversity Metric as for offsite mitigation within the local authority area and will have the</p>	<p>The requirements of policy G4 do not seek to replicate the incentives in the national biodiversity metric (which will apply anyway) – the local policy instead merely sets out the City Council’s strategic preference for where off-site</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>same benefits in terms of net gain. In order for the G4 to be consistent with the metric, the policy should allow offsite delivery in the relevant NCA at each stage of the hierarchy set out in G4.</p>	<p>delivery should go—which is primarily to be guided by the county Nature Recovery mapping where sufficient local sites are not available. Whilst we acknowledge that the NCAs are a useful device for considering impacts on the natural environment, they don't provide much local benefit in relation to exporting the value of biodiversity from urban to rural environment where off-site delivery is required—which is a particularly relevant issue for the city.</p>	
<p>Comment asserting the difficulty in balancing the ability to achieve viable schemes against multiple requirements, particularly in the case of achieving BNG, Urban Green Factor (UGF) and other enhancements on sites required by Policies G1 to G5.</p>	<p>The requirements of policies G1-G6 each address specific issues in relation to the natural environment. The responses to the policies can often achieve multiple benefits that address multiple requirements at once. We address the differences in greater detail in the responses under policy G5.</p> <p>In relation to viability specifically, the whole plan assessment takes into account and has tested the combination of all the policies cumulatively.</p>	<p>No change proposed</p>
<p>Concern about potential duplication of requirements across G2 to G5 is unjustified and prohibitive approach to achieving ecological enhancement and BNG in Oxford.</p>	<p>See response above</p>	<p>See response above</p>
<p>Oxfordshire Local Nature Partnership acknowledges the issues relating to perceived</p>	<p>The BNG target being set at 10% was not based directly upon viability concerns but rather the</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>viability. A viability assessment conducted for Kent found the following headlines: - A shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite. - The biggest cost in most cases is to get to mandatory, minimum 10% BNG. The increase to 15% or 20% BNG in most cases costs much less and is generally negligible.</p>	<p>effectiveness of delivery of more than 10% for sites within the city as is explained in the Background Paper and Statement of Common Ground with Natural England. The Local Plan seeks to prioritise onsite delivery of features that support a range of biodiversity through other policies (e.g. G3 and G5), as opposed to setting a higher BNG target which would likely result in higher off-site delivery elsewhere outside the city—at least until sufficient market for BNG delivery is established locally.</p>	
<p>Since the drafting of this policy the secondary legislation for BNG has been published. This policy and supporting text will therefore need to be reviewed in light of this.</p> <p>Policy also needs to reflect that the emerging work of the Nature Recovery Network will be replaced by the LNRS eventually.</p>	<p>Noted, where required, the policy wording/supporting text will be updated.</p> <p>The policy already sets out at para 4.27 that the NRN is to be replaced by LNRS eventually and will form the basis for guiding offsetting in future.</p>	<p>Update to supporting text to reflect BNG introduction as follows:</p> <p>4.26 Under the Environment Act 2021 all new planning applications must deliver biodiversity net gain, with an initial requirement of 10% <del>expected to be net gain that was</del> introduced for large sites in <del>January</del> <u>February 2024</u> and <u>is expected to be introduced for</u> small sites in April 2024<sup>2</sup>. There are certain exemptions, including householder applications, to which this requirement does not apply. The 10% target should be considered as the minimum and applicants are strongly encouraged to explore options for delivery of net gain that exceeds this 10% wherever possible.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
		Amend footnote as follows: Expected introduction dates based on central government guidance at time of writing.
Biodiversity net gain is not sensible/effective in many cases and often relies on inaccurate/inappropriate responses. Policy does not have sufficient commitment or effort to make the objectives of the Plan a reality.	Noted. The Local Plan includes various policies to support biodiversity, including G5 also, as well as the greening requirements of G2 and G3. This sets out a strong, multi-faceted framework for delivery that fits with Oxford's local context.	No change proposed
Must include provision for where the habitat is not swappable, it is not permitted.	Noted – The functioning of BNG delivery in the context of the requirements of the Environment Act will be guided by that legislation and the functions of the Biodiversity Metric. This policy sets out the Council's preferences where the national legislation are not so specific. In addition, policy G6 sets a hierarchy of protection for the most valuable ecological sites in the city as well as requirements for applicants to address in relation to habitat/species identified on site.	No change proposed
A number of respondents supported Friends of Lye valley response – the key points of which are dealt with above.	Noted – the key elements from that response are addressed above.	N/A

POLICY	G5				
All respondents supporting policy	8.33	82.4	137.10	54.7	178.17

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COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A
General support - in particular, requirement for planting of native species and/or species beneficial to UK pollinators.	N/A
General support – whilst the policy is broadly supported, there should be an allowance made for alternative biodiversity solutions and/or to justify reduced provision. This would support design solutions which recognise site-specific conditions and recognise the challenges embedded into the greening of constrained brownfield industrial sites.	Noted. An initial list of enhancements has been identified in the Council’s Ecological Points list at the Appendix to the Local Plan because they are particularly suitable to Oxford’s setting and the species present. In future, it is envisaged that this list may be updated and any subsequent versions will be published within the Technical Advice Note for Green Infrastructure and Biodiversity.

POLICY	G5				
All respondents raising objections on this policy/chapter	23.3	42.1	43.1	52.1	53.9
	86.5	168.9	28.9	199.9	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy only covers green and blue infrastructure – does not cover built environment which is an important habitat in its own right (e.g. for cavity nesting birds). All should be encouraged through ecological enhancements with reference to BS 42021: 2022.	This is incorrect. The features listed in the biodiversity points list at Appendix 4.2 include features that will support building dependent species, for example, bat boxes and bird boxes (including consideration of building-dependent species.), these were included in recognition of	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>the fact that Oxford has several notable species that rely on built environment to support their life cycle. Guidance such as the BS standards could be flagged as part of supporting guidance that will be included in the Technical Advice Note envisaged to be produced to support the policy in future.</p>	
<p>Appendix 4.2 as referenced in paragraph 4.32 is welcome but it is not effective because the first table in in Appendix 4.2 it is unclear that 'All features (where applicable)' in Pot 1 requirements also applies to Minor and Major developments, in addition to Householder applications. This is clear in table on page 79. Add: 'All features (where applicable)' to appendix 4.2 first table Minor Development and Major Development, sections to match the Householder section</p>	<p>We agree, there is an error in the formatting of the appendix as flagged which does make it slightly unclear. We agree that the formatting will need to be amended to ensure the table more closely matches the one within the policy itself.</p>	<p>Amend formatting of the table in Appendix 4.2 to ensure it is clear that the mandatory features in pot 1 are applicable to all types of development.</p>
<p>Appendix 4.2 second table Pot 1 is unclear that swift bricks are equal to and usually better than swift boxes and general bird boxes. Not consistent with national policy because only swift bricks are specifically mentioned (NPPG Natural Environment 2019 paragraph 023). Swift bricks are the default type of integral nest box for small birds.</p>	<p>The (now deleted) para 23 of Planning Practice Guidance for Natural Environment did reference swift boxes, however the PPG is guidance, and the specific reference to swift boxes is considered to be given in context of an example (<i>it uses the term such as</i>) of the kind of small features that could achieve benefits for wildlife. The table of features in the biodiversity points list was selected to be proportionate in what is</p>	<p>Amend biodiversity points list in Appendix 4.2 as follows: <i>At least one swift box <u>or swift brick</u></i></p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Amend 'At least one swift box' in Appendix 4.2 second table Pol 1 (part 1) section to 'At least one swift box/swift brick'. Also, amend 'At least one bird box per dwelling...' in Appendix 4.2 second table Pol 1 (part 2) section to 'at least one bird box or swift brick per dwelling.</p> <p>As 'universal' nest box/brick for small bird species, swift boxes and bricks may be installed in any location not just in 'identified swift hotspots'. Integrated nesting bricks are preferred for various reasons inc longevity, maintenance, temp regulation and aesthetic integration. Please delete 'if within an identified swift hotspot' and replace with 'city-wide'.</p>	<p>required of development, securing the most fitting features for the location and types of species present. For householder development, the focus is only requiring features where there is particular benefit. There are clear hot spots in the city where swifts are present and swift boxes/bricks would be most fitting. It is agreed that a swift brick would be as acceptable as a swift box however and we are happy to amend as such.</p> <p>The requirement of minor/major development is at least one bird box per dwelling (resi) or per 1000m2 footprint (non-residential). The requirement includes consideration of building dependent species and as such does not prevent universal, or swift boxes. It is envisaged that a supporting Technical Advice Note will provide more advice/guidance on the best features/design of features and additional detail can be included here.</p>	
<p>Policy undermined by commitment to government policy. Current metrics not fit for purpose so compliance not effective.</p>	<p>Unclear on the commitment that is being flagged as undermining Policy G5 and it is unclear as to why the metric is considered not fit for purpose. G5 has been devised as a way to provide benefits for nature that address priority species which BNG legislation may not be able</p>	<p>No change proposed.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	to support, especially if off-site BNG delivery is relied upon by a proposal.	
Does not comply with duty to cooperate	Unclear on why the policy is not considered to comply with the DtC, comment does not provide further explanation.	No change proposed.
Should encourage edible landscaping to make clear food growing spaces can contribute to biodiversity.	<p>Where green infrastructure is incorporated into a scheme, it should be designed to provide multi-functional benefits as outlined in policy G2. We agree food growing spaces can also contribute to biodiversity (and vice versa) where they are designed appropriately. Criterion i of policy G2 already sets this out as one of the benefits that should be explored:</p> <p style="padding-left: 40px;">1) <i>Opportunities for edible planting or community food growing</i></p> <p>This needs to be read alongside the requirements of policy G5 and does not need to be repeated.</p>	No change proposed.
Concern about the significant and potentially duplicate requirements of Policies G2 to G5, being unjustified and inappropriately prohibitive approach to achieving ecological enhancement and biodiversity gains. Policy should be amended or removed from the Plan, unless additional robust justification is provided in	BNG is only concerned with habitats not protected or notable species. It is not a green infrastructure standard, nor does it support the inclusion of other types of non-habitat features like bird boxes that are needed to support many priority species. Each policy addresses a	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>support of the policy's requirements, in accordance with the draft national policy guidance pursuant to addition Biodiversity Net Gain (BNG) requirements.</p>	<p>bespoke element of greening/environmental gain:</p> <ul style="list-style-type: none"> <li>• G2 sets out standards for new greening, the quality to which it should be designed, the way it should be managed and monitored once planted.</li> <li>• G4 is focused on habitat creation to meet specific requirements of environmental net gain. It sets local criteria for off-site delivery.</li> <li>• G3 is a greening standard applied to larger scales of development and sets a minimum level of provision for greening for benefits of people and environment, much of which would not be delivered by BNG alone (especially if BNG is delivered off-site).</li> <li>• G5 ensures development includes features that support species which are ignored by BNG metric.</li> </ul>	
<p>Unclear on why such prescriptive requirements are needed alongside other policies like UGF and BNG legislation.</p>	<p>See response above. These prescriptive requirements help to support species that will not be directly supported through those other policies. We have sought to build in as much policy into the working of the policy, so that applicants can select the right measures for</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	their proposal and site context in order to meet overall points targets.	
The policy states that ‘Proposals incorporating invasive plant species will be refused’, without defining what constitutes an ‘invasive plant species’	We would argue that the term invasive species is a commonly used/accepted term. If necessary/helpful, the future Technical Advice Note flagged in the Local Plan--which is planned to support the implementation of the greening/biodiversity policies and support applicants in interpreting their requirements— could provide further guidance.	No change proposed – consider how Technical Advice Note could further expand on guidance to help applicants in meeting this requirement in future.

POLICY	G6					
All respondents supporting policy	8.34					

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A

POLICY	G6					
All respondents raising objections on this policy/chapter	23.4	53.10	79.2	89.10	117.1	
	137.3	153.9	174.12	191.2	28.10	
	30.11	38.3	58.7	59.19	202.17	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy only covers green and blue infrastructure – does not cover built environment which is an important habitat in its own right (e.g. for cavity nesting birds). All should be encouraged through ecological enhancements with reference to BS 42021: 2022.</p>	<p>See response to same comment under G5. However, it should be noted G6 sets out requirements to assess biodiversity on a site/protection for biodiversity which could be impacted, regardless of the type of site. If there is potential for impacts on species of brownfield sites, policy G6 would apply.</p>	<p>No change proposed</p>
<p>National guidance is ineffective, compliance with it will make policy ineffective. Propose that national legislation should be changed or higher standards imposed locally above national.</p>	<p>The Local Plan process does not have the power to change national policy. The purpose of local policies is to set additional protections/considerations than national policy—for example, policy G6 protects locally designated sites which have no protection through national legislation.</p>	<p>No change proposed</p>
<p>Local Plan fails to act on biodiversity evidence submitted by independent ecologists and housing developers in relation to SPS13. SPS13 has clear biodiversity value and should be a city wildlife site with allocation removed from LP.</p>	<p>Issues directly relevant to SPS13 are addressed in the responses against that allocation. Policy G6’s requirements will apply alongside any requirements set by an allocations policy and proposals will have to address these in any application.</p>	<p>No change proposed</p>
<p>Approach to Irreplaceable habitats is unsound. Policy G6 does not appear to contain any policy on irreplaceable habitats, making it inconsistent with the NPPF. Whilst no national agreed list, county resource has listed what is considered important and consider G6 should apply to these habitats as following: Ancient Woodland;</p>	<p>Irreplaceable habitat is rightly protected via national policy and it is not necessary to repeat this in Local Policy. See statement of common ground with Natural England for more detailed response on this issue – whilst that response is made in relation to policy G1, it also applies under G6.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Ancient/veteran trees (which are often outside of ancient woodlands); Ancient Hedgerows; Traditional unimproved meadows/ancient grasslands; Fens.		
Approach to UK priority habitats and species (or habitats and species of principal importance) is unsound and not in line with NPPF. Wording in relation to ‘other features of interest’ is ambiguous and as a result not likely to be effective, due to the use of phrases such as “seek to” and “wherever possible”. Prefer wording in the previous Oxford City Local Plan which used the same policy for priority habitat and species as for LWSs and OCWSs.	As above, this issue is addressed in responses as part of statement of common ground with Natural England-whilst that response is made in relation to policy G1, is also applies under G6.	No change proposed
Some protection within G1 for some irreplaceable habitat but the Local Plan is missing protection of lowland fen. A bespoke policy is required to ensure protection of this habitat as it is both priority and irreplaceable habitat and cannot be created elsewhere due to unique conditions that give rise to it.	See responses above to comments on irreplaceable habitat and priority habitat.	No change proposed
Also important that the term “irreplaceable habitat” is used in policy generally as this allows cases to made (as the NPPF definition intentionally allows as far as we understand, at least until an agreed list of irreplaceable habitats is created, by the use of the word	See responses above	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>“include” before the above list) in some circumstances for other habitats</p>		
<p>Ecological Networks - Conservation Target Areas (CTAs), lack of recognition is unsound with NPPF. The NRN builds on but does not replace the existing CTA network. Policy should be provided for CTAs and referenced in the supporting text. CTAs are long-standing core of the ecological networks referred to in the NPPF. The majority of Local Plans of local authorities in Oxfordshire have been including CTAs in them for many years and we consider such policy is essential to comply with the above referred to paragraphs in the NPPF</p>	<p>Conservation Target Areas informed the mapping of the Nature Recovery Network and are incorporated into the core and recovery areas. Policy G4 requires delivery of off-site BNG to be guided towards the areas identified in the NRN where onsite options are not available, similar to the working of existing policy G2 in how it focuses off-site BNG. The majority of the Conservation Target Areas fall within areas of the city that are then protected from development via the green Infrastructure Network and national green belt designations. It is unclear what additional policy could establish beyond these mechanisms for enhancement and protection of these areas.</p>	<p>No change proposed.</p>
<p>Policy is unsound due to no policy on Ecological Networks Ecological Networks - Nature Recovery Network. Policy is needed on the Nature Recovery Network, which alongside CTAs, represent the main ecological networks as referenced in paragraph 179 of the NPPF. Flag that the NRN is being developed across the county at moment.</p>	<p>The Nature Recovery Network (and the future Nature Recovery strategy) is not a planning tool in of itself. Our response to Natural England in the statement of common ground addresses how we have used the NRN (and will use the future Nature Recovery Startegy) in the formulation of the Local Plan.</p>	<p>No change proposed</p>
<p>Concern about the Flood Alleviation Channel being an expensive temporary solution as far as</p>	<p>The OFAS scheme is not directly influenced by the Local Plan process, neither is the ongoing</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>flooding is concerned and that more focus should be put on measures that incorporate natural responses (e.g. wetlands) similar to those used at Lye Valley.</p>	<p>management of land in relation to flood risk measures. Where new development comes forward, over which the plan's policies will have influence, the Local Plan sets out requirements for SUDS (and particularly green, natural SUDS features) within policy G8, it also includes strong policies on increasing green surface cover e.g. policies G3 and G2.</p>	
<p>Concern about Lye Valley's future including impacts of recent flooding and loss of 'leaky dams' and subsequent risks for runoff, flooding and sewage overflows. Flag need for a Special Planning Document to constrain development that reduces permeability and require Thames Water to do more in relation to water management.</p>	<p>Work is ongoing on a hydrogeological study of the Lye Valley which is due to complete this year. The expectation is that this will better inform an understanding of the natural process of the area, the influence of development on them, and will inform additional guidance that will supplement the Local Plan. At present, the Plan protects ecological sites such as Lye Valley through policy G6, requiring adverse impacts from development to be appropriately mitigated, this includes changes in surface/ground water flows. The Local Plan cannot influence how Thames Water manage water in the area.</p>	<p>No change proposed – future guidance to be informed by the Lye Valley study when complete.</p>
<p>Absolute protection needed for designated sites including from impacts of proximate development. Extensions of protected areas also needed and explicit protection of all sites with peat.</p>	<p>Policy G6 sets out strong protections that are proportionate to the ecological value and sensitivity of different sites in the hierarchy of designations. Where relevant, consideration of impacts from development on sites nearby will</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>need to be considered/mitigated in order to comply with the policy (e.g. adverse impacts on the SSSIs can occur from impacts arising outside of the SSSI boundaries).</p> <p>Additional local designations have been added through the Local Plan process, including 2 new LWS and and 3 new City Wildlife Sites – designation of national sites like SACs and SSSIs is not within the city’s control.</p> <p>Policy R6 provides protection for identified peat reserves as well as requirements for mitigation of impacts on peat reserves that may be identified through the development process.</p>	
<p>Council lacks courage/vision/determination to properly apply the principles and does not seem to plan in accordance with them.</p>	<p>Noted. We would flag that the policy framework set out in the Local Plan 2040 is considered to be a strengthening of the approach within the current Local Plan 2036.</p>	<p>No change proposed</p>
<p>It would also be useful to include a figure/diagram like Figure 4.2 on the mitigation hierarchy near paragraph 4.35.</p>	<p>Noted – it is likely we will include some sort of figure like that within future Technical Advice Note addressing greening and biodiversity and expanding on the guidance for applicants.</p>	<p>No change proposed – consider inclusion in future Technical Advice Note</p>
<p>Council has not met duty to cooperate/positively prepared policy because the NRN includes waterways and these are currently being negatively impacted by sewage. Not effective to build homes whilst the sewage infrastructure is failing and illegally discharging</p>	<p>The issues of water quality are addressed via various policies in the Local Plan as is set out in para 5.31 of chapter 5 (which the Council proposes to modify with additional detail in response to feedback from the Environment</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>into waterways. No agreement made with surrounding districts about river quality and impact of new housing county-wide. City should minimise housing, permit no new development until a plan is in place from Thames Water with timelines/funds to improve the STW. No new development until the STW has capacity to manage.</p>	<p>Agency and as documented in the statement of common ground with them).  In addition, the Council is actively engaging in joint discussions with the Environment Agency and Thames Water to address ongoing concerns about water quality and these discussions and the proposed future engagement are covered in detail within the joint statement of common ground between the three parties.  County-wide strategy on water quality is not an issue within the Local Plan's control.</p>	
<p>Green belt is not covered sufficiently, only one sentence. Given Oxford's history of removal of numerous sites within the City's Green Belt, failing to follow the 'exceptional' requirement, this does not reflect 'protecting Oxford's biodiversity including the ecological network'.  Add to policy:</p> <p><i>The Green Belt should be recognised for its value in climate resilience and enabling nature networks to flourish, as well as its original purposes [prevention of urban sprawl, keeping land permanently open] and should not be considered for development whether or not re-provision off site is possible.</i></p>	<p>The Local Plan does not need to repeat national policy (which protects green belt). The Local Plan does not propose to remove any additional sites from the green belt.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>There is no explanation, acknowledgement, or policy regarding runoff from transport infrastructure or the danger of flooding in FZ2,3s from FZ1 development such as from Headington, which has caused repeated flooding in Northway/Marston, the Lye Valley and Cowley Marsh and Barton Park. Increasing and intensive urbanisation is a far greater cause of floods than climate change, yet it is not even acknowledged, Para 4.43 is simply wrong.</p>	<p>Flood risk is dealt with through policy G7, the management of run off is dealt with through policy G8. In addition, the greening policies, particularly G3 have been formulated to ensure development reduces impact of urbanisation by including natural surface cover.</p> <p>We are unclear why para 4.43 is wrong, it sets out factually the potential impacts of climate change in future, the role of OFAS and that this will not address all problems alone however.</p>	<p>No change proposed</p>
<p>G6 is ineffective as it does not provide mapping of the area where groundwater must be protected.</p>	<p>G6 sets out that applicants will need to consider adverse effects from development on the ecological sites and the supporting text flags the range of considerations including impacts on surface and ground water flows. To address these considerations, reference will need to be made to various information sources depending on the site and the development proposed– the policy sets out in para 4.38 some examples but this is not intended to be an exhaustive list as every site will differ and information sources can change.</p>	<p>No change proposed</p>
<p>A number of modifications were suggested in relation to the policies including setting standards for run off/requiring greenfield run off rates, proportional FRAs, addressing</p>	<p>Where these issues occur through development and have impacts on the designated sites, the policy sets out in supporting text that they will form part of the consideration of adverse effects that applicants will need to address. These</p>	<p>No change proposed.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
development's impacts on flooding from various sources.	comments are also addressed via the responses to policy G7 and G8 where they relate to the wider city more generally.	
<p>For the Lye Valley and area the following modifications are required:</p> <ul style="list-style-type: none"> <li>• Formal survey and policy demarcation of ground, Thames Water and surface water catchments for the Lye Valley and other areas as per Lambeth where floods can, and have, damaged important environments such as the Lye Valley SSSI.</li> <li>• Formal identification calcareous emergence areas such as Headington Hill and Dunstan Park, Ruskin College and others</li> <li>• NO further development in groundwater catchment, SUDS are NOT acceptable as they will fail and require maintenance.</li> <li>• Article 4 Direction to abrogate permitted development rights in both groundwater and surface water catchment areas of the Lye Valley to reduce cumulative impacts of redirection of water to urban drainage, by the 100s of small householder extensions etc for ALL development, greenfield runoff rates required by infiltration</li> <li>• Statement "Planning permission will only be granted if it can be demonstrated that there</li> </ul>	<p>Work has already been undertaken in the past to determine the catchment of the Lye Valley SSSI, and survey work is ongoing currently. The wording in the site allocation policies is informed by this.</p> <p>SuDS are an accepted and established technology. Policy G8 sets out considerations for SuDS, including that a SuDS maintenance plan must be submitted.</p> <p>The policy says that: <i>Development will not be permitted that would have an adverse effect on the integrity of the Oxford Meadows Special Area of Conservation (SAC) or an adverse effect on any Site of Special Scientific Interest (SSSI).</i></p> <p>This will require there to be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. Any further data gathered about the nature of the catchment, such as through the survey currently underway, can inform technical advice notes, setting out these details for the information of developers and decision-makers.</p>	No change proposed.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI” to apply to ALL development in the catchments above not just specific development sites, extension to other land designations (LNR, LWS etc)</p> <ul style="list-style-type: none"> <li>• Update to all Site Policies that impact the Lye (MROFAOF, SPE7, SPE6, SPE8)</li> <li>• Remove “Any planning applications near the Boundary Brook or Lye Valley/SSSI/LNR/LWS etc) will also need to assess the potential for additional indirect impacts on the flora and fauna of those area..” from Churchill (SPE6) policy and apply as a general statement to ALL development sites.</li> <li>• G6 - Proposals with a reasonable likelihood of adversely impacting semi-natural habitats requires rewriting as it excludes natural habitats.</li> </ul>		

<b>POLICY</b>	<b>G7</b>				
All respondents <b>supporting</b> policy	8.35	203.2			

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Support, no reason given.	Support welcomed
Support – policy is Sound. We generally support Policy G7 as it is in general accordance with the NPPF and the PPG.	Support welcomed

<b>POLICY</b>	<b>G7</b>				
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	28.11	30.12	80.4	89.11	153.10
	162.3	178.18	200.6	202.18	204.3

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
In the case of SPS13, it is evident that there has been no application of a sequential approach to locating the development and where the Sequential Test and the Exception Test (where necessary) have been passed. Policy SPS13 offends emerging G7 because it proposes development on a site (HELAA 389), where around 7% is within Flood Zone 2 - precisely the same amount as caused the adjacent Memorial Field site (HELAA 388) to be rejected as	The sequential test demonstrates that the city’s housing requirement cannot be met entirely in Flood Zone 1, therefore the next step is to consider the capacity within Flood Zones 1 and 2 combined and then Flood Zone 3a etc. if that can’t be achieved. More detail on this is set out in the background paper entitled “BGP9 Flood Risk and Sequential Test of Sites”.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>unsuitable for development in the HELAA. This sort of inconsistent decision making should not be permitted.</p>	<p>In relation to site 388, as also stated in the HELAA, there is no landowner intention to develop. If there was, for a greenfield site the onus would be on the landowner to show that is likely that loss could be compensated for, and in addition a fuller site appraisal would be required, in this case looking at the likely heritage impacts in particular, and this site (388) has previously been rejected because it is integral to the character of the conservation area.</p>	
<p>Due to several reasons including non-compliance with EA directives and use of outdated calculation methods for surface run-off etc., there is no accurate or reliable data to assess risk of increased local flooding. Hydro review confirms that SPS13 is likely to increase the risk of local flooding to neighbouring properties downstream.</p>	<p>Noted, but national guidance related to flood risk provides best practice advice as to how the Flood Risk Assessment should be prepared and what should be included.</p>	None
<p>Paragraph 4.43 - The Council should adopt the principle of rewilding of sites for both biodiversity and drainage reasons within the city, where opportunities exist. More should be done with interested groups to make nature restoration an ever more active area of policy within the city.</p>	<p>These actions would take place outside of the planning system.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Paragraph 4.47 - Great faith is expressed here in SuDS. However, there is a lack of evidence about how they are, if at all, being regularly maintained. Either a voluntary code of conduct needs development or a Special Planning Document requiring maintenance throughout the city is required.</p>	<p>Policy G8 (SuDS) stipulates that a maintenance plan must be submitted alongside any planning application for minor or major development, demonstrating how SuDS will be managed and remain effective for the lifetime of the development. The plan must clearly explain what maintenance measures will take place, how frequently they will occur and for how long and will be secured by condition.</p>	<p>None</p>
<p>Paragraph 4.51 - Extensions are, in volume, significant as a general feature of weekly planning applications. Requirements for these should include soakaways/French drains from roof gutters as compulsory. Given that extensions are part of the process of converting homes into HMOs, a general block on concrete-tarmac new frontages is needed, which will discourage car use.</p>	<p>Minor applications, including householder extensions, are captured by Policy G7 and are required to submit an FRA.</p>	<p>None</p>
<p>Policy G7 is generally against development in Flood Zone 3b unless it is for water-compatible development or on previously developed land with appropriate mitigation. The policy also states that development should not lead to a net increase in the built footprint of the existing building within flood zone and where possible lead to a decrease.</p>	<p>The policy does allow for intensification, but not a greater footprint of buildings. That is very important, because the policy also requires flood risk is not made worse elsewhere. Increasing the built footprint would decrease flood storage and cause changes to flows and other issues that could not be compensated for.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The current proposed wording of this policy prevents any net increase in built development within these areas, where robust mitigation strategies and sensitive design solutions could prevent any further increase of flood risk on schemes which may exceed the existing building footprint. The wording of the policy should be amended to allow for some flexibility to reflect this, i.e. allowing a larger footprint in Flood Zone 3b if supported by suitable mitigation measures, ensuring that the risk of flooding is not increased as a result.</p>		
<p>There is no acknowledgement/ policy regarding runoff from transport infrastructure or the danger of flooding in FZ2 and FZ3 from FZ1 development – such as from Headington, which has caused repeated flooding in other areas including the Lye Valley, Cowley Marsh and Barton Park. Increasing and intensive urbanisation is a far greater cause of floods than climate change, yet it is not even acknowledged in paragraph 4.43. Modifications required to address this include the requirement of a proportional FRA for all zones including offsite cumulative risk, acknowledgement that urbanisation is a major cause of downstream flooding and a ban on development in low-lying</p>	<p>FRAs will be required in many cases, including minor applications in flood zones 2 and 3. These must use up-to-date data and consider flooding from all sources and most demonstrate no increase in flood risk off-site.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
FZ3 land as flood defences do not protect against groundwater flooding.		
The extent and scale of Flood Zone 3b needs to be identified within this or the Strategic Flood Risk Assessment so that those promoting development are clear about the requirements at a policy level.	This is identified in the GIS mapping that accompanies the SFRA and is identified on the Local Plan Policies Map.	None
The policy discusses that development needs to consider all sources of flooding, however it does not state how this should be considered, or what would be appropriate in areas that are shown to be at risk from sources other than those linked to fluvial flood zones. This includes how they would sequentially test sites in relation to other sources. The policy should be amended to clarify this.	The issue regarding other sources of flooding has also been raised by the Environment Agency – see Appendix A of the SoCG with the Environment Agency and the SFRA Addendum (March 2024).	None
<p>Policy G7 is not considered to be sound because it is inconsistent with national policy, and it is not justified because it does not reflect the flood risk evidence that has been provided. Issues to be resolved include:</p> <ul style="list-style-type: none"> <li>• Referring to critical drainage areas identified in Flood Zone 1 in the SFRA when none are defined</li> <li>• Providing details on how high the resilience measures should be regarding</li> </ul>	See Appendix A of the SoCG with the Environment Agency	Main and minor modifications

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>design finished flood levels - should be at least 300mm above this</p> <ul style="list-style-type: none"> <li>• Making clear in the policy that for those site allocations where part of the site lies within Flood Zone 3b, dwellings are not to be permitted/ built in this zone, consistent with national policy.</li> <li>• Ensuring that development proposals safeguard land for future flood relief measures – e.g. for the Oxford Flood Alleviation Scheme (OFAS), where the Council is an important stakeholder.</li> <li>• Having a standalone policy to discuss and address the matters relating to the OFAS.</li> </ul> <p>Further comments were also received on the Level 1 and 2 Strategic Flood Risk Assessment and Sequential Test which supports this policy.</p>		

POLICY		G8				
All respondents supporting policy	8.36	174.23				
COMMENT SUMMARY		OFFICER RESPONSE			PROPOSED ACTION	
The policy is sound		Noted			No action	
We welcome provisions within this policy to include a Foul and Surface Water Drainage Strategy for larger schemes, and the requirement for new developments to separate foul and surface water sewers and existing developments to explore the idea of separating combined sewers where possible.						
POLICY		G8				
All respondents raising objections	30.13	89.12	133.9	148.10	152.6	
	178.19	200.7	202.19	203.9		
COMMENT SUMMARY		OFFICER RESPONSE			PROPOSED ACTION	
Not effective. Rendered unsound by innate conflict with Policy SPS13 which dictates a form of development which cannot comply with Policy G8.		Policy SPS13 does not undermine other policies of the proposed Local Plan 2040. Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023.			No action	
The Policy MUST comply with NPPF regs and replace ALL outdated methods with long-current ones for calculating water volumes that determine SuDS systems.		Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004			No action	

	and other legislation if brought forward under the Levelling Up and Regeneration Act 2023.	
<p>The WNF supports this policy, as it is consistent with WNP policy BE27: ‘All run off water should be infiltrated into the ground using permeable surfaces (SUDS), or attenuation storage, so that the speed and quantity of run off is decreased.’ Nevertheless we are deeply concerned that water quality in our rivers is deteriorating significantly, and increasing development will make this worse. Present water treatment plants are inadequate and assurances from Thames Water cannot be relied upon. Environment Agency figures for 2022 state that storm overflows were used 15 times in rivers within Oxford’s local authority boundaries. This is not a complete reflection, as 39% of Thames Water facilities did not report overspill data last year. In view of climate change, the increased number of houses envisaged up to 2040 and beyond, and Thames Water’s poor record, it is most unlikely that the water facilities will cope, even if efficiencies reduce per capita water consumption. Hence the wording of the policy needs to be made more robust; placing increased onus and responsibility on developers and water suppliers to ensure quality standards and reliability. In particular, what can qualify as ‘exceptional circumstances’ in which surface water is permitted to be discharged into a combined sewer, should be tightly specified.</p>	<p>Oxford City Council are liaising with the Environment Agency and Thames Water to take into account the matters raised in this comment. Their responses as statutory consultees have been published as part of the submission of the Local Plan 2040 to the planning inspectorate. Thames Water have statutory responsibilities that site outside the scope of the planning system, whilst Policy G8 includes criteria to avoid causing harm.</p>	<p>No action</p>

<p>There are instances where to make effective and efficient use of land it is necessary to use underground tanks and pipes, and it is not always possible, practical or sensible to include swales and ponds in higher density developments. The wording in the policy contradicts the wording in policies H1 and E1 that both refer to making the most “efficient use of land”. It is also at odds with the wording at paragraph 124 of the NPPF (Sept 23) that requires planning policies to “support development that makes efficient use of land”. More flexibility should be included in the policy to ensure development makes efficient use of the land. This will address the above issues whilst still enabling the benefits of SUDS to take place.</p> <p>ARC consider the provision to strongly restrict the use of below ground features is not justified, effective or consistent with national policy – as is required by Paragraph 35(b), (c) and (d) of the NPPF. In terms of justification, this appears only to have been founded in the desire to promote the wider benefits of above ground features (see supporting paragraph 4.55) – including providing open space for recreation and habitats to support wildlife and biodiversity. Whilst it is recognised the need to promote natural interventions would have wider sustainability benefits, it is considered this should follow a hierarchy instead. This would enable each development to be designed and delivered on a case-by-case basis, taking into account the deliverability of a proposal, whilst achieving the aims of the policy.</p>	<p>Policy SPS13 does not undermine other policies of the proposed Local Plan 2040. Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023. The policy includes suitable criteria against which applications will be determined. Extensive guidance is available on how to design SUDS and maximise the efficient use of land. The policy contains a suitable hierarchy with flexibility in the policy.</p>	<p>No action</p>
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<p>Bullet point 4.57 needs to refer to national SuDS guidance as there are both national and local standards applicable across the County. It would also be helpful to clarify that the LLFA's role is to review major applications in relation to surface water drainage including SuDS measures and to provide information on whether the proposals at planning stage meets the local standards. We as LLFA have no other remit as a statutory consultee and do not set policies in relation to surface water drainage. In relation to the policy, it is useful to see our local standards mentioned. It may also be useful to add that there are national standards that run alongside our local standards as Defra set these out and may at some point amend these and we have no control over these changes. Amend Policy G8 or supporting text to refer to the national standards set by Defra in addition to our local standards.</p>	<p>Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023. There is no requirement to amend the policy or supporting text to ensure the policy is sound.</p>	<p>No action</p>
<p>The policy attempts to protect groundwater resources however it could be improved. Oxford City has areas where there is shallow Ground Water. You will note that in the introductory texts, we highlighted the need for a specific standalone water policy for the protection of ground water resources due to the unique situation in Oxford. To improve this policy, it will be beneficial to include specific wording about sites that have shallow groundwater not being suitable for infiltration SuDS. Inclusion of text: <i>Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable.</i></p>	<p>The improvement suggested is agreed with the Environment Agency in the associated Statement of Common Ground and main modifications table.</p>	<p>Main modification</p>

<p>We support Policy G8 in principle. In regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy set out in the London Plan. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p>	<p>Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023. The policy includes suitable criteria against which applications will be determined.</p>	<p>No action</p>
<p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: “It is the responsibility of a developer to make proper provision for surface water drainage to ground,</p>	<p>olicy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023.</p>	<p>No action</p>

water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	The policy includes suitable criteria against which applications will be determined.	
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POLICY	G7				
All respondents supporting policy	8.35	203.2			

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	Support welcomed
Support – policy is Sound. We generally support Policy G7 as it is in general accordance with the NPPF and the PPG.	Support welcomed

POLICY	G7				
All respondents raising objections on this policy/chapter	28.11	30.12	80.4	89.11	153.10
	162.3	178.18	200.6	202.18	204.3

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
In the case of SPS13, it is evident that there has been no application of a sequential approach to locating the development and where the Sequential Test and the Exception Test (where	The sequential test demonstrates that the city’s housing requirement cannot be met entirely in Flood Zone 1, therefore the next step is to consider the capacity within Flood Zones 1 and 2	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>necessary) have been passed. Policy SPS13 offends emerging G7 because it proposes development on a site (HELAA 389), where around 7% is within Flood Zone 2 - precisely the same amount as caused the adjacent Memorial Field site (HELAA 388) to be rejected as unsuitable for development in the HELAA. This sort of inconsistent decision making should not be permitted.</p>	<p>combined and then Flood Zone 3a etc. if that can't be achieved. More detail on this is set out in the background paper entitled "BGP9 Flood Risk and Sequential Test of Sites".</p> <p>In relation to site 388, as also stated in the HELAA, there is no landowner intention to develop. If there was, for a greenfield site the onus would be on the landowner to show that is likely that loss could be compensated for, and in addition a fuller site appraisal would be required, in this case looking at the likely heritage impacts in particular, and this site (388) has previously been rejected because it is integral to the character of the conservation area.</p>	
<p>Due to several reasons including non-compliance with EA directives and use of outdated calculation methods for surface run-off etc., there is no accurate or reliable data to assess risk of increased local flooding. Hydro review confirms that SPS13 is likely to increase the risk of local flooding to neighbouring properties downstream.</p>	<p>Noted, but national guidance related to flood risk provides best practice advice as to how the Flood Risk Assessment should be prepared and what should be included.</p>	<p>None</p>
<p>Paragraph 4.43 - The Council should adopt the principle of rewilding of sites for both biodiversity and drainage reasons within the</p>	<p>These actions would take place outside of the planning system.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
city, where opportunities exist. More should be done with interested groups to make nature restoration an ever more active area of policy within the city.		
Paragraph 4.47 - Great faith is expressed here in SuDS. However, there is a lack of evidence about how they are, if at all, being regularly maintained. Either a voluntary code of conduct needs development or a Special Planning Document requiring maintenance throughout the city is required.	Policy G8 (SuDS) stipulates that a maintenance plan must be submitted alongside any planning application for minor or major development, demonstrating how SuDS will be managed and remain effective for the lifetime of the development. The plan must clearly explain what maintenance measures will take place, how frequently they will occur and for how long and will be secured by condition.	None
Paragraph 4.51 - Extensions are, in volume, significant as a general feature of weekly planning applications. Requirements for these should include soakaways/French drains from roof gutters as compulsory. Given that extensions are part of the process of converting homes into HMOs, a general block on concrete-tarmac new frontages is needed, which will discourage car use.	Minor applications, including householder extensions, are captured by Policy G7 and are required to submit an FRA.	None
Policy G7 is generally against development in Flood Zone 3b unless it is for water-compatible development or on previously developed land with appropriate mitigation. The policy also states that development should not lead to a net increase in the built footprint of the existing	The policy does allow for intensification, but not a greater footprint of buildings. That is very important, because the policy also requires flood risk is not made worse elsewhere. Increasing the built footprint would decrease	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>building within flood zone and where possible lead to a decrease.</p> <p>The current proposed wording of this policy prevents any net increase in built development within these areas, where robust mitigation strategies and sensitive design solutions could prevent any further increase of flood risk on schemes which may exceed the existing building footprint. The wording of the policy should be amended to allow for some flexibility to reflect this, i.e. allowing a larger footprint in Flood Zone 3b if supported by suitable mitigation measures, ensuring that the risk of flooding is not increased as a result.</p>	<p>flood storage and cause changes to flows and other issues that could not be compensated for.</p>	
<p>There is no acknowledgement/ policy regarding runoff from transport infrastructure or the danger of flooding in FZ2 and FZ3 from FZ1 development – such as from Headington, which has caused repeated flooding in other areas including the Lye Valley, Cowley Marsh and Barton Park. Increasing and intensive urbanisation is a far greater cause of floods than climate change, yet it is not even acknowledged in paragraph 4.43. Modifications required to address this include the requirement of a proportional FRA for all zones including offsite cumulative risk, acknowledgement that</p>	<p>FRAs will be required in many cases, including minor applications in flood zones 2 and 3. These must use up-to-date data and consider flooding from all sources and most demonstrate no increase in flood risk off-site.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>urbanisation is a major cause of downstream flooding and a ban on development in low-lying FZ3 land as flood defences do not protect against groundwater flooding.</p>		
<p>The extent and scale of Flood Zone 3b needs to be identified within this or the Strategic Flood Risk Assessment so that those promoting development are clear about the requirements at a policy level.</p>	<p>This is identified in the GIS mapping that accompanies the SFRA and is identified on the Local Plan Policies Map.</p>	<p>None</p>
<p>The policy discusses that development needs to consider all sources of flooding, however it does not state how this should be considered, or what would be appropriate in areas that are shown to be at risk from sources other than those linked to fluvial flood zones. This includes how they would sequentially test sites in relation to other sources. The policy should be amended to clarify this.</p>	<p>The issue regarding other sources of flooding has also been raised by the Environment Agency – see Appendix A of the SoCG with the Environment Agency and the SFRA Addendum (March 2024).</p>	<p>None</p>
<p>Policy G7 is not considered to be sound because it is inconsistent with national policy, and it is not justified because it does not reflect the flood risk evidence that has been provided. Issues to be resolved include:</p> <ul style="list-style-type: none"> <li>• Referring to critical drainage areas identified in Flood Zone 1 in the SFRA when none are defined</li> </ul>	<p>See Appendix A of the SoCG with the Environment Agency</p>	<p>Main and minor modifications</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<ul style="list-style-type: none"> <li>• Providing details on how high the resilience measures should be regarding design finished flood levels - should be at least 300mm above this</li> <li>• Making clear in the policy that for those site allocations where part of the site lies within Flood Zone 3b, dwellings are not to be permitted/ built in this zone, consistent with national policy.</li> <li>• Ensuring that development proposals safeguard land for future flood relief measures – e.g. for the Oxford Flood Alleviation Scheme (OFAS), where the Council is an important stakeholder.</li> <li>• Having a standalone policy to discuss and address the matters relating to the OFAS.</li> </ul> <p>Further comments were also received on the Level 1 and 2 Strategic Flood Risk Assessment and Sequential Test which supports this policy.</p>		

POLICY		G8				
All respondents supporting policy	8.36	174.23				
COMMENT SUMMARY		OFFICER RESPONSE			PROPOSED ACTION	
The policy is sound		Noted			No action	
We welcome provisions within this policy to include a Foul and Surface Water Drainage Strategy for larger schemes, and the requirement for new developments to separate foul and surface water sewers and existing developments to explore the idea of separating combined sewers where possible.						
POLICY		G8				
All respondents raising objections	30.13	89.12	133.9	148.10	152.6	
	178.19	200.7	202.19	203.9		
COMMENT SUMMARY		OFFICER RESPONSE			PROPOSED ACTION	
Not effective. Rendered unsound by innate conflict with Policy SPS13 which dictates a form of development which cannot comply with Policy G8.		Policy SPS13 does not undermine other policies of the proposed Local Plan 2040. Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023.			No action	
The Policy MUST comply with NPPF regs and replace ALL outdated methods with long-current ones for calculating water volumes that determine SuDS systems.		Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004			No action	

	and other legislation if brought forward under the Levelling Up and Regeneration Act 2023.	
<p>The WNF supports this policy, as it is consistent with WNP policy BE27: ‘All run off water should be infiltrated into the ground using permeable surfaces (SUDS), or attenuation storage, so that the speed and quantity of run off is decreased.’ Nevertheless we are deeply concerned that water quality in our rivers is deteriorating significantly, and increasing development will make this worse. Present water treatment plants are inadequate and assurances from Thames Water cannot be relied upon. Environment Agency figures for 2022 state that storm overflows were used 15 times in rivers within Oxford’s local authority boundaries. This is not a complete reflection, as 39% of Thames Water facilities did not report overspill data last year. In view of climate change, the increased number of houses envisaged up to 2040 and beyond, and Thames Water’s poor record, it is most unlikely that the water facilities will cope, even if efficiencies reduce per capita water consumption. Hence the wording of the policy needs to be made more robust; placing increased onus and responsibility on developers and water suppliers to ensure quality standards and reliability. In particular, what can qualify as ‘exceptional circumstances’ in which surface water is permitted to be discharged into a combined sewer, should be tightly specified.</p>	<p>Oxford City Council are liaising with the Environment Agency and Thames Water to take into account the matters raised in this comment. Their responses as statutory consultees have been published as part of the submission of the Local Plan 2040 to the planning inspectorate. Thames Water have statutory responsibilities that site outside the scope of the planning system, whilst Policy G8 includes criteria to avoid causing harm.</p>	<p>No action</p>

<p>There are instances where to make effective and efficient use of land it is necessary to use underground tanks and pipes, and it is not always possible, practical or sensible to include swales and ponds in higher density developments. The wording in the policy contradicts the wording in policies H1 and E1 that both refer to making the most “efficient use of land”. It is also at odds with the wording at paragraph 124 of the NPPF (Sept 23) that requires planning policies to “support development that makes efficient use of land”. More flexibility should be included in the policy to ensure development makes efficient use of the land. This will address the above issues whilst still enabling the benefits of SUDS to take place.</p> <p>ARC consider the provision to strongly restrict the use of below ground features is not justified, effective or consistent with national policy – as is required by Paragraph 35(b), (c) and (d) of the NPPF. In terms of justification, this appears only to have been founded in the desire to promote the wider benefits of above ground features (see supporting paragraph 4.55) – including providing open space for recreation and habitats to support wildlife and biodiversity. Whilst it is recognised the need to promote natural interventions would have wider sustainability benefits, it is considered this should follow a hierarchy instead. This would enable each development to be designed and delivered on a case-by-case basis, taking into account the deliverability of a proposal, whilst achieving the aims of the policy.</p>	<p>Policy SPS13 does not undermine other policies of the proposed Local Plan 2040. Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023. The policy includes suitable criteria against which applications will be determined. Extensive guidance is available on how to design SUDS and maximise the efficient use of land. The policy contains a suitable hierarchy with flexibility in the policy.</p>	<p>No action</p>
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<p>Bullet point 4.57 needs to refer to national SuDS guidance as there are both national and local standards applicable across the County. It would also be helpful to clarify that the LLFA's role is to review major applications in relation to surface water drainage including SuDS measures and to provide information on whether the proposals at planning stage meets the local standards. We as LLFA have no other remit as a statutory consultee and do not set policies in relation to surface water drainage. In relation to the policy, it is useful to see our local standards mentioned. It may also be useful to add that there are national standards that run alongside our local standards as Defra set these out and may at some point amend these and we have no control over these changes. Amend Policy G8 or supporting text to refer to the national standards set by Defra in addition to our local standards.</p>	<p>Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023. There is no requirement to amend the policy or supporting text to ensure the policy is sound.</p>	<p>No action</p>
<p>The policy attempts to protect groundwater resources however it could be improved. Oxford City has areas where there is shallow Ground Water. You will note that in the introductory texts, we highlighted the need for a specific standalone water policy for the protection of ground water resources due to the unique situation in Oxford. To improve this policy, it will be beneficial to include specific wording about sites that have shallow groundwater not being suitable for infiltration SuDS. Inclusion of text: <i>Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable.</i></p>	<p>The improvement suggested is agreed with the Environment Agency in the associated Statement of Common Ground and main modifications table.</p>	<p>Main modification</p>

<p>We support Policy G8 in principle. In regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy set out in the London Plan. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p>	<p>Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023. The policy includes suitable criteria against which applications will be determined.</p>	<p>No action</p>
<p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: “It is the responsibility of a developer to make proper provision for surface water drainage to ground,</p>	<p>Policy G8 is soundly based. Planning decisions will be made in accordance with S38 (6) of the Planning and Compulsory Purchase Act 2004 and other legislation if brought forward under the Levelling Up and Regeneration Act 2023.</p>	<p>No action</p>

water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	The policy includes suitable criteria against which applications will be determined.	
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POLICY	G9				
All respondents supporting policy	8.37	85.3	178.20	200.8	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
General support – no comment	N/A	N/A
General support – Local Plan should recognise value of Ground Source Heat Pumps (GSHPs) to the benefits of summer cooling via ‘passive cooling’ as opposed to traditional air conditioning.	The comment is noted, thanks. We appreciate that there are efficiency differences between technologies that applicants may use. The policies of the Local Plan set out the key expectations of sustainable/net zero carbon design (e.g. no fossil fuels, energy efficient, climate resilient) but are technology agnostic. They allow applicants to select the most appropriate technology for the context of their site/proposal and to meet the overall policy targets. This allows not only for flexibility to respond to different site constraints and viability concerns, but also for future-proofing as new technologies may emerge. We envisage publishing a Technical Advice Note that supports	No change proposed to Local Plan  Detail on different types of heat pumps to be incorporated into future Technical Advice Note supporting policy implementation.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	applicants to meet Local Plan policy requirements and would suggest this to be the place for us to expand on the range of technologies, their benefits/constraints, other considerations.	
General support - Property Flood Resilience is referenced in the SFRA level 1. The SFRA section includes reference to Property Flood Resilience best practice. Throughout the SFRA, climate change is included. You may wish to direct applicants to the SFRA for more information on Property Flood Resilience and climate change.	This comment has been addressed through the statement of common ground with the Environment Agency.	Refer to Statement of Common Ground.

POLICY	G9					
All respondents raising objections on this policy/chapter	86.6	89.13	168.10	30.14	199.10	
	203.4					

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
G9 should mention importance of integrating edible landscaping and community food growing spaces to mitigate food insecurity. Suggest extra criterion in policy: <i>Integrate edible landscaping and community food growing spaces to help with food security and food resilience.</i>	Where green infrastructure is incorporated into a scheme, it should be designed to provide multi-functional benefits as outlined in policy G2. We agree food security is an important concern and want to encourage opportunities for informal food growing. For this reason,	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>criteria i of policy G2 already sets this out as one of the benefits that should be explored:</p> <p><i>1) Opportunities for edible planting or community food growing</i></p> <p>This needs to be read alongside the requirements of climate resilient design set out in policy G9 and does not need to be repeated.</p>	
<p>SPS13 conflicts with the aspirations of policy G9 – remove policy SPS13.</p> <p>Another response refers to the detail of the current application on the site and what is considered by the respondent to be inadequate approach to flood risk.</p>	<p>The requirements of the Local Plan policies need to be read and addressed as a whole, this will include where development is proposed on an allocated site.</p> <p>Concerns about the allocation of any particular site will be addressed in the responses to that specific policy.</p>	<p>No change proposed</p>
<p>Policy (or potentially the green policies) would benefit from reference to the BREEAM scheme as an internationally recognised standard for sustainability.</p>	<p>Whilst the Local Plan does not require certification against any particular sustainability scheme, there is no barrier preventing applicants utilising BREEAM. Where appropriate, we will consider how we can cross reference to external certification schemes such as BREEAM in any applicable future Technical Advice Notes.</p>	<p>No change proposed to Local Plan</p> <p>Consider cross-reference to external certification schemes within applicable future Technical Advice Notes in order to flag useful external resources for applicants.</p>
<p>Local Plan is not explicit enough that benefits of meeting one policy area (e.g. greening) can comply with multiple policies as part of a holistic approach.</p>	<p>We would suggest that this is already covered within para 4.64 of the policy, which includes the following wording:</p>	<p>No change proposed to Local Plan</p> <p>We will also consider how future Technical Advice Notes that support applicants in</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p><i>It is acknowledged that there may be overlap with requirements in other policies, equally, there will be many design solutions that can deliver upon multiple requirements (e.g. green infrastructure can promote urban cooling as well as flood resilience). Applicants are encouraged to incorporate design measures that have multi-functional benefits and can refer to the same design features where they meet the requirements of multiple parts of the checklist.</i></p>	<p>interpreting requirements of Local Plan policies can reinforce that holistic approaches to design can meet the requirements of various policies.</p>
<p>The policy includes requirement that 'Supporting infrastructure is designed to function in extreme weather conditions' without any definition of 'extreme weather' and no regard for cost or necessity.</p>	<p>It is not considered unreasonable to ask that applicants consider impacts of future weather scenarios when designing any supporting infrastructure they take responsibility for providing as part of a scheme. The necessity is justified based on an understanding that climate change is likely to exacerbate extreme weather scenarios and these will impact the supporting infrastructure as much as the development itself. Considerations will vary with the type of infrastructure and the policy does not go so far as to set particular standards which would be rigidly applied for this reason and could be more practically costed. It will be down to the applicant to justify what is reasonable and proportionate to their application where this is of relevance.</p>	<p>No change proposed.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Support Policy G9 where it refers to water efficiency, but flag that this needs to be strengthened to ensure the water efficiency standard of 110 litres per person per day is met in practice. Policy G9 should be amended to state: “.....All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the ‘Fittings Approach’ in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.....”</p>	<p>We agree this would be helpful addition to the policy to ensure it is effective and suggest a modification to be made.</p> <p>We do not consider it necessary to set out that the requirement will be conditioned in the policy.</p>	<p>Main modification to be made as follows:</p> <p>All dwellings (including conversions, reversions and change of use) achieve an estimated water consumption of no more than 110 litres per person per day <u>using the ‘Fittings Approach’ as set out in Building Regulations part G2</u> (proposals are encouraged to go further than this).</p>

rCHAPTER	5		
All respondents supporting policy	8.46		

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A

CHAPTER	5			
All respondents raising objections on	30.17	74.40	84.8	85.8

<p>this policy/chapter</p>	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>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.</p>	<p>See Historic England Statement of Common Ground response where this comment is addressed.</p>	<p>N/A</p>
<p>There should be policy requiring solar pv on all new-build with appropriate roofs to accommodate.</p>	<p>This comment is responded to in detail in the responses under policy R1.</p>	<p>N/A</p>
<p>Embedded carbon requirements should be stronger. Strengthen the preference for retaining existing structures rather than demolish and rebuild.</p>	<p>This comment is responded to in detail in the responses under policy R2.</p>	<p>N/A</p>
<p>The plan identifies that 'new development can create environmental impacts, particularly during the construction phase', but while requiring mitigation, there is no provision for compensation for adverse effects on businesses or residents (see also comments under S3). The Local Plan should require that provision should be made by developers for adverse effects of construction or finished developments</p>	<p>Noted. This is outside of the scope of the planning system. Mitigation measures are delivered to alleviate the impact of developments and such should not require compensation for residents and businesses.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Local Plan is unsound as it has not considered networked heat pumps as part of the solution to heat decarbonisation—these are ground source heat pumps (GSHPs) sharing a ground loop, rather than each individual system having its own heat pump. GSHPs are more efficient and economically viable and is an established technology.</p> <p>Networked heat pumps need to be considered and a clear distinction between different types of heat pump technologies needs to be set out (e.g. ASHPs and GSHPs have clear differences but referring together does not recognise GSHP’s own benefits).</p>	<p>Noted. The Local Plan does not preclude networked solutions. It just does not explicitly reference them. Any infrastructure network would need to take account of other policies in the plan (e.g., GSHPs would need to consider their impact carefully on archaeology for example). GSHPs may be the most fitting way to meet the requirements of the Local Plan policies, policy R1 allows flexibility to select the right solution for the site in order to meet the overall policy targets.</p> <p>The net zero policies are likely to be supported by a future Technical Advice Note (similar to those produced for LP2036). It may be that additional guidance could be provided there on pros/cons of different types of heat pump, if this would be helpful to support applicants.</p>	<p>No change proposed – potentially consider additional detail on types of heat pumps and pros/cons as part of a future Technical Advice Note to support implementation of LP2040’s policies.</p>
<p>Objectives of the chapter are undermined by site allocations – specifically SPS13—which is an unsustainable site allocated in LP2036 on basis of poor information. SPS13 should be deleted.</p>	<p>Development on site allocations will be subject to requirements of the strategic policies of the plan. Specific comments in response to the allocations are addressed in their respective consultation summaries sections.</p>	<p>No change proposed</p>

POLICY	R1
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All respondents supporting policy	8.39	75.1	136.16	164.12	170.5
	58.8	71.15	174.24	178.21	

COMMENT SUMMARY	OFFICER RESPONSE
General support – no reason given	N/A
General support – recognise that consultation is happening concurrent with government Future Homes Standard	Noted – the Council is aware of the consultation and will monitor its progress.
General support – improvement on LP2036, thorough approach to removing fossil fuels from buildings, use of absolute energy metrics over % improvement on emissions.	N/A
Whilst generally supported in principle, flexibility needs to be embedded in the Local Plan policies to accommodate growth aspirations/requirements related to economic theme which may not otherwise be realised.	Noted – the policies of the plan are intended to secure the sustainable growth of the city, this means allowing/enabling development whilst also setting strict standards for the quality of that development. Policy R1 includes flexibility for applicants to justify where particular targets cannot be achieved and sets out via criteria a)-c) how the Council will assess applications that cannot meet the full standards. <u>Note also proposed modifications later in this table in relation to non-residential development which will help address this point.</u>
Whilst supportive of R1, limited mention of heritage assets like listed buildings – would be prudent to ensure appropriate protection for these whilst also making energy efficient.	The policies of the Local Plan need to be read as a whole, as such, the protections for heritage assets set out in policies HD1-HD6 will apply. Where retro-fit is part of an application, policy R3 sets out guidance in relation to traditional/historic buildings.
General support – need to ensure no more harm and zero-carbon homes in operation is good step. Needed for current/future residents to support greenhouse gas emissions in line with national policy, provide comfortable/cheap-to-run housing, and for increasing fuel security.	Noted

<b>POLICY</b>	<b>R1</b>
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All respondents raising objections on this policy	17.6	26.10	28.1	73.8	85.4
	54.3	61.3	89.15	121.4	124.8
	125.4	130.3	133.10	144.3	152.7
	153.11	155.3	168.11	175.7	151.6
	38.5	126.6	127.2	148.11	149.4
	171.7	177.11	194.5	196.12	202.21
	199.11				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Considered unsound as not effective but no further comments provided	Noted	None
A number of respondents supported ambition of policy or commended commitment to meeting local/national net zero targets despite finding policy unsound and then setting out various issues as noted below.	Noted – we have responded to the individual issues below and, where appropriate, set out proposed modifications.	None
Some general commentary reflecting on the significant jump in requirements from the existing Local Plan 2036.	OLP2036 took a step forward in policy addressing carbon emissions, setting a target of 40% reduction in emissions over building regulations, which stepped up to net zero by 2030. OLP2036 stepped up from the previous policy framework which required 20% of a building’s total energy requirements to come from renewable or low-carbon sources (for residential development this equated to an approx. 35% reduction in emissions over building regulations. As such, the step change was quite slight. However, viability evidence for	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>OLP2036 showed that net zero was affordable from the start of the plan period, but a step-change was introduced to allow the industry time to actually deliver net zero.</p> <p>Since OLP2036 was adopted (2020), the UK has set a net zero target of 2050 and Oxford has set its own target of 2040, meanwhile industry has continued to adapt and low/zero carbon technologies have advanced.</p> <p>It is necessary for LP2040 to again take a strong step forward to ensure we meet net zero goals, but also to address wider challenges of fuel poverty, energy security etc.</p>	
<p>Concerned about approach to onsite renewables being at odds with Written Ministerial Statement (Dec 2023) and therefore not consistent with national policy.</p> <p>Council will need to reframe its policy to total emissions as assessed by Building Control's SAP methodology and amend policy para 5.7 which currently refers to CIBSE TM54 as preferred methodology.</p> <p>Council cannot demonstrate robustly costed/viable demands of the WMS as current proposed policy will go beyond Future Homes</p>	<p>The WMS allows local policy makers to go beyond national standards where a case is well-reasoned and costed. The Council has produced a Background Paper to address this issue and sets out why the Council considers its proposed policy is sound.</p> <p>The BGP also addresses why the SAP methodology is inadequate for delivering net zero development, as did the topic paper published as part of the Reg 19 consultation.</p> <p>Additional costs of carbon reduction associated with Policy R1 have been factored into Local</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Standard, add costs for fabric efficiency, new skills/material.</p>	<p>Plan viability testing. The Local Plan Viability Study considers that "the costs of achieving operational net zero carbon are typically 5% of construction costs". The Local Plan viability assessment shows that the reduction in residential land values is typically between 5%-8%, with higher reductions on larger residential schemes (flats), student housing and retail/ office/ R&amp;D developments.</p>	
<p>The Council will need to consider these impacts on its delivery projections for early years of plan and potentially fewer homes brought forward whilst these higher standards take time to embed.</p> <p>Policy requirements will impose delivery delays, as it will incur demands for skills/materials that may not be readily available. Even with a short transitional period, there is likely to be high risk of quality problems, inflated costs and potentially stalled build programmes.</p>	<p>Noted. In delivering sustainable development, the Local Plan has a role in addressing multiple objectives, both delivery of housing and growth, as well as ensuring growth is aligned with commitments for addressing climate change and protecting the natural environment.</p> <p>On the demand for skills/materials point. The transition to net zero carbon design and the shift to use of associated technologies (e.g. heat pumps) is part of a larger-scale societal change that is being driven at various levels outside of the Local Plan, including current and planned updates to national building regulations and similar policy advances in authorities across the country. The plan also includes policy for CEPPs (Community Employment and Procurement Plans) which can assist with skills shortages.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Consideration should be given to a phasing process to account for the significant design changes that will be needed.	Phasing is not currently proposed and not deemed to be necessary to ensure the policy is sound.	None
<p>The 5% viability cost increase set out in viability study for this policy may be an underestimate, meaning the full costs of the policy do not appear to have been fully considered.</p> <p>Work has been undertaken by HBF to assess costs of delivery of number of archetypes to range of specifications up to those similar to Council's proposed policy.</p> <p>Research indicates 15-20% increase in costs above Building regulations 2021 on a standard 3 bed end of terrace house. Whilst acknowledged the methodology is not directly comparable, indicates potential for higher build costs than the viability study indicates.</p>	<p>The Viability Study evidences the cost increase for Policy R1. We have been unable to find the specific research referenced in the rep online, however, we appreciate that different costs will result in different results. The costs used in the Viability Report have been sourced from a variety of different authorities proposing similar policies and represent a good cross section of typologies.</p> <p>Where overall viability impacts can be demonstrated when taking into account all policy costs, the Local Plan includes guidance on how these considerations will be taken into account in policy S4, including allowance for incremental reduction of energy offset contributions.</p>	None
Concern about viability implications of such prescriptive requirements when combined with the asks of other policies, particularly for larger and major schemes.	Noted. See previous response above.	None
Furthermore, off-site renewable generation is dependent on adequate capacity in local	Noted, the policy does not require off-site generation but sets out a variety of ways that	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>infrastructure to be able to accommodate. Concern about this being a major local constraint owing to the shortage of capacity within the electric grid in Oxford.</p> <p>More flexible approach is needed and should be informed by Local Area Energy Plan (LAEP). LAEP would inform most cost-effective and sequenced plan to achieving net zero and without this the policy risks prescribing approaches that are not the most cost-effective pathway.</p>	<p>overall impacts on energy capacity as a result of new development can be mitigated – ideally onsite generation, off-site where this is feasible for applicant, or else, any demand that cannot be mitigated directly by applicant should be addressed via offsetting contributions.</p> <p>The City Council is involved in joint work with County Council on developing Local Area Energy Plans for the county. LAEPs are about understanding our current/future energy demands and being innovative about how we address these. Proposed changes to building regs via Future Homes Standard will necessitate a shift from fossil fuels regardless of Local Plan, a policy like R1 which drives energy efficient design will be needed to reduce demand on an overburdened grid regardless.</p>	
<p>No climate emergency and therefore no basis for net zero carbon policies/targets. No basis in science and against human rights and primary legislation.</p>	<p>The overwhelming scientific consensus is that climate change is occurring and that society needs to reduce emissions of greenhouse gases into the environment. Net zero carbon future is also a legislative requirement set nationally which the Council must be aligned with. Putting the question of climate change to one side, there are other benefits to net zero policies for residents of the city. This is particularly in</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	relation to securing more efficient development that uses/sources energy cleanly and more affordably for occupants, as well as reducing impacts on air quality (by reducing emissions from boilers).	
Net zero gives no choice on design and forces compliance with 'nonsense'. Suggest removing policy.	The policy sets overall targets for net zero carbon in operation and energy efficiency, it does not prescribe how the development should be designed specifically, and is agnostic as to the technologies/design features that are chosen to reach these targets.	None
Policy is not strong enough to meet local/national net zero targets, does not require only 'suggests', policies must be enforced. No specific targets for carbon emissions or over-use of other natural resources, no guidance on how impact will be measured/mitigated.	The policy requires new buildings to be net zero carbon in operation. It also sets specific performance targets in relation to overall energy use and space heating that must be demonstrated at application. There is flexibility inbuilt into the policy for trickier developments, which evidence suggests is necessary for the time being, however the policy is clear that a case for anything short of full compliance will be expected to be clearly justified.	None
Unclear on definition for energy that is being used to calculate Energy Use Intensity targets – is it counting energy from ground/air, or boiler/heat pump consumption. Greater clarification needed on how Council has come to	The Council will publish a Technical Advice Note which will set out more guidance supporting applicants with meeting the requirements of the policy. To be clear, EUI calculation will need to consider all of the energy that is used within the building as part of its normal operation, this will	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
the EUI targets proposed for resi/non-resi development.	include the energy directly consumed in the operation of technologies like heat pumps to provide sufficient heating.	
<p>Policy could be expanded to create equivalency with BREEAM UK and/or other standardised measurements of sustainability. Council should consider how it could align with these standards which are widely adopted in industry. Others have noted that removal of BREEAM is considered to be a retrograde step as it is well understood and development has been delivered that meets/exceeds these standards, or allows for comprehensive approach to sustainability. Council should consider retaining in some form, if only as guidance to meet new standards.</p>	<p>The Local Plan 2040 takes a step forward in requirements in relation to various sustainability topics, including net zero carbon in operation, embodied carbon, but also other areas such as biodiversity, flooding and climate resilience. This policy framework addresses all of the key topics that the Council considers it important for new development to address and as such, it was considered overly onerous to impose additional costs on applicants to meet certification against other schemes such as BREEAM (which covers much of what the Local Plan policies are already asking for).</p> <p>According with the Local Plan 2040 does not restrict applicants from also pursuing certification against schemes like BREEAM. Resources such as BREEAM can be a helpful way of undertaking sustainable design in one comprehensive/holistic approach and it will be flagged within future Technical Advice Notes where appropriate.</p>	<p>No change proposed to Local Plan</p> <p>BREEAM to be flagged as a useful sustainability certification exercise through future Technical Advice Note.</p>
Various respondents have flagged that government is working on updates to national	Comments are noted. The background paper produced for Reg 19 consultation, and the City	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>compliance standards (e.g. Future Homes Standard) which will amount to enhanced sustainability standards and will capture some of what R1 asks for and/or makes Council policy that goes beyond at this stage unnecessary.</p> <p>To be more pragmatic, policy targets should be 'stepped' and aligned with government targets/proposed changes to Building Regs. Recommend stepped targets or R1 is deleted as net zero development will be dealt with via Building Regulations.</p> <p>Linked to above, national grid is to be decarbonised by 2050 latest, thus not necessary for Council policies to adopt alternative standards to national regulations.</p> <p>Linked to above, benefit of deferring to national standards (e.g. Building Regs, instead of local policy which goes beyond, allows for single approach all developers understand and achieve. Approach can be rolled out at scale allowing supply chains/skills to improve prior to implementation.</p>	<p>Council's response on the WMS sets out why it is considered that Local Policy needs to go beyond current/planned building regulations updates. This is not only about reaching net zero targets in sufficient time, but also about reducing impacts of fuel poverty for vulnerable residents and also reducing pressure on the energy grid by encouraging accordance with energy hierarchy and setting minimum standards for energy use.</p> <p>Current/planned updates to building regulations are not able to deliver net zero carbon development in operation. Relying on decarbonisation of the national grid alone will not deliver energy efficient development, nor will it secure the local transitions in energy systems that are necessary to support local energy security and meet net zero targets.</p>	
<p>Policy should incorporate Passivhaus standards – current wording around 'high energy</p>	<p>The space heating target of 20kwh/m2/yr set out in the policy is close to the target set out in</p>	<p>No change proposed to Local Plan</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>efficiency/insulation' is open to being manipulated.</p>	<p>passivhaus and was set at a level informed by feasibility research of various local authorities across the country – as is set out in the carbon reduction technical feasibility literature review paper consulted on at reg 19. It will represent a significant improvement on existing standards. The principles of fabric-first and alignment with energy hierarchy set out in the policy are also in accordance with passivhaus principles. The policy does not restrict applicants from meeting passivhaus accreditation, but does not impose the cost of certification as standard. It is envisaged that the future Technical Advice Note will be able to sign post applicants to useful resources/standards such as BREEAM and Passivhaus.</p>	<p>Passivhaus Standard to be flagged as a useful accreditation and general resource through future Technical Advice Note.</p>
<p>Unclear if Council has considered the resource implications (e.g. new surveys/reports) inherent in the significant step up in policy from current and the subsequent impacts on decision-making.</p> <p>Council will require specialist officers to review and interpret reports – needs to be appropriately resourced to deal with increased workload and meet statutory decision-making timeframes.</p>	<p>We have undertaken viability evidence to support this so have factored in cost but whenever a new policy area is introduced, there needs to be an element of training and learning. This training will apply to Council officers also, as with all policies in the Local Plan.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unclear on evidence underpinning the proposed policy and whether this has considered context like local circumstances, local building stock, employment needs/aspirations.</p> <p>The introduction of any standards must be evidence based. It is currently unclear how these standards have been set, including whether and how any references in UK guidance and/or legislation have been used.</p>	<p>The Council has reviewed technical feasibility work of a number of local authorities across the country in order to get as broader understanding as possible about technical feasibility to deliver net zero in operation. A particular focus was given to comparable authorities to the city and particular typologies of development that would be expected in Oxford. This is set out in the literature review consulted on at Reg 19 and has informed the policy. For example, where potential challenges were identified for certain types of development meeting policy targets, e.g. tall buildings and energy demanding typologies, a pragmatic approach was taken to the policy drafting including setting out guidance for how applicants should justify any deviation from the targets (criteria a-c at end of policy) and also making allowance for offsetting.</p> <p>Please see later responses to comments on non-residential uses which has informed a modification to EUI targets.</p>	None
<p>Unclear how EUI targets will be calculated with no clear methodology referenced in the policy wording.</p>	<p>The supporting text of the policy sets out that calculations will need to be undertaken using an approved methodology. It goes on to state that at the current time, the most appropriate</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Also, policy does not make clear what unit of area is to be used: targets would be even more restrictive if they apply to Net Internal Area.</p>	<p>methodology is considered to be the CIBSE TM54 methodology. It is envisaged that the Energy and Carbon Technical Advice Note (TAN) will then expand on this with additional guidance to assist applicants.</p> <p>Para 5.7 sets out the unit of area: gross internal floor area (m<sup>2</sup> ).</p>	
<p>Unclear on whether Council has considered alternative forms of energy use rating e.g. Display Energy Certificates which may be more compatible for certain building types.</p>	<p>Council considered a number of different forms of energy rating at the preferred options including SAP/ SBEM. The Energy Use Intensity metric is a standard way of measuring energy performance at the meter which can be applied to any type of development.</p>	<p>None</p>
<p>Energy Use Intensity and space heating targets are not useful/achievable for a number of building types which can make implementation challenging (examples given include life sciences, health, education, research/labs) and will create unnecessary issues for developers to address. Policy needs to be more flexible to account for range of uses in city. Future needs of wider array of non-resi should be reflected in requirements where particular needs cannot allow them to meet the policy targets – e.g. for safety or technical operation reasons.</p>	<p>Energy Use Intensity and space heating targets measured in kwh/m<sup>2</sup>/yr are a simple, transferable way of measuring energy performance that can be applied to any type of building.</p> <p>The targets have been informed by a technical feasibility research review as set out in the evidence base, although it is acknowledged that for non-residential development, the variation in building design and uses makes feasibility testing more challenging. We recognise that the policy as drafted will be challenging for certain development typologies (e.g., R&amp;D), particularly</p>	<p>Main modification proposed to the policy's EUI target for non-residential development as follows:</p> <p>A total Energy Use Intensity (EUI) figure for the development has been provided, calculated using an approved methodology as set out in supporting text. Developments will not be permitted where they exceed the following Energy Use Intensity targets <u>(unless demonstrated to be technically unfeasible)</u>:</p> <ul style="list-style-type: none"> <li>• Residential: 35 kwh/m<sup>2</sup> /yr</li> <li>• Non-residential: 70 kwh/m<sup>2</sup> /yr</li> </ul>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Concern that requirements of criteria 2 are completely unachievable for life sciences buildings. Limits should not be placed on innovation or safety which require energy intensive equipment, high fresh air rates and significant cooling requirements.</p> <p>Responses flag that power demand of lab buildings can typically be 4-5 times more than that for a standard office building and can be even higher for more specialised requirements. Other responses state typically values in the range of 200 -300 kWh/m2/year are seen in laboratory buildings, including off-setting PV generation, against the target in the policy of 70.</p>	<p>those that use high energy demand equipment which cannot easily be made more efficient. The policy already included flex and guidance for applicants where particular targets could be robustly demonstrated to not be feasible, which the Council considered to be a pragmatic way to accommodate these uncertainties. However, the feedback at reg 19 clearly indicates that further modification is necessary to accommodate higher energy demand uses and we have taken that onboard and propose a main modification.</p>	<ul style="list-style-type: none"> <li>▪ <u>For non-residential uses with exceptionally high energy demands, including R&amp;D/labs/hospitals, a higher EUI target will be accepted where it can be robustly justified, including the measures taken to limit this.</u></li> </ul> <p>Additional paragraph to be added to supporting text, after para 5.8, to read as follows:  <u>For some non-residential uses, it is expected that applicants may find it challenging to reduce energy use to the target set in the policy. For example, uses such as research and development (R&amp;D), laboratories and hospitals can have specialist equipment needs that are necessary to the functioning of the development and that have high energy demands which cannot feasibly be reduced. Higher energy use intensity performance will be accepted where proposals for these types of development can justify this requirement, however, the application should still set out the</u></p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
		<u>measures that have been taken to reduce energy demand as much as possible.</u>
Linked with above, non-residential target should be updated to acknowledge varying EUI requirements for different uses e.g. Research and development with higher energy needs than office/retail thus could not meet same standard. Emerging work of Cambridge Local Plan is offered as helpful example of such an approach.	See response above – we acknowledge and agree a modification is needed and have reviewed the work of Cambridge to help inform this modification.	Main modification
Linked with above, alternative wording for EUI targets element of policy suggested:  2. A total Energy Use Intensity (EUI) figure for the development has been provided, calculated using an approved methodology as set out in supporting text. Developments will not be permitted where they exceed the following Energy Use Intensity targets, exceptions will be allowed where the development type justifies higher EUI targets and this is fully demonstrated through the application submission: a) Residential: 35 kwh/m2/yr b) Non-residential: 70 kwh/m2/yr	See responses above. The policy already sets out that applicants are able to make a case for non-compliance, as long as it can be justified against the criteria a-c at the end of the policy – this effectively already allows for what is being asked in the response here.  It is envisaged that the future Technical Advice Note will set out more guidance for applicants on how to approach applications where meeting the targets are especially challenging.	None
A range of targets would be one way to set targets or simply seek scheme to minimise total energy use for the particular building in question. If buildings are using a high proportion	The Council is proposing a modification to introduce additional allowances for non-residential uses that require high energy use which is not easy to make more efficient, which	Please refer to earlier response about modification for non-residential uses.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>of renewable energy then it is questioned if this figure has much relevance? Suggest either delete EUI target or set a range.</p>	<p>it considers to be a pragmatic solution reflecting the consultation feedback.</p> <p>The limit on EUI alongside requirement for meeting energy demand with sufficient generation is considered necessary to reduce the scale of renewables needed to accommodate energy demand and to drive more efficient design as part of a holistic policy approach.</p>	
<p>Policy seeks to achieve 100% of on-site energy needs to be generated on site. This policy is potentially costly to developers and operators and difficult to implement for OCC.</p>	<p>Noted – refer to earlier responses on viability. Where onsite is not feasible, the policy includes allowances for off-site installation or payment into energy offsetting.</p>	None
<p>Policy states that ‘Where the total energy need cannot be met onsite, the remaining energy balance should be met through installation of sufficient additional renewable generation at a location offsite’. This reads as though it is intended to be a requirement for additionality in renewable energy generation offsite, and not merely as a requirement for offsite electricity to be provided from (possibly existing) renewable sources, or through purchasing energy from a certified renewable source.</p>	<p>The approach seeks to ensure that energy demand created by a development is balanced by sufficient renewable energy generation – either onsite or offsite (directly or through offsetting). This is after the design process has sought to reduce energy demand as much as possible through efficient design.</p>	None
<p>Difficulty in how a building is used and how that might change over time and this is a concern</p>	<p>It is important that post occupancy performance is considered to help reduce issues of the performance gap. However, the policy does not</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
with post-occupancy monitoring. Suggest remove need for post-occupancy monitoring.	specify the type of post-occupancy monitoring required, it allows applicants to set out what they consider to be most appropriate.	
More flexibility needed in policy.	We consider that the policy includes sufficient flexibility, particularly where exceptional circumstances/non-standard design means that meeting standards are not feasible. In addition, we have proposed modification to non-residential EUI target in response to the feedback (as set out above). Additional flexibility runs the risk of more uncertainty for applicants at application stage and also has risk of undermining the objectives of the policy.	None
Not aware of any precedent for offset payments based on operational energy models (these are typically Part L).	Typically offset payments have been tied to emissions in the past. As emissions relating to the national grid reduce over time, the increasing issue is capacity and energy security. The policy overall takes an energy focussed approach to addressng impacts on climate change, but also addressing issues of fuel poverty and energy security. The offset is therefore tied to remaining energy use that is not met directly through generation as part of the application.	None
Responses have flagged that London boroughs are struggling to spend the money they receive	The Reg 19 background paper detailed in its appendix the Council’s plans for running the offsetting mechanism. The ZCOP road	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
via carbon offsetting – may be difficult for City Council to implement here.	map/action plan identifies a large retro-fit need in the city which offsetting payments could support. Work is ongoing in setting up this process, including identifying a pipeline of potential projects.	
Policy's allowance for offsetting may not be achievable for those with limited land control and conflicts with other Local Plan aspirations for land e.g. for meeting housing need. Restrictions on sites for other reasons e.g. heritage constraints that prevent onsite renewables is another constraint to achieving policy asks.	This comment appears to relate to the element of the policy that allows for direct delivery of renewables off-site where onsite is not possible. This is not a requirement of the policy but an option set out as acceptable where onsite is not possible. Of course, other considerations will apply and will need to be addressed where relevant (as with any type of development). There is suitable flexibility built in to the policy.	None
For offsetting (payment into Council fund), background papers do not set out how resulting funds will be used to provide required offsetting. No fund or schemes have been established to ensure contributions deliver true offsetting. If this is kept, Council will need a suitable audit trail for payments made and projects delivered to offset carbon to demonstrate effective policy.	The City Council is in the process of establishing the specifics of the energy offsetting mechanism – linking in with work of the Zero Carbon Oxford Partnership in order to identify a range of transparently assessed and suitable projects for offsetting to be delivered on within the city.  More detail will ultimately be set out in the Technical Advice Note.	None
Applicable amount of financial contribution to be paid for offsetting should be clarified and supported with evidence for transparency in line with viability considerations of S4.	Noted. The background paper published at reg 19 set out the process the Council envisages to follow in setting costs for offsetting – linked to	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Council needs to set out more detail about how it would work.</p>	<p>nationally published data on average costs for renewables. More detail will ultimately be set out in the Technical Advice Note.</p>	
<p>Concern/skepticism about offsetting allowance – large amount of critical literature about its effectiveness in addressing climate change. Policy should focus on cutting emissions at source.</p> <p>Policy should ensure no further emissions from new buildings and also from their construction (which should be made as sustainable as possible).</p>	<p>Concern about offsetting is noted, however, the delivery of net zero carbon in operation is particularly challenging for certain typologies of development as was acknowledged in the evidence base which means offsetting is likely to be required in certain situations (and can then help in addressing emissions associated with existing buildings elsewhere as a result). The policy sets out pragmatic approach to these more challenging situations and states that offsetting to be used “as a last resort”. The primary objective of policy R1 is to ensure new development is net zero carbon in operation – thus not adding to carbon emissions through operation. Policy R2 focuses on the more complex issue of carbon associated with construction process.</p>	None
<p>Disappointment policy does not automatically require solar PV on all new roofs – policy (along with H2 and C8) needs to be more rigorous to insist on this. Current wording is too weak.</p>	<p>The policy is technology agnostic, this allows for future-proofing where new technology comes on to market in future. It also allows for applicants to choose right solution for the context of their site—for example, requiring PV on all roofs does not take account of significant</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Allowance for offsetting is a 'get-out' clause for developers which needs to be tightened. Policy should require use of solar PV even if it cannot supply all energy needs.</p>	<p>heritage sensitivities in Oxford. Not all roofs are appropriate for Solar.</p> <p>The policy sets the performance standards expected of new development (net zero carbon in operation and meeting specific targets for energy use/space heating) and then allows flexibility in how these are attained. The requirement is that once energy demands are reduced, and energy is used efficiently, all energy needs are sourced renewably—ideally onsite. This onsite energy generation requirement is not specified as needing to come from PV but is likely to be the case for most developments.</p> <p>Offsetting is only allowed as a 'last resort'.</p>	
<p>Concern that the Local Plan Viability Assessment demonstrates that the requirements of these policies (particularly Policy R2) are only achievable where land values are at the upper end. Risks delivery and not in accordance with para 35 of NPPF in relation to effectiveness/deliverability.</p>	<p>The Local Plan viability study shows that the reduction in residential land values is typically between 5%-8%, with higher reductions on larger residential schemes (flats), student housing and retail/ office/ R&amp;D developments.</p> <p>The viability study applies a precautionary scenario to costs associated with Policy R2 (i.e. delivery Net Zero Construction, which the policy itself does not push for) and it notes that some evidence has shown this aspect to be cost neutral.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy should consider impacts of construction proposed. Figures quoted do not take account of factors like energy/carbon consumed through materials sourcing outside Oxford.</p> <p>Council needs proper measurement of the emissions related to consumption outside of boundary.</p>	<p>Policy R2 addresses the embodied carbon associated with new development. Calculation of emissions from outside the boundary (category 3 emissions) is highly complex and highly variable depending on types of materials used and general design approaches. It is not something that is considered to be accurately assessable at Local Plan stage, nor is it considered justifiable or proportionate.</p>	<p>None</p>
<p>Focus on small-scale renewables alone fails to address NPPF requirements for: supporting community-led initiatives for renewable/low carbon energy, identifying opportunities for development to draw from decentralised systems and co-locating potential heat customers/suppliers. There should be policies addressing these.</p>	<p>Policies in the Local Plan should not duplicate the NPPF. These requirements are already within the NPPF and do not need to be repeated. The focus on small-scale renewables is because these are expected to be most likely to come forward in the constrained environment of the city. The Council has other methods to support communities seeking ways to decarbonise e.g. via the Zero Carbon Oxford Partnership. The lack of specific policy does not prevent such schemes coming forward where they require permission.</p>	<p>None</p>
<p>Local Plan seems to be seeking to off-load energy generation to neighbouring districts and ignoring the need to achieve energy reductions through direct action within city boundaries. Local Plan needs brownfield-led approach to renewable energy generation – maximising on</p>	<p>Policy R1 seeks to address the impacts of new developments in Oxford. There are limited opportunities to deliver large scale renewable energy generation in the city due to the limited land available. Local Plan supports a brownfield-led approach to renewable energy</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>sites like industrial uses, shopping centres, car parks, roads. Oxfordshire roof space is more than enough to accommodate solar energy needs – Council should be maximising these opportunities to meet not only its own but wider county’s needs. No sufficient focus on maximising renewable energy generation. No mention of hydro-electric power in the Local Plan either.</p>	<p>generation but is concerned with ensuring that each new development makes its own contribution to net zero.</p> <p>The Council has delivered a number of brownfield renewable energy projects on its own land including decarbonisation of leisure centres and delivering solar PV on its estate.</p>	
<p>The policy expects proposals for conversions, extensions and change of use to demonstrate they are in accordance with criteria 1 and 4 which includes that non fossil fuels are being directly utilised in the operation of the development. In some instances, it may not be the most appropriate or sustainable solution to replace gas boilers where they are relatively new and in good condition. It may be more appropriate for the heating system to be upgraded to a non-fossil fuel solution when the existing heating system requires replacement.</p>	<p>It is agreed that the policy erroneously captures extensions within criteria 4, which is not appropriate. The policy will be soundly based with a main modification.</p>	<p>Main modification as follows:</p> <p>Proposals for conversions, <del>extensions</del> and change of use (where they include works to the fabric of the building to facilitate this) that would require planning permission are only expected to demonstrate accordance with criteria 1 and 4, unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply. <u>Extensions are expected to comply with criteria 1-3 unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply.</u></p>
<p>In Oxford, it is widely reported that there is limited electrical power available until after Q4 2026, following the completion of significant reinforcement works to the Extra High Voltage</p>	<p>Management of the electricity power grid is deeply complex and beyond the scope of the planning system. The distribution network operator, transmission network operator and</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(EHV) lines at all subsidiary substations within the Cowley Grid Supply Point area. That, together with the critical importance of back-up power from non-grid sources, makes this policy impracticable.	OFGEM have a role to play and statutory responsibilities to manage the power network. The Local Plan 2040 has taken into account a wide range of issues and formed a proportionate and sound policy response to the evidence and comment of statutory consultees.	
Policy is forcing householders (condition 4) to heat their existing homes with gas, but then with an entirely new method (non-gas) for a new extension. An acceptable solution should be to achieve a net improvement, eg: a householder can insulate the rest of the house at the same time as the extension construction.	It is agreed that the policy erroneously captures extensions within criteria 4, which is not appropriate. The suggestion of upgrading the fabric is captured within criteria 1 – 3 and can be reasonably applied to extensions. The policy will be soundly based with a main modification.	Main modification as above to require extensions to comply with criteria 1-3.

POLICY	R2					
All respondents supporting policy	8.40	124.9	144.4	163.3	164.13	
	175.8	12.2	71.16	74.41	126.7	
	149.5	174.25	177.12	178.22		

COMMENT SUMMARY	OFFICER RESPONSE
General support – no specific comment	N/A
General support – however Council should give greater emphasis to Whole Life Carbon testing – ensure buildings have longer lifespan capable of flexibility of use rather than constructing short lived low embodied carbon buildings.	The requirement of Whole Life Cycle Carbon testing has been focused on larger schemes likely to have the biggest embodied carbon footprint.

COMMENT SUMMARY	OFFICER RESPONSE
<p>General support – welcome no specific targets in policy but question how Council proposes to assess feasibility of demolition versus re-use of buildings.</p> <p>Recommendation that Council needs to consider operational needs of businesses/employers more clearly – if building no longer fit for intended purpose then this should weigh in favour of its removal.</p>	<p>These points are addressed later in the responses, including a proposed modification to the supporting text.</p>
<p>General support – however policy needs caveat to ensure most efficient use of land is not constrained by having to retain existing buildings, though it is noted there is flexibility in policy already.</p> <p>Another response, also supporting, flagged a similar comment recommending that part a) of policy needs an additional supporting para which sets out that any such assessment is proportionate to the assets being reviewed and in context of other policies such as those promoting transformational change. This would ensure that development outcomes on brownfield sites with existing buildings are optimised where a retention approach renders development undeliverable.</p>	<p>Noted, as with the above, these comments are addressed later in the responses, including a proposed modification to the supporting text.</p>
<p>General support – but Council should recognise that retention/re-use of poor quality building can actually lead to a greater level of embodied carbon.</p>	<p>Noted, as with the above, these comments are addressed later in the responses, including a proposed modification to the supporting text.</p>
<p>General support – pleased to see focus on embedded carbon in materials and whole life cycle approach to buildings.</p>	<p>N/A</p>

POLICY	R2					
All respondents raising	9.4	26.11	61.4	73.9	75.2	
	113.5	121.5	125.5	130.4	133.11	

objections on this policy/chapter	136.17	152.8	155.4	162.4	168.12
	170.6	189.7	28.13	58.9	89.16
	127.3	148.12	171.8	194.6	196.13
	199.12	202.22	204.4		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
There is no climate emergency and therefore no basis for any net zero carbon policies/targets.	We address this point under the responses to policy R1.	No change proposed
Object to the lack of policy on net zero carbon construction thus ignoring potentially half of emissions arising from new buildings.	Policy R2 takes an important step forward in addressing embodied carbon in the construction process, whilst recognizing that this is a complex issue that is still subject to evolving guidance and understanding. It sets out key principles that will need to guide design and sets out requirements for calculating embodied carbon in larger developments. Despite there being no national requirement for net zero carbon construction, this was considered a pragmatic step which can be built upon in future Local Plans if national standards are not implemented in future.	No change proposed
The Local Plan does not address challenge of embodied/upfront emissions associated with its strategy for new housing.	As set out in the responses under chapter 2, it is acknowledged that new development will have an embodied carbon cost. The assessment of embodied carbon is complex and depends upon many design variables which make it challenging to reliably quantify at the high level Local Plan stage (e.g. types of materials used, where they	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>are sourced from etc). Alongside the net zero carbon in operation policy, the Local Plan includes this embodied carbon policy that seeks to ensure new development reduces these emissions, and requires larger development to quantify and demonstrate reductions through design process. It is intended as a stepping stone to more rigorous policy in future as national guidance and assessment methods improve.</p>	
<p>Local Plan should be acting on under occupancy of current housing, promoting sub-dividing of existing under-occupied properties in the city – impact of existing under-occupation is energy wasted heating spaces that are not meeting housing needs and giving rise to new home building with high-levels of up-front carbon emissions associated with construction.</p>	<p>The Local Plan cannot control occupancy rates directly but other City Council initiatives aim to tackle this such as incentives to council tenants to move into smaller homes if homes are under-occupied.</p>	<p>No change proposed</p>
<p>The Local Plan allows for offsetting but only through local offsetting schemes, yet there is no attempt to describe reliable ways of offsetting carbon emissions or to explain how this would be achieved ‘locally’.</p> <p>No reliance should be placed on offsetting until it can be explained how this could be relied on</p>	<p>Offsetting is not a mechanism that is addressed within policy R2, it is set out as part of the approach for applicants to meet the requirements of policy R1. The Regulation 19 consultation net zero carbon background paper sets out more detail about how offsetting is intended to be managed within its Appendix. The Zero Carbon Oxford Partnership identifies the significant retro-fit burden of existing</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
to reduce carbon emissions arising from development.	development within the city which offsetting can help support.	
Concern about the viability impacts of embodied carbon policy. Introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can be justified by the Council. Viability assessment assumes no additional cost to embodied carbon – respondent does not agree and feels this should be accounted for in the viability work.	The whole plan viability work looks at two approaches to embodied energy based on minimum and full net zero carbon scenarios. The minimum scenario assumes a neutral cost impact whereas the ‘worst-case’ (in terms of cost) scenario assumes a 10% increase in build costs – though it should be noted that the Local Plan policy R2 does not require full net zero carbon construction. Viability assessment takes a mid-point residential sales value, and most typologies are viable.	No change proposed.
<p>There were a number of comments flagging concern about criteria a) of the policy such as: New development will often be far more sustainable including in building fabric by use of modern methods of construction but also due to optimisation of use of a site.</p> <p>Question how the Council proposes to assess the feasibility of demolition or re-use of buildings.</p>	<p>The first point to note is that the policy requires applicants to demonstrate that they have explored re-use and found it to be unfeasible before resorting to demolition—it does not prevent demolition/replacement.</p> <p>It is understood that the approach to redevelopment of a site needs to incorporate many complex considerations and that retention of buildings may not always be the right solution for the future of a site. The policy criteria was worded in a way that does not</p>	<p>Minor amend to criteria a) of the policy, as follows:  a) Re-use of any existing buildings on a site has been <del>robustly</del> explored and <u>robustly</u> demonstrated to be unfeasible before resorting to demolition</p> <p>In addition, new para in the supporting text after current para 5.18 to expand on guidance on expectations in relation to criteria a), as follows:</p> <p><u>Existing buildings can be a valuable store for carbon embedded within the materials originally used to construct them. Whilst the policy does not mandate their retention, the criteria seeks to ensure that</u></p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Recommend that Council needs to consider operational needs of businesses/employers more clearly – if building no longer fit for intended purpose then this should weigh in favour of its removal.</p> <p>Policy should be caveated to ensure that redevelopment securing the most efficient use of land is not unduly constrained by having to retain existing buildings.</p>	<p>require, but rather, ensures applicants have at least considered retention first, as there can be opportunities to bring existing buildings back into use without resorting to demolition.</p> <p>Nevertheless, we note the various concerns flagged and understand that more clarity would be helpful. To that end we are proposing a couple of minor modifications, including a small change to the criteria a) of the policy itself and then a new para in the supporting text to provide more clarity around what is expected.</p>	<p><u>applicants have considered whether it is feasible to retain and re-use buildings on a site, before resorting to demolition. Of course, there can be justifiable reasons for replacing buildings which should be demonstrated through the application where relevant. Consideration in relation to feasibility of retention could include (but is not limited to) factors such as:</u></p> <ul style="list-style-type: none"> <li>• <u>if building is no longer fit for its intended purpose or the needs of users;</u></li> <li>• <u>if age/construction of the building means it is inefficient in terms of energy use;</u></li> <li>• <u>if a new building will be of more benefit to achieving wider place-making.</u></li> </ul>
<p>Further comments on the same theme as the above include:</p> <p>Policy needs to acknowledge that feasibility of retaining existing buildings does not just relate to technical considerations like structural limitations or operational requirements.</p> <p>Wider objectives of the Local Plan, including the planning requirements for the site, must also be an important consideration when considering any demolition. Sometimes demolition is the only route to achieve objectives including strategic transformation, intensification of</p>	<p>Comments are noted see our response above.</p>	<p>See proposed modification above.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>employment sites, building on strengths in healthcare/knowledge and innovation.</p> <p>Although there are higher embodied carbon costs associated with this route initially, it may derive larger carbon savings in the future, along with wider social and economic benefits.</p> <p>Policy focus should be: Retrofit/refurbishment-first as opposed to a retrofit/refurbishment-only policy.</p> <p>Others have suggested wording to be added:  part a): <i>Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or not suited to the requirements for the site, before resorting to demolition</i></p>		
<p>Linked with above, another suggestion is the introduction of a paragraph of supporting text to go alongside part a) of the policy. This would make reference to the fact that any such assessment pertinent to addressing the requirements of part a) is proportionate to the assets being reviewed and in the context of other planning policies, such as those which promote transformational change and</p>	<p>Comments are noted, again see response above.</p>	<p>See proposed modification above.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>encourage redevelopment to deliver optimum outcomes.</p> <p>As part of this, emphasis should continue to be placed on retaining a high standard of sustainable development and climate change objectives as key priorities for such site proposals. This would ensure that brownfield sites with existing buildings and those allocated for redevelopment in the Local Plan are optimised where a retention approach renders development undeliverable.</p>		
<p>Council should ensure that data in relation to embodied carbon is available to developers from suppliers through an Environmental Product declaration, at present it is not readily available.</p>	<p>We assume that this response is in relation to embodied carbon in different materials used by suppliers. This is not within the Local Plan's control. We are willing to explore through the future Technical Advice Note what additional support/guidance we can point applicants towards.</p>	<p>No change proposed – additional guidance to be considered through the future Technical Advice Note.</p>
<p>Policy compromises the ability of present and future generations to meet their own needs.</p>	<p>The policy seeks to ensure development comes forward in a way that has a reduced impact in relation to climate change as well and more prudently uses resources. As such, we would disagree with this comment.</p>	<p>No change proposed</p>
<p>Policy does not require or enforce requirements sufficiently which will not allow Council to meet local/national targets. Use of language like</p>	<p>This is acknowledged. As set out earlier, the policy is intended as a stepping stone that seeks to prompt applicants to consider embodied carbon in the design process and reduce this</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>'wherever possible' is vague/ineffective and compares unfavourably to policy R1's targets.</p> <p>Another comment is concerned that policy includes no specific targets/measures in relation to carbon emissions or use of other natural resources, the likely impact of the plan on these resources, how the impacts will be measured/addressed.</p>	<p>through careful design choices. It allows flexibility to choose the most sustainable solutions for a site, recognising that embodied carbon is a very complex issue. As industry understanding and national guidance improves, this will support more precise targets in future iterations of the Local Plan.</p> <p>For major schemes policy requires a measurement of embodied carbon and details of actions to reduce this as much as possible. Also requires a Whole Life Carbon Assessment and that the ECS sets out specific reductions that to embodied carbon that have been secured through the design process.</p>	
<p>Not enough consideration of complex requirements of certain uses e.g. academic and research. Policy needs more flexibility to allow for optimisation of sites.</p>	<p>See above. In addition, we would also flag that the policy requirements are not overly prescriptive partially in recognition of this very issue and the fact that understanding about best practice is still evolving.</p>	<p>No change proposed</p>
<p>Planning policy at a national level requires policies to only support and encourage retrofitting and not mandating. Does not suggest that carbon saving policies should be prioritised over economic growth and innovation either.</p>	<p>Noted. The policy does not mandate retrofitting. The policy, and the Local Plan as whole, does not specify that carbon policies should be prioritised over other objectives either. We would flag however that the UK is subject to a statutory obligation to reduce carbon emissions by 100% from 1990 levels by 2050 as set out in the Climate Change Act 2008. Schedule 7 (15C)</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy as drafted creates discretionary carbon budgeting which will not be resolved until the end of planning process and needs to be more clearly defined so matters of principle are not left to the discretion of the Planning Authority.</p>	<p>of the Levelling Up and Regeneration Act 2023 also requires that: 'The local plan must be designed to secure that the use and development of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'</p> <p>We disagree that the policy creates 'discretionary carbon budgeting' - the policy seeks to require all applications to take actions to reduce embodied carbon, it also requires the largest developments to quantify and detail reductions they have secured through design process.</p>	
<p>Urge more ambition, particularly on larger development. Suggestions of reframing criteria f) and g) of policy to impose, if not net zero carbon, then a demanding quantitative upper limit on embodied carbon to what is acceptable.</p>	<p>Given the complexities and the emerging nature of guidance and industry awareness we did not consider it justified to go further. The Policy is intended as a stepping stone whilst industry evolves to stronger policy in future iterations of the Local Plan. In addition, wide range of additional potential costs associated with delivering NZC embodied carbon/energy (research inputs to Viability Study considered addressing embodied carbon as cost-neutral and then a full net zero construction scenario of 10%). Not appropriate to impose a quantitative amount given the wide variation in viability consequences of policy.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Concern that the Local Plan Viability Assessment demonstrates that the requirements of these policies (particularly Policy R2) are only achievable where land values are at the upper end. Risks delivery and not in accordance with para 35 of NPPF in relation to effectiveness/deliverability.</p>	<p>See above for comment on costs. Policy does not push for net zero carbon construction, which viability testing indicated would have most significant cost. Instead, it expects all developments to demonstrate consideration of embodied carbon in the construction process and limit as much as possible through careful design choices.</p>	<p>No change proposed</p>
<p>Unclear on how the threshold of 100 resi or 10,000 non-resi for quantifying embodied carbon has been determined.</p> <p>Unclear on how an appropriate level of embodied carbon will be determined or what would be an appropriate level of reduction.</p>	<p>Because measuring embodied carbon can be complex and may be overly onerous for smaller development, it was considered reasonable to set the requirement for this extra assessment at a level that would capture the largest developments expected to come forward in the city and that will practically have the largest embodied carbon cost. The policy does not ask for ‘an appropriate reduction’ but simply for applicants to measure and quantify how they have reduced embodied carbon through the design process</p>	<p>No change proposed</p>
<p>Council will need to consider how it will monitor the policy and consider the implications of preparing an assessment – particularly how readily available the data on embodied carbon will be for applicants, especially as many of these emissions will be outside of the control of the homebuilding industry, including material</p>	<p>Noted, additional guidance will be published within a Technical Advice Note to support applicants with interpreting the requirements.</p> <p>As set out above, the requirement for quantifying and demonstrating specific reductions has been set for the largest</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>extraction and transportation, occupation and maintenance, demolition and disposal.</p> <p>Suggest that the policy is amended to remove the specific requirements for larger developments to provide measurements of embodied carbon as it is unclear as to how these would be used by decision makers.</p>	<p>developments. The Council has not set specific limits on embodied carbon or targets for amounts of reduction as it acknowledges guidance and understanding are still evolving. The requirement is intended as a stepping stone, increasing understanding of impacts of development, encouraging actions to reduce and forming a stepping stone to stronger requirements in future Local Plans (unless these are replaced by national standards in future).</p>	
<p>Council has acknowledged the complex nature of embodied carbon and the trade offs between design and carbon reduction. If policy is to be retained, it should acknowledge these trade-offs to ensure that it is at the forefront of decision makers considerations.</p> <p>Policy should also include a transitional period to give industry time to adjust to requirements and supply chains to be updated/amended as required.</p>	<p>As per the above, the Council did not want to specify precise targets because of these trade-offs. Different schemes will be able to deliver different carbon reductions and ultimately the policy provides a flexible approach to helping deliver reductions in embodied energy</p> <p>Noted</p>	<p>No change proposed</p>
<p>Additional requirements applicants will need to demonstrate via their application will result in delays and costs for the process of making/determining application.</p>	<p>Noted – as per the answers above, there are no specific targets, therefore it will be for applicants to determine what is reasonable in addressing these considerations in their application.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
BREEAM allows for considerations of embodied carbon to be made as part of its certification.	As long as appropriate credits are achieved in BREEAM scoring and these are presented to meet the policy criteria, a BREEAM accreditation rating would not be prevented. The Local Plan sets various sustainability requirements and it was not considered justified to require accreditation against a separate sustainability scheme, which will come at its own costs. The future Technical Advice Note will flag BREEAM as a useful resource/approach to meeting various policy requirements.	No change proposed
Policy should insist on 'cradle-to-grave' circular economy approach.	Agree this is an important consideration, however, as set out above, the policy is intended as a stepping stone which bridges the gap between no embodied carbon policy at present and potentially stronger policies in future. The focus at this stage is on sourcing of materials and construction stages, but the policy's supporting text flags that meeting many of the policy's criteria will help in addressing impacts at all stages of a building's life.	No change proposed
Policy should be stronger and insist on zero (or less) embodied carbon new development. Possible for development to be carbon-positive and lock up more carbon than it gives off.	Agree carbon-positive construction will be an opportunity some development can pursue and the policy does not prevent this. Criteria c) for example also encourages materials that can sequester more carbon than is used to produce	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	them. The reasoning for not going further is addressed in previous responses.	
Disjuncture between policy aims and objectives and failure to provide adequate Construction Impact Assessments are all too common and can have serious pollution consequences – application at Iffley Meadows/land at Meadow Lane given as example.	Noted. The policy does not address requirements for construction impact assessments. The policies of the Local Plan set the standards expected, the development management process determine whether an application has met these standards.	No change proposed
Sometimes matters like source of materials is not possible to define up front or until after permission has been granted. Suggest amend policy R2 to acknowledge that information could be supplied either with a planning application or via condition due where it is not possible to provide up front.	Noted, where information cannot be sourced this will need to be explained through the application process. As much information is needed up front to make an informed judgement about an application, we do not see that it is necessary to set out what will need to be conditioned and what should be provided up front, and this would be challenging to set out in policy in a consistent way. As already discussed, the policy does not set specific targets and a future Technical Advice Note will provide more guidance on interpreting requirements of the policy.	No change proposed
Unclear on whether policy applies to buildings in entire Conservation Areas (Designated Heritage Asset), thus policy is not effective.	The first part of the policy applies to all development and the second part to large new build development. No geographical distinction is made and the requirements should be of relevance to all development to varying degrees. Proposals affecting designated assets	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	will need to comply with the relevant heritage policies also.	
Policy R2, as proposed, expects applicants to 'robustly demonstrate' that the re-use of any existing building is 'unfeasible' before it can be demolished. Lack of clarity over what is meant by 'robustly demonstrate' in the policy. Also, whilst it may be feasible to keep building, policy does not address whether this is conducive to the best outcome, in terms of sustainability, cost and public benefit.	We have addressed this point earlier in the responses. Agree that more clarity is needed and have proposed to modifications, additional text in supporting text and a modification to the criteria a) which addresses this point specifically.	See proposed modification set out earlier.
Policy is too open-ended and leaves uncertainty for applicants at DM stage.	The responses above set out why the policy does not go further with specific targets/limits at this stage.	

POLICY	R3						
All respondents supporting policy	8.41	44.8	124.10	136.18	144.5		
	164.14	178.23	59.8	74.42	75.6		
	126.8	171.9	174.26	177.13			

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	None
General support – positive approach set out is welcome	None
General support – in particular, that the policy does not set out targets or introduce specific measures especially in regard to historic buildings and heritage assets which are noted as being more sensitive to change.	Noted

COMMENT SUMMARY	OFFICER RESPONSE
<p>General support – would welcome mention of the impact conservation areas can have on attempts to decarbonise (i.e. in conservation areas, cladding often cannot be added to buildings as it would disrupt the appearance of a street) and a similar positive approach towards allowing sensitive retrofit in these areas.</p>	<p>The policy promotes Whole Building Approach for retro fit of traditional buildings and heritage assets which would include those in conservation areas – this should guide applicants to select measures that are informed by the context of the building including heritage context. It is also a topic that is expanded upon in the Technical Advice Note.</p>
<p>General support – suggest that reference should also be made to the wider setting within which a building is located.</p> <p>There may be instances where work to the existing building will result in improvements in energy efficiency, however with wider implications for how the building is viewed from the public domain or within long or short distance views e.g. solar panels added to roof of historic building could be visible from public realm and harm character of roof scape. Impacts should not be outweighed by aspirations of the policy.</p>	<p>Noted – this would be a consideration that should inform the Whole Building Approach, it is also a consideration that is required in order to satisfy other policies of the plan, including HD7 (Principles of High quality Design).</p> <p>On the second point, other policies in the Local Plan (particularly the design chapter and design checklist in the appendix) require such impacts to be addressed. Policy R3 cannot set out one specific approach to how these should all be balanced, every application will have different context and impacts to consider in the decision-making process.</p>
<p>General support - welcome the reference to the circular economy. However, the policies should set out the principles of how the circular economy will be achieved through the development process in Oxford, in line with best practice. Should add how the circular economy will be achieved to Policy R3.</p>	<p>This comment is addressed through the statement of common ground with the County Council.</p>
<p>General support – aligns with the approach of E1 which supports retrofitting/extending buildings to enable further R&amp;D floorspace on existing sites. Note, however, not all buildings are suitable for conversion and new build tends to provide space that is not only better configured for modern usage but is also cheaper and more sustainable to run.</p>	<p>Noted. The policy is there to guide applicants who wish to pursue retro-fit and require planning permission—it does not force building owners to retro-fit if they determine that an alternative future for a building is more suitable.</p>

<b>POLICY</b>	<b>R3</b>
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All respondents raising objections on this policy/chapter	26.12	85.5	28.14	199.13	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
No climate change emergency and no basis for net zero carbon policies/targets.	See response under R1 to same point	No change proposed
Cost of retro-fitting a property has been estimated at 25k— Consultations to date have not mentioned cost of retro-fitting. It should be people’s choice, what if they cannot afford this or choose not to retrofit their properties?	Retrofitting a building is not mandatory, the policy is in place to support applicants who seek to undertake retro-fit works which will require planning permission. It sets out guidance to ensure these applications have best chance of success, particularly when dealing with more sensitive/challenging traditional buildings.	No change proposed
The policy seemed to have support from 19 homeowners during Citizen’s climate assembly in 2019—not right to base a policy from an event with only this much support. Needs more debate first.	The background paper sets out the context of the retro-fit challenge in the city and why a policy is needed in order to support this to enable Oxford to meet its net zero carbon targets, and help applicants who wish to undertake such works. The Local Plan has been subject to multiple stages of consultation, responses are documented in the consultation summary reports.	No change proposed
Policy is based on energy hierarchy which promotes fabric-first approach through energy reduction measures first – this does not take	The energy hierarchy is commonly accepted approach that aligns with national guidance (e.g. the National Design Guide) and ensures that	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>account of energy economics/effectiveness of energy efficiency measures.</p> <p>Assumes insulation measures are always the best first option before anything else considered, which is considered wrong when taking account of energy savings after the first year. Important that future energy efficiency policy reflects significantly higher energy efficiency savings that can be had from heat pumps compared to insulation alone. The focus on a fabric-first approach, therefore, needs to be removed in order to make the Local Plan sound.</p>	<p>fabric improvements are delivered before other measures. Principally the focus is to reduce the energy demand required of buildings by heating/cooling technologies which will allow for the most efficient systems to be installed. A less fabric efficient building is likely to require a more energy demanding heating/cooling system, than a fabric efficient one. R3 also sets out the importance of Whole Building Approach, which promotes measures that are informed by a thorough understanding of how the building performs.</p>	

POLICY	R4		
All respondents supporting policy	8.42	75.7	

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A

POLICY	R4			
All respondents raising objections on	28.15	66.4	89.17	202.23

this policy/chapter	
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<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
<p>Concern that Hill View Farm, the Land West of Mill Lane, and the Marston Paddock sites are now formally designated 'air quality hot spots', which will make them highly undesirable places to live for new residents. Concerned that the planned impact of the traffic filters will be to direct traffic to the ring road, which will only exacerbate the dangers for residents living in this area, some of whom are among the most disadvantaged in the Parish.</p>	<p>Designation of the hot spots is independent of the Local Plan, based on ongoing monitoring and these are flagged within relevant site allocations that are in proximity for info to applicants. The management of traffic filters is not within the scope of this policy or the wider Local Plan as the City Council is not the local highways authority.</p>	<p>No change proposed</p>
<p>Claiming that 'the entire City is in an Air Quality Management Area' in order to tick this particular policy box is incorrect: there are areas of Oxford - Meadow Lane, Iffley for example, that is not in an AQMA. Local Plan needs to be more accurate about where the AQMA designation does/does not apply.</p>	<p>The Council previously declared AQMA's in central Oxford (2003) and at Green Road roundabout (2005). Following further detailed assessments in 2008 and 2009 several additional areas were identified where the annual mean nitrogen dioxide objective will not be met. In September 2010 the City Council made an Air Quality Management Order declaring the whole of the city as an AQMA. As such, this designation applies across the city – though with some more localised hot spots – and this has been the case for over ten years.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Air quality Management Area reference is ineffective and ambiguous as this only applies to centre and small areas around.	This is incorrect, refer to answer above.	No change proposed
Policy is ineffective as it only addresses air quality and ignores problems caused by traffic (e.g. car traffic). No acknowledgement anywhere of Oxford's responsibility to tackle climate change by reducing the factors that lead to congestion and emissions.	<p>A key theme highlighted in the overarching threads of the Plan is addressing climate change.</p> <p>In considering air quality, applicants will have to take into account all relevant sources of poor air quality in the appropriate vicinity of their application and incorporate appropriate mitigation where needed, as such, this would take into account air quality impacts of transport as it would any other sources. It is not within the scope of this policy to reduce emissions from vehicles alone, and the Local Plan has limited power to do this, particularly as the Council is not the local highways authority (which is the County Council). The Local Plan does however include various policies to support decarbonising transport where it can (e.g. policies C7 and C9 as well as the approach to supporting residents to meet all daily needs though walking and cycling).</p>	No change proposed
The reference to mitigation must be removed and replaced with term net zero.	It is unclear what this response is asking for. Sources of air pollution differ and it is not practical for all air pollutants to be balanced via demonstrating 'net zero'. The requirement of	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>the policy is for applicants to identify impacts of different sources of air pollution and provide sufficient mitigation to address this. For major development, an Air Quality Assessment will need to be submitted and criteria a-d set out what it will need to demonstrate. This includes site-specific mitigation measures to address negative impacts identified, following the principle of redesign – mitigate – offset.</p>	
<p>Inclusion of environmental, social and health benefits of reducing traffic, not just air quality of “efficient use of land” Update to policy to recognise negative contribution to global warming</p>	<p>The impacts of air quality on health and the environment are discussed in the supporting text and explored more fully in the background papers. Para 1.31 to 1.33 and figure 1.2 in the overarching threads section of the Local Plan highlight that multiple policies are important for addressing climate change, this includes policies that support people to live lifestyles are responsible for less carbon emissions – including shifting to active/sustainable transport options where possible.</p>	<p>No change proposed</p>
<p>Concern that traffic impacts relating to hospitals and more generally are not sufficiently addressed and undermine this policy. Local Plan needs to more strongly address parking provision and limitations on driving with no net increase in parking permitted.</p>	<p>General traffic impacts and parking provision to the hospitals are not within the scope of this policy. Policy C8 sets out requirements on motor vehicle parking design, and other policies in chapter 7 set standards for provision for alternative means of transport. The measures</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The Workplace Levy will not happen. Traffic Filters are not on any of the routes to the hospitals.	like Workplace parking levy and traffic filters discussed in supporting text are relevant context to the wider issues of actions being taken on air quality and highlighted as such, however they are not within the gift of the policy to influence.	

POLICY	R5
All respondents supporting policy	8.43

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
General support – no comment	N/A	N/A

POLICY	R5
All respondents raising objections on this policy/chapter	None received

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
None received	N/A	N/A

POLICY	R6

All respondents <b>supporting</b> policy	8.44	58.10	136.19	
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COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A
General support – particularly the note that simply offsetting emissions from developing on peat soils is unlikely to be acceptable.	N/A
General support – flag that soil loss is an extreme problem and soils best conserved by avoiding development.	N/A

POLICY	R6				
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	124.11	180.4	181.4	182.5	183.5
	184.5	202.24			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Impact of the consideration of soil quality in all development proposals (as the policy is currently worded) would further restrict the opportunities for development and sterilise development opportunities on sites where there are other conflicting constraints on the site. The policy wording for this should state that this applies to new developments on undeveloped or largely greenfield sites. Suggested wording: <i>Planning applications for the development of</i>	Even minor development can take actions which help to conserve and enhance local soils on the site, though this depends on context. As such, the first part of the policy (including criteria 1-d) sets out principles that could be applicable to a range of types of development, though not all. It includes the caveat that proposals should include details responding to each criteria 'where relevant' for this reason.	Minor modification to policy wording as follows:  <i>Proposals for new <del>m</del>Major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the Council to determine any potential impacts on reserves.</i>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p><i>greenfield sites will be expected to demonstrate how the impact of development on soils has been mitigated and opportunities for conserving and enhancing the capacity/ quality of soil maximised.</i></p>	<p>The second part of the policy sets out requirements for major development on undeveloped land, which is where there is most significant potential for harmful impacts on peat. The focus on undeveloped land means that development coming forward here would naturally be new development in most instances. We agree this could be made more explicit to ensure effective policy however and are happy to propose a modification.</p>	
<p>Concerns about the mapping and policy wording - A peat layer as shallow as 30cm can contain more carbon per same area as a tropical rainforest – but crucial these areas are kept wet. No mention in this policy of the desirable aim to keep as much of the city’s peat reserves wet to prevent CO2 release and this should be included.</p> <p>City should be ambitious for its peat-rich areas as a positive feature, and not view peat as a dead inert material that is a ‘problem’ for development – e.g. driving restoration by re-wetting.</p>	<p>Whilst we concur that restoration is an important objective, the management of existing land where it is not a part of a planning application is not within the scope of Local Plan policy R6 (or other policies). Policy R6 sets out protections for deposits where new development could impact them, it also sets out that proposals should demonstrate how opportunities for conserving and enhancing the capacity/ quality of soil are maximised.</p>	None
<p>Regret that the City Council states it will not rule out building on peat. Volume threshold used in policy before development refusal is considered</p>	<p>There is no specific national guidance on how peat should be addressed through applications, and the existing Local Plan includes no such</p>	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>to be far too high at 10m3. One estimate (National Trust for Scotland) suggests the value of 172kg CO2 per m3 of peat, so 1720kg of CO2 (30-70kg of carbon) likely to be emitted from 10m3 of peat upon oxidation following dewatering. Thus policy threshold should be much lower.</p>	<p>explicit protection. The Council has sought to incorporate protection for these important reserves through this new policy for the Local Plan 2040 in response to consultation feedback. We have engaged with our heritage officers and Natural England to seek views on an appropriate threshold. The threshold has ultimately been set at what it considers to be a reasonable and pragmatic level, bearing in mind the capacity of officers and also other requirements on applicants. We will keep the effectiveness of the policy under review throughout the lifetime of the Local Plan.</p>	
<p>Concern that the area designated for peat reserves does not match with the wider catchments e.g. the whole of Lye Valley which is at risk to erosion/dewatering. Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin's Lane Field), and other peat reserves and demarcation of groundwater and surface water catchments is flagged.</p>	<p>Reflecting feedback from previous consultations, the Council considered it important to include a policy in the Local Plan that seeks to protect the valuable peat reserves in the city from inappropriate development. The Council has acknowledged that national datasets on peat mapping is indicative and also subject to future review, which may result in refinement. Because this is a new policy approach, the Council considers it particularly important that the requirements are clear and robust so that applicants know where and when the policy is of relevance to their application to be effective and fair. The Council has sought to</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>ensure that the mapping relied upon is transparent and publicly accessible and the data layers of Natural England’s web viewer were considered to be the most suitable and robust reference point in this regard. In addition, there is additional protection for the majority of these sites set out via other policies – e.g. Green Infrastructure protections of G1 and ecological protection of G6.</p>	
<p>200m buffer is arbitrary.</p>	<p>There is no standard guidance on an appropriate buffer for investigating potential unrecorded peat reserves around known peat reserves nationally. The Council has therefore reviewed the national peat mapping data set available from Natural England and set a precautionary/pragmatic buffer for investigation of potential additional/unrecorded reserves based upon the local context of the city and extent of undeveloped land around the known sites. In setting the buffer, the Council has liaised with Natural England to get a view on what is reasonable/effective based on their understanding of their mapping and sought input from their soil experts.</p>	<p>None</p>
<p>Reference was made from several reps about concurring with Friends of Lye Valley</p>	<p>Noted – the key points of that response are addressed above.</p>	<p>None</p>

POLICY		R7		
All respondents supporting policy	8.45	178.24		

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A
General support – welcome that noise and water are within the range of factors to be used to determine whether to approve a development.	N/A

POLICY		R7				
All respondents raising objections on this policy/chapter	89.18	101.1	164.15	168.13	174.13	
	30.16	148.13	196.14	202.25	203.5	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Conflict with the SPS13 policy flagged, e.g. impacts on active transport corridor/designated quiet route from increased transport movements and impacts on the conservation area. Suggest delete SPS13	The requirements of the Local Plan policies need to be read and addressed as a whole. This will include where development is proposed on an allocated site. Concerns about the allocation of any particular site are addressed in the responses to that specific policy.	No change proposed
Question whether reference should also be made to public realm in the policy and supporting text. Suggested wording:	The policy makes no distinction between which elements of a development to which it applies, as such the considerations of environmental	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p><i>Development that has the potential to impact upon areas of public realm, should be required to ensure that these areas are protected, or enhanced, for the wider public benefit.</i></p>	<p>impacts arising from development would apply to public realm as much as private spaces. Other policies in the Local Plan address high quality design which would include considerations of protection/enhancement of public realm – for example policies S2 and HD7 – with public realm addressed in detail in various places within Appendix 1’s Design Checklist.</p>	
<p>Concern about policy creating overly prohibitive consequences of delivery of a new Unipart development. Amendment to this policy is suggested in order to strengthen provisions relating to the protection of existing uses, particularly those which could be considered as “anti-social,” which may be adjacent to a proposed new sensitive uses, which could otherwise may be adversely affected by the existing use. This would avoid unfairly prejudicing the functionality of such site uses, such as the Unipart site, in accordance with the “agent of change,” concept.</p>	<p>NPPF already sets out detailed expectations in relation to the Agent of Change principle which do not need to be replicated within local policy. See response below which does however propose a minor mod to flag the NPPF guidance in the supporting text.</p>	<p>See below response for minor modification</p>
<p>Policy/Local Plan is unsound as it does not make reference to the agent of change principle. Para 5.47 and policy R7 appear to reference it but not explicitness enough or broad enough to capture NPPF considerations – failing to deal with wider complexities. Concern that current reference to</p>	<p>As the comment highlights, the NPPF already sets out detailed expectations in relation to the Agent of Change principle which do not need to be replicated within local policy. Policy R7 seeks to ensure that noise concerns are considered appropriately at the planning application stage</p>	<p>Minor modification to para 5.47 of supporting text as follows:</p> <p><i>Noise and vibration have a significant impact upon amenity and people’s health and wellbeing. <u>National Policy sets out expectations</u></i></p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>noise considerations would mean planning permission is given without due consideration to all issues, resulting in developments that are then disturbed by existing activity covered by agent of change but not mitigated for. Suggest need for standalone policy on Agent of Change – formulated based on NPPF para 193 and using the same descriptive and prescriptive points and language set out in The London Plan March 2021- Policy D13 (as an example). Failing a full policy being added, it is suggested that R7 is amended, to include the longer description used in The London Plan March 2021 with its explicit reference to agent of change:</p> <p>"The Agent of Change Principle places responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed noise-sensitive development.</p>	<p>by the applicant in line with the requirements of the NPPF. This includes ensuring an acceptable level of amenity for end users of a proposed development whilst also preventing harm to the continued operation of existing uses. It is not considered that there are further local circumstances that would justify any additional amendments to the policy requirements. We would be happy however to make an explicit reference to the Agent of Change principle as set out in the NPPF via an additional sentence within para 5.47 of the supporting text to the policy.</p>	<p><i><u>for new development to consider and appropriately mitigate the impacts of noise from existing businesses so as to ensure unreasonable restrictions are not imposed on their operation after a development is permitted (the Agent of Change Principle). As such, the management of noise should be an integral part of development proposals and should be considered at the earliest opportunity to ensure that the right acoustic environment is achieved in new development. The consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities....</u></i></p>
<p>There could usefully be some further clarification in the supporting text to differentiate this policy from that of Policy HD10 on Health Impact Assessment.</p>	<p>This comment is addressed within the statement of common ground between the Council and West Oxon District Council.</p>	<p>Refer to the statement of common ground between the Council and West Oxon District Council.</p>
<p>Concern the wording essentially would not allow any assessment of harm and benefits as per the NPPF. Criteria a)'s wording about 'protect'</p>	<p>The policy allows for mitigation measures where necessary that would be needed where impacts cannot be avoided.</p>	<p>No change proposed</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>should be amended so that instead it sets out that where any impact occurs it is off-set by the benefits of the proposed development or through appropriate mitigation.</p>		
<p>Criterion b) the test set out at paragraph 111 of the NPPF is that development that results in “severe” highway impacts should be prevented. This should be set out clearly in the policy with an amend that instead says: does not have severe [unacceptable] transport impacts affecting communities, occupiers, neighbours and the existing transport network;</p>	<p>The Local Plan does not need to repeat national guidance. The NPPF sets out: <i>an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe</i>. We consider that the policy is not in conflict with this.</p>	<p>No change proposed</p>
<p>Policy is too ambiguous without clear rules/metrics. Another suggestion is that the factors set out in criteria d) to n) should be accompanied by criteria, targets or standards as to when an impact would become unacceptable.</p>	<p>These details can only be assessed as part of detailed proposals in a planning application, and will need to be judged on a case-by-case basis. There are not clear thresholds that will apply in every situation that would be possible to include in this policy.</p>	<p>No change proposed</p>
<p>Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations The new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle. For development proposed within 800m of a sewage treatment works or 20m of a sewage pumping station, the developer or local</p>	<p>The policy already sets out that odour impacts will be a consideration. We agree, it would be helpful to set out that this will be a particular consideration for development in proximity to the treatment works and will incorporate an additional para into the supporting text of the policy.</p>	<p>Minor modification proposed to add a new paragraph to supporting text of policy as follows:</p> <p><u>5.49 Odour impacts on future occupiers of a development will be a particular consideration for applications that propose development in proximity to the Sewage Treatment Works. Proposals within 800m of a sewage treatment</u></p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>authority should liaise with Thames Water to consider whether an odour impact assessment is required. Text should be incorporated into policy as follows: <i>When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.</i></p>		<p><u>works or 20m of a sewage pumping station should be informed by liaison with Thames Water. When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment may be required.</u></p>

CHAPTER	6			
All respondents supporting	8	84		
COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION		
Soundly based	Noted	No action		
CHAPTER	6			
All respondents raising objections	30.19	74.43	89.20	164.21

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Insufficient attention is given to retaining the character of Victorian housing (terraces &amp; semis) in, especially, East Oxford, but also Headington and Jericho outside formal conservation areas.</p>	<p>The Oxford Local Plan 2040 is based on proportionate evidence. Policy S2 (Design Code and Guidance) in Chapter 1 and the rest of the plan's policies provides a suitable framework against which decisions can be taken with regard to the character.</p>	<p>No action</p>
<p>SPS13 is a site allocation policy that is flatly incongruent with this chapter, enshrining as it does substantive harm to the Iffley Conservation Area.</p>	<p>Chapter 6 provides an appropriate and soundly based framework for decisions to be taken. Comments on SPS13 have been addressed in the associated section of this report. The policy is sound and not incongruent with chapter 6.</p>	<p>No action</p>
<p>Ignoring the connection between Oxford's heritage and its economy is, in our opinion, unsound (failing to deliver a positive strategy for the historic environment) and a missed opportunity. We suggest revised wording in this opening paragraph, which also recognises in positive tone how heritage is a matter not simply deserving of respect, but an asset in the broadest sense that can support future growth and development.</p>	<p>A series of modifications have been proposed which address key heritage matters. These modifications have been considered further against the appropriate section of this report. A Statement of Common Ground has also been agreed with Historic England.</p>	<p>No action</p>
<p>Oxford is a world-renowned historic city with a rich and diverse built heritage. Its iconic skyline has inspired artists and poets, and whilst the city is under pressure to grow, it must also protect what makes it so unique and special. The Trust has some concerns with regard to Chapter 6 in that it contains a number of standalone policies rather than an overarching positive strategy for the historic environment. Paragraph 6.8 makes reference to</p>	<p>The Oxford Local Plan 2040 provides a soundly based spatial strategy for development in the city. Chapter 6 provides a suitable framework for decision taking, including supporting text where relevant. The introductory text covers the detail suggested as important to include. Chapter 6 is a sound approach in accordance with national planning policy and guidance.</p>	<p>No action</p>

<p>views and landscape features in a wider sense, the Trust feel it is important that specific reference is made to the wider landscape setting of Oxford within this section, in addition to subsequent Policy HD9, as this plays an intrinsic and positive part of the wider setting of the historic setting of the City. The Trust is also concerned that the role of 'setting' is underrepresented in the chapter and ought to be strengthened.</p>		
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<b>POLICY</b>	<b>HD1</b>
All respondents supporting policy	8.47

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
General support – No comment.	Noted.

<b>POLICY</b>	<b>HD1</b>
All respondents raising objections on this policy/chapter	26.13    71.10    71.18    74.8    136.20    162.5    163.4    170.7    199.14    202.26    204.5

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
The policy suggests that if public benefit can be demonstrated then it may be that some heritage sites could be harmed. There should be NO harms to heritage sites whatsoever. No public benefit can justify this. Oxford’s heritage should be sacrosanct and protected 100%.	This approach would be inconsistent with the National Planning Policy Framework, which requires any potential harm to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (paragraphs 207-208). No change required.	None
The plan doesn't include the Bartlemas Conservation Area (Bartlemas farmhouse, chapel etc). This area has been neglected by the council and needs protection.	Bartlemas Conservation Area is covered by Policy HD1. No change required.	None.
The policy is unsound.	Noted.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Criterion a) focuses on understanding significance, which includes consideration of setting. To divorce setting from significance may undermine how the policy is implemented. We recommend deleting the separate paragraph on setting and integrating this consideration into criterion a). This would also help to streamline the policy.</p> <p>The policy is not consistent with national policy (specifically NPPF paragraph 206 which requires local authorities to look for opportunities to enhance or better reveal the significance of conservation areas), as there is no mention of the potential to enhance conservation areas, a point that is noted also in the Council’s Sustainability Appraisal.</p>	<p>A series of amendments have been provisionally agreed with Historic England via a Statement of Common Ground to address these concerns.</p>	<p>Main modification.</p>
<p>A positive approach to retrofit in conservation areas must be taken. A positive approach must also be taken to densification of some sites within conservation areas, where appropriate care is taken to minimise harm to existing amenities, to allow Oxford to deliver the housing it urgently needs in sustainable locations.</p>	<p>Amendment to paragraph 6.1 has been provisionally agreed with Historic England via Statement of Common Ground, adding in cross-reference to Policy R3 (Retro-fitting existing buildings).</p>	<p>Minor modification.</p>
<p>The policy states that “planning permission will be granted for development that responds positively to a conservation area’s significance, character and distinctiveness”. This wording is particularly onerous and does not align with the wording within the National Planning Policy Framework (“NPPF”) which states that there is a ‘desirability’ for new development to sustain and enhance heritage assets.</p>	<p>Amendments have been provisionally agreed with Historic England via a Statement of Common Ground, adding reference to enhancing heritage assets.</p>	<p>Main modification.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It is considered that the word ‘wholly’ should be removed from the policy drafting as this is not consistent with the wording of paragraph 201 of the NPPF and should be brought in line with this for consistency.</p>	<p>Noted. The NPPF provides a national context, this wording has been accepted by Historic England. No change required.</p>	<p>None.</p>
<p>Whilst it is important to respect and respond to the historic environment this objective needs to be balanced against the potential for modern, floorspace and high-quality architecture to meet commercial requirements and contribute positively to the City Centre. The inclusion of the phrase ‘great weight’ is not considered to be appropriate. There is no justification within the emerging Local Plan for this heritage policy to be afforded greater weight than other strategic objectives such as the requirement to deliver homes or new jobs.</p> <p>A revision to the Policy will ensure that heritage assets would still benefit from protection but without imposing a hierarchy within the Local Plan, and conflict that could preclude development and innovation. It is critical that the evolving context for particular areas (such as the Area of Focus and the West End SPD) can be afforded appropriate weight.</p>	<p>This wording is consistent with paragraph 205 of the NPPF, which states:  <i>When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be).</i></p> <p>No change required.</p>	<p>None.</p>
<p>Tests for development range beyond those in national policy: impacts of any kind are prohibited and mitigation is not offered as a solution.</p>	<p>We can’t roll back from the package of policies we currently have – they all play an important role in shaping the use of land; we can’t exempt the universities. No change required.</p>	<p>None.</p>
<p>It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy. It is unjustified and ineffective to mark Conservation</p>	<p>The policy wording requires compliance with paragraph 201, stating that:</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Areas with boundaries which include parts with nothing left to preserve, these must now be shrunk to remove parts which the Council has allowed to be destroyed, it cannot, and must not claim, to be protecting areas that are now wholly lost.</p>	<p><i>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 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.</i></p> <p>Appraisals have been written for a number of our conservation areas, some of which are currently being updated. These documents detail the locations and characteristics which contribute to each area’s architectural or historic importance, as well as opportunities for enhancement. No change required.</p>	
<p>Policy HD1 (Conservation Areas) states that “planning permission will be granted for development that responds positively to a conservation area’s significance, character and distinctiveness”. This wording is particularly onerous and does not align with the wording within the National Planning Policy Framework (“NPPF”) which states that there is a ‘desirability’ for new development to sustain and enhance heritage assets.</p>	<p>Amendments have been provisionally agreed with Historic England via a Statement of Common Ground, adding reference to enhancing heritage assets.</p>	<p>Main modification.</p>

POLICY	HD2
All respondents supporting policy	8.48

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted.

POLICY	HD2
All respondents raising objections on this policy/chapter	74.7    162.6    174.14    204.6

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Criterion a) focuses on understanding significance, which includes consideration of the setting of the asset. To divorce setting from significance may undermine how the policy is implemented. We recommend deleting what is currently the final paragraph of the policy and integrating consideration of setting into criterion a). This would also help to streamline the policy.</p> <p>We believe there is scope for improving the opening of criterion b) and we suggest alternative wording for consideration.</p>	A series of amendments have been provisionally agreed through a Statement of Common Ground with Historic England to address their concerns.	Main modification.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The current structure of criterion b) combines two different ideas within part i), followed by use of the word “or”. This could imply that if avoidance is impossible, the proposal does not need to meet the first part of b) i), which we infer is not intended. So, we suggest splitting part b) i) into two. This would also give room also for aligning with paragraph 197 of the NPPF. Additionally, this paragraph is silent on minimising unavoidable harm, which is the natural product of NPPF paragraph 199.</p> <p>We recommend use of the term “offset” rather than “compensate”. The latter implies giving the asset’s significance a monetary value, which would be a regrettable emphasis within Council policy.</p> <p>We welcome reference to change of use in the policy, but recommend amendments to clarify the focus of criterion d.</p>		
<p>The policy states that “planning permission will be granted for development that responds positively to a listed building’s significance, character and distinctiveness”. Again, this wording does not align with the NPPF.</p> <p>It is proposed the following amendment is made: “Planning permission will be granted for development that [responds positively to] preserves and, where possible, enhances a listed building’s significance, character and distinctiveness.”</p>	<p>Existing wording within criterion b relates to the preservation of listed buildings, as where development would result in harm to significance, the extent of harm will be properly and accurately assessed and understood, minimised as far as possible, and clearly and convincingly justified. No change is required in this regard.</p> <p>Provisionally agreed with Historic England via Statement of Common Ground, amendments</p>	<p>Main modification.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>have been made to criterion b including reference to 'any measures within the proposal to enhance the significance of the listed building (including its setting)'.</p>	
<p>The opening paragraph states: <i>'Planning permission or listed building consent will be granted for development that respects and draws inspiration from Oxford's listed buildings, responding positively to their significance, character and distinctiveness'</i>. This is vague and could be misinterpreted, whereas Policy HD6 for non-designated heritage assets is more robust and states: <i>'Planning permission will only be granted for development affecting a local heritage asset or its setting if it is demonstrated that due regard has been given to the impact on the asset's significance and its setting and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development'</i>.</p> <p>It is suggested that these differences could usefully be reconsidered.</p>	<p>The opening paragraphs of Policy HD1 and HD2 are positive statements worded in similar ways that are considered to match these positive statements. No change proposed.</p>	<p>None.</p>
<p>The policy states that "planning permission will be granted for development that responds positively to a listed building's significance, character and distinctiveness". Again, this wording does not align with the NPPF.</p> <p>It is proposed the following amendment is made: "Planning permission will be granted for development that [responds positively to] preserves</p>	<p>Existing wording within criterion b relates to the preservation of listed buildings, as where development would result in harm to significance, the extent of harm will be properly and accurately assessed and understood, minimised as far as possible, and clearly and convincingly justified. No change is required in this regard.</p>	<p>Main modification.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
and, where possible, enhances a listed building's significance, character and distinctiveness."	Provisionally agreed with Historic England via Statement of Common Ground, amendments have been made to criterion b including reference to 'any measures within the proposal to enhance the significance of the listed building (including its setting)'.	

POLICY	HD3
All respondents <b>supporting</b> policy	8.49

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted.

POLICY	HD3
All respondents <b>raising objections</b> on this policy/chapter	74.8

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Currently the policy is focused solely on repeating what is in the NPPF.</p> <ul style="list-style-type: none"> <li>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.</li> <li>The line midway through that “Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden requires clear and convincing justification in a Heritage Assessment” makes the current</li> </ul>	<p>Noted. A series of main modifications have been provisionally agreed through a Statement of Common Ground with Historic England to address these concerns.</p>	<p>Main modification.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>opening line redundant. Given the wording of that line is broader than the current opening line, we suggest bringing that forward in the policy.</p> <ul style="list-style-type: none"> <li>• The line on substantial harm in the second paragraph is not needed as it repeats what is currently in the first paragraph.</li> <li>• The opening section of the third paragraph of policy HD3 repeats what is currently covered by the second paragraph.</li> </ul> <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>		

POLICY	HD4
All respondents <b>supporting</b> policy	8.50

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted.

POLICY	HD4
All respondents <b>raising objections</b> on this policy/chapter	74.9

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>As with policies HD1 and HD2, there is scope to integrate a reference to setting within the overall approach on heritage assessment, rather than treating setting as an additional, separate consideration.</p> <p>We believe there is scope to streamline the policy, which would help its implementation. The opening paragraph summarises what is in a heritage assessment, which is covered by the criteria in the second paragraph, and so could be deleted.</p> <p>We believe the policy's references to listed buildings and listed building consent are not intended, though for the two references to listed buildings the point is</p>	<p>Noted. A series of main modifications have been provisionally agreed through a Statement of Common Ground with Historic England to address these concerns.</p>	<p>Main modification.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>moot if the Council deletes the text suggested.</p> <p>Criterion b) would benefit from referring to the scope for enhancing the significance / setting of a Scheduled Monument, as part of plan's positive strategy for the historic environment in accordance with NPPF paragraph 190 (especially criterion a).</p> <p>We recommend use of the term "offset" rather than "compensate". The latter implies attributing a monetary value to the asset's significance, which would be a regrettable emphasis with Council policy.</p> <p>In the supporting text, use of the term "designated" is more appropriate than "made". Also, Historic England does not designate, we can only recommend designation. We suggest minor modification to address these points.</p> <p>Also, we recommend including reference to notifying Historic England where SMC is required and encouragement for early engagement.</p>		

POLICY	HD5
All respondents <b>supporting</b> policy	8.51

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted.

POLICY	HD5
All respondents <b>raising objections</b> on this policy/chapter	74.10

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<ul style="list-style-type: none"> <li>• There’s a word missing from criterion a) before “information”.</li> <li>• Criterion b) would benefit from a comma.</li> <li>• Criterion c) has a typo.</li> <li>• Criterion d) would benefit from referring to “archaeological remains” not “archaeology”.</li> <li>• 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.</li> <li>• 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</li> </ul>	Noted. A series of main modifications have been provisionally agreed through a Statement of Common Ground with Historic England to address these concerns.	Main modification.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>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> <ul style="list-style-type: none"> <li>• 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.</li> </ul>		

<b>POLICY</b>	<b>HD6</b>
All respondents <b>supporting</b> policy	8.52

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
General support – No comment.	Noted.

<b>POLICY</b>	<b>HD6</b>								
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	<table border="1"> <tr> <td>74.11</td> <td>124.12</td> <td>126.9</td> <td>162.7</td> <td>164.16</td> <td>177.14</td> <td>199.15</td> <td>204.7</td> </tr> </table>	74.11	124.12	126.9	162.7	164.16	177.14	199.15	204.7
74.11	124.12	126.9	162.7	164.16	177.14	199.15	204.7		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Not consistent with national policy. Neighbourhood plans provide another route through which non-designated heritage assets may be identified, which should be acknowledged in the policy.	Noted. Minor amendment to paragraph 6.20 has been provisionally agreed through a Statement of Common Ground with Historic England to address these concerns.	Minor modification.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The policy as proposed requires the impact of the development upon the significance of a non-designated heritage asset to be weighed against the 'public benefits' of the scheme. This is out of alignment with the requirements of the NPPF (paragraph 203) which states that 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset'. The policy text should reflect this test rather than the test associated with designated heritage assets.</p> <p>In addition, there should be an easier way of identifying non-designated heritage assets through a mapping system rather than the currently available list which is not easy to use in identifying potential constraints.</p>	<p>The NPPF provides a national context, and we feel we need a stronger position for our non-designated heritage assets, and the extant plan of the currently adopted 2036 plan has the same approach which has been accepted by a Planning Inspector. It is worth noting that when we reviewed the archived NPPF (2019) it contained the same wording as the 2023 version (albeit a different paragraph number). As such the approach to go beyond the requirements of the NPPF for non-designated heritage assets has been previously accepted at a Local Plan examination.</p>	<p>None.</p>
<p>Policy HD6 is not consistent with National Policy in the form of the NPPF (Dec 2023) paragraph 209. The policy currently refers to balancing the scale of any harm against the public benefits that may result from the development. The NPPF only refers to balancing public benefits against harm for designated heritage assets and not non-designated heritage assets. The policy should be amended as below to ensure it is consistent with National Policy.</p>	<p>Previously accepted policy approach that goes beyond the NPPF approach. The NPPF provides a national context, and we feel we need a stronger position for our non-designated heritage assets, and the extant plan of the currently adopted 2036 plan has the same approach which has been accepted by a Planning Inspector. It is worth noting that when we reviewed the archived NPPF (2019) it contained the same wording as the 2023 version (albeit a different paragraph number). As such the approach to go beyond the requirements of the NPPF for non-designated heritage assets has</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	been previously accepted at a Local Plan examination.	
Not justified, as the policy wording references “Local Heritage Assets” which is a confusing term that does not clearly distinguish between non designated heritage assets and designated heritage assets. This draft policy needs to be supported by a clear definition of the term ‘Local Heritage Asset’.	Non-designated heritage assets have already been defined in paragraph 6.20 of the supporting text. Paragraph 1 of draft policy HD6 clarifies that non-designated assets and local heritage assets are interchangeable. No change required.	None.
<p>Currently ineffective, although the Trust supports proposed policy HD6 and welcomes its inclusion within the Local Plan. Non-designated heritage assets can hold significant local importance and their protection and preservation is a key to ensure they are not lost through redevelopment of sites.</p> <p>Some commitment to continued monitoring and review of the Local List within the supporting text would help make the policy robust and ensure that assets included in the list are offered a degree of protection. An increased awareness of the assets list would also enable a wider audience to understand the process and how they can identify, enjoy and preserve such buildings.</p>	<p>The Oxford Local Plan 2040 includes policies on non-designated heritage assets in accordance with the NPPF and relevant legislation. The OHAR is updated via public nominations, and therefore any continued monitoring would not be beneficial. No change required.</p>	None.
Policy HD6 is not consistent with National Policy in the form of the NPPF paragraph 209. The policy currently refers to balancing the scale of any harm against the public benefits that may result from the development. The NPPF only refers to balancing public benefits against harm for designated heritage assets and not non-designated heritage assets. The	The NPPF provides a national context, and we feel we need a stronger position for our non-designated heritage assets, and the extant plan of the currently adopted 2036 plan has the same approach which has been accepted by a Planning Inspector. It is worth noting that when	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
policy should be amended as below to ensure it is consistent with National Policy.	we reviewed the archived NPPF (2019) it contained the same wording as the 2023 version (albeit a different paragraph number). As such the approach to go beyond the requirements of the NPPF for non-designated heritage assets has been previously accepted at a Local Plan examination.	
Tests for development range beyond those in national policy: impacts of any kind are prohibited and mitigation is not offered as a solution.	The NPPF provides a national context, and we feel we need a stronger position for our non-designated heritage assets, and the extant plan of the currently adopted 2036 plan has the same approach which has been accepted by a Planning Inspector. It is worth noting that when we reviewed the archived NPPF (2019) it contained the same wording as the 2023 version (albeit a different paragraph number). As such the approach to go beyond the requirements of the NPPF for non-designated heritage assets has been previously accepted at a Local Plan examination.	
The wording of draft Policy HD6 (Non-designated Heritage Assets) references “Local Heritage Assets” which is a confusing term that does not clearly distinguish between non designated heritage assets and designated heritage assets. This draft policy needs to be supported by a clear definition of the term ‘Local Heritage Asset’.	Non-designated heritage assets have already been defined in paragraph 6.20 of the supporting text. Paragraph 1 of draft policy HD6 clarifies that non-designated assets and local heritage assets are interchangeable. No change required.	None.

<b>POLICY</b>	<b>HD7</b>				
All respondents <b>supporting</b> policy	8.53	133.12	148.14	177.15	196.15

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
(133.12) Oxford has many cultural buildings of high quality that are much admired. Equally the place and setting in residential estates and environments is also very important in forming strong bonds, social harmony and connection with the people who live there and bring up their families. The ambition to preserve ‘heritage assets’ must not be confined to buildings in the city centre. In north Oxford, too many distinctive quality houses are being destroyed/removed, and this is significantly changing the character of some streets. We realise the need to increase housing density overall, but this must be done sensitively, without the trashing of architectural quality. That is counterproductive to the fostering of a sense of place and character of established communities. It breeds claustrophobia and alienation. We therefore strongly support policy HD7.	Support welcomed.
(148.14) TWO supports high quality design in the City. This should be proportionate to the location and setting of the proposed development.	Support welcomed.
(177.15) ChCh supports high quality design in the City. This should be proportionate to the location and setting of the proposed development.	Support welcomed.
(196.15) ONV supports high quality design in the City. This should be proportionate to the location and setting of the proposed development.	Support welcomed.

<b>POLICY</b>	<b>HD7</b>				
All respondents <b>raising</b> <b>objections</b> on	132.3	164.17	202.27		

this policy/chapter	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(132.3) I have concerns that the wording in paragraph 6.29 is somewhat diluted and carries less weight than the wording of point 6.11 in the local plan 2036. I ask that the requirement for developments to be built to meet the requirements of Secured by Design is maintained, with wording updated to reflect the old local plan.</p>		
<p>(164.17) The Trust understands the need to promote high quality design and welcomes the inclusion of a policy that promotes it. It is the Trust's view that the link between design and heritage setting should be made more explicit within the policy and its supporting text. It is however pleasing to see that a requirement is being placed on applicants to provide a design statement which sets out the design rationale for the majority of all new developments.</p> <p>Policy HD7 omits householder applications from this requirement, however the Trust feels it should be made clear that high quality design is expected for all development, including householder schemes.</p>	<p>The impacts of development on heritage assets and their setting are addressed in other policies in the plan (H1 to H6) and do not require repetition here.</p> <p>The impacts on design can be assessed without a checklist for these smaller applications such as householder schemes. Some elements of the policy requirements (e.g. evidence of applying urban design principles, detailed design statements) will not be applicable to such schemes and could be quite onerous to apply without necessarily adding significant value.</p>	None
<p>(202.27) Is ineffective, as the vast majority of applications, namely, householder, are excluded from the necessity to provide even a basic rationale for the proposal. Remove Householder application exception, this is covered by the proportionality clause.</p>	<p>The impacts of development on heritage assets and their setting are addressed in other policies in the plan (H1 to H6) and do not require repetition here. The impacts on design can be assessed without a checklist for these smaller applications such as householder schemes. Some elements of the policy requirements (e.g. evidence of applying urban</p>	None

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
	design principles, detailed design statements) will not be applicable to such schemes and could be quite onerous to apply without necessarily adding significant value.	

POLICY	HD8				
All respondents supporting policy	82.5	148.15	170.8	177.16	196.16

COMMENT SUMMARY	OFFICER RESPONSE
<p>Support this policy, in particular:</p> <p>d) protects significant green infrastructure features such as biodiversity habitats, public open spaces and mature trees and considers existing provision of these in the local area as well as opportunities to enhance greening and biodiversity on the site.</p> <p>This will strengthen the ability of the Plan to deliver requirements on BNG and nature recovery.</p>	Support welcomed.
Policy HD8 of the Submission Draft Local Plan requires development proposals to make efficient use of land, appropriate for the context of the site and its surroundings. It is expected that that sites at mobility hubs and within the City and District Centres will be capable of accommodating development at an increased scale and density.	Support welcomed.
(17.16, 148.15) Building at appropriate densities is an important component of sustainable development. Making efficient use of any land in the City is a priority. This policy must be read in relation to the HD9 on building heights.	Comment noted and support welcomed.
(196.16) Building at appropriate densities is an important component of sustainable development. Making efficient use of any land in the City is a priority. This policy must be read in relation to the HD9 on building heights.	Support welcomed.

POLICY	HD8				
All respondents raising objections on this policy/chapter	26.14	74.12	125.6	130.5	151.7
	164.18	170.8	189.8	194.7	
	202.28				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(26.14) Increasing density in Oxford's city and district centres will ruin the city.	Comment noted.	None required
(74.12) 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.	See Historic England SoCG	See Historic England SoCG
(125.6) We would encourage further guidance in relation to strategic site allocations and large areas which are planned for intensification and transformation, recognising that they must optimise density and will create a new context because of their size and scale. The Plan should make reference to and recognise the fact that development at strategic sites need to acknowledge existing context and have regard to any visual relationships with areas of the City which are sensitive from a heritage perspective, whilst also recognising the opportunity to create new transformative neighbourhoods which have their own unique built form and sense of place.	Allocated Sites have their own bespoke policies in the plan, which contain site and context-specific guidance on appropriate type and quantum of development and design requirements – including density.	None required

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(130.5) This approach is welcomed in order to make the most efficient and best use of limited land within the city centre. We would encourage further guidance in relation to strategic site allocations and large areas which are planned for intensification and transformation such as the Botley Road Retail Park, which will create a new context because of their size and scale in Policy HD8. The Plan should make reference to and recognise the fact that development at strategic sites need to acknowledge existing context but also have the opportunity to create new transformative context.</p>	<p>Allocated Sites have their own bespoke policies in the plan, which contain site and context-specific guidance on appropriate type and quantum of development and design requirements – including density. Each allocated site was individually assessed using urban design principles.</p>	<p>None required</p>
<p>(151.7) We believe that the City Council could and should be more ambitious in this regard. The 100 dph (dwellings per hectare) target for the City and District centres is still relatively modest in terms of modern urban environments. Likewise, Gateway Sites (proposed at 60-70dph) should be assessed with regards to the capacity to absorb a higher density. It is our view that ALL new housing should be brought forward at a minimum of 70 units per hectare, unless demonstrable exceptional circumstances dictate otherwise.</p> <p>The NPPF (Paras 124-125) is clear that efficient use of land is essential especially where there is an envisaged shortage of land to meet housing needs.</p> <p>We support the submission by South Oxfordshire and Vale of White Horse District Councils that this</p>	<p>Density figures in the plan, unless otherwise indicated, are considered as indicative and minimum levels. In the case of site allocations, each site was individually assessed through an urban design led process. Individual schemes proposing higher densities than the indicated minimum figures would be assessed on their merits.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>failure to maximise density means the policy is not Positively Prepared or Effective, as it does not seek to meet the area's objectively assessed needs and undermines joint working on this cross-boundary strategic matter.</p> <p>The Policy should be revised to set higher minimum densities, that should be adhered to unless demonstrable exceptional circumstances dictate otherwise. In particular:</p> <ul style="list-style-type: none"> <li>- increase the density assumptions, especially for the City and District Centres and the Gateway sites</li> <li>- reflect further opportunities to raise density eg in more suburban areas and along main roads.</li> </ul>		
<p>(164.18) The Trust supports the inclusion of a policy which provides a framework for using context to determine appropriate density. Oxford is a constrained city, with an ever-growing pressure to accommodate development. Whilst it is important to make efficient use of land, this should not be to the detriment to other considerations such as impact on views, the street scene or nearby heritage assets.</p> <p>The Trust welcomes reference to impact on heritage within the Policy text but feels that this could be expanded upon to include reference to more specific heritage elements such as short and long-distance views, both in and out of the city, skyline, roofscape and green setting of the city.</p>	<p>The supporting text references the contextual considerations for assessing the appropriate density for development schemes.</p>	<p>None required</p>
<p>(165.5) Policies HD8 (Using Context to Determine Appropriate Density) and HD9 (Views and Building</p>	<p>Density figures in the plan, unless otherwise indicated, are considered as indicative and minimum levels. In the case of site allocations, each site was</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Heights) will militate against any opportunity to create greater density along the Cowley Branch Line.</p>	<p>individually assessed through an urban design led process. Individual schemes proposing higher densities than the indicated minimum figures would be assessed on their merits.</p>	
<p>(170.8) Policy HD8 of the Submission Draft Local Plan requires development proposals to make efficient use of land, appropriate for the context of the site and its surroundings. It is expected that that sites at mobility hubs and within the City and District Centres will be capable of accommodating development at an increased scale and density.</p>	<p>Density figures in the plan, unless otherwise indicated, are considered as indicative and minimum levels. In the case of site allocations, each site was individually assessed through an urban design led process. Individual schemes proposing higher densities than the indicated minimum figures would be assessed on their merits.</p>	<p>None required.</p>
<p>(189.8) The policy notes that development proposals in areas such as District Centres will be able to accommodate an increased scale of density. High-density residential development is indicatively taken as 100dph for highly accessible locations such as District Centres. The reference to 100dph should be removed on the basis that setting this metric restricts optimising the development potential of brownfield sites in the most sustainable locations to deliver a suitable and appropriate amount of housing.</p> <p>The policy should respond to NPPF Paragraph 124 (Part D), which states that the promotion of regeneration and change should be factored into any assessment of/ or when considering, the efficient use of land for a development proposal. For the site to meet its full potential for residential development, a design led approach should be adopted so that the quantum of development</p>	<p>Density figures in the plan, unless otherwise indicated, are considered as indicative and minimum levels. In the case of site allocations, each site was individually assessed through an urban design led process. Individual schemes proposing higher densities than the indicated minimum figures would be assessed on their merits.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>appropriately responds to existing context and heritage, via a thorough assessment process as well achieving high quality placemaking and public realm. It is also well understood that the availability of suitable land in the city is limited due to the historical significance of the city centre, the heritage policies that create a sensitive framework to introduce development of height and the limited availability of large scale suitable brownfield sites to deliver development in sustainable/ accessible locations. In this context, Templars Square represents a valuable and sustainable brownfield site which can make a significant contribution to meeting the city's housing need. In accordance with paragraph 125 of the NPPF, planning policies must avoid homes being built at low densities and ensure that development delivers the optimal use of each site. It is therefore of great importance that the site is not limited in its scope to deliver much needed housing for the city. Accordingly, density should be a design-led process and be based on the opportunities and constraints of a site. For the site opportunity to be optimised, and for Policy HD8 to be effective in delivering high density development in District Centres, the density metric of 100dph should not apply to such locations and in place a design led response to density should be inserted into the policy.</p>		
<p>(194.7) We would encourage further guidance in relation to strategic site allocations and large areas which are planned for intensification and</p>	<p>The plan includes Area of Change policies, which set out key development principles which relate to all schemes within areas identified as being subject to</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>transformation such as Osney Mead, which will create a new context because of their size and scale...</p> <p>...the Plan should make reference and recognition to the fact that large-scale redevelopment and regeneration projects need to acknowledge existing context but also have the opportunity to create new transformative context.</p>	<p>cumulative impacts of development that are potentially transformative. They highlight opportunities for infrastructure delivery, high quality design and place making.</p> <p>Osney Mead itself sits within the West End and Botley Road Area of Focus.</p>	
<p>(202.28) Waffle, ineffective. “is informed” is practically meaningless, “does not substantially impact” Para e) “opportunities for net zero carbon design” unrelated to topic, remove, also f) “flood risk”</p>	<p>Urban design principles were used to determine the indicative density figures. It is a holistic approach that takes into consideration factors that are deemed to be relevant in the context of the built environment. E.g. net zero carbon design may have implications on siting, height, massing etc and flood risk may impact the amount of developable land on a site.</p>	None required.

POLICY	HD9					
All respondents supporting policy	8.55	54.4	144.6			

COMMENT SUMMARY	OFFICER RESPONSE
Support for the policy	Noted
BMW broadly support this policy but request that clarification is included on whether the 15m height limit is Oxford-wide or within a certain buffer of the Carfax Tower. An illustrated plan would be helpful to be included in this policy’s supporting text. Further, it is unclear from the Local Plan’s supporting evidence	The support for the policy is noted. The High Buildings TAN considers in particular the height at which buildings in particular areas may be impactful on the skyline views of special significance. The lower levels of sensitivity are reflected in the greater stated heights where they may be impactful. But

COMMENT SUMMARY	OFFICER RESPONSE
base and Background Papers where the 15m figure was derived from – this should be clarified and justified.	development in all of the city may be impactful on the historic skyline over certain heights.

POLICY	HD9					
All respondents raising objections on this policy/chapter	26.15	28.16	74.13	113.7	124.13	
	133.13	164.19	189.9	165.6	202.29	
	148.16	177.17	196.17	144.6	149.6	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(26.15) Building tall buildings in Oxford will ruin the city.	Whilst the policy does not preclude the development of high buildings, it requires that they meet the criteria set out in the policy and are compatible with other requirements of the plan covering a range of relevant material planning considerations.	None
Policy HD9 is not consistent with NPPF as it does not allow for the level of harm to historic significance to be assessed and then balanced against public benefit. Under the terms of the Policy, all levels of harm are unacceptable and cannot be approved which is not consistent with national policy. In addition, the approach goes against the tradition within the City of positively supporting innovative schemes which make best use of land and contribute positively to the skyline of the City.	<p>The policy does not preclude the development of high buildings provided they meet the criteria set out in the policy and are compatible with other requirements of the plan.</p> <p>The policy approach is consistent with previous plans. It does support innovative schemes that contribute positively to the skyline. Criterion c says: ‘it should be demonstrated how proposals have been designed to have a positive impact on important views including both into the historic skyline and out towards Oxford’s green setting...’</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The Policy refers to specific software (VuCity). It is not appropriate for a Local Plan to push a particular brand of software. This reference should be deleted and the policy simply refer to the use of an appropriate 3D model.</p>	<p>Comment noted. VuCity is the platform used by the city council to assess schemes and it is necessary that information is provided in this format. The current policy has the same wording.</p>	<p>None</p>
<p>(127.4, 149.6) Policy HD9 requires the provision of a visual impact assessment for any development over 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher). The special significance of the views of Oxford's historic skyline, both from within Oxford and from outside is acknowledged. However, there are parts of the City where there is less sensitivity and therefore the requirement for the visual assessment should be proportionate. The wording of the policy should be amended from requiring 'extensive information' to provide greater flexibility.</p>	<p>The High Buildings TAN considers in particular the height at which buildings in particular areas may be impactful on the skyline views of special significance. The lower levels of sensitivity are reflected in the greater stated heights where they may be impactful. But development in all of the city may be impactful on the historic skyline over certain heights.</p>	<p>None</p>
<p>Support the intentions of this Policy, but we are concerned that, in present form, it is inadequate. One of Oxford's major heritage assets is Port Meadow. We urge the Council to revise Policy HD9, to make clear that its intention includes protecting views both to and from Port Meadow, and not only to and from the city's Historic Core Area. For example, in the first paragraph we suggest 'Oxford' is replaced by 'Oxford (including Port Meadow)'. Past experience of the Castle Mill flats disaster has shown that, without such clear policy intention, the preciousness of views from Port Meadow will be neglected in the planning process.</p>	<p>A whole range of policies in the Plan ensure important local views are considered, including HD2 and HD7. Policy HD9 ensures an appropriate design response in terms of heights, across the city, and not only in terms of the impacts on the historic skyline.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>We urge the Council to amend the policy as above, to prevent such errors recurring in future.</p>		
<p>It should be made clear within the policy that a view is not itself a heritage asset and does not have significance in the same way a heritage asset does, as defined in the NPPF. It is considered that replacing 'special significance' in the first and sixth paragraphs of the policy with 'important characteristics' would appropriately respond to the guidance set out in GLVIA 3rd edition.</p>	<p>Views into and from within the city are important elements of the setting of heritage assets. The collection of buildings that make up the 'dreaming spires' are considered a heritage asset in their own right, and they do have special significance. There is sufficient detail in the supporting text that provides clarity to the policy, and there have been no objections to this specific wording from Historic England and key conservation groups.</p>	<p>None</p>
<p>The Trust worked very closely with the city and other specialists to create the 'Assessment of the Oxford View Cones report' in 2015. It is pleasing to see reference to the report within the Local Plan, but the Trust is concerned that the report is described as an 'absolute' and not an approach to assessment. The views of Oxford are experienced and enjoyed from a wide variety of places and not just the specific view points in the report. The report should be seen as a starting point, and all major development proposals should be cognisant of the potential impacts that might occur in any view. The report highlights some particularly important and sensitive views but should not be considered as an exhaustive exercise. The Trust suggests that an update or addition to the View Cones study could be commissioned that also includes the assessment of views within the city and</p>	<p>Following feedback from HE, amendments to the policy wording have been proposed to give clarification with respect to vantage points of views from outside and inside the city. Please see the Statement of Common Ground agreed with Historic England.</p>	<p>None (except those agreed through the SoCG with Historic England)</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
out from it. These elements of heritage setting should also be included in the proposed policy.		
The proposed policy is missing an element of national policy that explains how new development can help people’s understanding of significance – development involving heritage assets and their setting can “better reveal their significance.”	This wording from the NPPF does not need to be copied into policies of the Local Plan.	None.
<p>The Trust is concerned that the drafted wording for policy HD9 focuses on urban design and gives insufficient recognition to setting. The proposed criteria references “design choice” and fails to properly consider the appreciation of setting and better revealing that significance. The Trust also suggests that the policy needs to be absolutely clear on the difference between ‘views’ and historic ‘setting.’</p> <p>Furthermore, the Trust consider it appropriate that development should only be allowed in exceptional circumstances where the need for it can be demonstrated to be in the public benefit.</p>	Policies HD1 and 2 in particular do carefully consider the setting of heritage assets and may also be of relevance, alongside Policy HD9.	None.
<p>Policy HD9 allows for no weighing of harm and its balancing against public benefit, thereby departing from national policy.</p> <p>To ensure that proposed policy HD9 is fully justified and effective, the wording should say:</p> <p>... Applications for any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher) <u>should demonstrate a clear need for them and that there is a public benefit arising</u></p>	The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It is also considered that the term ‘highest design quality’ should be replaced with ‘of high-quality design’. Reference to ‘highest design quality’ is a subjective term and is not defined. The policies in the Plan collectively serve to deliver high quality development and design in the city as part of a comprehensive design process. This same detailed design process would take place for development above the heights noted in Policy HD9. The term highest design quality is also not referenced in the NPPF (2023) and therefore the wording should be updated to ‘of high quality design’.</p>	<p>Views into and from within the city are important elements of the setting of heritage assets. There is sufficient detail in the supporting text that provides clarity to the policy, and there have been no objections to this specific wording from Historic England and key conservation groups.</p> <p>The term ‘high-quality design’ is no clearer than ‘highest design quality’ and does not convey the necessary level of expectation.</p>	<p>None.</p>
<p>The word ‘bulk’ should be removed from the following sentence ‘Development above this height must be limited in bulk and must be of the highest design quality’. The meaning of the word bulk can be overly interpreted, and it is considered unhelpful to include within the policy wording. Removal of the word ‘bulk’ does not dilute the intention of the policy due to the supporting explanatory paragraphs and text which sit alongside Policy HD9.</p>	<p>The word ‘bulk’ is considered to be vital to the policy, and its removal does not add to clarity, but would lead to greater potential for harm. It is a design term that will be used in the assessment of planning applications.</p>	<p>None</p>
<p>(202.29) Ineffective as it appears to only refer to central Oxford and the dreaming spires, not views for example into, and out of the Old Headington Conservation area, the language needs to be clearer that it applies to ALL of Oxford where views exist either in or out. See also Ruskin Field SPE19.</p>	<p>The policy does not only refer to central Oxford and the dreaming spires. Although the policy is in several parts, it is considered that this is clear, especially as the second part starts ‘Applications for any building that exceeds 15m...’</p>	<p>None.</p>

<b>POLICY</b>	<b>HD10</b>
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All respondents supporting policy	8.56	178.26	186.4
<b>COMMENT SUMMARY</b>		<b>OFFICER RESPONSE</b>	
Policy is sound.		Noted.	
See full letter for rep.		Noted.	
The ICB supports Policy HD10 in general for the submission of a health impact assessment as part of the planning application for major development proposals.		Noted.	
<b>POLICY</b>	<b>HD10</b>		
All respondents raising objections on this policy/chapter	61.5	155.5	164.2
	202.3		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>		<b>PROPOSED ACTION</b>
The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead	Noted and agreed. Although, this is not a reason to why HD10 is not a sound policy.		No action

<p>recognise the health benefits that delivering older people's housing can bring to individuals.</p>		
<p>HD10 requires all major development undertakes a Health Impact Assessment (HIA). Whilst the HBF would agree that they are an essential part of plan making to ensure the Council understand the health outcomes it is seeking to achieve and creates a plan that seeks to deliver these. This should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health outcomes for the area. An HIA as part of the application would merely be repetition of the work the council has already undertaken. The only circumstance where an HIA may be appropriate would be for a larger unallocated site where the impacts may not have been fully considered by</p>	<p>We also have a whole plan HIA which considers the health implications of all policies. However, having application specific HIAs will enable specific socioeconomic and geographical health indicators to be considered. The policy is soundly based.</p>	<p>No action</p>

the council as part of the plan wide HIA.		
To ensure the policy is effective, the Trust suggests that Policy HD10 should include reference to access to green space and how this can be provided for the benefit of both future and existing residents.	The policy is a sound and proportionate response to the evidence base. It will shape the assessment at the planning application stage. Health factors such as proximity to green space are referenced within referenced HA guidance and our Technical Advice Note.	No action
Ineffective, requiring an assessment does not set a target for compliance, not clear how this is implemented for health impacts from increased traffic, loss of green space etc.	The policy is a sound and proportionate response to the evidence base. It will shape the assessment at the planning application stage. Health factors such as proximity to green space are referenced within referenced HA guidance and our Technical Advice Note.	No action

<b>POLICY</b>	<b>HD11</b>
All respondents supporting policy	8.57

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
General support – No comment.	Noted.

<b>POLICY</b>	<b>HD11</b>
All respondents raising objections on this policy/chapter	28.17

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
This policy is unsound.	Noted.	None.

<b>POLICY</b>	<b>HD12</b>
All respondents supporting policy	8.58    178.27

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
General support – No comment.	Noted.
The Public Health team welcomes this policy, recognising the range of ways in which internal living conditions can affect the health and wellbeing of Oxford residents.	Noted.

<b>POLICY</b>	<b>HD12</b>
All respondents raising objections on this policy/chapter	28.18    153.12

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The policy is unsound.	Noted.	None.
Not effective. New homes should have at least Parker-Morris size standards for rooms, provision for home offices, 'wet rooms' for washing machines/drying and consideration of having some developments with rooms higher than typical for the UK, allowing some residents the opportunity to have taller furniture, fittings, bookshelves etc.	The Oxford Local Plan 2040 includes policies on internal space standards for residential development in accordance with the NPPF and relevant legislation. The background papers explain the planning judgement exercise in the preparation of the policies. No change required.	None.

POLICY	HD13
All respondents supporting policy	8.59

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted.

POLICY	HD13
All respondents raising objections on this policy/chapter	28.19    132.4    178.28    187.3    194.8

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
This policy is unsound.	Noted.	None.
Shared gardens for individual maisonettes and flats have the potential to cause conflict should the	Noted. The Oxford Local Plan 2040 includes policies on outdoor amenity space in	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>privacy and amenity of one resident be compromised by the use of the garden space of another. Ideally all units should have dedicated private space, however where this is not possible it is important that the ground floor flat is not negatively impacted in terms of privacy or noise where garden space must be shared. Rear access routes are very vulnerable to crime and ASB, and facilitate high harm crime such as burglary unless well designed. In order to reduce the risk of crime and ASB, garden access routes must be as short as possible, serve no more than 4 homes, and must be secured in line with the building line. Garden access routes must not undermine the security of dwellings by creating recessed areas that expose vulnerable boundaries in areas lacking surveillance. They should not run in parallel or create unofficial “rat runs” through the development.</p>	<p>accordance with the NPPF and relevant legislation. No change required.</p>	
<p>It is welcomed that this policy includes the provision of spaces to sit and play in communal areas. However, the policy only states that residential units with three or more bedrooms will be provided with outdoor drying space for clothes. Considering smaller residences such as 1 and 2 bedroom flats are more likely to lack private outdoor space, it is pertinent that all residential units are given access to some form of drying space, such as a communal drying area. This is to ensure that indoor air quality is protected from the potential risks from damp clothes drying, and the subsequent hazards to human respiratory health. Suggest an amendment to include a requirement for outdoor drying space in smaller residences.</p>	<p>The policy wording already requires 1 and 2-bed flats and maisonettes to provide either a private balcony or terrace of usable, level space, or have direct and convenient access to a private or shared garden. An amendment to paragraph 6.51 defines usable space as being able to dry clothes, grow plants and vegetables, and provide shade.</p>	<p>Minor modification.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Criterion c allows for a 3 bed flat to have a garden/amenity space of a minimum of 4.5sqm. This is deemed appropriate, however any other 3 bed single-storey home requires a garden/amenity space the same size as the floorspace. Thus a 60sqm bungalow (GEA) requires a garden amenity area some 13x larger than if the accommodation were a flat. A 90sqm bungalow would require an amenity space of up to 20x the space of an equivalent sized flat. This enormous and unjustified disparity is made all the more clear when one also then considers what the garden amenity space for a three-storey 90sqm dwelling would be. There is no need to relate the garden size to the footprint of the dwelling as this is not required in national policy.	The NPPF provides a national context, and the extant plan of the currently adopted 2036 plan has the same approach which has been accepted by a Planning Inspector (current Policy H16). As such the approach to go beyond the requirements of the NPPF for non-designated heritage assets has been previously accepted at a Local Plan examination.	None.
The plan should be made clearer as to whether this standard applies to new student accommodation or graduate housing, in line with Policy H9 (b).	Noted. Amendment to supporting text referencing Policy H9.	Minor modification.

POLICY	HD14
All respondents supporting policy	8.6

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted.

POLICY	HD14
All respondents raising	None received

<b>objections</b> on this policy/chapter	
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<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
None received.	N/A	N/A

<b>POLICY</b>	<b>HD15</b>
All respondents <b>supporting</b> policy	8.61

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
General support – No comment.	Noted.

<b>POLICY</b>	<b>HD15</b>					
All respondents <b>raising objections</b> on this policy/chapter	<table border="1"> <tr> <td>28.20</td> <td>132.5</td> <td>132.6</td> <td>136.21</td> <td>174.27</td> </tr> </table>	28.20	132.5	132.6	136.21	174.27
28.20	132.5	132.6	136.21	174.27		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
This policy is unsound.	Noted.	None.
Not effective. Add a point “Examples of good practice can be found in the Parking and bike parking technical advice note and Secure by Design”.	Paragraph 6.61 of the supporting text already refers to the Parking and Bike Parking Technical Advice Note. Secure by Design is referenced in	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	the supporting text of Policy HD7 (Principles of high-quality design). No change required.	
I ask that a further point is added requiring bike and bin storage to be secure. (see comment below ref page 325).	Paragraph 6.61 of the supporting text already sets out that bike and bin storage must be secure. No change required.	None.
Not effective. This policy should have an addition mentioning the desirability of providing bike storage for non-standard bikes, such as cargo bikes or trikes, which are increasingly popular.	Noted.	Minor modification.
Whilst the principle of this policy is supported, it would benefit from including reference to the storage of other wheeled vehicles, such as wheelchairs, mobility scooters and eBikes.	Noted.	Minor modification.

CHAPTER	7		
All respondents supporting policy	8.72		

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given	The support is welcomed.

CHAPTER	7			
All respondents raising objections on this policy/chapter	26.20	84.10	86.9	164.26
	136.28	59.20		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Why has the term 15-minute city been replaced with liveable city when the definitions are the same?</p> <p>Changing from 15-minute city to liveable city is not possible only by replacing terms/words, but requires a new structure and framework. Achieving a liveable city with strong communities is primarily a multi-dimensional social objective that requires a comprehensive understanding- not reducing it to transport. It is not clear how equality will be achieved. The controversy around LTNs and their risks to social cohesion and inclusion should be acknowledged.</p>	<p>A key spatial strategy of the Plan is to ensure people have good access, by sustainable modes of travel, to facilities they need and that enrich their lives. The term 15-minute city aims to encapsulate this idea. However, it became misinterpreted to mean people's movement would be restricted to their area. The term liveable city also encapsulates the same idea, probably better, so is used instead.</p>	<p>None</p>
<p>The chapter misses some opportunities to empower community groups and give them greater agency over the community spaces they depend on.</p>	<p>There are a wide range of community uses, with a wide range of different ownerships and means of operation. Often they are used by a wide range of community groups, and require an overarching management. There are centres run by the local community organisation. This is generally a matter outside of the realm of planning.</p>	<p>None.</p>
<p>There should be better reference to both the Local Transport and Connectivity Plan (LTCP)</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>and the Central Oxfordshire Travel Plan (COTP), as well as the relevant travel hierarchies.</p>		
<p>The assumption that liveable cities are intrinsically desirable is flawed. Policies that block roads and restrict vehicle access and parking cause businesses to fail and thus increase distances to desired facilities. It also causes recruitment problems because of congestion caused by displaced traffic. Those who drive as part of their job are badly affected, thus policies cause distress and division instead of enhancing well-being.</p>	<p>Oxford is by nature a compact city, with excellent local access to facilities and options to travel by means other than the private car. District centres and the city centre have public car parks. Whilst site allocation policies include these car parks, the policies require sufficient parking to remain to support the centres. Congestion does have many negative impacts, but it will not be resolved by unfettered car use. The County Council as Highways Authority does take a lead in overall transport strategy.</p>	<p>None.</p>
<p>Concern about the lack of detail regarding the issue of public realm and the management of tourist coaches. It also fails to provide an overarching strategy for tourism. Reference is made to the challenge tourist coaches present but no specific policy is included to help manage them. Piecemeal policies will not create vibrant centres- an overarching strategy is needed. There is a specific policy on sustainable tourism in the current plan that should be included in LP2040.</p>	<p>Policy V5 in the LP36 sets criteria for short-stay accommodation and new tourist attractions. In the current plan Policy E5 sets criteria for short-stay accommodation and Policy C5 sets criteria for cultural venues and visitor attractions. Visitor and cultural attractions may attract tourists, but should certainly not be considered 'tourist attractions' because these facilities are also generally highly valued by local people also. The Plan cannot itself resolve the issue of coach parking and drop-off. Solutions will most likely need to be brought forward outside the planning system. Policy C2 does consider public</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	realm of centres and how to ensure they continue to be attractive places to visit.	

POLICY	C1		
All respondents supporting policy	8.63		

COMMENT SUMMARY	OFFICER RESPONSE
Support the policy with no reason given	The support is welcomed.
Support proposal that community resources be further developed in New Marston.	The support is welcomed.

POLICY	C1				
All respondents raising objections on this policy/chapter	12.3	28.21	46.2	202.31	189.10
	66.5	86.8	100.2	174.29	174.15
	136.22	149.7	159.1	187.4	170.9
	164.22				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Broadly supportive but seek specific inclusion of education uses.	The policy allows for various town centre uses and also does allow for other uses to be considered on their merits and according to the other policies of the Plan (and the policy does not prevent existing uses continuing or intensifying).	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council commented on this policy and the summary and response can be found in the Statement of Common Ground.		
West Oxfordshire District Council commented on this policy and the comment is summarised in the SoCG.	The response is in the SoCG	Minor modification made (see SoCG with West Oxfordshire and table of minor modifications).
The main concern with the draft local plan is the principle of 15 minute neighbourhoods, which is a main element of the local plan. Marston lacks many basic facilities, including a GP surgery, and NHS dental practice, a large supermarket/general store, a swimming pool. Marston can't be considered a local centre unless facilities are improved.	The local plan aims to protect existing facilities. The local centre in Marston is considered to meet the definition, and therefore it is worth including in the policy to maintain an active frontage and also to allow new developments of facilities in those locations.	None.
Headington District Centre includes Bury Knowle Park, which is ineffective and unjustified as most of the uses are inappropriate for core green space.	The park is an important draw for a wide area, attracting people to the centre and drawing the community together (and it includes the library. It is also protected as Green Infrastructure.	None.
The policy should allow for visitor accommodation, not just hotels.	Agree that use of word 'hotels' lacks clarity. Amendment to use short-stay accommodation for consistency with Policy E5.	Policy C1 ... • Visitor attractions (Sui Generis uses including pubs, cinemas, live music venues, concert halls, dance halls); • <u>Short-stay accommodation</u> Hotels.
Headington is a district centre and Underhill Circus is proposed as a local centre but with new developments at Barton Park and proposed at	There is not another centre in the area, including Underhill Circus, that is at the level of a district centre. The Policy can only try to	No change proposed.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Bayswater there is a need to upgrade it to a district centre that is a focal point for the area.	protect what is there and cannot bring in new shops and businesses.	
Policy C1 seeks to direct town centre uses to the defined centres and requires a sequential approach for new town centre uses. This is not considered reasonable when an existing town centre use/employment site outside of these centres is looking to expand.	Commercial developments are best placed in the centres, and expansion of these uses outside of these centres should follow the sequential test. The comment seems to be focused largely on the requirement in Policy E1 to justify expansion of Category 3 employment sites through use of the sequential test, and a response to that point is provided in the summaries of Policy E1.	None
The area around the Kassam Stadium/Ozone Leisure Park should be designated a local centre if there is substantial development there and south of Grenoble Road. This would have important planning implications, in terms of community facilities, retail, transport and healthcare facilities, not only for new developments but for the parts of Blackbird Leys and Littlemore.	The policy can only try to protect what is there and cannot bring in new shops and businesses. The Ozone Leisure Park does not represent a local centre. If development goes ahead at Grenoble Road (South Oxfordshire), there may be enough housing in the local area to support a new local centre naturally.	None.
A larger area of Blackbird Leys (around Cuddesdon Way) is defined as the district centre than is actually the case. That allows for uses that are not appropriate to come into this wider area. The district centre already has an approved application for a high and dense	The wider area does include important community facilities that help to make the centre the heart of the community, and it is largely restricted to these uses. The centre includes facilities such as the community centre, church, pub and leisure centre. These are part of the centre, as accessible as the rest of the	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
development, and at least 100dph is not appropriate across this wider area.	centre and also potentially suitable for high density residential development.	
The policy fails to refer to public realm- and how any new development within the identified areas should make positive contributions to these areas. This is contrary to the NPPF para 96, 116, 124. The policy should refer to distinct local character and the public realm should be elevated in importance.	Policy C1 is restricted to considering the suitable locations for town centre uses. Policy C2: Maintaining Vibrant Centres does consider the environment in these centres, including public realm.	None.
The policy should include support for all operations within Class E, i.e. research and development and light industrial uses which are not currently identified.	Agree that these Class E uses should be captured. The policy does say use class E and other town centre uses will be permitted, and the list cannot be exhaustive because so many uses fall into Use Class E, but it would nevertheless be helpful to include these in the list.	<p>Policy C1:</p> <p>In the city and district centres, new Use Class E and other town centre uses will be permitted, which <u>include are</u>:</p> <ul style="list-style-type: none"> <li>• Retail, cafes and restaurants;</li> <li>• Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres);</li> <li>• Health centres, GPs and clinics;</li> <li>• Offices; <u>research and development and light industrial</u></li> </ul> <p>...In the Local Centres, new Use Class E uses will be permitted, including:</p> <ul style="list-style-type: none"> <li>• Retail, cafes and restaurants;</li> <li>• Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres);</li> <li>• Health centres, GPs and clinics</li> <li>• Offices, <u>research and development and light industrial</u></li> <li>• Residential (except student accommodation)</li> <li>• Community facilities</li> </ul>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Magdalen Road should be added to the list of local centres as it clearly meets the criteria for a local centre and is a well-used hub. It is far more than a small parade of shops with a purely local function.	Magdalen Road is not considered suitable to add to the list of local centres. Each local centre has a defined active frontage, where, to promote vitality, class E uses should remain at over 80%. Magdalen Road does not have a defined centre or frontages, but a variety of businesses along the street, separated from each other. Some of these may attract people from a much wider area than the local area, but in all likelihood they will be visiting an individual business, rather than visiting the place itself as a centre.	None.

POLICY	C2			
All respondents supporting policy	8.64	46.3	131.1	136.23

COMMENT SUMMARY	OFFICER RESPONSE
Support with no reasons given	The support is welcomed.
Support the intent of the policy and that it applies 'where relevant'.	The support is welcomed.
Support the aspirations of the policy and note the potential at Gloucester Green for public realm enhancements and to attract more visitors.	The support is welcomed.
Support that the policy encourages the reduction of car parking, particularly large surface-level car parks	The support is welcomed.

POLICY	C2
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All respondents raising objections on this policy/chapter	26.16	133.14	153.13	172.12	173.12
	163.6	164.23	170.10	189.11	174.16
	202.31				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
District centres tend to have the usual supermarkets, which do not necessarily sell good quality food, and independent shops seem to be disappearing. Many prefer to travel to, e.g. farm shops, and their travel should not be restricted. Reduced parking, CPZs and traffic filters are in effect fines and prevent free movement of people in their own city.	Planning policies cannot influence the occupiers of units (for example by favouring independent shops over supermarket chains). Traffic filters and intended to manage traffic and will not prevent access to anywhere. Transport measures introduced by the County Council has highways authority are independent of the Local Plan, but should work together with policies such as C2, which try to retain the vibrancy of local centres that are easily accessed, to encourage the ability to use more sustainable modes.	None
Support much of the policy but restrictions on the car will not meet customer and employee needs and centres will suffer. Bus routes do not successfully inter-connect and fast and efficient alternatives are needed.	Car parks will remain at the district centres and they will remain fully accessible. Bus operations in the city are nearly all operate on a commercial basis.	None
In the city centre pedestrianisation with marked cycle routes would help solve the problem. There should be goals for significant pedestrianisation of the city centre, which	The City Council will continue to work with the County Council to identify potential solutions to conflicts between different road users in the city centre, with the aim of enhancing public realm,	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>would allow public realm enhancements that significantly improve the attractiveness of the area.</p> <p>Reference should be made to the wider public realm.</p>	<p>whilst also allowing good accessibility by bus. However, the details of this work , and implementation of schemes, will be led by the highways Authority and are outside the realm of the Local Plan. Nevertheless, the Policy does set out that opportunities, where relevant, should be taken to deliver public realm improvements, rebalancing space within streets from vehicles to pedestrians.</p>	
<p>No provision is made in the NPPF for setting a threshold in active frontages. Suggest the policy should apply outside of site allocations and that the provisions of the policy should be considered flexibly so that proposals demonstrate active frontages have been maximised and promote vitality and activity at ground floor level.</p>	<p>The policy provides flexibility through setting of thresholds that are above current levels and also because of the broad range of uses in Use Class E, which ensure active frontages. This policy provides an essential means of ensuring continued vitality of the city centre and district centres.</p>	None.
<p>The threshold for Class in the Hythe Bridge Street active frontage is too prescriptive and may render the development of sites unviable where retention of ground floor use at class E is not feasible. Proposals should be considered site-by-site for their impacts on vitality. Also question the definition of 39-42a Hythe Bridge Street as being included in the ‘secondary frontage’ They are isolated and do not form a key part of the network of frontages.</p>	<p>The Hythe Bridge Street active frontage is secondary city centre frontage with a threshold of 70% Use Class E. Given the relatively low level of the threshold and the very broad nature of Use Class E, this is considered to give an appropriate degree of flexibility. 39-42a are important frontages. Hythe Bridge Street is a key street in connecting the station to the city centre. It has long been allocated as a retail frontage, and maintenance of activity and</p>	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	commercial uses at ground floor along this route is essential.	
Further consideration is required on what is deemed as an active frontage within the Templars Square site. What is defined on the draft policies map as an active frontage is not conducive to what an active frontage is considered to be. Setting a threshold for Class E uses restricts the opportunities available to transform Templars Square into a modern, fit for purpose site in a district centre. In any mixed-use residential development, there will be pressure on ground floor space for entrances, escapes for upper floor uses, bins and bike stores. Development proposals should be given the flexibility to deliver an appropriate quantum and location of active frontages through a design-led and place-making process, which would be delivered through design codes and masterplans for large-scale sites.	Policy SPS12: Templars Square makes it very clear that in an redevelopment of the centre, the active frontages should be re-provided along the identified principal routes. This does give significant flexibility to consider where the active frontages are when the centre is re-designed. There is no link to the current frontages. The active frontages would only be on the principal routes and would not therefore need to include bin and bike stores and other necessary servicing for residential (or other) uses. The policy says the principal routes should draw people into and through the centre, and activity at ground floor level will be important here. The level of the threshold and the very broad range of uses included in Use Class E gives sufficient flexibility.	None
Ineffective, waffle, verbal diarrhoea seems to say everything but nothing, could mean anything, or nothing.	Comment noted.	None
South Oxfordshire and the Vale of White Horse District Councils consider the Plan is unsound because it is ineffective and not positively prepared. The aim to achieve high densities in	Oxford has over 1000 years of world-class heritage, and with that comes a responsibility and a particular need to balance benefits of development against their impacts. Oxford is	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>the city and district centres is welcomed, but when read together with other policies protecting heritage this could, without positive planning and proactive intervention, lead to underplaying the city and district centres' growth potential. The city and district centres need to be subject to specific studies and action plans that actively identify and support regeneration.</p>	<p>also a compact city with already dense development and opportunities for regeneration that make efficient use of land. The West End and Osney Mead SPD looks in detail at the area of the city centre with the most opportunity for regeneration, setting out urban design guidance to guide this to make best use of the land and to be responsive to the heritage of the area. Chapter 8 of the Plan takes a proactive approach to guiding development on all of the sites with identified development potential, setting minimum housing numbers in all cases where appropriate.</p>	
<p>Response from West Oxfordshire District Council summarised in Statement of Common Ground.</p>		

POLICY	C3	
<p>All respondents supporting</p>	8.65	49.4
COMMENT SUMMARY	OFFICER RESPONSE	
<p>Yes. No reason given.</p>	<p>Noted.</p>	
<p>NHSPS welcomes the clarity that this definition provides as it will enable the NHS to undertake estate reorganisation programmes as needed on sites in a health use (Class C2 and/or E(e)).</p>	<p>Noted.</p>	
POLICY	C3	

All respondents raising objections	89.21	122.2	136.24	163.7	189.12
	178.3	187.5	195.1		
COMMENT SUMMARY		OFFICER RESPONSE		PROPOSED ACTION	
<p>Unsound, not to positively prepared, not justified, not effective and not consistent with national policy.</p> <p>Incorrect data is used as facilities provided should be judged in facilities provided per person. The policy should consider per capita statistics.</p>		<p>Noted. The policy's focus is to support and improve existing community facilities. The Community and Cultural Facilities background paper sets out the data and rationale behind the formulation of policy C3.</p>		<p>No action</p>	
<p>Unsound, not effective and not consistent with national policy.</p> <p>Policy is focused on "town centre uses" and lacks an internal balance for cases where the loss of a facility could be justified by the criteria set out in the Framework (NPPF) at 103.</p> <p>Policy C3 lacks positive support for the improvement or existing facilities, or the creation of new facilities, which is a missed opportunity, and contrary to the Framework at 96, 97, and 102.</p>		<p>The policy is in accordance with national guidance and prevents the loss of community facilities that are vital for local communities. Criteria must be met for the loss of a community space to occur. The policy wording supports the creation of new facilities wherever possible.</p>		<p>No action</p>	
<p>Unsound, not positively prepared and not justified. Policy needs to allow for extensive engagement with the local community if a community facility is to be lost or altered. We would also like to see this policy address more explicitly how it will preventing the reduction in size of community spaces.</p>		<p>The point about engagement has been noted, however engagement will be supported as part of the planning applications process. The policy sets out the key criteria that resists the loss of community spaces where appropriate.</p>		<p>No action</p>	
<p>Unsound, not justified. It is considered that an abstention of this policy should apply to sites proposed for redevelopment, where protection of such spaces would prohibit successful development</p>		<p>Site specific policies will be provided within chapter 8. Sites will come forward in the planning balance having regard to all relevant material planning considerations. The policy is soundly based.</p>		<p>No action</p>	

<p>coming forward comprehensively where identified as such in the Local Plan i.e. in this case Nuffield Sites and Templrs Square.</p>		
<p>We consider that there should be mention of the potentially multi-functional benefits that community facilities can offer.</p>	<p>See Statement of Common Ground with Oxfordshire County Council. Paragraph 7.12 of the Local Plan says: 'Co-locating multiple facilities on a single site can be an efficient way to improve both quality and accessibility.' Therefore, we consider there is already positive wording about multi-functional benefits of community facilities. It is considered that the policy provides sufficient flexibility and clarity, being clear under which circumstances a case may be made for loss of a facility and how it may be shown that it can be replaced or changed to an alternative facility. <a href="#">However, it is also agreed that the that it refers to community facilities that may be within school sites, rather than schools themselves.</a></p>	<p>Modification as follows:</p> <p>Planning permission will be granted for new local community facilities, including those <u>located</u> within schools and colleges grounds, where opportunities are taken to secure community use and joint user agreements.</p>
<p>We note in the context of Draft Policy C3 that 'community uses' are expected to be protected or reprovided. We consider the Stadium distinct from the general thrust and objectives of Policy C3 but would welcome the Council's clarification of this point. The current facility is a commercial enterprise rather than providing a 'community' activity. We accept that it offers 'entertainment' but as referenced elsewhere the interest, particularly in greyhound racing, is very much in decline. We do not consider it feasible to protect the existing uses or reprovide similar uses within the site in the event that the existing greyhound and speedway uses</p>	<p>Oxford Stadium is within the Oxford Stadium Conservation Area and is a heritage asset. The existing uses are valued by the local community. It has been brought into these uses very recently and the exact nature of them may change. However, it is clearly an important asset for the local community.</p>	<p>No action</p>

become unviable. On this basis we would see redevelopment facilitating wider alternative community benefits rather than replicating or re-providing existing uses on site.		
Policy C3 seeks to preclude improvements to local shops that might fall within Use Class F2 if they would become large enough to then fall in Class E. This seems illogical. Someone will only propose to improve a facility where there is a need and demand for it. To deny someone the ability to provide a better facility for local people based on an arbitrary floor space that was not of their own making, and does not necessarily reflect real world local needs, is unduly controlling and actually self-defeating. If someone wants a large Class F2 shop in order to better serve their community then that should be allowed not stifled. Other controls are available to prevent the shop becoming some other use- e.g. planning conditions or planning obligations. This criterion actively seeks to preclude shop owners making better services which is contrary to the aims and objectives of the overall plan.	The purpose of this policy is to retain small local shops as an important community asset. The policy also helps to maintain a diversity of shop sizes and protect the long-term future of a local community. Large F2 shops will be permissible.	No action

<b>POLICY</b>	<b>C4</b>				
All respondents <b>supporting</b> policy	8.66				
<b>COMMENT SUMMARY</b>		<b>OFFICER RESPONSE</b>			
Sound – no reason given.		Noted.			
<b>POLICY</b>	<b>C4</b>				
All respondents <b>raising</b>	113.8	178.31	199.18	202.33	46.5

objections on this policy/chapter		
COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound, unjustified. Policy C4 is unnecessary controlling and presents a threat to the future academic and research strategy of the Collegiate University. It is not clear why any justification for future academic and research development is required and in no way can a local need be guaranteed beyond that any such development in a global hub for learning is inherently desirable and necessary. Further clauses in the Policy require the Universities to justify why existing uses are no longer required and why new ones are important. This places the Local Planning Authority in control of the research and learning strategies being pursued by an institution, a level of control which is unjustified and inappropriate.</p>	<p>The City Council supports new learning and non-residential institutions that meet certain criteria. This will ensure growth that benefits the city holistically. The City Council has been working closely with partners including the County Council as the Local Education Authority to plan the educational needs of the city and will continue to work in partnership to ensure that new development is provided with access to school places, and that existing access is enhanced and improved when opportunities arise. Close partnership working will be essential to ensure that communities continue to have the best possible access to facilities.</p>	<p>No action</p>
<p>Addition of 'where possible' to the wording is welcomed, however, it would be useful to have clarification on what level of data or justification would be required in order to assess whether such an agreement is 'possible' or not in each case.</p>	<p>Please see the Statement of Common Ground with the County Council.</p>	
<p>Policy C4 is a threat to the future academic and research strategies of both Universities. It is not clear why any justification for future academic and research development is required and in no way can a local need be guaranteed beyond that any such development in a global hub for learning is inherently desirable and necessary. Indeed, the importance of</p>	<p>This policy is not intended to apply to higher residential institutions such as the universities, and we think it is clear it does not apply to them. However, for absolute clarity we suggest a modification to demonstrate this.</p>	<p>Underneath the last bullet point of Policy C4, include an asterisk, denoting <i>“*This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University.”</i></p>

<p>research and learning undertaken at both Universities may from time to time generate challenging development propositions. These issues are likely to engage matters of public benefit in respect of heritage policy given the historical continuity of this activity within Oxford. This benefit should be acknowledged within Policy C4 and wherever institutional activity falls within the Areas of Focus, such as Policy NCCAOF and Policy MRORAOF. The various tests for new development around density and traffic are duplicating other policies in the Plan and it is not planning positively to single these institutions out in this way.</p> <p>Tests for development range beyond those in national policy: impacts of any kind are prohibited and mitigation is not offered as a solution.</p> <p>Protection, Alteration and Provision of Learning and Non-Residential Institutions (Policy C4) is unnecessarily controlling without recognising the important benefit and historical continuity of this activity within Oxford.</p>		
<p>OCC has, at every single local plan, attempted to block any rivals to Oxford University or other institutions trading on the Oxford moniker.</p>	<p>The City Council supports new learning and non-residential institutions that meet certain criteria. This will ensure growth that benefits the city holistically. The City Council has been working closely with partners including the County Council as the Local Education Authority to plan the educational needs of the city and will continue to work in partnership to ensure that new development is provided with access to school</p>	<p>No action</p>

	places, and that existing access is enhanced and improved when opportunities arise. Close partnership working will be essential to ensure that communities continue to have the best possible access to facilities.	
Policy C4, Protection, alteration and provision of learning and non-residential institutions provides an overarching policy approach which supports the provision, redevelopment and relocation/reprovision within sustainable locations within the city. Whilst it is not explicitly stated it would be helpful if it were acknowledged in the supporting text to this policy that the replacement or relocation of a facility should be designed to meet future needs and that does not equate to a 'like for like' floorspace replacement particularly where a facility is inefficient and does not meet modern needs.	The City Council supports new learning and non-residential institutions that meet certain criteria. This will ensure growth that benefits the city holistically. The City Council has been working closely with partners including the County Council as the Local Education Authority to plan the educational needs of the city and will continue to work in partnership to ensure that new development is provided with access to school places, and that existing access is enhanced and improved when opportunities arise. Close partnership working will be essential to ensure that communities continue to have the best possible access to facilities.	No action

POLICY		C5			
All respondents supporting	8.67	77.1	177.18		
COMMENT SUMMARY		OFFICER RESPONSE			
Yes. Not, answered.		Noted			
We welcome inclusion of this policy which addresses our comments of the previous stage. We consider that it will provide robust protection for Oxford's valued facilities, ensuring that change of use can only occur where there is clear and demonstrable redundancy. This ensures it reflects		Noted			

paragraph 97 of the NPPF (2023), and that the social and cultural well-being for local people provided by these facilities and the wider economic benefits can be maintained.					
<b>POLICY</b>	<b>C5</b>				
All respondents raising objections	136.25	163.8	165.7		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>		<b>PROPOSED ACTION</b>		
Unsound, not positively prepared and not justified. As there is no specific policy on pubs in the new plan, this policy (or policy C3) should make explicit that they cover pubs, which provide important community spaces in many communities. We would suggest that the Council considers adopting CAMRA's model planning policy, particularly the Public House Viability Test, to ensure pubs are not deliberately run down so they can be redeveloped into more profitable uses for the owner.	Pubs are mentioned within the policy. The policy requires that an application with evidence is submitted to prove that the criteria required for a pub to close has been met.		No action		
Unsound, not effective. It should be made evident in the policy that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites.	Planning decisions will be taken in accordance with national and local planning policies, including the National Planning Policy Framework and PPG. Chapter 8 of the Local Plan comprises site specific requirements whilst the rest of the Local Plan comprises policies against which decisions will be made.		No action		
It is suggested that supporting text is incorporated which supports a flexible approach toward protection and retention of cultural venues where site allocations are supported for comprehensive mixed use redevelopment, as well as an additional bullet point included in the policy itself regarding the list of	Any comprehensive redevelopment scheme should consider the protection of cultural venues and the policy outlines the circumstances where the loss of existing venues and attractions could be lost. There		No action		

<p>circumstances where the loss of cultural venues is supported. This additional bullet point could be incorporated / read as follows:</p> <ul style="list-style-type: none"> <li>· Or forms part of comprehensive, mixed use development scheme.</li> </ul>	<p>is no requirement to amend the which is soundly based. The policy is soundly based.</p>	
<p>Object to Policy C5 (Protection, alteration and provision of cultural venues and visitor attractions) on the basis they should be defined in accordance with the definition of such facilities in paragraph 88d of the NPPF: local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. Commercial town centre uses such as cinemas and bingo halls should be excluded from this definition.</p>	<p>Policy C5 sets a framework for the protection, alteration and provision of cultural venues and visitor attractions that add to the cultural and social scene of the city and district centres. It provides criteria against which planning decisions will be made. NPPF paragraph 88d enables the retention and development of community facilities and provides some examples. It is not a restrictive policy. Therefore, Policy C5 is an appropriate framework in response to the evidence and context of the City of Oxford. It is soundly based.</p>	<p>No action</p>

POLICY	C6				
All respondents <b>supporting</b> policy	8.68	16.4	157.1	174.17	178.32

COMMENT SUMMARY	OFFICER RESPONSE
Supportive of policy – no further comments (2 respondents)	N/A
Support the central aims of this policy which is to ensure that there is no unacceptable residual cumulative impact on the road network, whilst prioritising pedestrian and cycle movements and facilitating access to high-quality public transport.	Support welcomed

<p>Agree with the approach that transport assessments and travel plans should be required to review transport impacts. Given the car free aspirations of the City Council, this could be referred to more strongly in this policy with more emphasis on how these can aid this transition. We remain of the opinion that the plan would benefit from a stronger focus on connectivity more generally. This could include polices related to active travel, public transport, mobility hubs, green infrastructure and digital connectivity which not just limits the need to travel but has the ability to improve the travel experience through live information and on-line ticket purchasing etc.</p>	<p>In response to a representation from the County Council we intend to put forward a change to paragraph 7.21, which does widen the reference to County Council schemes. However, we do not intend to reference things that are not directly relevant to the local plan and which it can have absolutely no influence over, such as on-line ticket purchasing and live information.</p> <p>Change also proposed to paragraph 7.40. See SOCG with West Oxfordshire District Council for details.</p>
<p>Oxfordshire County and Oxford City Councils have written and updated many documents which aspire to prioritising vulnerable roadusers - but change is slow to come. We applaud the changes to policy that have made LTNs possible, we support the traffic filter strategy to come into practice in October 2024, we support the creation and expansion of the Zero Emissions Zone. We are glad that policy to put pedestrians and wheelchair users at the top of the road users' hierarchy have been adopted.</p>	<p>Support welcomed</p>

POLICY	C6									
All respondents <b>raising objections</b> on this policy	26.17	59.9	83.1	136.26	144.7	148.17	164.24	178.32	189.13	
	194.9	196.18	199.19	202.34						

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not justified - The transport policies and measures being planned and implemented by the county council are intended to reduce the ownership and use of private cars in the city.</p>	<p>Oxford City Council works with Oxfordshire County Council, the local highways authority. Local Plan policies support the county council's measures set out in the Local Transport Connectivity Plan (LTCP) and the Central Oxfordshire Travel Plan (COTP) to ensure that new developments support and encourage the</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>This is simply an attack on people’s privacy, independence and freedom. Not everyone wants to or can walk or cycle. Just provide good public transport and let people make their own choices about which mode of travel they wish to use. There is no need for fines and permits. Such measures simply restrict people and take away their freedom.</p>	<p>move away from private vehicle journeys where possible and seek to support sustainable and active travel options.</p>	
<p>Unsound - Strengthen the first paragraph of the policy with the following:  “These measures need to prioritize active travel above all other forms of transport, and include safe connectivity with the surrounding infrastructure, such as safe road crossings [bridges/underpasses] or roundabout improvements. Development of nearby transport interchanges to address increasing transport volumes must be considered.”</p>	<p>Comments noted.   The supporting text para 7.33 notes that it is important to optimise active travel. Additional text in the policy is not considered necessary.</p>	<p>None</p>
<p>Unsound (no further reason given) - It is essential to ensure that no developments are approved unless there is high quality walking and cycling connectivity both to district centres and to city centre, including safe crossings of major roads. The routes need to meet the standards of LTN 1/20. Perceived road danger is</p>	<p>The supporting text sets out at para 7.33 that <i>“development proposals should seek to optimise active travel opportunities”</i>. It also identifies at para 7,23 that the City Council will <i>“work with Oxfordshire County Council, the local highways authority, to ensure that new development incorporates the principles and encourages sustainable and active travel that offers joined up travel options”</i>.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>the major reason why people don't cycle. We want to see an explicit mention of safety.</p> <p>We are pleased to see CLOCS referred to. Prefer as applicable to where applicable to.</p>		
<p>Unsound as not justified or effective - Construction Management Plans should be required not just where large amounts of construction traffic will be generated, but also for developments where smaller amounts of construction traffic may cause significant disruption on the surrounding area (e.g. on small residential roads where access to the site may be very limited).</p>	<p>The policy as drafted requires Construction Management Plans (CMP) to be submitted where the proposed development will generate significant amounts of movement. The requirement for a CMP can also be conditioned as part of any planning permission if appropriate and necessary.</p>	<p>None</p>
<p>Not sound, the policy wording is ambiguous - in relation to transport measures associated with development, 'adequate and appropriate' are not properly defined nor do they align with the NPPF. Wording should be amended and include 'necessary'. Suggested amendment: 'Planning permission will only be granted for development proposals if the City Council is satisfied that <u>necessary</u> <del>adequate and appropriate</del> transport-related measures will be put in place.</p>	<p>Agree that the use of the words 'adequate' and 'appropriate' is ambiguous, and neither are defined within the Plan. The insertion of 'necessary' in their place will provide more clarity.</p>	<p>Minor modifications to policy wording.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>-under Transport Assessment section – suggest word ‘unacceptable’ is included under bullet point ‘a’ to ensure the transport assessment is focused - suggested amendment: a) there is no <u>unacceptable</u> impact on highway safety to be assessed on a case-by-case basis;</p> <p>-references to the County Council Street Design Guide and the requirement for CLOCS accreditation for any Construction Traffic Management Plan. This provides an inflexible approach where, should these documents or standards be amended or removed compliance with the policy could not be achieved. Suggestion that if these need to be specifically referred to in the policy then there should be a caveat included for other reasonable alternative guidance/ standards) subject to agreement with the City Council – suggested amendment: f) the development helps to create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards as set out in the Oxfordshire County Council Street Design Guide <u>or other suitable alternative as agreed with the Council</u></p>	<p>Agree that the insertion of the word ‘unacceptable’ will provide greater clarity.</p> <p>If additional guidance is published that supersedes any of the guidance referred to within the policies, an updated TAN or equivalent guidance will be issued.</p>	<p>Minor modifications to policy wording.</p> <p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>-Within the policy the terminology changes from “Delivery and Service Management Plan” to “service and delivery plan”, this should be made consistent within the policy.</p>	<p>Agree, wording needs to be consistent.</p>	<p>Minor modifications to policy wording.</p>
<p>-It is also unclear what ‘Substantial’ refers to in relation the triggering the need of such a plan. This should be more clearly explained.</p>	<p>Each application will need to be judged on a case by case basis. There is no clear threshold.</p>	<p>None.</p>
<p>-Similarly, the requirement for a Construction Traffic Management Plan (CTMP) is noted as being required where development is likely to generate ‘significant’ amounts of movement. There should be a definition of “significant” provided in terms of scale of movement. Notwithstanding this, development proposals often do not have a contractor on board at the application stage. Contractors are those operating on site and are best placed to provide the appropriate CTMP for the development. This is historically a matter which is conditioned as part of a planning permission and this is the most appropriate route within which to control this matter. This element of the policy should be omitted or replaced with a note that CTMP’s will be required on any approved planning permissions - suggested amendment:</p>	<p>Although ‘significant’ is not explicitly defined, Appendix 7.3 indicates thresholds for when a Travel Plan is required and Appendix 7.2 makes reference to when a Transport Assessment or Transport Statement may be required. Both can be used as guidance.</p> <p>Whilst acknowledged that the requirement for a CTMP can be conditioned as part of any planning permission, the applicant is expected to demonstrate that the impacts of construction have been considered and appropriately mitigated at the application stage. The inclusion of additional text is not deemed necessary.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Construction Traffic Management Plan must be submitted for development that is likely to generate significant amounts of movement during construction.</p> <p>This CTMP must incorporate the CLOCS (Construction, Logistics and Community Safety) standards where applicable <u>or other suitable alternative as agreed with the Council.</u></p>		
<p>Unsound as not effective: No ambition to increase pedestrianised areas on the part of the City Council. The minute area of pedestrianisation in Oxford is one of the worst aspects of the City Centre, and certainly very restrictive in its capacity to attract and absorb the attention of visitors and residents alike. Air pollution from vehicles, including non-exhaust emissions, is best cut by radically increasing the pedestrianised area with marked cycle tracks wherever possible.</p> <p>In relation to Vision Zero, concentrations of pedestrian, cyclist and car accidents should guide County and City to pursue measures to reduce traffic movement on the specific roads involved. This should include remodelling junctions.</p>	<p>The City Council will continue to work with the County Council to identify potential solutions to conflicts between different road users in the city centre, with the aim of enhancing public realm, whilst also allowing good accessibility by bus. However, the details of this work, and implementation of schemes, will be led by the County Council as Highways Authority and are outside the realm of the Local Plan. Nevertheless, the Policy does set out that opportunities, where relevant, should be taken to deliver public realm improvements, rebalancing space within streets from vehicles to pedestrians.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>We want the coach station moved to the Becket Street car park, creating a transport hub including the rail station. Coupled with an ambitious expansion of pedestrianisation between the City Centre and the rail station, it should be possible for coach users to be dropped off at Becket Street and have better pedestrian routes allowing them to access the City Centre. This could be used to regenerate existing empty units aimed at tourists and others on such routes. The City Council, in cooperation with County, should look at the traffic reduction possibilities for Park End Street and Hythe Bridge Street, as regeneration measures where footfall could be increased.</p> <p>We urge that pursuing a re-opening of the rail line to Witney/Carterton be part of the Plan period objectives.</p> <p>A 50% increase in cycle trips by 2031 is a good goal. It would be much easier to achieve if more dedicated cycle tracks across the City Centre area are added. We also need new bridge access across Oxford for walkers and cyclists providing alternative routes to Magdalen Bridge (see earlier comments). Whilst not opposed to scooters in principle, casual observation suggests that students who might have cycled</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>before are using scooters on cycle tracks and elsewhere. This is not Active Travel and we think the Council should recognise that scooters are 'inert travel' with little health promotion value.</p> <p>An overall goal of annual reductions in the number of vehicle movements within Oxford is needed. Therefore, transport assessment must consider how any given development contributes to this goal. It may help this process to consider what targets are desirable for different types of vehicles. For example, SUVs are entirely inappropriate for urban areas, occupying too much space, adding to road damage due to weight, and taking too much of what should be a shrinking amount of car parking; single person car journeys are very much to be discouraged.</p>		
<p>Unsound - OPT has great concerns about the lack of detail in the Plan regarding the management of tourist coaches. The Plan appears to be advocating continuation of the status quo, with dropping off places in the existing locations with coaches then required to go to an off-street location, currently provided for at Redbridge Park and Ride. Enforcement of the existing on-street stopping regulations is extremely difficult and not very effective. As a</p>	<p>Paragraph 7.28 sets out the Local Plan approach to tourist coaches. This indicates that the City Council are working with the County Council as the Highways Authority to strategically plan for coach parking in the city and that drop off points for coaches will continue to be needed in the city but enforcement is required to ensure coaches return to a long stay parking area.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>consequence there are regularly large numbers of coaches stationary in locations such as St Giles with their engines (and air-conditioning) left running, resulting in obstruction of the carriageways and footways, unacceptable noise and emissions in the vicinity and a general degradation of the public realm. This is a disappointing demonstration of the level of disregard for the historic environment shown in the Local Plan, and in 'reality' a lack of disregard for the city centre generally. It is unacceptable to have a coach park in St Giles and Beaumont Street and puts at risk the very attraction that the tourists from across the world comes to enjoy.</p>		
<p>Unsound as not justified - There is no reference to the Local Transport and Connectivity Plan (LTCP) under the section on 'Transport Assessments, Travel Plans and Servicing and Delivery Plans'. Reference is needed in Policy C6 and supporting text. Working in partnership with the County Council, the City Council should ensure that this Local Plan is working towards the targets in the LTCP. There is reference in paragraph 7.40 to one of the supporting strategies to the LTCP (the Mobility Hub Strategy), but all the relevant documents need to be mentioned. The County Council's</p>	<p>Agree that the additional references could be helpfully added to the text, and that the text of paragraph 7.21 should be amended to make it easier to read and more understandable. The text explains what is expected to be considered in transport assessments. To add this to policy is unnecessary and removes flexibility should these considerations change over time.</p> <p>Refer to SOCG with Oxfordshire County Council.</p>	<p>Main modification proposed.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>'Implementing Decide and Provide' should also be mentioned as it is important for developers to follow that advice to devise sustainable developments that help create liveable neighbourhoods.</p> <p>Amend the text of paragraph 7.40 as follows:            'Transport Assessments will be considered in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and supporting strategies including the Central Oxfordshire Travel Plan, Active Travel Strategy, Innovation Framework and Mobility Hub Strategy.</p> <p>Particular attention should be given to the Mobility Hub Strategy on proposals at railway stations, bus stations, town and district centres, hospitals, university campuses and Category 1 employment sites.'</p> <p>Amend the first paragraph of Policy C6 to add:            'Consideration of proposals will be in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and its supporting strategies and advice such as 'Implementing Decide and Provide'.</p> <p>Amend the text of paragraph 7.21 to make it easier to read and understandable.</p>		
<p>Unsound as not effective, not consistent with national policy -</p>		<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy requires surveys and reports to be prepared to accompany planning applications some of which would be better conditioned to come after consent has been issued. To require delivery and service management plans up front is not practical, particularly on outline schemes or where an occupier is not yet known. Likewise, a construction management plan should be conditioned until a contractor is on board.</p> <p>The following changes to the policy should be made: para 3: “.....b) there is no <del>unacceptable</del> <u>severe</u> residual cumulative impact on the road network;.....”</p> <p>para 4 “A Travel Plan..... must be submitted for development <u>or will be conditioned to be provided</u> that is likely to generate significant amounts of movement in accordance with.....”</p> <p>Para 5: “Where a Travel Plan is required....., a Delivery and Service Management Plan will be required (<u>either to accompany the application or via a planning condition</u>).”</p> <p>Para 8: “A Construction <u>Traffic Management Plan</u> must <u>either</u> be submitted <u>with a planning application or will be required by condition</u> for development that is likely to generate</p>	<p>Do not consider a justifiable reason as to why this would not be required upfront. It is important that this information is submitted to support the application and inform the decision-making process rather than being deferred to a condition.</p> <p>Agree that a minor modification to the policy wording would align with the NPPF.</p> <p>Not considered appropriate as per comment above</p> <p>Not considered appropriate as per comment above</p> <p>Not considered appropriate as per comment above</p>	<p>Minor modification.</p> <p>None</p> <p>None</p> <p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>significant amounts of movement during construction. This CIMP must incorporate the CLOCS standards where applicable (Construction, Logistics and Community Safety).”</p>		
<p>Unsound as not positively prepared, not justified, not effective, not consistent with national policy – Policy requires a Travel Plan to be submitted for Higher and Further education facilities over 2,500sqm or other uses which are likely to generate significant amounts of movement. Whilst the Universities fully accept the need to promote a reduction in car use in favour of sustainable and active travel, the draft policy fails to make exemptions for institutions which already have overarching Travel Plans. The Universities, therefore, ask that where the University has an up to date Travel Plan, any new student development is exempt from providing an independent Travel Plan.</p>	<p>A Travel Plan should be submitted that is bespoke to the development proposal. This can include objectives, measures and targets that form part of an institution's overarching travel plan, but it is not considered appropriate to provide an exemption.</p>	<p>None</p>
<p>Unsound as not effective - Query what “...residual .. impact” means. Believe reference to “and within neighbouring areas;” is ineffective as it is outside of the developer’s control. Both of the above are ineffective, as they don’t reduce anything and imply an increase in traffic is acceptable. Also ineffective</p>	<p>Policy is about ensuring that any traffic impacts are appropriately addressed and have been drafted to align with the wording in NPPF.</p> <p>The draft policy wording does not make any direct reference to the AQMA. The whole of the city was declared an AQMA in</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>as muddles planning with delivery of the objectives, the policy must state this must be done, not planned for. Ineffective as states “is likely to” which is meaningless, and only applies to the City Centre AQMA not the whole city. Ineffective as no metrics given.</p>	<p>2010 so the comment about the City Centre is not considered to be appropriate.</p>	
<p>Unsound as OxPA still finds that despite the aspirations in policy documents, practice often falls short of words.</p> <p>Our policy for Transport and Planning is and remains (for new and existing developments):</p> <ul style="list-style-type: none"> <li>-Walking and wheeling need to be at the centre of street and public space planning.</li> <li>-Pavements need to be 3m wide so that two wheelchair users can pass one another in comfort and dignity.</li> <li>-Wide and level pavement extensions should be installed across all side roads, on desire lines, and crossings should be on desire lines,</li> <li>-Waiting times to cross need to be shorter, and crossing times longer than is currently policy.</li> <li>-Pavements should be level (including at driveway entrances), and unobstructed.</li> </ul> <p>If just these principles were applied across the board we will have come a long way.</p> <p>We ask that these standards be incorporated into the Local Plan 2040 in both the Planning and the Transport sections.</p>	<p>The City Council works with Oxfordshire County Council as highways authority. In new developments we would defer to highways design guidance for adopted roads.</p> <p>Appendix 1.1 of the Local Plan 2040 sets out a design checklist that development proposals are expected to consider.</p>	<p>None</p>

POLICY	C7			
All respondents <b>supporting</b> policy	8.69			

COMMENT SUMMARY	OFFICER RESPONSE
Support with no further comments – 1 respondent	Noted

POLICY	C7							
All respondents <b>raising objections</b> on this policy	28.22	83.2	132.7	136.27	174.18	178.33	199.20	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified – 1 respondent with no further comments	Noted	None
Unsound – Inconsistencies between the standards in the cycle parking TAN and those in the Local Plan appendix. Very supportive of the standards set out in the appendix, suggest increasing the standards for city primary and secondary schools. Query why the numbers of spaces specified for several of the institutions indicate per staff or visitors, surely this should read staff and visitors?	<p>A main modification is proposed to refer to the County Council’s cycle parking standards instead of the standards in the Local Plan appendix.</p> <p>The cycle parking Technical Advice Note (TAN) will be updated to ensure it is consistent with the policies in Local Plan 2040 upon its adoption.</p>	Main modification.
<p>Unsound as not effective – Cycle theft is prevalent in Oxford City and a real and increasing threat to the council’s ambitions for net zero. The local plan should require developers to consider cycle store security, as well as ease of access and convenience.</p> <p>Unable to locate any requirements in the documentation for the physical security standards of cycle storage. Simply including the</p>	<p>Policy C7 sets out requirements that bicycle parking in new development is secure and accessible: <i>Bicycle parking should be well designed and well-located, convenient, <b>secure</b>, covered (where possible enclosed) and provide level, unobstructed external access to the street.</i></p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>word “secure” in the policy is not sufficient as this may be interpreted and manipulated by developers, and carries no real meaning or weight.</p> <p>-Infrastructure for securing cycles, particularly in public places needs to be strong enough to resist attack.</p> <p>-Request that a point is added to this policy, requiring cycle parking to conform to police approved specifications as laid out in Secured by Design. Reference must also be made to the Secured by Design cycle parking security standards document.</p>	<p>Modification proposed to para 7.43 to refer to ‘Secured by Design Cycle Parking Standards’.</p> <p>Examples of good practice for cycle storage are also provided within the Car and Bicycle Parking TAN published in March 2022.</p>	
<p>Unsound as not justified – Concerned that the provision for student accommodation to provide bike parking below minimum standards may be detrimental. Unless pre-existing bike parking is incredibly close to the new development, it is likely to be inconvenient to park bikes beyond the development, and this may result in bikes being locked to railings or lampposts instead, which should be avoided.</p>	<p>A main modification is proposed to refer to the County Council’s cycle parking standards. Whilst these do not indicate bespoke standards for student accommodation, minimum residential standards are indicated for house, flat and visitor cycle parking. Non residential minimum standards are indicated for different use classes.</p>	<p>Main modification</p>
<p>Unsound as not effective – Consider this to be an important element in achieving the City’s aspirations to significantly reduce private vehicles within the city. If successful, this policy should help significantly reduce the reliance on car journeys, particularly for short distances. Given the above, suggest that the bicycle parking standards for student accommodation should be tightened up by removing the ‘or’ from the two criteria. In terms of the bicycle parking standards, it may be helpful if the policy referred to more detailed standards set out elsewhere. This should also cover parking standards for the needs of disabled people etc. Finally, the policy could specify the need for bicycle parking to be conveniently located</p>	<p>A main modification is proposed in discussion with Oxfordshire County Council, to refer to the County Council’s parking standards for bicycle parking, instead of the local plan appendix.</p> <p>Refer to SOCG with West Oxfordshire DC.</p>	<p>Main modification proposed to cycle parking standards.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
to changing rooms/ showers and lockers where possible, to allow for easy access.		
Unsound as not positively prepared, not effective - These standards are not the same as the County Council's requirements set out in our recent Parking Standards document that is available online and was available at the time this Local Plan was being prepared. The City Council agreed these standards prior to their adoption. The City's standards in some cases do not require as much bicycle parking as the County standards. The City's standards are also difficult to understand in part and imprecise. Amend Policy C7 and the related appendix so that bicycle and powered two wheeler parking design standards do not contradict the County Council's standards.	It is agreed that the differences in categories, and small differences in measures and requirements are confusing and not necessary. Main modification proposed to refer to County Council's standards.	Main modification proposed.
Unsound as not positively prepared, not justified, not effective, not consistent with national policy - Although we support this Policy with qualification, bicycle parking provision should be informed by an assessment of need, considering occupancy levels and travel data to avoid unnecessary duplication of cycle facilities. The proposed policy fails to recognise the unique operations of Universities and that students and staff often travel between multiple buildings throughout a day. Cycle parking provision for University facilities should be exempt from standard methodical calculations which are oversimplified for such uses and risk creating an overprovision.	The standards are applicable to all within the city and it is not considered appropriate to offer exemption to the University.	None

POLICY	C8		
All respondents <b>supporting</b> policy	8.70	83.3	157.2

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (with no further comment) - 1 respondent.	N/A
Want to see low car developments across Oxford. Do not want to see any additional public parking anywhere in the city. The extra parking recently put in at Florence Park and the ice rink goes against a policy of reducing motor vehicle movements. CPZs need to be across the whole city so that any future development can become low car. Developers need to work with bus companies to change routes so that developments then qualify as being close to a bus route.	Comments noted.

POLICY	C8									
All respondents <b>raising objections</b> on this policy	26.18	28.23	34.3	59.2	100.3	132.8	133.15	144.8	172.13	
	173.13	174.19	178.34	187.6	193.9	202.35				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified – New developments should provide car parking for its residents. There should be no CPZs or policies to reduce or have no car parking spaces.	The transport and movement strategy of the Plan is based upon reducing the need to travel and promoting active travel and public transport. The ongoing challenge is to improve air quality and cut carbon emissions, supporting people to shift away from a reliance on private vehicles will be essential to achieving this goal.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not positively prepared, justified, effective or consistent with national policy – no further comment/ explanation given – 1 respondent.	N/A	None
Unsound, no reason given - It is time to give consideration to the parking of mopeds used for delivery services. The use of edge of road and/or pavement parking in prominent locations runs the risk of blighting areas. Carfax, which already suffers from traffic, becomes a parking lot for moped riders. Some form of strategy for these mopeds would improve the city centre, but also the local shopping centres.	It is not within the scope of the Local Plan to influence parking on the public highway. Unauthorised parking is an enforcement issue.	None
Unsound as not justified and not effective – Narrative discusses issues with coaches but there is no policy statement to address misuse of street parking and obstruction of cycleways by coaches. Add additional text - Scheduled and tourist coaches will drop off and pick up at designated locations, and must then leave the City and go to a long-stay parking area. Residential streets must not be used for this purpose.	It is outside the remit of the Local Plan to address misuse of street parking and cycleway obstruction. This is an enforcement issue.  Para’s 7.27 and 7.28 of the Local Plan address scheduled and tourist coaches.	None
Unsound as not effective – Concerns regarding the meaning of the wording in this policy, specifically that requiring vehicle parking to be located “to minimize the circulation of vehicles around the site” and does not take into consideration crime and pedestrian safety concerns. Parking must remain safe and carefully located to ensure high levels of surveillance that reduce opportunities for crime, e.g. not provided for in isolated locations at the periphery of developments.	It is not considered appropriate to remove unallocated parking from the policy. The Plan includes policies intended to set out requirements for following a design process that will ensure development responds to its context including the immediate and wider surrounds. This	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>-Concerns about the safety of woman and girls accessing parking and suggest parking is designed to be safe, well overlooked and close to the homes that it serves.</p> <p>-Landscaping around parking areas must also be designed to ensure surveillance is not compromised – the use of trees with a clear stem up to 2m and hedge planting maintained below 1m is important.</p> <p>-Concerns that policy allows for unallocated parking for residential dwellings. Whilst car ownership remains high, this creates a free for all with significant risk of neighbour disputes, community tension and inappropriate parking on the highway with associated obstruction and safety risks. Request that unallocated parking is removed from this policy, with all residential dwellings being allocated parking. This is the only way that enables effective monitoring and management of parking across sites with low numbers of parking spaces.</p>	<p>includes consideration of the principles and physical security standards of the police's Secure by Design scheme.</p>	
<p>Unsound as not justified – Although agree with the aim of discouraging use of private cars, imposing ‘low car’ or ‘car free’ residential developments, except in special or unusual circumstances, will have too many damaging effects – e.g. by causing displaced parking and by depressing the market value of properties and is not viable due to public transport availability.</p>	<p>The viability impacts of low car policies have been tested and explored in the Viability Assessment for the Plan, separately and cumulatively with the other policy requirements of the Plan, to ensure that developments are not made unviable.</p>	<p>None</p>
<p>Unsound as not justified – For residential schemes the policy refers frequently to ‘low-car’ residential development although phrase is not defined as part of the glossary of terms at the beginning of the chapter which would be a sensible addition.</p>	<p>Para 7.52 states <i>“low car development means that no car parking spaces are provided within the site other than those reserved for blue-badge holders, car clubs</i></p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>-In relation to the non-residential standards the Council’s ambitions to reduce those arriving by the private vehicle are commendable however, the reality is that for a number of locations the park and ride facilities or frequency and range of bus routes do not make it a reasonable option for those who live outside of the City.</p> <p>-Whilst the attitudes of works and companies are changing in relation to how they access the normal place of work, there remains a desire to have convenient parking associated with commercial development especially where public transport is not frequent. Policy E1 encourages the intensification of employment sites by making the best and most efficient use of the land but this is not supported by the parking policy which outlines that no net increase in parking would be supported, indeed, encouraging a reduction where there is good accessibility to a range of facilities.</p> <p>Where development is provided at a greater density, there may be justification for additional parking, particularly where there is limited access to alternative forms of transport. The policy should be amended to allow for this where robust Transport Assessments and justification are provided.</p> <p>On the basis of the above we would propose the following variations in the text: “In the case of the redevelopment of an existing or previously cleared site, there should be no net increase in parking on the site from the previous level <u>unless robust evidence is provided which demonstrates an increase in parking is appropriate for the site.</u> The Council will <u>encourage</u> a reduction <u>in parking</u> where there is good accessibility to a range of facilities <u>and frequent public transport”</u></p>	<p><i>and for operational uses including spaces dedicated for working drivers.....”</i></p> <p>It is not necessary to amend the policy wording. The intensification and modernisation of employment sites provides opportunities for investment in transport infrastructure improvements (e.g., more frequent public transport services and other active travel measures). These measures can help encourage a modal shift away from private car use and onto more sustainable modes of travel.</p>	
<p>Unsound as not positively prepared, not effective and not compliant with the Duty to Co-operate.</p>	<p>The parking standards are part of a suite of policies to reduce the need</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The restrictions on public parking provision, together with other private vehicle access restrictions, could provide the opportunity to re-assess the need for and scale of public parking available with the possibility of re-development of public car parking facilities for other uses (or combined with other uses), including residential development above car parking facilities. This would help make more efficient use of land in the city and be another contributor to housing land supply.</p> <p>Draft Policy C8 provides the basis for a strong positive approach to re-organisation of provision for private vehicles in Oxford with a clear direction towards restriction of parking provision over the plan period. A key benefit of this would be a reduction in the amount of land and space needed to accommodate private vehicles overall and the potential to release such land for residential or other development. As written, the policy and approach taken in the plan is not Positively Prepared because it doesn't seek to meet the area's objectively assessed needs.</p> <p>The policy is also not Effective, because it has the effect of adding to unmet housing need which is not effective joint working on this cross-boundary strategic matter.</p> <p>Fails the duty to cooperate and cannot be rectified. But some reflective changes to the approach to seek to deliver housing need in Oxford uses would have helped to avoid the failure.</p>	<p>to travel and to encourage active travel modes. Over time, if public car parks become redundant and available for development then those sites could come forward and the priority use would be for residential on suitable sites. The policies in the plan already allow for these changes where opportunities arise, for example at Templar's Square the policy allows for reduced public car parking provision and increased residential, and at Northern Gateway the policy allows for consolidation of the park and ride element of the site.</p>	
<p>Unsound as not effective– The policy is very prescriptive so there needs to be a careful consideration as to whether this approach proposed is appropriate in the majority of circumstances. The policy focuses on</p>	<p>The policy sets parking standards; it is not considered to be unnecessarily prescriptive. There is</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>parking restrictions but there is very little about design (for example the possibility of integrating parking into the street design and the ability to allow for future conversion). Also there is very little reference to how future technological development could shape parking.</p>	<p>some reference to design in the policy in terms of integrating into the landscaping and minimising circulation around the site. Policy C9 is about electric vehicle charging.</p>	
<p>Unsound as not positively prepared, not justified, not effective – Amend Policy C8 and the related appendix so that motor vehicle parking design standards do not contradict the County Council’s standards.</p>	<p>Unlike other districts the city council has long set out its own parking standards. The standards in the OLP2036 are reflected in the County’s recent parking standards document. The City Council considers it important as part of its overall strategy, as something that should be led by the Local Plan.</p>	<p>None</p>
<p>Unsound as not positively prepared, not effective -            -The policy text explanation after the asterisk should be placed above 'non-residential developments', as it is a helpful intro to the non-residential section.            - Criterion c)- it is welcome that the policy is now clearer on the sort of 'shop' that is deemed to be a supermarket however the policy is still insufficiently clear for a number of reasons:            -Does not define how to measure the floor space or clarify the scope of retail space. Additional explanation in the policy is needed.            -Furthermore the items listed in the policy are not considered sufficient for people to live from, the policy risks including facilities that are not</p>	<p>Comments noted and suggested amendments not considered necessary.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>really supermarkets.</p> <p>-Disagree with part of policy that specifies 'measurements taken from the midpoint of the proposed development' as depending on the size and shape of the development this may mean that residents will have to travel further depending on where they live on the development. An alternative suggestion would be to change the phrase to 'midpoint of the proposed residential unit'</p> <p>in recognition that large sites will have different character areas and potentially different frontages and access points.</p> <p>- Disagree that a supermarket should have a minimum floorspace of 130sqm as this is considered too small to provide the range/variety of goods needed and suggest this is increased to 280sqm in line with Sunday trading law thresholds. Suggest the following changes:  "within 800m walk to a supermarket or equivalent facility with a minimum floor area of 280m<sup>2</sup> of retail space/trading space which sells essential items including milk, bread, pasta and fruit and vegetables" or "within 800m walk to a supermarket or equivalent food or grocery type facility with a minimum range of at least 4,000 different including essentials of milk, bread, pasta, fruit and vegetables"</p> <p>-Also insertion of the word 'local' does not help with supermarket definition and consider that the current wording excludes certain groups who are not able to access larger supermarkets elsewhere and may therefore not be able to access healthy food choices.</p> <p>- Suggestion that criterion should be based on the no. of goods provided rather than floorspace. Also concern about risk of dependence on only one shop and to avoid the peculiarity of there being say three good shops locally the policy could also be changed to say: "within 800m walk to either the centre point of a city, district or</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>local centre, or the entry point of a supermarket or equivalent facility with a minimum floor area of 280m<sup>2</sup> of retail space/trading space which sells essential items including milk, bread, pasta and fruit and vegetables”.</p>		
<p>Unsound as not justified - Supporting text states permission may be refused for development where additional parking pressure would compromise highway safety or restrict the ability of existing residents to park (paragraph 7.48). Current LP2036 Policy M3 states that there would be a presumption that vehicle parking would be kept to the minimum necessary to ensure the successful functioning of the development. Supportive of this policy insofar that it allows for flexibility between non-residential developments and recognises that needs differ for different uses. Submission Draft Policy C8 still includes the former part of policy M3 but prefaces it with the presumption that any vehicle parking will be for blue badge and servicing only. Do not support the inclusion of the presumption against vehicle parking as a blanket rule. Given the detail provided in the remainder of the policy, such as in relation to the redevelopment of existing sites, or that parking should ensure functionality of the development, it is not considered necessary to include such wording in the policy.</p>	<p>The Plan aims to promote and achieve a shift towards more sustainable modes of travel. Policy C8 helps to achieve this aim by minimising car use through delivering a reduced number of unallocated and other parking spaces (in line with the parking standards at Appendix 7.6) where certain criteria are met.</p>	<p>None</p>
<p>Unsound as not effective –  - “scheme” is not defined, in particular for smaller developments such as end of garden development/site split or 2-3 houses and frequency is not defined by time e.g.: rush hour versus 04:00 AM.  - “Seek a reduction” is ineffective. As extra staff or residents will be multimodal, at least some will increase traffic, therefore a net reduction is required to compensate.</p>	<p>Agree that the use of the word ‘schemes’ is unclear. Suggest a minor modification to change to ‘developments’.</p> <p>The policy wording states “<i>there should be no net increase in</i></p>	<p>Minor modification</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p><i>parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities.”</i> No further changes are considered necessary.</p>	
<p>Unsound but no reason for unsoundness provided – Concerns raised that it’s not possible, nor desirable, to deem any future housing development in Blackbird Leys as ‘low car’ and thereby require that only pooled car parking spaces are provided. Consider that Blackbird Leys is a peripheral housing estate beyond the Oxford Ring Road and with all our main convenience shops being beyond the periphery of our area this will require the use of a car for most trips (although acknowledge that most parts of the Parish benefit from good public transport access). Other policies of the Local Plan provide for, and actively promote in some cases, many hundreds of new homes in the Parish and its immediate edges. It is not conceivable, without a clearly thought through parking strategy for Blackbird Leys, that the City Council’s ambitions could be achieved here without causing very significant disruption to the local community.</p>	<p>Any residential application that comes forward for development within the area would be assessed against the criterion for low car schemes set out in Policy C8.</p> <p>Included within the criterion are controlled parking zones - the County Council is ultimately responsible for the introduction/ delivery of these.</p>	None

POLICY	C9		
All respondents <b>supporting</b> policy	8.71	16.5	174.20

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (with no further comment) - 2 respondents.	n/a

COMMENT SUMMARY	OFFICER RESPONSE
No objection to the policy but wonder if it could be simplified with some of the details included within supporting guidance. Also, where covered by building regulations, some elements of the policy may not be necessary. There may be the opportunity to merge this proposed policy with a general policy covering parking standards if it is necessary to condense the number of proposed policies in the Local Plan.	Noted

POLICY	C9				
All respondents raising objections on this policy	26.19	28.2	59.21	131.2	133.16
	164.25	178.35	189.17	199.21	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified or effective - EVs are not environmentally sound and restrict their drivers in how far they can travel.	Comment noted and not considered a soundness issue.	None
Unsound as not justified or effective - Forcing individuals to comply with policy that doesn't offer any benefits. It's an extra cost as the cable to the site has to be thicker. To make sound the policy should be removed as it doesn't serve any benefit.	Policy seeks to ensure that EV chargers are well located and designed for ease of use. Policy includes reference to national standards and guidance.	None
Unsound as not effective - Insufficient technical detail to deliver uptake: Add for newbuild residential developments one 11kw charge point for 20 dwellings	The delivery of infrastructure for charging electric vehicles is set out in Building Regulations as identified in para 7.60 of the Plan. Within the Policy wording, the reference to PAS standards also seeks to	Minor modification to policy wording to ensure that references to PAS standards and their associated footnotes are correct.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
for new build non residential dwellings one 11kw point/20 car park spaces	ensure that EV infrastructure is installed to an acceptable standard.	
Unsound as not justified or effective: Policy as currently drafted is particularly onerous and may potentially deter investors or visitors to the City. The costs of upgrading existing electricity infrastructure may be prohibitive, and the cost of upgrades to the wider electricity supply and distribution network to support EV charging would likely add a further financial burden to existing and new commercial operations and may impact businesses' ability to remain competitive. We, therefore, request that this policy is amended so that providing onsite electric vehicle charging infrastructure is only required subject to technical feasibility and financial viability.	The policy seeks to ensure that EV charging infrastructure is installed at all new build developments helping the City respond to the challenges of climate change and move towards becoming net zero.	None
Unsound as not positively prepared or justified –Strongly support the aims of this policy, but it should be strengthened in two respects. For new build residential developments with on-street parking, the Policy should specify the minimum proportion of parking spaces that must be electrified (we suggest 50%). Similarly, for new build non residential developments, the requirement for 'access to' EV charging should be strengthened to specify a minimum proportion of parking spaces to be electrified (again we suggest the norm should be 50%), unless it can be robustly demonstrated that this would be excessive for a particular development.	Policy wording refers to the provision of infrastructure in new residential developments to enable the charging of EV's on the street in accordance with Oxfordshire County Council's Street Design Guidance. Modification proposed to new build non-residential development.	Main modification to Policy C9

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not positively prepared, justified or effective - Amend Policy C9 so that it is consistent with the Oxfordshire County Council Street Design Guide and Oxfordshire Electric Vehicle Infrastructure Strategy requiring that at least 25% of car parking spaces for non-residential development have EV charging infrastructure.</p>	<p>Agree that that part of the Policy could be more clearly worded. See SOCG with Oxfordshire County Council.</p>	<p>Main modification to Policy C9.</p>
<p>Unsound as not effective or consistent with national policy: OPT supports the provision of electric vehicle charging points, however Policy C9 only refers to the technicalities of delivering these within new development. Reference should be made either within the Policy text itself, or the supporting text, of issues such as public realm (noting the NPPF at paragraphs 96, 116 and 124), and impact upon the historic environment (NPPF paragraph 196) to ensure that charging points in public areas are not located in sensitive areas.</p>	<p>The impact on townscape for EV's is addressed in the SOCG with Historic England.</p> <p>The impact on the historic environment will be covered by HD1 – HD6.</p>	<p>Refer to SOCG.</p>
<p>Unsound as not effective and not justified - The adoption of £500 per charging point is exceptionally low. CBRE requests underwrite on this cost and transparency on the application of costs to the typologies assessed.</p>	<p>The Viability study has been undertaken following national guidance in the NPPF and RICs guidance.</p>	<p>None</p>
<p>Whilst the Universities recognise the need to provide Electric Vehicle charging provision, this should be based on overall institutional/ operational need rather than repeated provision across all schemes. This is on the basis that most employees are able to charge at home to support their commute. Secondly, the requirements for Electric Vehicle charging points are not always compatible with changing insurer requirements</p>	<p>The policy seeks to ensure that EV charging infrastructure is installed at all new build developments helping the City respond to the challenges of climate change and move towards becoming net zero.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
which dictate where they can be safely located owing to risk of fire. This can exclude their provision altogether on dense urban sites which means that developments would be unable to comply with the draft policy as proposed. Finally, it is not justified why all new blue badge parking should be equipped with EV charging provision. It is considered that future-proofing would be a more suitable requirement to enable its conversion should sufficient demand arise.		

CHAPTER	8					
All respondents <b>supporting</b> chapter	8.128	188.2				

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted
Support proposed infrastructure projects which will support the station redevelopment at Oxford and improve the environment for passengers	Noted

CHAPTER	8					
All respondents <b>raising</b> <b>objections</b> on this chapter	26.21	30.22	32.8	48.2	64.3	
	64.4	73.15	84.11	159.4	168.11	
	172.27	173.27	203.8			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>OLP2040 is unsound in two respects; namely primary health care provision (in particular, Paragraph 8.54/ Policy SPS12) and how Littlemore and the surround area is envisaged and planned for over the plan period. Paragraph 8.54 and Policy SPS12. The South Infrastructure Area (inc. CBLLAOF) pages 186-191 and SPS2 and SPS3</p>	<p>Noted</p>	<p>None</p>
<p>Delete SPS13 and Deliver 100% affordable homes on SPS14</p>	<p>Comments addressed under specific site allocations</p>	<p>None</p>
<p>Protect sports fields and recreation areas.</p> <p>Minimise development. Keep the character of Oxford – there are too many ugly modern housing developments being built which are out of character with the city.</p> <p>In addition, remove all restrictions on car parking and car use and leave people to make their own choices.</p>	<p>In general, unless allocated, sports fields and recreation areas are protected.</p> <p>Plan includes policies on heritage and urban design to help to help ensure new development relates well to the area’s character and context</p> <p>Noted</p>	<p>None</p>
<p>The Local Plan should prioritise actions that align with addressing climate change.</p>	<p>The plan includes a number of policies including G1-G5 and R1-R3 to address these issues</p>	<p>None</p>
<p>The very significant matter of lack of sewage capacity also appears to have been deferred.</p> <p>Given the current financial difficulties Thames Water find themselves in it would seem appropriate to test this assertion and actually obtain a PLAN with a</p>	<p>We are in conversation with the EA and TW to resolve the timings of the delivery of the upgrade the Oxford WWTW. A statement of common ground is being produced which will set out where we have got to in the process at the time of Submission of the</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>delivery date. Their stormwater discharge site <a href="https://www.thameswater.co.uk/edm-map">https://www.thameswater.co.uk/edm-map</a>, showing Sandford's ongoing regular discharges of raw sewage into the Thames, states: <i>'We're finalising plans for a major upgrade at Oxford STW, costing more than £130m. This will provide a significant increase in treatment capacity, larger storm tanks and a higher quality of treated effluent going to the river. We can't yet confirm a completion date.'</i></p>	<p>Plan. It is likely that that further conversations will be required. If so, a further Statement of Common Ground is likely to be needed to set out the precise delivery timescales.</p>	
<p>Should be a presumption to provide genuinely and permanently affordable housing on brownfield sites (e.g., Oxpens) rather than employment. Oxford has full employment and a shortage of housing.</p> <p>Need to ensure climate emergency is addressed, biodiversity is protected and enhanced, inequalities reduced, and the capacity of present and future generations is protected.</p>	<p>The plan provides as much housing as possible and does not allocate new land for employment generating uses.</p> <p>The plan includes policies related to all these areas.</p>	None
<p>Entire growth strategy is unsound. Developments like Northern Gateway will have a significant negative effect on the ambience and well-being of North Oxford.</p> <p>Do not build on green belt sites in the green urban fringe and do not release more sites from the Green Belt</p>	<p>Noted.</p> <p>No further release of Green Belt is proposed.</p>	None.
<p>The 2040 Local Plan should both address possible options to meet the health care needs of south-east area Oxford over the next 15 years.</p>	<p>Noted. Modifications have been suggested for Policy SPS12 to make it explicit that a health centre</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Suggested amendment - n additional bullet point in paragraph 8.54 (p 179) to <u>'Ensure that the needs of the whole area in terms of primary health care provision are considered in a strategic way so that modern facilities are provided which are easily accessible by all residents.'</u></p>	<p>is one of the town centre uses that would be supported on site.</p>	
<p>Main concerns are that the historic and green settings of the city are preserved and that by delivering much needed (affordable) homes the heritage of the city is not adversely impacted.</p>	<p>Policies are in the plan to protect the historic and green setting of the city.</p>	<p>None.</p>
<p>Paragraph 8.2 sets out some context about the development site allocation policies, including explaining that the development site allocation policies have been informed by what is claimed to be a thorough process, building upon urban design appraisals that were carried out for each site.</p> <p>A Background Paper 'Site Densities and Capacities' is referred to at paragraph 2.2.4 of the HELAA, but this does not appear to have been published with the Pre-Submission Draft Local Plan: 2040 unless the reference meant to be to Background Paper 15a 'Site Assessment Process (Urban Design and Assessment of Housing Capacity)'. </p> <p>It has subsequently been confirmed to us by the City Council that the 'urban design capacity assessments' for individual sites are not publicly available and were prepared for internal use only. It was</p>	<p>Noted.</p> <p>That is the correct paper.</p> <p>They were urban design assessments, not urban design and capacity assessments. The template is included in BGP15a as an Appendix.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>confirmed that they would not be provide to SODC and VOWHDC either. It is not possible therefore to examine those assessments or the approach taken in each case in any detail.</p> <p>The plan is not Positively Prepared because we are unable to scrutinise the capacity of allocated sites that seek to meet the area's objectively assessed needs. The plan is also not Effective, because we cannot scrutinise capacity and we are concerned that this has the effect of adding to unmet housing need which is not effective joint working on this cross-boundary strategic matter. The assessments were not published or shared and in this regard the matter fails the Duty to Cooperate.</p> <p>Fails the duty to cooperate and cannot be rectified.</p>	<p>The majority of site capacities are extant in the Local Plan 2036 and a capacity assessment has also taken place through the HELAA process.</p> <p>Noted.</p>	
<p>Paragraph 8.7 claims "During the Plan's preparation work has continued with neighbouring districts whereby discussions were held about how to accommodate the additional unmet need beyond that already agreed to 2036." The names of those neighbouring Districts aren't specified, but to be clear South and Vale have attended relevant sessions of the Oxfordshire Planning Policy Officer meetings and have expressed at those meetings that the fundamental issues with Oxford's HENA and HELAA are unresolved, and as we disagree about the need for additional unmet need, this prevents us all</p>	<p>See SoCG for details of how Duty to Co-operate has been addressed.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>from being able to move on to discuss how any apportionment, if any exists, could be distributed, or how Oxford can best accommodate a realistic level of need.</p> <p>This is not Effective as it Oxford have not dealt with the cross-boundary matter which remains unresolved, nor has the Duty to Cooperate been complied with.</p> <p>The paragraph then states "In several instances the sites identified in Figure 8.2 above are already indicating a greater capacity than previously estimated, so it may be that the additional unmet need to 2040 can be met this way". This is over-reaching. The last round of Local Plans around Oxford have all contributed to meeting Oxford unmet need in various different ways. It is not clear how Oxford can pre-empt the next round of plan-making for its neighbours to demand more capacity on some sites/areas to come forward. This is especially troubling because surrounding plans may not have explicitly expressed in their adopted local plans that any headroom capacity would be planned to offset Oxford housing need again. The headroom in allocated sites or areas may be required to meet their own needs.</p> <p>Fails the Duty to Cooperate and cannot be rectified.</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.	Noted	None

POLICY	NEOAOF				
All respondents supporting policy	8.73	164.27	174.21	196.19	

COMMENT SUMMARY	OFFICER RESPONSE
Plan considered sound (no reasons given).	Noted.
<p>The Trust reads with interest the content of this proposed policy, and supports proposed criterion (a) and in particular that development should facilitate the delivery of “pedestrian and cycling infrastructure improvements must be delivered in accordance with the requirements of the Oxfordshire Local Cycling and Walking Infrastructure Plan. All opportunities to optimise connectivity and permeability for people wishing to walk or cycle in the area to other parts of the city and/or to destinations in the neighbouring districts of Cherwell District Council and West Oxfordshire should be taken.</p> <p>The Trust is keen to see footpaths/infrastructure links considered which link into the area from the surrounding hinterland. The Council will need to work collaboratively with applicants and the County Council to ensure that sites integrate with the neighbouring uses and become part of North Oxford rather than sitting on the edge of it.</p>	Comments noted and support welcomed.
In geographic terms, the most relevant area to West Oxfordshire is the Northern Edge of Oxford Area of Focus to the west and north of the Wolvercote Roundabout. Notably, one of the general principles for development in this location is that it should optimise connectivity and	Comments noted and support welcomed.

COMMENT SUMMARY	OFFICER RESPONSE
permeability for people wishing to walk or cycle in the area to other parts of the city and/or to destinations in the neighbouring districts of Cherwell District Council and West Oxfordshire. This is supported.	
The approach set out in the policy is supported. It would be useful to have wording to recognise that developments such as Oxford North has already contributed to providing significant improvements to pedestrian and cycling infrastructure as well as public transport.	Comments noted and support welcomed.

POLICY	NEOAOF		
All respondents <b>raising objections</b> on this policy	27.6	136.29	186.5

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy considered unsound (no reasons given)	Comment noted.	None required.
These proposals will result in a very built-up area in North Oxford. Taken cumulatively, if all sites both within the city and those sites in Cherwell which will meet Oxford's unmet housing need, were developed as allocated, Oxford and Kidlington would become one large urban sprawl. If these developments go ahead, we estimate that there will be a continuous built-up area from Shipton to South Abingdon, around 13 miles. This will dramatically change the character of this part of Oxfordshire and undermine the policies elsewhere in this paper on preserving green corridors for nature. Large areas of Cherwell's green belt have already been given up to meet the city's unmet housing need. We accept that it will likely not be possible for Oxford to meet this need entirely within its own boundaries. However, some of the proposed site allocations in North Oxford impose unacceptably upon Cherwell's space. We	<p>The principle of strategic development at Northern Gateway was established in the Northern Gateway Area Action Plan (adopted July 2015), and a large part of the site is already under construction (Oxford North). The site allocation (SPN1) in OLP2040 is simply carrying forward the allocation to ensure that development of the remaining parcels of land are brought forward in a joined-up way, and to ensure that optimum use is made of the site.</p> <p>The assessment of proposals within Cherwell will be carried out on their own merits by Cherwell District Council as the Local Planning Authority. We are also working closely with</p>	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>have particular concerns about developments proposed around Yarnton and Begbroke, where the need being met by new housing will be less Oxford's need than Oxford University's need (through Begbroke Science Park), with the university's housing need.</p> <p>In the Northern Edge of Oxford Area of Focus we welcome the stipulation that new developments must deliver improvements to walking, cycling and public transport infrastructure. Walking and cycling links are sorely needed to ensure this is a sustainable location to live or work in.</p>	<p>Cherwell to ensure a joined up approach, for example with cycling and walking connections through sites and connecting to Oxford Parkway station.</p>	
<p>The ICB considers that new developments within this area of focus could provide a funding opportunity for Cutteslowe Surgery to provide extra clinical space.</p> <p>The ICB does not own any real estates or has any dedicated funding to commission any feasibility study of the projects. Therefore, the ICB suggests that the wording of Policy NEOAOF – Northern Edge of Oxford Area of Focus can be revised to reflect this: <i>Planning permission will be granted for new development within the Northern Edge of Oxford Area of Focus where it would ensure that opportunities are taken to deliver the following (as applicable):</i></p> <p>...</p> <p><u><i>e) creation of additional estates capacity at or near Cutteslowe Surgery and/or Wolvercote Surgery, including but not limited to a financial contribution</i></u></p>	<p>The anticipated delivery for the provision of healthcare facilities during the plan period is set out in the Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule (IDS), and Areas of Focus and site allocation policies have been written accordingly.</p> <p>As part of their representations, BOB ICB has provided a list of potential upgrades/ extensions to their infrastructure. The Council will be reviewing the Infrastructure Schedule which forms part of the Infrastructure Delivery Plan (IDP) ahead of the Local Plan Examination. This update is undertaken to ensure that the IDP captures the most up-to-date infrastructure from all the infrastructure providers. The Council will review the list provided by BOB ICB</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<i>towards the commissioning of the feasibility study of any proposed works.</i>	<p>as part of this IDP update for the Local Plan Examination.</p> <p>It is worth noting that there is an expectation that infrastructure providers undertake feasibility studies to work out the costs of any infrastructure required to inform negotiations with developers.</p>	

POLICY	SPN1			
All respondents supporting policy	8.74	138.32	147.1	

COMMENT SUMMARY	OFFICER RESPONSE
Policy is Sound [reason not stated]	Support welcomed
Site is well located for development, as it forms part of Merton College's wider landholdings at Pear Tree Services	Support welcomed
Policy makes provision for the remaining area of the Northern Gateway area to come forward which includes land to the northeast of the A44 Woodstock Road alongside the railway. It is not envisaged that there will be any interface between the track works proposed for EWR and future development proposals coming forward in this area as these works are intended to be contained within the railway corridor. EWR Co will however wish to raise this matter with the Council through future engagement and therefore reserves its position in respect of the Submission Draft Local Plan until those discussions have taken place.	Comments noted.

POLICY	SPN1				
All respondents raising	14.1	53.11	74.14	133.17	136.30
	138.2	148.18			

<b>objections on this policy/chapter</b>	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Object to redevelopment of the Wolvercote services area. The services provides the only food shop within reasonable walking range for many residents in area. Policy should specify that food shop must be reprovided.	As this part of the site has had investment in recent years, it is not anticipated that this part of the site will change in the earlier part of the plan period. Whilst it is not a requirement, there is potential to provide a local food shop at the Red Hall (within Oxford North development) within the commercial units. Unfortunately the Plan is not able to protect individual shops, and as a “class E” use national policy allows changes of use to other E class uses without any planning permission being required.	None
Reference to pedestrian and cycle access through pear tree farm site, to Oxford Parkway Station, but this bridge currently isn’t usable by bike. Policy should specify PTF permitted only after a new cycle-friendly railway bridge has been achieved.	Policy SPN1 requires that development shall not compromise the delivery of the pedestrian and cycle improvements or the potential future direct cycle link to Oxford Parkway, and the supporting text (paragraphs 8.26 and 8.34) also sets out the importance of connectivity with development to the north in Cherwell and cycle links.	None
Object to more employment at Red Barn Farm, there is already too much employment at Northern Gateway, leading to more housing pressure.  Not positively prepared, justified, effective, SPN1 must prioritise housing, particularly social rent	Northern Gateway is a mixed-use site allocation. It includes a Category 1 employment site, so development here will have a significant positive impact on the supply of specialised employment floorspace and new homes. Within the site, parcels are designated for different uses. Red Barn Farm was considered for residential or employment, but has ultimately been identified for employment mainly because of the constraints of the site: it is sandwiched between A34 and the	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>A44; adjoins the main employment provision in the Oxford North development which is under construction; the topography, with the site lying lower than the busy roads, is also less suited to a pleasant living environment for residential units. Other parcels within Northern Gateway are more suited to residential.</p>	
<p>Not effective or consistent with national policy, too expansionist, threat to local green areas and to Green Belt. Abandon policy.</p>	<p>The principle of strategic development at Northern Gateway was established in the Northern Gateway Area Action Plan (adopted July 2015), and the removal of a small parcel of land from the Green Belt was also through the Area Action Plan process.</p> <p>A large part of the site is already under construction, so the site allocation in OLP2040 is simply carrying forward the allocation to ensure that development of the remaining parcels of land are brought forward in a joined-up way, and to ensure that optimum use is made of the site.</p>	<p>None</p>
<p>Not effective, not consistent with national policy - 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.</p>	<p>Noted, add cross-reference to HD4 and HD9.</p>	<p>Main mods</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not positively prepared, justified, effective, Re-provision of the community facilities at Red Barn Farm should be within the city so services remain accessible to current users. Outside of the city is not acceptable. Re-provision must be in collaboration with current users.</p>	<p>Policy C3 includes measures to help ensure that re-provided community facilities remain accessible to current users. Because the site is located at the edge of the administrative boundary then it may be that a site nearby in Cherwell is equally or more accessible than a site across the other side of Oxford. Policy C3 sets out the framework to guide the search for a suitable alternative site.</p>	<p>None</p>
<p>Further development must consider the impact of further development on existing residents who have already seen significant changes as a result of Oxford North</p>	<p>Many of the policy requirements for the remaining parcels of land at Northern Gateway are designed to benefit existing as well as future residents and occupiers of the area, including transport improvements to roads, cycle networks, and pedestrian access, and access to open space.</p>	<p>None</p>
<p>Concern about traffic increases resulting from development at Northern Gateway, and impacts on Wolvercote roundabout. What happened to the proposed road to cut through the development.</p>	<p>The link road is already under construction, as part of the Oxford North planning permission. A Transport assessment has been undertaken as part of the evidence base for OLP2040 and any planning applications within the site would also need to demonstrate how it contributes to the “coordinated and comprehensive package of transport measures” for the area, as specified in Policy SPN1.</p>	<p>None</p>
<p>Suggest adding to wording for Pear Tree Farm to allow “complementary uses” to allow for a portion of the site to be allocated for employment uses alongside homes. This would complement the proposed CDC allocation to create a cohesive development parcel. A cross-authority allocation would be an exemplar for</p>	<p>Policy SPN1 requires a minimum of 122 homes at Pear Tree farm and already allows for complementary uses to be considered on their merits.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
providing mixed and balanced communities and making effective use of land		
<p>Not justified, effective, consistent with national policy. Support the allocation but the policy has moved away from the vision set in the NGAAP: whilst homes are referred to in the vision, it was an employment site first and foremost. That position is also in CS6 of the Core Strategy and the NGAAP Inspectors report (para 43) that the residential would remain complementary to the employment led development. Whilst residential is important, the focus of the site should remain employment and to take up potential employment floorspace at Northern Gateway with further housing is inappropriate and contrary to the NGAAP and to the Cherwell Local Plan.</p> <p>Also add to the initial bullets list of SPN1:</p> <ul style="list-style-type: none"> <li>• Subject to closure, consolidation (through use of a decked car park) or reduction in the size of the Park &amp; Ride facility, employment led development at [Pear Tree Park &amp; Ride] including an element of housing subject to environmental constraints being shown to be acceptable.</li> </ul>	<p>This is one of the largest sites for housing and employment growth in Oxford. Development here will have a significant positive impact on the supply of specialised employment floorspace and new homes, and it is crucial to ensure the optimum use is made of the area. In response to the City's pressing need for housing, the main use for remaining areas at the Northern Gateway is residential alongside the Category 1 employment uses as defined by Policy E1.</p> <p>The Peartree Park &amp; Ride site, is not within the Cat 1 employment designation, and as such would be considered as a new employment site, which would be contrary to Policy E1. The priority landuse for any additional capacity at Northern Gateway is residential, to meet Oxford's pressing housing needs.</p>	None
Update the online policies map to show the whole of Northern Gateway site as a category 1 employment	Amend Cat 1 to incorporate the eastern parcel as well, in line with the parameter plans in the hybrid permission for Oxford North, to	Main mod (diagram for SPN1) and amend to policies map

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
site as per the PDF version of the policies map and extant Local Plan policies map.	show the parcels within Northern Gateway with authorised use for employment.	
Delete reference in Policy SPN1 to Compensatory improvements to the surrounding areas of Green Belt – this is not consistent with national policy as all of the land was removed from the Green Belt via the Northern Gateway AAP process some years ago.	Paragraph 147 of the NPPF says that, when proposing removal of sites from the Green Belt for development, plans should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The Green Belt land was removed as part of the Oxford Local Plan 2036, but development of this site has not yet come forward, and the compensatory improvements have not yet been achieved. Therefore, this requirement should remain in the Oxford Local Plan 2040.	None
Update policies map to define the areas referred to in the policy ie Peartree Park & Ride, Goose Green Close, Pear Tree Farm etc.	Policies map to be updated to show parcels within the site.	Policies map amends

POLICY	SPN2		
All respondents supporting policy	8.75		

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	The support is welcomed

POLICY	SPN2
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All respondents raising objections on this policy/chapter	36.1	74.15	133.18	164.28	199.22

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Sport England is concerned that the policy uses imprecise language- how can it be that sports pitches are currently not surplus to requirements but they suddenly become surplus to the backdrop of an increasing population. It has not been proven that there is scope to re-provide facilities at the same capacity in a smaller space. There is a need to retain cricket and the reduction of the site will create serious health and safety issues through ball strike- the netting has on-going costs and can be visually intrusive. The whole of the site is required to be relocated (estimated as approx 3.10 hectares).</p> <p>There should be greater importance placed on the protection of green space and recreation provision.</p>	<p>It is agreed it is highly unlikely that the sports provision will become surplus. If it is not surplus its capacity must be re-provided. The policy does not make any presumptions. Through a detailed application, the exact means of re-provision will need to be explored. However, it is absolutely considered to be the case that there is potential for re-provision within the site in addition to new development, because the site is very large. The minimum housing number is modest and based on realistic assumptions about re-provision. As stated in the Sport England representation, there are means of re-provision, which may well include netting.</p>	<p>None.</p>
<p>Historic England has made a representation relating to this site, which is summarised and responded to in the Statement of Common Ground.</p>		
<p>We accept the policy's committing of some of the space to new development subject to the</p>	<p>There are generic policies of the plan that consider amenity of local residents, over-</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
re-provision. No limit on heights is mentioned however, so object to the policy's suggestion these could be to the 'west' of the site, as that may overlook other housing. The south-east corner of the site minimises over-looking and should be stated as most suitable.	looking, etc. Heights will be considered and tested through the planning application process, guided by all the policies of the plan. The area to the south of the site is sensitive because of the Wolvercote cemetery.	
The University of Oxford request a minor modification of the Policy text: ...Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. Development should line and face the key streets and including <u>which should be greened by greening features alongside</u> such as verges...	It is agreed this change helps the reading of the policy.	Minor modification.

POLICY	SPN3			
All respondents supporting policy	8.76			

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason stated.	The support is welcomed

POLICY	SPN3				
All respondents raising	178.36	59.22	74.16	186.6	199.23
	14.2				

objections on this policy/chapter	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>There is insufficient detail recognising community requirements. It should be clear there will be a replacement community centre equal to the existing facility which will be demolished. A health centre should be considered based on its merit, acknowledging the fact that Diamond Place has been identified as the only realistic option to absorb the increasing health service demands due to planned expansion towards the north of Oxford.</p>	<p>It is agreed that the Policy could make it clear that a replacement community facility would be required if the existing one were to be demolished. It could also be more positively stated that a medical centre would be an acceptable use on the site.</p>	<p>Planning permission will be granted for a mixed-use development and the minimum number of dwellings to be delivered is 180 dwellings. A minimum of 100 dwellings should be delivered on Diamond Place and 80 dwellings on Ewert House, <del>or</del> if delivered as non-self-contained student accommodation, the number of rooms that equate to this when the relevant ratio is applied.</p> <p>A range of other uses would also be suitable, including the following:</p> <p>a) a <del>replacement</del> community centre, <u>Replacement of facilities will be required if the existing community centre <del>one</del> is demolished;</u> and/or</p> <p>b) town centre supporting uses of an appropriate scale to a district centre, which could include additional shops / cafes / services / Class E uses to provide services for local people and new workers / residents / students; and/or</p> <p>c) <u>a medical centre</u></p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
		c) other complementary uses <del>such as a medical centre</del> will be considered on their merits.
<p>The ICB request that the following additional wording is made in relation to the possible medical centre provision: A feasibility study of the provision should be provided including the project costing and delivery timescale. If the outcome of the feasibility study sets out that the provision of a medical centre is not financially viable and/or operationally viable, other offsite mitigation measures should be provided funded by developer contributions, to ensure the primary healthcare provision can support the new population growth.</p>	<p>The medical centre is not a requirement of the policy; the policy is merely positive of the potential of the site to include a medical centre. Therefore, the wording about feasibility is not needed. In addition, we do not consider the wording about funding offsite mitigation measures is justified within this policy. There is no information about what particular healthcare infrastructure would be funded, what the needs created by the development would be, or whether anything is therefore justified beyond the normal CIL contributions. Because the site could have a medical centre, does not mean it needs to fund alternative provision if it does not have a medical centre, because the medical</p>	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	centre is not proposed to manage the demands from this new development, but to replace existing, outdated facilities already in the district centre.	
The proposal for Diamond Place says it will 'seek to minimise public car parking on the site to a level which is reasonable to serve the area. The existing parking is just about adequate, so any reduction will create problems. Policy should ensure there is adequate provision.	The intention of the Policy is exactly to ensure there is adequate parking to support the centre, although with the ambition of keeping this to a minimum.	None.
Comment made by HE summarised and responded to in the Statement of Common Ground.		

POLICY	CBLLAOF					
All respondents supporting policy	8.77					

COMMENT SUMMARY	OFFICER RESPONSE
Support	Noted

POLICY	CNLLAOF				
All respondents raising objections on this policy	16.1	54.5	74.17	93.1	100.4
	114.1	164.29	165.8	171.10	177.19
	186.7	188.1	189.14	195.2	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Consideration should be given to a rail extension to Horspath – this would enable improved rail accessibility for Horspath residents and solve a long-standing issue of lack of public transport for Horspath residents.	Outside the scope of the city’s plan.	None
Unclear whether CBL contributions would be additional to CIL. Plan should provide clarity on what constitutes ‘trip-generating uses’.  MINI Plant Oxford is almost completely within the 1500m buffer of the proposed station but due to off-peak shift patterns, and because many employees live far away from the plant due to the cost of local housing, employees are highly unlikely to use/ rely on CBL. The Plan needs to acknowledge that MINI Plant Oxford will not support the viability of CBL due to shift patterns and because most employees live far away.	Additional work is being undertaken to support the delivery of the Cowley Branch Line by the County Council. It is anticipated that this work will conclude shortly.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The detailed text regarding considerations about when large scale buildings are proposed, could be better incorporated into policy HD9 and used as criteria when considering high building proposals across all Areas of Greater Potential, thus more clearly connecting with the Council's evidence base and High Buildings TAN.</p> <p>Criterion g) does not currently make sense. See edited version of criterion in comments on HD9.</p> <p>Should the key to the map on page 178 be amended to show hatching for the area of focus?</p> <p>Suggest moving the whole section of policy CBLLAOF on large-scale buildings to HD9.</p>	<p>These comments are addressed as part of Statement of Common Ground with Historic England.</p>	<p>Refer to Statement of Common Ground with Historic England for response.</p>
<p>The branch line bridge of the Thames downstream of Iffley Lock is in poor condition and will need major work or replacement for passenger use. There is no indication that this has been considered. It would be unfortunate to discover that the bridge was unsafe once the policy had been committed to and even work begun.</p>	<p>Noted</p>	<p>None</p>
<p>Welcome CBL re-opening to passengers. Concerned about whether it will be delivered in a timely manner as many other local proposals depend on for their justification. Potential that BBL community</p>	<p>All infrastructure to support the LP2040 is set out in the Infrastructure Delivery Plan. CBL is included in that document. Delivery of CBL requires collaboration with third-party</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>will be negatively impacted if delays in delivery of the CBL. We would have expected LP2040 to be firmer in proposals for phasing of development and how developer contributions will help to fund it.</p> <p>Note that Policy SP51 Oxford Stadium has not been carried forward in the Plan. BBLNP may still provide a framework for this crucial sports, cultural and heritage asset for Oxford rather than leave it to a windfall planning application</p>	<p>providers (e.g., Network Rail and others) to co-ordinate its delivery and the re-opening of the stations. CBL feasibility study is underway but not yet completed. The level of support provided in LP2040 for CBL is proportionate and appropriate.</p> <p>We welcome any additional policy support for this important venue that may be forthcoming as part of a Neighbourhood Plan for BBL.</p>	
<p>Do not support the inclusion of an obligation towards CBL because it is beyond the remit of Oxford City to impose policy requirements/ seek financial contributions etc. on sites within a neighbouring authority.</p> <p>Respondent may support some objectives (such as improving pedestrian and cycle connectivity), it remains that these sites are wholly within South Oxfordshire District and therefore, as a matter of principle, it is not within the remit of the Oxford City Local Plan to impose policy requirements upon those sites.</p>	<p>The policies in Oxford City Council's Local Plan 2040 apply to sites within the city's administrative boundary.</p> <p>Any infrastructure requirements in Oxford City Council's Local Plan 2040 apply to developments in the city.</p> <p>It is important that linkages are made between the two districts with regards to walking and cycling infrastructure in order to deliver any planned infrastructure in a co-ordinated manner.</p>	None
<p>Policy CBLLAOF should make it clear that there will be a requirement for an assessment on the</p>	<p>Policy HD9 already includes such a reference. No need to duplicate in this policy</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
potential impacts of building heights in this area – “larger scale buildings” referred to in the proposed policy will need careful assessment and management.		
Spatial implications are lacking from the opportunities identified in paragraph 8.54 of the Area of Focus which adds no strategic or spatial dimension to the Area of Focus Policy set out at CBLLAOF (Cowley Branch Line and Littlemore Area of Focus).	Noted	None
<p>NPPF paragraph 57, requires obligations to be sought only where they are necessary, directly related to the development; and fairly and reasonably related in scale and kind to the development. The support already provided by The Oxford Science Park, whether financial or in-kind, to the CBL, should be taken account of when determining financial contributions to CBL on future applications at The Oxford Science Park. Our client is concerned about the individual and cumulative impact of the draft policies in the Plan on the viability of future development.</p> <p>It would be useful to have wording to recognise that financial contributions should be “proportionate” to the scale of development proposed. In addition, safeguarding land for routes</p>	Modification proposed under Policy S3 (which also applies to Policy CBLLAOF) to Add <u>“These will be tested in accordance with Paragraph 57 of the NPPF.”</u> to the final paragraph of the policy.	Main

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
to the CBL stations should be noted to be “where feasible”.		
Several employment site allocations with the area of focus seek to allow an element of residential development. Where new homes are brought forward, this adds pressure to existing primary healthcare facilities. ICB request suitable mitigation is proposed to ensure accommodation population growth. A requirement should be added to Policy CBLLAOF to address this.	<p>Policy S3 deals with city-wide infrastructure and the delivery of primary healthcare (and other infrastructure to mitigate the impact of development) is covered sufficiently in that policy.</p> <p>Economy Background Paper 6c explains the permissive approach to residential development on all Category 1 and 2 employment sites in the city.</p>	None
Policy CBLLAOF references the proposed CBL railway stations at Oxford Science Park and in the vicinity of ARC Business Park. For these stations to be delivered Mallams footpath level crossing must be formally closed as currently part of the PROW network and the nearby Spring Lane Level Crossing upgraded as an alternative to Mallams as part of the Cowley Branch Line project. Policy CBLLAOF should reference the need to close this level crossing before the stations can be delivered.	This infrastructure project is related to the delivery of the CBL and has the potential to be included in the IDP as part of the IDP Examination Update.	None
<p>Templars Square falls within the buffer zones for the proposed stations.</p> <p>Further clarity is required on why additional CIL contributions are being sought. Further clarification</p>	Additional work is being undertaken to support the delivery of the Cowley Branch Line by the County Council. It is anticipated that this work will conclude shortly.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>is required for the 1,500m buffer zone. It is not considered appropriate to seek additional funding CBL from developments within this limited zone. CBL should be delivered through CIL.</p> <p>Improvements to transport infrastructure are recognised as important. However, seeking further contributions from development where viability is challenging, (and already captured by CIL) is not considered a sound approach to the plan making process and would render the Local Plan. It would make development at the Templars Square site undeliverable.</p>		
<p>Consider that the Oxford Stadium site should benefit from a site allocation. Object to the lack of a site allocation in the Local Plan 2040, which prevents the redevelopment of the Oxford Stadium site or its associated car park. The inclusion of the site within the CBLAOF is a sign that the Council sees this as an area for regeneration. The facility provides limited on-going benefits to the local community.</p> <p>The Site therefore represents a significant opportunity for OCC and could accommodate a range of potential uses to help meet Oxford's needs in a city where the availability of land for new development is constrained.</p>	<p>OLP2036 included a site allocation (SP51) for the redevelopment of the Oxford Stadium site. LP2040 does not allocate the site as the Stadium has been subsequently brought back into use. As such, any residential use at the site can be delivered without an allocation.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>There remains uncertainty about the longer-term operation of the Oxford Stadium and longer-term opportunities for the land should be included within the emerging Plan.</p> <p>We therefore request that Policy CBLAOF includes similar working to Adopted Plan Policy SP51 and propose the following for inclusion in the new Plan.</p>		

POLICY	SPS1			
All respondents supporting policy	8.78			

COMMENT SUMMARY	OFFICER RESPONSE
Support	Noted

POLICY	SPS1				
All respondents raising objections on this policy	125.7	144.9	151.8	164.30	178.37

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
In relation to the Cowley Branch Line, we recognise the benefits that this will bring to the ARC Oxford Business Park, particularly its role in improving	Policy S3 and Policy CBLAOF provide details of how contributions to the CBL are to be applied.	Main

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>sustainable connections to the area for future occupiers. Contributions towards this sought from development should be proportionate to the quantum and scale of development in the context of deliverability and viability, and clarity on how contributions are calculated should be provided.</p>	<p>A main modification is proposed to Policy S3 and Policy CBLLAOF to ensure that contributions align with paragraph 57 of the NPPF.</p> <p><u>These will be tested in accordance with Paragraph 57 of the NPPF.</u></p>	
<p>Additional wording should be included in the policy to enable redevelopment of sites to come forward either without conflict to the wider site aims or to come forward where there isn't a masterplan in place. The following amended wording is proposed to the second sentence of the first paragraph under the 'Urban design and heritage' heading:</p> <p>New development proposals should seek to improve both the place-making on this site, connectivity and <del>the</del> permeability and recognise its relationship to the wider area as part of a comprehensive master plan, <u>or, if an individual site, does not undermine the principles of an agreed master plan.</u></p>	<p>Do not consider modification needed. Policy as drafted enables individual sites to come forward.</p>	None
<p>ARC Oxford originally became vacant in the early 1990s. A proportion of the site is still vacant. This shows that demand for office/ R&amp;D is not as strong as the Council claims. There are a large number of offices currently available for rent at the site. The site, which was originally intended for office use</p>	<p>Background Paper 6a sets out the employment land supply position for the city to 2040. It shows that Oxford is in a strong position to meet its employment land supply for office/ R&amp;D within the plan period. Proposed employment strategy does not seek to allocate new strategic employment sites in the city. Policy E1 includes a permissive approach to the delivery of</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>only, now includes a range of uses including retail, a large gym and a nursery.</p> <p>It is very suitable for residential use. Policy E1 is too restrictive. Proposed Policy E1 should not apply to this site. It should be delivered for residential development.</p>	<p>residential development on all Category 1 and 2 employment sites in the city.</p>	
<p>We have concerns about the policy and its potential operation. In particular, with regard to building heights. OPT welcomes the reference to building heights and Policy HD9 but both policies need to be tightened to ensure their effectiveness. SPS1 should be amended as follows:</p> <p>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says skylining impacts may be possible from 15m and above) will <u>only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising</u>, so that the full impacts can be understood and assessed as listed in Policy HD9.</p>	<p>The High Buildings Study was produced by LDA Design. OPT was a stakeholder in its production, alongside Historic England and other valued local specialist heritage groups.</p> <p>Proposed amendments to the policy are not aligned with the evidence base (High Buildings TAN) or with Policy HD9 as drafted.</p>	<p>None</p>
<p>Add to the end of the paragraph on movement and access in Policy SPS1: 'It is expected that proposals will have less car parking associated with them than has existed historically.'</p>	<p>These comments are addressed as part of a Statement of Common Ground with Oxfordshire County Council.</p>	<p>Refer to Statement of Common Ground with Oxfordshire County Council for response.</p>

COMMENT SUMMARY		OFFICER RESPONSE			PROPOSED ACTION
POLICY	SPS2				
All respondents supporting policy	8.79	203.6			

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	The support is welcomed.
Thames Water support the reference to odour (subject to requested revisions to Policy R7)	

POLICY	SPS2				
All respondents raising objections on this policy/chapter	27.8	36.2	64.5	74.18	97.1
	100.5	110.1	115.3	151.9	159.2
	164.31	165.9	172.14	173.14	178.38

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Sport England consider it is presumptuous to suggest the site is not required given there is no replacement site secured yet. Any application would be contrary to paragraph 103 of the NPPF.	The Policy does not suggest the site is not required. It is carefully worded to say that the football stadium should remain unless it has been replaced elsewhere in Oxford or in proximity to Oxford.	None.
The reasons for the end of OUFC's tenancy at the Kassam Stadium have not been publicly	OUFC's tenancy at the stadium owned by Firoka group is not a matter for the City Council.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
disclosed, which is a failure in the duty of all relevant parties to cooperate.		
Demolishing such a big structure would incur a bit environmental cost and given the relatively young age of the stadium is not careful use of resources. Any suggestion it might be demolished and another development take its place should be omitted from the policy.	If the stadium is relocated, it is important that best use is made of the land on this site. The football stadium is not a structure that may be easily or effectively used for another purpose.	None.
The stadium should remain on the site for a number of reasons. Understand OUFC made itself homeless as a result of poor decision making, which makes it unlikely it will be able to demonstrate very special circumstances to justify a new stadium in the Green Belt (in a location with many unresolved issues). The Kassam is a more sustainable site, being easy to travel to, near the fanbase and with potential for CBL and the carbon footprint of demolishing and rebuilding would be high. Oxford City Council should be working to ensure the future of OUFC and this has more chance of success on an existing site.	Whether or not the football stadium remains on the site is out of control of the City Council. Issues relating to any new location for the stadium will need to be dealt with separately as part of that planning application.	None.
The site is in an area of Oxford short of leisure facilities and which is deprived and where there will be growing demand. This will harm the local community.	The policy says planning permission will be granted for replacement community and/or sport and leisure facilities. The site will also need to provide 10% public open space. There are many community facilities in the local area,	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	which are a lot more open to the public than the football stadium.	
No reference is made to the Grade II* listed Minchery Farmhouse that is on the site and which is on the heritage at risk register. Applicants should be required to preserve and enhance the building and look to bring it back into a stable, if not viable, state.	The Minchery Farmhouse is within the Science Park allocation not the Kassam, nevertheless, further reference is to be made to it, as set out in response to Historic England's representation, appended.	Yes, additional references to Minchery Farmhouse.
Comments from Historic England summarised separately, appended		
A football stadium to the north of Oxford will add traffic and pollution there. You are going to smother us with new developments all around the city.	The impacts of an new location for a stadium will need to be considered as part of the planning applicaiton.	None.
The policy makes reference to the relocation of the football stadium, which is not a certainty and should not be speculated on in the LP. This gives the wrong message- the City Council should be trying to facilitate continued occupation of the stadium.	Plans are already underway to find a new site for the football stadium, and the lease is shortly to expire. Therefore, it is reasonable for the site allocation policy to guide development in the event of its relocation. The policy does say that the football stadium should remain unless it is replaced.	None.
Concerned that new buildings such as shops and especially facilities such as a community centre and/or health centre would be precluded. While the may be provided in South Oxfordshire, it should be included in the LP2040. Further laboratory space or similar would not be	Part of the site is already in lawful use as Use Class E, which may include R&D. The policy does restrict this to the existing area of the Ozone Leisure Park only, rather than allowing expansion of it across the site. The policy says planning permission will be granted for	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
desirable, given the amount already built nearby.	residential development, public open space and replacement community and/or sport and leisure facilities, so these uses are not precluded. A doctors surgery will often fall into Use Class E anyway, so could have lawful use on part of the site.	
Object to the portrayal of the site as being 'poor' in sustainability terms. Though it may not be centrally located, the site already has access to all modes of travel, and these could be improved through comprehensive development.	The site is not directly served by buses. Even on match day, coaches stop outside the site, on Grenoble Road. Good bus services are relatively nearby, but there are not clear or attractive routes to the stops at the current time. The site is largely accessed by car. There is potential for this situation to be hugely improved through comprehensive development, and the site has potential to be good in sustainability terms. But it is fair to describe it as poor at the current time, especially as compared to the majority of Oxford.	None.
South Oxfordshire District Council and the Vale of White Horse District Council consider that the policy is neither positively prepared nor effective because it does not maximise the efficiency of the site, therefore ramping up unmet need and not dealing with this strategic matter. They consider it highly likely that an increased density of 70+ dph could be adopted reflecting a change in the character of the area	Paragraph 8.72 is very clear about how the minimum housing number has been calculated, and indeed 70dph has been taken as a reasonable assumption of achievable density on some of the site. It must be assumed that the Ozone Leisure Park will remain in its lawful use, which is largely Class E, and the policy can't prevent this. It is also assumed that 10% of the residential area will provide public open space	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
and allowing for an element of height (on a small part of the site).	and that a 10m buffer will be left alongside the watercourse. Whilst the minimum number may be exceeded, the City Council consider that this minimum number does represent a maximising of capacity to the extent that can be assumed achievable ahead of the more detailed testing through a detailed proposal.	
The relocation of the football club should prioritise how the current CPZ, which relates only to the occasional use of the stadium, should be revised as part of a much wider consideration of how car use and parking should be practically managed in Blackbird Leys. (copy into SPS2)	Any new development would need to follow the parking standards set out in Policy C8. The County Council are considering the expansion of the CPZs across the city. Implementation of CPZs is dependent on the County Council as highways authority.	None.
Concerned the area is losing a significant amount of publicly accessible open space (at Knights Road and possibly Sandy Lane). This site should maybe have a larger proportion of remaining open space. (copy into SPS2)	The allocation of these sites has been considered carefully and compensation measures are required. The Knights Road site is much closer to this site. It is adjacent to a nature area and well-used playground/park, which are accessible to this site. 10% public open space would be required on this site, and on the neighbouring overflow car park site if that is developed, which would create additional public open space in this area.	None.

POLICY	SPS3		
All respondents supporting policy	8.80	136.31	203.7

COMMENT SUMMARY	OFFICER RESPONSE
It is very positive to see the overflow carpark at the Kassam Stadium (SPS3) allocated for residential or public open space. We would be very keen to see this site come forward in such away.	The support is welcomed.
Support, no reasons given	The support is welcomed.
Thames Water support the reference to odour (subject to requested revisions to Policy R7)	

POLICY	SPS3				
All respondents raising objections on this policy/chapter	36.3	53.12	64.6	74.19	100.6
	159.3	172.15	173.15	178.39	
	<b>165</b>				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Sport England consider it is presumptuous to suggest the over flow car park site is not required and any application would be contrary to paragraph 103 of the NPPF.	See responses to Sport England's comment on SPS2.	None.
Concerned the area is losing a significant amount of publicly accessible open space (at Knights Road and possibly Sandy Lane). This site	The same comment is made in relation to SPS2, and is responded to there.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
should maybe have a larger proportion of remaining open space. (copy into SPS2)		
The relocation of the football club should prioritise how the current CPZ, which relates only to the occasional use of the stadium, should be revised as part of a much wider consideration of how car use and parking should be practically managed in Blackbird Leys. (copy into SPS2)	The same comment is made in relation to SPS2, and is responded to there.	None.
The policy does not require that vehicular access is safeguarded through the Kassam/Ozone site to enable access to the Overflow site over the existing Littlemore bridge.	Oxfordshire County Council commented on this site and modifications are proposed regarding access to and around the sites.	Main modification proposed relating to transport (in table of main modifications and Statement of Common Ground with Oxfordshire County Council).
Historic England has commented on this site, and that comment is summarised and responded to in the Statement of Common Ground.		
Unsound because the football ground is well located here.	The policy approach does not require the stadium to leave, but provides guidance should it be located. This site is the overflow car park, so could potentially come forward without relocation of the stadium in any event.	None.
The sentence regarding other complementary uses should have the following addition: 'with new facilities of benefit and easily accessible to local residents such as those providing for	The existing phrase in the policy: 'Other complementary uses will be considered on their merits' is considered to represent appropriate flexibility, and does not need expanding on or making more specific. The spatial strategic and	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
community use and leisure and primary health care considered favourably.'	relevant policies for particular uses will be used to assess the merits of other uses.	
South Oxfordshire District Council and the Vale of White Horse District Council consider that the assumed density of 50-60dph is low. Given the nature of adjoining residential and commercial uses it is considered a higher density (70+) could be adopted. A lower capacity inflates the housing need. It makes the plan not effective or positively prepared as is one of the reasons the duty to cooperate is failed.	60dph has been assumed for a lot of the site. This is a high density for a suburban site. The density of neighbouring Greater Leys varies from 30-40dph, so 60dph is a step-change. It is similar to the density achieved at Barton Park, which is a combination of flats and mainly terraced housing, and it is a similar density to the Victorian terraces of Jericho. 50-60dph is a very reasonable assumption for this site, which is surrounded by much lower density suburbs. The capacity may be exceeded, but the policy gives a minimum, so it is important to be satisfied that this minimum is achievable without compromising other considerations.	None.

POLICY	SPS4		
All respondents supporting policy	8.81		

COMMENT SUMMARY	OFFICER RESPONSE
<i>Keep succinct with a focus on the reason for unsoundness</i>	<i>Succinct summary</i>

COMMENT SUMMARY	OFFICER RESPONSE
Support	Noted

POLICY	SPS4				
All respondents raising objections on this policy	54.6	114.2	164.32		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>BMW understand the Local Plan’s wider objective to deliver employment-related housing where appropriate. However, there is no intention to provide residential development within the MINI Plant. As such any references to residential development should be removed.</p> <p>Some consideration should be given to prioritisation of Cat. 1 floorspace in relation to the UGF tool. Recognition of the challenges inherent in attempting to ‘green’ such a constrained brownfield industrial site in a significant/ meaningful way.</p> <p>15m height should be justified (as stated for Policy HD9).</p>	<p>Policy SPS4 aligns with Policy E1 to provide a permissive approach to the delivery of residential development on all the city’s Category 1 employment sites.</p> <p>Consideration has been given to this issue under Policies G1-G5</p> <p>15m comes from evidence base – High Buidlings TAN</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Reference to “habitable spaces” should be removed from policy.</p> <p>MINI Plant Oxford will not support the viability of the CBL due to staff shift patterns, the fact that staff travel to work by car (away from Oxford) due to cost and short supply of housing.</p>	<p>Noted</p> <p>Noted</p>	
<p>Policy SPS4 should be amended to include a requirement for any development proposed within the site to demonstrate consideration of its impact on neighbouring SODC allocation at Northfield. Policy SPS4 should be explicit that the consideration of impacts should include, but not be limited to noise/ vibration, lighting, highways/ transport and air quality.</p> <p>Policy SPS4 should be amended to include a requirement for any development proposal within the site to demonstrate consideration of its impact upon SODC housing allocation at Northfield.</p> <p>Policy SPS4 should be explicit that the consideration of impacts should include, but not be limited to, noise/ vibration, lighting, highways/ transport and air quality</p>	<p>Disagree. This appears at odds with the agent of change principle. The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. The residential allocation at Northfield therefore proposes the introduction of new noise-sensitive (i.e., residential) development adjacent to an existing employment location.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>OPT has concerns about the policy and its potential operation, in particular with regard to building heights. OPT welcomes reference to building heights and Policy HD9 but both policies need to be tightened to ensure their effectiveness. SPS4 should be amended as follows:</p> <p>Development proposals that exceed the height that the High Buildings TAN states may have an impact on the historic core (which says skylining impacts may be possible from 15m and above) <u>will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising,</u> so that the full impacts can be understood and assessed as listed in Policy HD9.</p>	<p>The High Buildings Study was produced by LDA Design. OPT was a stakeholder in its production, alongside Historic England and other valued local specialist heritage groups.</p> <p>Proposed amendments to the policy are not aligned with the evidence base (High Buildings TAN) for the policy.</p>	<p>None</p>

POLICY	SPS5		
All respondents supporting policy	8.82		

COMMENT SUMMARY	OFFICER RESPONSE
Support	Noted

POLICY	SPS5				
All respondents raising objections on this policy	74.20	165.10	171.11		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
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.	These comments are addressed as part of a Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>We believe that the best way to do this is to amend the site boundaries so that the eastern part of the Oxford Science Park forms part of the Kassam Stadium site, coupled with a change in wording of the policy and the inclusion of specific requirements linked with the farmhouse. We suggest revised wording in our comments on the Kassam stadium policy (SPS2).</p> <p>Assuming this change is made, there is still potential for development on the larger parcel of land in SPS5 to impact on the setting of Minchery Farmhouse, so related text in policy SPS5 can be retained. Given the likelihood of large-scale buildings proposed within Oxford Science Park, we recommend a policy requirement for a masterplan.</p> <p>Accompanying changes to the supporting text are also suggested, though these are indicative only and would need to be checked by the City Council's archaeological adviser.</p>		
<p>Although SPS5 is allocated for commercial development in support of the OSP, Sites SPS2 and 3 are primarily allocated for residential purposes but at densities which may be conservative if opportunities for height are not taken.</p>	Noted	None
<p>Paragraph 8.94 conflicts with the Area of Focus and Local Plan policies that seek to make best use of land. The Oxford GI Study (2022) outlines that Littlemore scored a priority factor of 2 (in areas which require enhanced green infrastructure provision and/or quality), based on this initial contextual analysis. A priority factor of 2 scores lower on the scale and suggests that the local area is lower on list of priority areas which require green infrastructure enhancement.</p> <p>The Study also identifies canopy cover across the Science Park is characterised by an 'Excellent' rank accessible natural green space at Land adjacent to Eastern Bypass. The evidence base suggests that The Oxford Science Park does have green infrastructure</p>	The detail set out in para 9.94 is advisory based upon initial, high level desk based analysis of the allocation using the UGF tool. This is a separate assessment to the one presented in the city-wide GI study. The indicative findings are provided to support applicants in understanding how their site may score when they come to make an application.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>features and paragraph 8.94 should be amended to remove reference to there being limited presence of green infrastructure features on site.</p> <p>Paragraph 8.94 further conflicts with the policy wording itself with paragraph 3 of Policy SPS5 stating “The site and its perimeter contain significant existing trees, hedgerows and woodland which form the structural landscaping of the Science Park that are important to public amenity in the area and will provide valuable ecosystem services.” This wording is contrary to paragraph 8.94 as the Policy identifies there is significant existing green infrastructure features including trees, hedgerows and woodland.</p> <p>Paragraph 8.94 is not justified and wording suggesting there is limited presence of green infrastructure features on site should be deleted.</p> <p>...</p> <p>The Oxford Science Park welcomes the support for development and modernisation of buildings for research and development and office employment uses. This will support the site’s continued role as a R&amp;D location of choice.</p> <p>The first paragraph on page 197 states “Development proposals will be expected to mitigate impacts to the sensitive skyline and surrounding area <u>by avoiding built forms with excessively overbearing scale and massing, and avoiding roofscapes that are excessively uniform.</u>” We consider the underlined text is a subjective opinion and should be deleted. The impacts of development on the skyline should be assessed based on the merits of the design, which is provided for by High Buildings TAN and Policy HD9. These provide the Council with control over the design of future development proposals, as is referenced in Policy CBLLAOF (Cowley Branch Line and Littlemore Area of Focus). It is considered that the inclusion of the underlined wording places unnecessary restrictions specifically on The Oxford Science Park.</p>	<p>This has been done for all allocations. The analysis of the UGF is based upon a review of surface areas across the site on average, it does not mean that there are no high scoring elements, but presents a score based upon the overall site area.</p> <p>Upon making an application, applicants will need to provide their own site assessment using the UGF tool, which will reflect the situation as it is at time of application.</p> <p>Noted</p> <p>The underlined text adds site-specific detail to the wider policy context provided by HD9 (city-wide) and CBLLAOF (area-based). It provides an important site-based policy criteria for assessing applications.</p>	<p>None</p> <p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The Oxford Science Park has not been identified in the evidence base as a particularly sensitive location for the skyline of Oxford comparative to other locations in the City, we request the underlined wording is deleted as it is not justified by proportionate evidence.</p> <p>...</p> <p>The figures outlining the quantum of consented floorspace at the Park at Paragraph 8.89 of the Regulation 19 Plan are incorrect. The Oxford Science Park has two undeveloped plots with planning permission for 85,362m<sup>2</sup>. A planning application has been submitted for a further undeveloped plot at Plot 27 for 9,306m<sup>2</sup>. Therefore, the Park has a total future pipeline of 94,668m<sup>2</sup>. It is requested these figures are revised to ensure they accurately reflect the consented floorspace on the Park and ensure the Plan is proportionately justified.</p>	<p>Amend paragraph 8.89 of the supporting text to reflect the current supply position at the Science Park</p>	<p>Minor</p>

POLICY	SPS6		
All respondents <b>supporting</b> policy	8.83	36.4	

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	N/A

COMMENT SUMMARY	OFFICER RESPONSE
General support - Oxford City Council have been working with sport England to ensure that the playing fields at Sandy Lane are replaced as per the NPPF paragraph 103 bullet b) and the adopted Oxford City Council Playing Pitch Strategy.	Support welcomed.

POLICY	SPS6		
All respondents <b>raising objections</b> on this policy	100.7	136.32	164.33

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound, no reason provided- Whilst acknowledging the value of reopening the Cowley Branch Line, concerned about the loss of the sports pitch and lack of LP direction in terms of re-provision. Concerned this is part of a pattern of open space loss across allocations. Existing sports pitches should therefore be retained.	Para 8.101 indicates <i>“in the event the pitches are to be relocated, the City Council’s Active Communities team should be consulted to provide advice and the needs for sports fields in the area local to the site and should be satisfied with the proposed re-provision to ensure that the facilities are not lost to the local community”</i> .	None
Unsound as not justified - The Sandy Lane Recreation Ground is well-used by the community. Inappropriate for the sports pitches to be allocated for development, as it is unlikely they can be re-provided nearby.	The draft policy wording indicates that “Enhanced outdoor sports facilities should be provided..... The City Council’s Active Communities Team must be consulted and in agreement with any relocation of these sports facilities”. The supporting text at para 8.101 (see comment above) also identifies the importance of ensuring that the facilities are not lost to the local community.	None
Unsound as not justified and not effective – concerned about the potential loss of sports pitches in this location. Whilst it is noted that the retention or re-provision of the football pitches is encouraged through	It is not considered necessary to amend the draft policy wording. Policies G1 and G3 are referenced in both the draft policy and the supporting text.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>the policy, and ‘public open space’ is also sought, there should be greater importance placed on the protection of green space and recreation provision.</p> <p>For policy to be effective it should include the following text to provide confidence that sports provision, and green space can be retained as far as practicable:</p> <p>Open space, nature and flood risk  ... The capacity of the sports provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. If the sports provision is to be provided elsewhere, then enhanced outdoor sports facilities [should] must be provided in line with the requirements of Policy G1. The City Council’s Active Communities Team must be consulted and in agreement with any relocation of these sports facilities.</p>		

POLICY	SPS7		
All respondents supporting policy	8.84		

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	Noted

POLICY	SPS7		
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All respondents raising objections on this policy/chapter (use rep ID no – column K.)	<i>Insert rep id no's (copy and paste from excel spreadsheet)</i>				
	74.21	114.3	151.10	168.14	178.40

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
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”)?	These comments are addressed as part of a Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.
Policy SPS7 should be amended to be explicit that any consideration of impacts upon Land at Northfield should include, but not be limited to noise/vibration, lighting, highways/transport and air quality.	Disagree. This appears to be at odds with the agent of change principle. The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. The residential allocation at Northfield therefore proposes the introduction of new noise-sensitive (i.e., residential) development adjacent to an existing employment location.	None
Large areas of brownfield land on site have effectively remained vacant (other than car parking/storage) with no plans emerging over last 30 years for development. Non-productive areas should be classified Category 3	The whole site is brownfield land as it is previously developed. It performs an important economic function for the city. Owners are keen to redevelop the site within the plan period.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
and/or brownfield to allow other development than just employment instead of Category 1.		
Whilst policy notes that “an element of residential development ... will be supported” it is maintained that Site SPS7 is inappropriate for residential development in part, or in whole. Essential to preserve from loss of employment sites to residential to meet employment needs of city.	Noted	None
<p>Whilst not soundness issue, concern about policy’s effectiveness/consistency with national policy. For example, the sub-section addressing open space, nature and flood risk repeats earlier requisite policies of the Plan, as well as obligations required in statute. Policy should be reworded to address this, for example avoiding repetition.</p> <p>Reference to delivery to meet market demands, such as the mix of employment land uses, could also be included to ensure that the opportunities of the site’s delivery are maximised.</p>	Noted	None
Amend the paragraph on movement and access in Policy SPS7 to include as the last sentence: ‘The existing active travel network should be improved and added to as a consequence of development to ensure better connections to both existing and planned development in the area, including that adjoining in South Oxfordshire District.’	These comments are addressed as part of a Statement of Common Ground with Oxfordshire County Council.	Refer to Statement of Common Ground with Oxfordshire County Council for response.

POLICY	SPS8				
All respondents supporting policy	8.85				

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	The support is welcomed.

POLICY	SPS8				
All respondents raising objections on this policy/chapter (use rep ID no – column K.)	32.5	55.1	73.10	89.22	136.33
	164.34	200.9			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The proposed development reduces amenities and green space for the local community in a recreation/green space deprived community. There is considerable local opposition. The park should be retained as a community amenity. The proposals compromise the ability of present and future generations to meet their own needs. The use of the site should be reviewed and further consideration of local views made	Policy SPS8 requires re-provision of the facilities. It states: <i>There must be adequate re-provision of the current recreation facilities to meet the needs of those who currently use the facilities (and the new residents). The playground should be re-provided within the site. Replacement of the Multi Use Games Area could be with an alternative type of facility or by improvements to the capacity of an existing one, provided the re-provision is in the neighbourhood and meets the</i>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>before automatically reallocating the housing provision.</p>	<p><i>recreation needs of teenagers.</i> It also cross-refers to Policy G1. It is very clear, therefore, that needs of existing and also future users must be met through sufficient re-provision of facilities.</p>	
<p>Appalled by every aspect of this design and its intent, the failure to take on board the very well thought through comments of its residents and many people who responded to the 'consultation'.</p>	<p>The site is allocated in the Oxford Local Plan 2036 and an applications has been made for development on the site. Separate consultation exercises to inform the detailed design of the proposals for the application have been carried out, separate to the local plan process.</p>	
<p>The policy is not sound because it does not comply with the NPPF. Previous plans complied because they required re-provision on land west of Wytham Street. This has been problematic so SPS8 attempts to legitimise the downgrading of the facilities. It only requires 'adequate' reprovision and does not protect the MUGA. One option is on land considered by Thames Valley Police to be unsuitable for unaccompanied children due to lack of surveillance. The MUGA must be kept or re-provided with suitable space between this and any new homes to limit disturbance to residences.</p>	<p>Green spaces are only allocated for development in the Local Plan if either (rarely if ever in Oxford) they are shown to be surplus, or if the landowner is able to suggest how the loss of facilities may be compensated for. This was considered to be possible in the Local Plan 2036 (where the allocation was considered to be sound) and in the Local Plan 2040. It is likely that the same space will be used for the compensation, but there is no need to be so specific as that may be too restricting or inflexible if other options become available. The previous policy was very specific because it also allowed for a school, which would have used that space for a playing field (needing a directly adjacent space), and the space was part of the</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	allocation. It is no longer part of the allocation area, so being so specific about a site outside of the red line is unnecessary. The requirements for re-provision do not change. Current proposals include a replacement MUGA within the site allocation (as well as a replacement playground.	
The legal status of the land has not been addressed- it is unable to meet the conditions for appropriation set out in s.122 of the 1972 local government act, and is therefore not deliverable within the plan period.	It is intended that the appropriation of the part of the site that the houses would go on will be brought to a Cabinet meeting in the future. Legally, this is not linked to planning and could happen before or after planning committee, as long as the status is considered.	None.
Recent consultations have not been compliant with procedures laid out in OCC's SCI. Consultation concerning the initial decision to include this site on in the local plan were carried out before the first SCI in 2006.	It is unclear whether this is referring to the Local Plan consultation or the planning application consultations, but in any event it is considered that consultations have met requirements (and details of the Local Plan consultation are set out in the Consultation Statement).	None.
The EA has commented on the site, advising that additional protective and enhancement measures will be needed in the ecological buffer zones (10m from watercourse), that further remediation may be needed and that they are objecting to the boundary treatment of the planning application, the main concerns being loss of floodplain storage and access routes.	Some of the comments seem to relate to the previously allocated part B of the site, which is no longer allocated. Therefore, the proposed allocation is not within 10m of a watercourse. The floodrisk characteristics and necessary mitigations are noted in the draft policy, as is the need for investigations of ground contamination.	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The City Council has classified Bertie Park as Green Infrastructure. The draft local plan says that where development sites include existing GI features proposals should seek to enhance these. Seek to mean they do not have to be and the definition of enhancement is vague.	Policy G2 requires that proposals should seek to enhance existing features. It would be too inflexible of the policy to require enhancement in all cases as realistically that may not be achievable alongside development. Policy G1 sets out requirements for protection of existing features.	None.

POLICY	SPS9				
All respondents <b>supporting</b> policy	8.86				

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	Support welcomed

POLICY	SPS9				
All respondents <b>raising objections</b> on this policy	36.5	74.22	100.8	136.34	172.16
	173.16				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Concerned over the lack of written detail on this policy. The red line includes a larger area than the district centre incorporating the leisure centre, its car parking and a 3G Artificial Grass Pitch but it is not clear what is happening to	Comments noted and modification proposed to SPS9 to update the red line and site size area to reflect the site area identified in the recent planning permission.	Major modification

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>them. The boundary shown on the Policies Map should be redrawn to follow the boundary of the District Centre scheme.</p>	<p>Modification also proposed to the Policies Map.</p>	
<p>Recommend a reference in policy to significance, rather than simply setting, mirroring what is in the supporting text.</p> <p>“Development proposals must be designed with consideration of their impact on the <u>significance setting</u> of the Oxford Stadium conservation area...”</p>	<p>Agree this makes sense and that the policy should be amended to reflect this.</p>	<p>Minor modification</p>
<p>The policy states that “planning permission will not be granted for development that prejudices the comprehensive development of the whole site” but this principle has already been undermined by the District Centre scheme, which only covers part of the land shown. No upper limit on the scale of development that may be supported by this policy has been set.</p>	<p>This would have been considered as part of the submitted planning application before permission was granted. The site allocation policy sets a framework guiding the uses which would be acceptable as part of the mixed-use scheme, including the minimum net number of homes to be delivered. However, the policy cannot exactly prescribe what should be delivered and as per the NPPF, planning policies should “be flexible enough to accommodate needs not anticipated in the plan”. In any case, there are other relevant policies in the plan that address scale of development including design, height, massing and density.</p>	<p>None</p>
<p>The minimum number of homes to be delivered is 200 (net gain), but the masterplan's output</p>	<p>The Council has undertaken extensive urban design assessments to help understand the capacity of proposed site allocations based on their local context of constraints/ opportunities,</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>should be expected to identify additional capacity.</p>	<p>and are satisfied with the current number proposed. Housing numbers are expressed as a minimum net-gain. The minimum number shall be exceeded where it is possible to do so consistent with the other policies in the Plan.</p>	
<p>In the absence of “any regeneration plan for the Blackbird Leys area”, the policy will allow for the redevelopment of the remaining social infrastructure as a matter of principle, offering the community no comfort that it will be replaced or relocated to the same size or specification. A recent example of this is the downgrading of the existing community centre that has received planning permission as part of the District Centre scheme, and that sets a worrying precedent for decreasing facilities provided for local people.</p>	<p>Any proposals submitted will be assessed on their individual merit, whilst taking account of the wider regeneration plan for the area. The principle of the new community centre has been assessed, however the details for this building including appearance, layout and scale are reserved for a later date. The relevant planning application (23/00405/OUTFUL) has a condition attached (number 70), to secure the minimum gross internal floorspace for the new community centre. Whilst it is recognised that this floorspace is slightly lower than the previous building, there is an opportunity to address the design in the reserved matters application and make much more efficient and flexible use of the floorspace.</p>	<p>None</p>
<p>There is an unacceptable impact upon local nature, which is particularly important in a built-up area like Blackbird Leys. Plans to mitigate this impact seem insufficient in current plans, therefore the site allocation should be strengthened in this regard.</p>	<p>These issues would have been carefully considered as part of the planning application before permission was granted. Any mitigation required would be secured by condition.</p>	<p>None</p>

<b>POLICY</b>	<b>SPS10</b>				
All respondents <b>supporting</b> policy	8.87				

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>
Support, no reason given.	Support welcomed

<b>POLICY</b>	<b>SPS10</b>				
All respondents <b>raising objections</b> on this policy/chapter	100.9	136.35	200.10		

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
This policy is in the process of being implemented through the recent planning consent. Concerned about the lack of proper attention to understanding the biodiversity interest of the land and putting in place effective mitigation measures.	These issues would have been carefully considered as part of the planning application before permission was granted. Any mitigation required would be secured by condition.	None
Several playing fields in the vicinity of Knights Road including this one have been allocated for development. Cumulatively, this loss is unacceptable and removes important recreation facilities in what is already one of the most densely populated parts of the city. Improvements to nearby recreational facilities	These issues would have been carefully considered as part of the planning application before permission was granted. Any mitigation required would be secured by condition.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(Fry's Hill Park) and nature parks, including pedestrian and cycle access would need to be sought to make this development acceptable.		
Flood risk - majority of the site is within FZ1 but awaiting exception test.	See Appendix B of the SoCG with the Environment Agency	None
Ground water protection - site has been the subject of prior site investigations and an updated desk study and site investigation may be warranted.	See Appendix B of the SoCG with the Environment Agency	None
Ecology and Biodiversity – seeking reassurance that additional protective and enhancement measures are in place for the Northfield Brook.	See Appendix B of the SoCG with the Environment Agency	None

POLICY	SPS11		
All respondents supporting policy	8.88	136.36	

COMMENT SUMMARY	OFFICER RESPONSE
Policy Sound [reason not stated]	Support welcomed
Support high density residential development of this site, given its sustainable location	Support welcomed

POLICY	SPS11		
All respondents raising objections on	74.23	200.11	

this policy/chapter	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not effective – site partially intersects with a protected view cone, so should reference policy HD9.	Add HD9 reference to policy SPS11	Main mod
Whilst most of the site is in FZ1, egress is through FZ3, awaiting exception test. Also opportunity to include flood storage.	See Appendix B of the SoCG with the Environment Agency	Main mods
Ecology and biodiversity – seeking reassurance that additional protective and enhancement measures are in place for the Boundary Brook	See Appendix B of the SoCG with the Environment Agency	None

POLICY	SPS12					
All respondents supporting policy	8.89					

COMMENT SUMMARY	OFFICER RESPONSE
Policy is Sound [reason not stated]	Support welcomed

POLICY	SPS12					
All respondents raising objections on	150.1	156.1	164.35	172.17	173.17	
	178.41	186.8	189.15			

this policy/chapter	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not justified, effective – concerned about adverse impacts from building heights. Add reference to building heights and HD9.	Policy already sets out that impacts on views must be assessed and evidenced in any proposals, in compliance with HD9 (and includes reference to HD9). It also already references height and HD7.	None
Not effective – policy needs to be clearer that development may be residential-led on all or part of the site. Remove retail from descriptive wording/add retail to list of suggested uses instead.	This site has an important role as a district centre in the east of Oxford, and district centres need active frontages especially at ground level for good urban design and place making. Note that the policy requirement is about active frontages rather than retail specifically. The policy does not specify retail-led, simply that its a district centre to active frontages along main routes are important for placemaking.	None
Given the scale of the site, its ambitions and associated complexities the policy and its supporting text should acknowledge and provide flexibility that any redevelopment scheme at the site can be delivered in phases. The minimum ‘350 residential units’ should be removed and replaced with a suitable figure that is supported by viability evidence.	350 homes is a <i>minimum</i> requirement not a cap, so proposals can exceed this figure if they can demonstrate meeting the other policy requirements of the plan in particular design. There is no specification about the delivery or phasing in the policy.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not positively prepared, the minimum number of homes to be delivered is 350 (net gain). The output of the masterplan should be expected to identify additional capacity. The uncertainty means that the policy is not Positively Prepared as it doesn't provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p>		
<p>The policy wording references 'town centre' however this should be brought in line with the site's District Centre status.</p>	<p>The site is within the District Centre, but term "town centre" used within the policy, is describing the relevant uses in city and district centres. The terminology aligns with Policy C1, which in turn aligns with the terminology that the NPPF uses in Chapter 7 of the NPPF.</p>	<p>None</p>
<p>Supporting paragraph 8.137 implies that users do not access the site by car, which does not reflect the current operational realities of the site. In Q4 2022, when Redevco undertook their most recent public consultation survey, 25% of respondents said that they accessed the site by car. Whilst this a reality that OCC want to move away from, this site allocation does need to acknowledge that the private car remains a significant form of transport for users accessing Templars Square.</p>	<p>The Council has not had sight of the survey or its parameters. However the intention of the site allocation is to seek to make more efficient use of the present car parking areas within the site, which are generally under-used. As part of this aspiration for the area, a parking strategy is required to be submitted, to review parking levels to support sustainable modes of transport. There is sufficient flexibility therefore for any proposal to respond to parking requirements identified.</p>	<p>None</p>
<p>Amend the paragraph on movement and access in Policy SPS12 to make it clear that the access</p>	<p>Between Towns Road already accommodates an important public transport hub, and that is</p>	<p>Main mod</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>arrangements will change as a result of redevelopment. The redevelopment must better provide for people to walk and cycle. There should be a requirement for a mobility hub being created on site.</p>	<p>referred to in the policy. Amend policy to make it clearer there should be better provision for people to walk and cycle would be helpful.</p>	
<p>With regard to community uses, any future scheme is likely to provide a reasonable quantum of retail or service uses that serve the community. Such service type uses would include uses such as dentists, banks and hairdressers (Use Class F2(a)), as opposed to community hub spaces. The proposed policy needs to acknowledge that service retail uses provide an important role for all residents, and also have an equally important role in increasing footfall within the District Centre. Such uses are defined as community uses in the Use Classes Order. Clarification is therefore required on what type of community hub uses are deemed appropriate from Oxford City Council's perspective which should be subject to further discussion.</p>	<p>The site allocation is not overly-prescriptive about what the provision of a community hub should entail. It is sufficiently flexible about provision of community facilities (from use classes D1/F2) to meet identified needs.</p>	None
<p>Not effective, add to policy: 'SE Oxford requires a new primary healthcare centre. Templars Square may be the most suitable location for this centre, and so this need should be</p>	<p>Amend to SPS12 and supporting text, to clarify that appropriate uses could include a health centre.</p>	Main mod

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>considered in development proposals, in discussion with NHS providers.'</p> <p>Not effective, consistent with national policy, the IDP fails to provide adequate primary healthcare infrastructure to meet needs in SE Oxford. Amend IDP and SPS12 to clarify SE Oxford needs new primary healthcare, Templars square may be the most suitable location, in discussion with NHS providers.</p> <p>Not effective. Concern about lack of primary healthcare in the local area. Opportunity to merge existing Donnington Medical Centre and Temple Cowley Health Centre to provide a new facility at Templars Square. Policy should identify provision of health centre, and that development should fund a feasibility study.</p> <p>Add to policy wording: A feasibility study of the provision should be commissioned prior to the submission of any planning applications including the project costing and delivery timescale. If the outcome of the feasibility study sets out that the provision of a medical centre is not financially and/or operationally viable, other offsite mitigation measures should be provided</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
to ensure the primary healthcare provision can support the new population growth.		

POLICY	SPS13				
All respondents supporting policy	8.90				

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	

POLICY	SPS13					
All respondents raising objections on this policy/chapter (use rep ID no – column K.)	1.1	2.1	3.1	4.1	5.1	
	7.1	11.1	21.1	22.3	29.1	
	30.18	30.20	32.6	38.1	67.1	
	68.1	73.11	79.5	89.23	120.1	
	128.1	134.1	135.1	136.37	137.4	
	142.1	154.1	158.1	164.36	166.1	
	167.1	169.1	185.1	200.12	79.4	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Undermined by site allocation policies, specifically SPS13 which enshrines significant harm to the Iffley Village conservation area of a magnitude that cannot be resolved without overhaul of the policy..	Noted	None
Policy should not have been allocated as part of OLP2036 as it was previously rejected. Previous plan (OLP2036) did not assess site with suitable rigour. Adjacent site rejected when it has a comparable degree	Noted	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>of flood risk (7%) in FZ2. adversely impact biodiversity, GI and cause significant traffic issues. Site allocation should be deleted from the plan</p>		
<p>The Environment Agency provides the following comments about site SPS13.</p> <p><b>Flood risk</b> -Main part of the site in FZ1. FZ 2 and 3 on western boundary. Over half of FZ2 is within the 10m buffer. Suggested wording to be added to policy: Dwellings shall not be located in 3b. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ground water protection</b> – Refer to overarching comment at top of table</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for the ordinary watercourse which forms the western boundary of the site. any proposals should include both design and maintenance regimes for an ecological buffer zone.</p> <p><b>Other</b> - Opportunity to enhance green infrastructure</p> <p><b>Ground water protection</b> The EA has provided the same comment in relation to groundwater protection on a number of applications:</p> <p><i>This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted.</i></p>	<p>These comments are addressed as part of a Statement of Common Ground with the Environment Agency.</p>	<p>Refer to Statement of Common Ground with the Environment Agency for response.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<i>Subject to the findings, further remediation of soils or controlled waters, may be required to bring this site into use.</i>		
Numerous comments suggesting site allocation should be removed – various reasons given (including heritage impacts, biodiversity impacts, flood risk, loss of green space and transport impacts) as summarised below.	There is a live planning application currently being consulted on for this site. A number of the respondents refer to material submitted with that application (e.g., EA objection in relation to consideration of climate change allowances in site specific FRA submitted alongside planning application). As it is a live application, it is being considered by the City Council Planning Department.	
Allocation would be in conflict with numerous policies in the Local Plan.	Noted	
Site is unsuitable for housing - brownfield sites should be used rather than greenfield sites - e.g. housing could be placed on the nearby former Iffley Mead school site, where houses are planned.	Site is an extant allocation with a live planning application with 100% affordable housing	
The allocation to build houses on this land does not take into account its location on Meadow Lane which is part of the County Council-designated Principal Quiet Route OXR 18 and the substantial harm that increased vehicular traffic will have on this narrow lane.	Noted	
<p>SPS13 is detrimental to Iffley Conservation Area, and minimises the importance of setting, landscape and rural values. It is not possible to bring forward development without significant harm to the Conservation Area as set out by Heritage experts to the planned proposal for this site. Recommend removing SPS13 from the LP.</p> <p>Development of any kind, fails to conserve and protect the rural characteristics that define the Iffley Conservation Area Appraisal (2009).</p>	Noted	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Meadow Lane is itself a designated heritage asset (including its hedges) as a mediaeval drove road linking diverse parishes during that long-established agrarian system. It was instrumental in forming the morphology of Iffley and also protected in its own right as a historic route in County's LTCNetwork Plan (p.29)		
The inclusion of SPS13 is neither sound nor sustainable. It ignores relevant available evidence. It also fails to consider reasonable alternatives: e.g. to put the allocated social housing on nearby Iffley Mead, which has also been allocated for housebuilding, and thereby to conserve the Horse Fields.	Noted	
There should be no development on site.	Noted	
One potential change suggested by some to improve policy's soundness would be to impose no minimum number of dwellings, though they generally also state preference is no development at all at this site. Should not simply carry forward number from last LP without taking into account the new evidence.	Minimum housing numbers were required by the Inspector at the previous Local Plan Examination.	
Concern flagged about deficiencies in the consultation procedures that informed the allocation through the last Local Plan review which made it unsound.	Noted	
New evidence suggests this allocation should never have happened, allocation should not carry forward to LP2040 as this 'compounds' the prior error.	This evidence has been provided to support a live planning application.	
HELAA Assessment for the site does not pay heed to the new evidence that is available. It also continues to rely on errors such as an assumption that the site already contains some measure of residential development (it doesn't).	HELAA assessment uses appropriate evidence and methodology to assess the potential for housing at this site. Site is suitable, available and viable as there is a live planning application.	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy lacks logical formulation, presupposing that factors emerging in 2023 do not impact the site's residential capacity. This is inherently illogical and unsound from a basic land use planning perspective.	Noted	
Site should not be allocated because of flood risk. Site is a flood risk area now but also increasingly so in future.	Sequential Test carried out to inform Local Plan allocation.	
Flood Risk Assessment for policy is flawed - however even it acknowledges that over 10% of the site is at risk from flooding. The site does not have enough space for correct/appropriate design for SUDS delivery in line with the policy. Sites should not be allocated where they need engagement of the exception test, as this one does.	This refers to the site-specific FRA produced to inform the live planning application. The EA has lodged an objection to it due to how climate change allowances have been considered as part of the site-specific FRA. This is not a Local Plan objection. Statement of Common Ground agreed with EA for this site as part of the Local Plan process	
Council should not allow any development within Flood Zones 3a or 3b, except in wholly exceptional circumstances	Noted	
Public-owned site is far more suitable to be used for nature that can be accessed by public (including the schools). It is suitable for City Wildlife Site status, and it clearly qualifies for this status.	Noted	
Concern that badger sett will be destroyed (and impacts cannot be mitigated e.g. by moving the badgers). Badgers are a protected species.	<p>Badgers are a protected species because of the extreme levels of persecution they face. <u>In 1992, the Protection of Badgers Act (PBA)[1]</u> gave badgers across the UK unrivalled protection. The National Federation of Badger Groups (precursor to Badger Trust) was instrumental in bringing this legislation to fruition.</p> <p>Unlike most native wildlife protections in Britain, the Protection of Badgers Act was initiated due to the unprecedented levels of <u>species-targeted</u></p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p><u>persecution</u> faced by these unassuming nocturnal mammals. Thus, the Protection of Badgers Act is concerned with animal welfare as a priority, compared with <u>the Wildlife and Countryside Act 1981 [2]</u>, which focuses more explicitly on wildlife conservation.</p> <p><a href="https://www.badgertrust.org.uk/why-are-badgers-protected-by-law">https://www.badgertrust.org.uk/why-are-badgers-protected-by-law</a></p>	
<p>Comments flagging that generally the site is highly biodiverse, including that it is an ancient meadow and provides a wildlife corridor function. Should be considered a City Wildlife Site. Current surveys have not recognised all of the important species (e.g. grass snakes and bats).</p>	<p>Policy includes a requirement to undertake appropriate biodiversity surveys and makes reference to the retention of existing on-site vegetation.</p>	
<p>There is already a lack of green space in the area which would be exacerbated by development of the site. Development will result in other types of green being lost including hedgerows and green verges. Knock on impacts for loss of benefits it provides including loss of water retention by increasing hard standing.</p>	<p>Noted</p>	
<p>Site should be protected via the green and blue infrastructure network – site fulfils multiple benefits that would qualify for green infrastructure (biodiversity, climate change mitigation/adaptation, air/water quality, amenity, value to heritage).</p>	<p>Noted. Policy SPS13 makes reference to the suite of GI policies in the plan and how this site should relate to them.</p>	
<p>Unclear which part of GI network the site is protected under, however as the plan sets out the intention to protect the network, the continued allocation of this site requires justification if it is to accord with the Local Plan’s apparent intentions.</p>	<p>Noted</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The fields are vitally connected to the Iffley Meadow SSSI and the Riverside Nature Network, and are also within The Wildlife Trust's Core Zone for nature in Oxford. Development will have subsequent impacts on these sites.	Noted. The policy makes reference to appropriate biodiversity surveys and the preference to retain existing vegetation on-site.	
Extent of habitat loss under current proposals means is not possible to achieve a 5% net gain on site and skepticism that this BNG can be offset or replaced.	Noted	
There has been no consideration of impacts on the amenity of the area and health of people using it – many people visit for nature, particularly at weekend.	Noted	
Conservation Area status of the area within which the site falls is in conflict. Concern that allocation would fail to preserve characteristics of conservation areas, including strong rural characteristics identified as key feature of Iffley Conservation Area Appraisal 2009. Development will deliver very substantial harm to these assets.	Policy SPS13 references the conservation area appraisal setting out that development proposals must be designed with consideration of their impact on its setting.	
Council's Appraisal of the Iffley Conservation Area put great stress on the significance of the few remaining open spaces and of their important contribution to the character of the Area. It is a contradiction to allow development and also conserve or enhance the Conservation Area.	Policy SPS13 references the conservation area appraisal setting out that development proposals must be designed with consideration of their impact on its setting.	
Development of Meadow Lane will also remove the long views identified in the appraisal. Policy stating that views need to be "considered" is unacceptable. The view needs to be preserved and it cannot be if it overlooks a field full of houses.	LP2040 draft Policy does not state that views need to be considered. LP2040 Policy includes detailed design guidance referencing the conservation area, retention of the building line and ensuring appropriate building heights will be delivered.	
Para 8.146 states that the stone wall boundary along Church Way should be retained. However, the recent plans for this site include a large gap being made in this historic wall which will conflicts with the	Noted	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Conservation Area Appraisal. Unnecessary, as the cycle path could be rerouted so that it joins Church Way through the existing gate		
Allocation should be removed as it is not in keeping with the conservation Area status. Conservation means conserve what we have. It means keep it the same because there is perceived value in how it is now.	Irrespective of any potential impacts that are identified, conservation area status does not mean freezing a location in time. It is about ensuring that any change that happens is managed in a way that does not harm the special characteristics for which an area is designated.	
Allocation goes against climate emergency. Council needs to match action with its claims about addressing climate change.	Noted	
Concerns the development will exacerbate capacity problems at the sewage treatment works and result in increased raw sewage discharge into the nearby water bodies as a result – impacting on nearby SSSI.	Noted. TW have commented on planning application.	
Site includes a County Council Principal Quiet Route. Church Way and Meadow Lane are part of designated Quiet Route OXR 18 which is heavily used for leisure, people getting to work, taking children to school, etc with cyclists, joggers, walkers, families with prams, mobility scooters, horse riders. Development would have substantial harm because of increased vehicle movements with impacts on congestion, air quality and safety.	Planning application proposes 17 parking spaces for 32 affordable homes.	
Concern about lack of transport links to site – e.g. no bus links to the station. No new houses until the Iffley Road bus link is reinstated.	Noted	
Does not fulfil Oxford Transport strategy aims (pg6) <a href="https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/ConnectingOxfordshireOxfordTransportStrategy.pdf">https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/ConnectingOxfordshireOxfordTransportStrategy.pdf</a> : To support social inclusion and equality of opportunity Oxford is a tale of two cities. Provide a fully accessible transport network which meets the needs of all users.	Noted	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Narrow access at Church Lane is already challenging due to parking on one side. Access will also be problematic for services like ambulances.	Noted	
Car free development will not be feasible – if delivered, it will lead to parking elsewhere in Iffley instead with subsequent impacts on other motorists and pedestrian safety. Some people need cars, also needs to be parking for visitors.	Site allocation does not suggest that the site should be car free. Planning application is suggesting the provision of 17 car parking spaces.	
Concerns flagged about current development proposals for site including concern about speed/secrecy around the proposals and lack of appropriate consultation of residents before Council purchase of land and in developing proposals. Also flag concern about Council not listening to resident’s views.	Noted	
Mistake for Council to buy the land and should not look to return investment via inappropriate design.	Noted	
Concern about Council ignoring advice of specialists and information they have put forward in relation to biodiversity and flooding impacts.	EA objection relating to FRA. Submitted FRA did not take account of Climate change allowances. EA set out how to overcome objection in initial response.	
Concern about Council not believing in duty to cooperate with residents and wasting money on scheme that will damage residents and environment.	Noted	
Failure of application in 2022 indicates the site is unsuitable.	2022 application is still being considered.	
Huge opposition to the plans to build on the site, both locally and nationally.	Noted	
Council needs to acknowledge that proposed 'affordable' housing is only for the short term (as it can come to market after 3 years) and they cannot use this as justification for destroying local heritage and biodiversity.	Noted. This is true for any social housing. Not all tenants will be able to afford this.	
Compromises the ability of present and future generations to meet their own needs.	Noted.	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>There are not enough GPs or other supporting infrastructure to accommodate the development.</p>	<p>Noted. We are working with appropriate infrastructure providers to ensure that this is addressed throughout the plan period.</p>	
<p>I was surprised to learn in considering the suitability of SPS13 and other developments in Iffley village that there is no provision for an assessment of new developments potential impacts on safe and quiet travel routes. The only material consideration appears to be if housing may access more sustainable travel routes, and is NOT focused on the negative impacts on these routes.</p> <p>SPS13 development discharging a volume of additional cars onto Meadow Lane and Church Way in Iffley an important artery safe route for cycles and other users will destroy the quiet/ safe travel route that borders it down Meadow lane as well as destroying a widely used recreational route used by many in East Oxford (as indicated in the 1000+ comments received speaking out against concerns to the quiet route and</p> <p>Remove SPS13 from the LP2040  Include assessment of the impacts of new developments on new or planned safe/ quiet travel infrastructure. New development should afford opportunity to make local transport safer, not worse.</p>	<p>Policies in the Local Plan 2040 allow consideration of a wide range of relevant material planning considerations, including safe and quiet travel routes and access to any development proposal.</p>	<p>None</p>

POLICY	SPS14		
All respondents <b>supporting</b> policy	8.91		

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (no further comments provided)– 1 respondent.	Noted

POLICY	SPS14				
All respondents <b>raising objections</b> on this policy	11.2	30.21	36.6	67.2	79.6
	89.24	93.2	136.38		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not positively prepared, not justified and not effective –</p> <p>Transport: No accessible transport link to the station, does not fulfil the aims of the Oxford transport strategy.</p> <p>Access: Concerns raised that the sole access to the site is via Augustine Way, which is inadequate to handle the peak traffic to Iffley Academy. This will worsen even though proposed site is car-free and increase the danger for those travelling to school by active modes and make access to the site for emergency</p>	<p>The site is considered to be in a sustainable location close to bus stops providing links to the city centre and close to existing cycle and walking infrastructure.</p> <p>The policy identifies that vehicular access to the site should not be detrimental to the adjacent school. It also identifies that opportunities to access the site for pedestrians and cyclists from Cavill Road through the adjacent recreation ground should be explored.</p> <p>Controlled Parking Zone would be delivered by the highways authority, Oxfordshire County Council.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>vehicles impossible. Ideally a new access road would be created into SPS14 through Donnington Recreation Ground from Cavell Road or Meadow Lane and a one way traffic flow put in past the Academy and out via Augustine Way. Failing this the number of dwellings should be reduced to the same density as SPS13 to reduce the pressure on the access road past the Academy. At a minimum bollarded emergency services access from the end of Cavell Road over the first 20m of the planned bike path across the Recreation Ground would reduce the risk to SPS14 residents.</p> <p>Car free: Unlikley to stop residents owning cars and unless 24/7 parking restrictions are introduced and enforced on neighbouring roads, AND the new residents CANNOT apply for permits, this will create severe traffic and parking problems. Until more of Oxford embraces a car-free or 'less-car use' culture, the denial of permits to new residents would be challenged.</p> <p>Sewerage: Already we have sewerage dumped in the river locally. What increase in capacity is there in the system to cope with needs of 84 new dwellings?</p> <p>Schools: A number of the local primary schools</p>	<p>Thames Water would be consulted on any development proposal submitted.</p> <p>Pupil place planning is undertaken by the education authority, Oxfordshire County Council. Oxford City Council works with the County Council to ensure they are aware of planned and emerging housing numbers.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>are oversubscribed. Have the council looked at proposed cohort sizes for the timings of the proposed development? Will local primary and secondary schools be able to support the numbers from this and proposed Horse Field site.</p>		
<p>Unsound -The City Council should work with the County Council to ensure delivery of a high proportion of (truly) affordable housing at this site, alongside the other requirements of the policy. The wording of the policy suggests some naivety about what can be delivered here in terms of minimum 84 units, plus UGF, plus 10% open space, plus &gt;10% BNG. That is not likely to be possible and something will have to give.</p>	<p>Any development proposal submitted would be assessed in accordance with emerging Policy H2 (Affordable Housing).</p>	<p>None</p>
<p>Unsound as not consistent with national policy - Since this site was allocated in the previous local plan, there has been a growth in the city's population. Unfortunately, the current playing pitch strategy was completed some years ago and therefore has not taken into account the current estimated future growth of the population as set out in this current plan. So, it cannot be shown that this site is surplus to requirements, as per paragraph 102 of the NPPF.</p>	<p>The site is an existing allocation in the Oxford Local Plan 2036. The status of the playing field was discussed at length during the Examination of the Oxford Local Plan 2036 and it was deemed to be surplus to requirements. This position has not changed.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound - Para 8.155 mentions that Neolithic remains have been found on the neighbouring Donnington Recreation Ground and that there may be further remains on the proposed site. There is no mention of a Romano-British and medieval farms being also identified on the same Donnington Recreation Ground as discovered by the East Oxford Archaeology Project - yet it is equally likely that these will also extend into the proposed site.</p> <p>It is also stated that pedestrian access to the site may be gained from Cavill Road. This is another howler and again shows that the local planners have no knowledge or understanding of the locality for which they are planning. In this instance they seem to have no knowledge of twentieth century history either.</p>	<p>Comment noted, supporting text can be expanded to include reference to the potential further archaeology identified.</p> <p>Noted, the draft policy wording states “opportunities to access the site for pedestrians and cyclists from Cavill Road and through the adjacent recreation ground..... should be explored. This would.....provide a connection with existing pedestrian and cycle infrastructure across the recreation ground between Cavill Road and Meadow Lane.</p>	<p>Main modification: Additional text at the end of para 8.155: <i>‘Also an unusually high number of residual early-middle Saxon, medieval and Roman pottery sherds were recovered from the pit circle excavation site suggesting the presence of rural settlement of these periods in the near vicinity’.</i></p> <p>None</p>
<p>Unsound - As publicly owned land this site should provide for 100% affordable homes and incorporate those affordable homes intended for SPS13. This would ensure that in Iffley we help address the Conservation, Ecology and Housing needs. A more holistic approach for land owned by public bodies should demonstrate the values and balance that is aspired to in this plan.</p>	<p>Any development proposal submitted would be assessed in accordance with emerging Policy H2 (Affordable Housing).</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not justified -</p> <p>As with Land at Meadow Lane, this site provides a vital wildlife corridor and given its lack of use in recent years is likely to be rich in nature. Given how well-used the nearby Donnington Recreation Ground is for football and other sports, this site has excellent potential to become public green space, linking the Donnington and Rose Hill areas to Iffley Village. If the site is developed, the 10% public green space delivered should endeavour to provide this link instead.</p>	<p>The site is an existing allocation in the Oxford Local Plan 2036 and it is still the landowners intention to develop it.</p>	<p>None</p>

POLICY	SPS15
All respondents supporting	8.92

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The policy is sound.	Noted and agreed.	No action.

POLICY	SPS15
All respondents raising objections	32.7, 73.12, 136.39, 137.5, 164.37, 200.13, 201.2,

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not justified because the land should be classified as blue/green infrastructure. Formally a landfill, it now comprises habitats on the flood plain. It could be used for a nature reserve or</p>	<p>The evidence base for the Oxford Local Plan 2040 indicates the presence of various green infrastructure features, despite being used for grazing. As such, in accordance with Policy G3, these features will be protected to be demonstrated through the</p>	<p>No action.</p>

<p>biodiversity offsetting. It is a vital site of substantial ecological interest adjacent to the Iffley Meadows Site of Special Scientific Interest (SSSI) which will be affected by the proposal. It is a vital ecological network and has intrinsic nature conservation interest. The land is habitat connected to the River Thames falling within BBOWT Core Landscape. It will place recreational pressure on the SSSI.</p>	<p>submission of an Urban Greening Factor. There are also policies that will support good quality design to avoid harming key features. The proposed policy is soundly based and in accordance with national planning policy and relevant legislation.</p>	
<p>Not effective and not consistent with national policy as development of this green field site will extend the built-form outwards towards the countryside contrary to government guidance on heritage value, character and value of the countryside. Not justified because new development should be focused on brownfield land and increasing density elsewhere.</p>	<p>The land was removed from the Green Belt in the previous local plan. Policy SPS15 and Policy HD7 require high quality design to protect this 'gateway site' from harmful development. It must be well-designed to enhance the area currently dominated by the Redbridge Park and Ride and Travelodge. Development proposals on the site must be designed with consideration of their impacts on the surrounding area. The proposed policy is soundly based and in accordance with national planning policy and legislation.</p>	<p>No action.</p>
<p>The site should not be developed because it is former landfill and this should be addressed as a matter of principle now and not left to the development management stage. The council should be certain of its deliverability now. Policy SPS15 should be removed from the plan.</p>	<p>Contamination can be dealt with through the development management process. Policy SPS15 includes a requirement to include a site contamination investigation and to demonstrate how contamination issues will be resolved in compliance with Policy R5. The proposed policy is soundly based and in accordance with national planning policy and legislation.</p>	<p>No action.</p>
<p>Further information may be required to bring this site into use, including flood risk exception test and soil and contamination remediation. Protection measures will be required to avoid harm to biodiversity and ecology. Surface water</p>	<p>The policy and supporting text ensure these matters will be addressed at the planning application stage.</p>	<p>No action.</p>

will need to be dealt with to avoid impacting water quality and hydrology.		
This site is identified as supporting G1B asset of the protected Green Infrastructure Network and is in close proximity to the SSSI, contributing to the strengthening and enhancement of the ecological network, therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Due to the potential high biodiversity value of this site and potential fragmentation of linkages impacting the SSSI, further information should be provided to evidence whether this site is deliverable.	A phase 1 habitat survey was carried out to inform the Oxford Local Plan 2036. This survey found that it was unlikely that, on more detailed consideration as would be required for a planning application, biodiversity interest would be found at a level that would prevent development going ahead. There is not thought to be a level of biodiversity interest on the site that could not be compensated for. The site is somewhat removed from the core wildlife corridor and the SSSI, because that is on the opposite side of the river. Nevertheless, the policy does require that a buffer is provided alongside the watercourse, to protect its function as part of the network. The site allocation policy and other policies of the plan do require more detailed surveys to support an application, as well as protection of core green infrastructure, biodiversity net gain and an overall retention of the Urban Greening Factor.	No action.

POLICY	SPS16	
All respondents <b>supporting</b> policy	8.93	

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (no further comments provided)– 1 respondent.	Noted

POLICY	SPS16	
All respondents <b>raising objections</b> on this policy	199.24	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not positively prepared, not justified, not effective and not consistent with national policy - The allocation includes a council owned Multi-Use Games Area (MUGA) within the site boundary and 'it is expected that this would be retained or integrated within any development scheme unless it is deemed surplus to requirements'. Oxford Brookes is of the opinion that the MUGA has been closed for several years following anti-social behaviour and that the City should satisfy itself now if the MUGA is surplus to requirements. In any case, if there is question over its delivery the MUGA should be removed from the allocation. Subject to further testing, the wider site could deliver a minimum of 450 gross bedspaces and this should be allocated as such.</p>	<p>The City Council suggested a solution would be to remove the MUGA from the site allocation. This would need to be agreed with the landowner and an updated red line plan submitted. A response to this suggestion has not been received.</p> <p>The landowner's aspiration to deliver a minimum of 450 gross bedspaces is noted and the draft policy includes for a min. of 29 net gain on the site, which can be exceeded. However, the minimum is considered reasonable.</p>	None

POLICY	SPS17			
All respondents supporting policy	8.94			

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (with no further comment) - 1 respondent.	N/A

POLICY	SPS17								
All respondents raising	36.7	164.38							

objections on this policy	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not consistent with national policy. This is school playing fields and will result in the loss of two football pitches, could impact on a third natural grass pitch. Unless the pitches are replaced this is contrary to the NPPF 103.</p> <p>There is a 3G Artificial grass pitch on site and the new dwellings would be located too close to the AGP which could have a negative impact on the amenity of the new residents. This could result in a Stop Notice being served on the Artificial Grass Pitch.</p> <p>I would draw you attention to Sport England’s guidance: Artificial Grass Pitches Acoustics Planning Implications Guide: <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/artificial-grass-pitches-acoustics-planning-implications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/artificial-grass-pitches-acoustics-planning-implications</a></p>	<p>The proposed site allocation is spare land at the edge of the playing fields and will not result in the loss of football pitches. The policy states that any development must not encroach upon the other playing pitches and the school site.</p> <p>The policy indicates that planting should be introduced on the northeastern boundary of the site to screen the sports pitch.</p> <p>Modifications are proposed to the policy wording under the ‘Urban design and heritage’ section to ensure that any development proposals are sympathetic to the school site, including site security and safeguarding of pupils.</p>	Main modification.
<p>Unsound as not justified, not effective and not consistent with national policy - The Trust is concerned that this allocation might represent the potential loss of sports pitches, and/or recreational space. Whilst it is noted that polices G1 and G2 are cited in the policy text, and ‘public open space’ is also sought, there should be greater importance placed on the protection of green space and recreation provision.</p> <p>The Trust suggests that for policy SPS17 to be effective it should include the following text to provide confidence that sports provision,</p>	<p>The proposed allocation is spare land at the edge of the playing fields and not an intrinsic or well used part of the outdoor sport offer.</p> <p>Policy G2 and public open space are not referenced in either the policy text or supporting text. Reference is made to various green infrastructure features on the</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>and green space can be retained as far as practicable: Open space, nature and flood risk... ...It is expected that those requirements will be met in the following ways. <u>The capacity of the sports and recreation provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. If the sports provision is to be provided elsewhere, then outdoor sports facilities [should] must be provided in line with the requirements of Policy G1.</u></p>	<p>site in the supporting text at para. 8.170 and to Policies G1 and G3 within the draft policy.</p>	

POLICY	SPS18		
All respondents <b>supporting</b> policy	8.95		

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (with no further comment) - 1 respondent.	N/A

POLICY	SPS18		
All respondents <b>raising objections</b> on this policy	200.14		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not justified - Concerns raised about flood risk and ground water protection. Flood Risk - Site including ingress/egress is within FZ2 and the min site level is 0.16m above FZ3. Consider the impacts of climate</p>	<p>Comments noted. Refer to SOCG with Environment Agency.</p>	<p>Modifications proposed – see EA SOCG.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
change and to demonstrate that occupants are safe for the lifetime of the development without increasing flood risk. Ground water protection – site has been subject to prior site investigation and an updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.		

spePOLICY	MRORAOF			
All respondents supporting policy	8.96			

COMMENT SUMMARY	OFFICER RESPONSE
Yes – support	Noted

POLICY	MRORAOF				
All respondents raising objections on this policy	12.4	136.40	176.5	186.9	202.36

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Lack of service provision / facilities in Marston is being further undermined by the pursuit of other local public policies (e.g., County Council Traffic Filters).	Noted	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Continued to be concerned about sewage flooding in New Marston on roads and footpaths. The Council and Thames Water Utilities are aware of the frequent overflow of sewers at Ferry Road and elsewhere in the locality. New development elsewhere adds to foul sewage spills in New Marston. Substantial infrastructure investment is required. This hazard is not properly recognised or policies of its resolution shown in the Plan.</p>	<p>Noted</p>	
<p>Many sites in this area are likely to have significant issues with transport, with limited active and public transport options.</p> <p>Policy MRORAOF should be strengthened, to ensure walking and cycling improvements must be delivered rather than it being down to the developer to decide where this is applicable. We hope the council will be able to ensure developers make significant investment in public and active transport as part of planning process.</p>	<p>Noted</p> <p>Infrastructure improvements delivered in accordance with this Policy will be determined through individual planning applications to ensure that each effectively mitigates their impacts.</p>	<p>None</p> <p>None</p>
<p>Criteria h) of the policy refers to “maintaining the verdant and rural character of the areas around Cuckoo Lane”</p> <p>Do not consider that the reference to ‘rural’ within the policy accurately reflects the area’s</p>	<p>Reference to the rural character of the areas around Cuckoo Lane comes from the Headington Hill Conservation Area Appraisal.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>character. The area has a 'green' character formed by mature trees and parkland however this is very much the part of the patchwork of the city, rather than the outlying countryside.</p> <p>The reference to 'rural character' should be removed to ensure policies are sound.</p>		
<p>Manor Surgery and Bury Knowles Health Centre are within this area of focus. The ICB notes that the usage of general medical services of the Surgery is 100%.</p> <p>Therefore, the Surgery would like to explore the opportunity to reconfigure the existing premises to provide extra clinical space and to extend the current premises. The ICB considers that new developments within this area of focus will provide a funding opportunity for Manor Surgery to consider the reconfiguration and extension option to provide extra clinical space.</p> <p>The ICB does not own any real estate or has any dedicated funding to commission any feasibility study of the projects.</p> <p>The ICB has the following recommendation on the wording of Policy MRORAOF:</p>	<p>As part of their representations, BOB ICB has provided a list of potential upgrades/ extensions to their infrastructure. The Council will be reviewing the Infrastructure Schedule which forms part of the Infrastructure Delivery Plan (IDP) ahead of the Local Plan Examination. This update is undertaken to ensure that the IDP captures the most up-to-date infrastructure from all the infrastructure providers. The Council will review the list provided by BOB ICB as part of this IDP update for the Local Plan Examination.</p> <p>It is worth noting that there is an expectation that infrastructure providers undertake feasibility studies to work out the costs of any infrastructure required to inform negotiations with developers.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>k) <u>Reconfiguration and/or extension of Manor Surgery and/or Bury Knowles Health Centre to provide extra clinical space, including but not limited to a financial contribution towards the commissioning of preliminary works and reconfiguration and extension works.</u></p>		
<p>The policy incorporates green spaces such as Headington Hill Park, South Park and affects the Lye Valley. These are core green space, so their inclusion is unjustified and ineffective as it leads to confusion as to which policy prevails, as MROFAOF states “Planning permission will be granted for new development within this Area of Focus”.</p> <p>Likewise, Site Policies call for “consolidation” of car parking, this policy calls for a reduction, as each objective can only be pursued on a site by site basis it is worse than ineffective it is confused and liable to challenge.</p> <p>The policy is nonsensical linking different sites and areas that have nothing to do with each other with different constraints, seems to be jumble of generic policies deliver and Waffle that can’t be delivered. It is extremely difficult to understand the logic of incorporating public</p>	<p>These core green spaces are protected under other policies in the plan. Explicit mention is given under part i) of the policy to “ensuring the protection of New Marston SSSI and Lye Valley SSSI...”</p> <p>Part e) of the policy seeks to ensure that opportunities are taken to deliver a “consolidation and reduction of excess parking...”. This provides a framework for the site policies to work within.</p> <p>Noted</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>green space unless to allow building on green spaces or to privatise it.</p> <p>Individual Site Allocation policies such as for Oxford Brookes and Old Road Campus which address specific site constraints should not be removed. a) What is special about South Oxfordshire? f) – there are few properties on south end of Marston Road, so does this mean building on Headington Hill Park? Most of the specifics belong in the Site Policies where developers will refer for guidance.</p> <p>Removal of policy as it is nonsensical, fluffy, and removes clarity of public green space status and site allocation policies exist (except Old Road) Reinsertion of site-specific policies for Old Road Campus and Oxford Brookes. e) – Already rejected by the Inspector as not related to specific development, what is “excess?”</p> <p>Removal of i) as protection required for all areas in and out of SSSIs such as LNRs, LWSs etc.</p> <p>Cuckoo Lane runs from Old High Street to Marston Road and is a local heritage asset, this should be incorporated into the relevant site policies (e.g., John Radcliffe/SPE20), Pullen’s Lane, Headington Schools, Gov and Harcourt,</p>	<p>Ensuring that walking and cycling infrastructure improvements are delivered in a timely manner and link with forthcoming development in SODC will be important to ensure good walking and cycling connectivity.</p> <p>There are development opportunities along the towards the southern end of Marston Road (i.e., Policy SPE1 Government Buildings and Harcourt House; and SPE2 Land at St Clements Church. The former is adjacent to Headington Hill Park.</p> <p>Noted</p> <p>Noted</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Oxford Brookes) or be a separate policy, it extends well beyond the MRORAOF area so is ineffective and unsound, muddled.		

POLICY	SPE1			
All respondents <b>supporting</b> policy	8.97			

COMMENT SUMMARY	OFFICER RESPONSE
General support – no comment	

POLICY	SPE1			
All respondents <b>raising objections</b> on this policy	176.6	201.3	202.37	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(176.6) Unsound as not positively prepared, not justified, not effective, not consistent with national policy – Site Uses</p> <ul style="list-style-type: none"> <li>The allocation should retain the schedule of uses set out in the current Local Plan policy SP16, namely residential development, student accommodation, academic institutional uses, and other complementary uses which will be considered on their merits. Draft policy SPE1 includes the same schedule of uses though not as clearly expressed.</li> </ul> <p>Suggest revised wording to clarify permitted uses on the site, including explicit support</p>	<p>It is agreed that the list of uses in the policy could be more clearly worded, and also that there is no need for the reference to public open space. The greater flexibility given by not restricting the reference to other complementary uses to commercial is preferable.</p>	<p>Planning permission will be granted for residential development, <u>which may include</u> <del>and public open space including</del> student accommodation, as well as <del>other</del> academic institutional uses (subject to Policy H10). The minimum <u>number</u> of dwellings to be delivered is 70 (or, if delivered as student rooms, the number of rooms that equate to this when the relevant ratio is applied). Other complementary uses will be considered on their merits.</p>

<p>for spin-out commercial space and omit reference to open space (which is covered by strategic policies and was removed during LP2036 examination): <i>“Planning permission will be granted for residential development, including student accommodation, as well as academic institutional uses and complementary commercial use”</i>.</p>		
<p><b>Site Views</b>  The commentary is framed around building heights and, based on text preceding policy SPE1 (para. 8.183), is understood to be concerned with important views across the site from elevated viewpoints as noted in view cone and conservation area documents. As drafted, the policy could be interpreted as resisting any development that obscures any existing views across the site from any direction. This is likely to hamper positive development Construction of buildings on the site will inevitably interrupt views from Marston Road at street level, through this will not be harmful by default. The policy should be modified to make clear the views which are of particular concern.</p>	<p>The height of buildings should be informed by consideration of views, and ensuring appropriate heights will be essential to protecting views. Paragraph 8.183 is very clear about notable views and view cones and includes reference to the Headington Hill and South Park view cone, significant view lines being indicated in the conservation area appraisal being from Headington Hill Hall towards the site and along the paths at the back of teh southern parcel. There is also detail about exactly how this is likely to inform heights, and also roofscape. This is helpful information, encapsulated in the supporting text to guide detailed design. The policy should not be read in a way that suggests any view across the site must be kept, because it is a development policy, and development will clearly block some existing views. However, to avoid any doubt, it is agreed this could be re-worded.</p>	<p>Building heights should be designed in a way that <u>is informed by an analysis and understanding of important views across the site</u>, <del>avoids interrupting or disrupting existing views across the site,</del> particularly <del>where their location is sited within</del> the protected view cones <u>and views identified in conservation area appraisals.</u></p>

<p>Site Layout</p> <ul style="list-style-type: none"> <li>• The commentary "The most efficient arrangement for the site is likely to be blocks parallel to the road to create a consistent building line within the setting of the trees" should be omitted.</li> </ul>	<p>The treed setting of Headington Hill is of significance, and the arrangement of blocks set out in the policy is most likely to retain this setting. This is not a requirement, but does highlight the importance of the treed setting, and how this can be retained.</p>	
<p>Green Spaces</p> <p>Having regard to the site's position to the edge of the park and spanning Cuckoo Lane the most meaningful contribution to green space is likely to be through improved connections to these green areas, rather than arbitrary provision of additional public open space within the site. This was acknowledged by the Inspector during examination of the current Local Plan who required removal of mandatory requirement of on-site green space from the draft site allocation policy.</p>	<p>The Policy does not contain a requirement for public open space on this site. We agree that the wording could be more clear however and have proposed a modification in the response above.</p>	<p>See modification set out above.</p>

<p>Green Roofs</p> <ul style="list-style-type: none"> <li>The aspiration of the policy (i.e. building incorporating 'green' features) can be adequately expressed without pre-judging design, we suggest: "Opportunities to incorporate green features in the design of any new building should be maximised" (omitting following text re green roofs)</li> </ul>	<p>The policy does not require green roofs, but does require that opportunities to incorporate green features in the design of new buildings should be maximised. This will be important on this site in order to achieve the UGF requirement.</p>	<p>None.</p>
<p>Ecology</p> <p>Having regard to other local and national policy requirements ecological assessment appears certain to be needed. It is unhelpful for the policy to indicate it 'may' be needed. In any case, there is no need for the policy to comment on the need (or otherwise) for specific assessments. The passage can be adjusted to read: "Development proposals are expected to demonstrate harm to biodiversity will be avoided, mitigated or compensated".</p> <p>Ecology</p>	<p>The policy wording is inconsistent with the other site allocation policies in the plan, and it is agreed it could be worded more clearly.</p>	<p><del>A biodiversity survey may be required to assess the biodiversity value of the site and where appropriate it should be demonstrated</del>  <u>Development proposals are expected to demonstrate</u> how any harm to biodiversity on the site will be avoided, mitigated or compensated.</p>
<p>(201) Unsound as not justified – Natural England welcome the recognition that there may be potential hydrological impacts from development at this location on New Marston Meadows SSSI and that any proposals coming forward will require a</p>	<p>This site is a previously developed site, separated from the SSSI by a road and sports pitches. We do not consider it at all likely that the presence of the SSSI will mean that this site cannot be delivered, and do not consider further evidence is needed in this regard. However, the Policy does set</p>	<p>None.</p>

<p>hydrological assessment and SuDS. However, due to its proximity to the SSSI and the presence of open mosaic priority habitat at the site and the site's likely high biodiversity value, we are concerned that development here will impact on the wider ecological network to which the SSSI is linked, potentially resulting in the fragmentation of linkages. Further information should be provided to evidence whether this site is deliverable.</p>	<p>requirements in relation to mitigation expectations.</p>	
<p>(202) Unsound as not effective – Waffle. A natural calcareous stream flows into Harcourt House from Headington Hill Park with water across the path after rain. Modification Requested Clarify “reduce” from what? Why not “must” Removal of “Setting” below for Harcourt House,</p> <p>Ineffective as does not include specific amount of public space. “however, care should be taken in how entrances are placed to reduce impacts on the green character of the eastern boundary or the setting of the park. “Must be modified to: “full screening of the developments from Headington Hill Park with trees, hedges .. is a requirement” as multiple sides of the developments can</p>	<p>Noted. At the planning application the site will be assessed in accordance with the Development Plan as a whole. This will include all of the Local Plan policies having regard to the relevant constraints and opportunities.</p>	<p>None</p>

<p>impact on the seclusion of the park. Peat and fen survey required at site, see Section Peat and Tufa above. Cuckoo Lane end of northern part is on the old Oxford City boundary, one stone survives, there may be 1-2 on this site buried, a watching brief is required.</p>		
<p>The draft policy includes detailed commentary on expectations of a development. This results in a lengthy policy which replicates matters covered in draft development management policies in the Plan and is at expense of clarity and undermines its soundness. Would be better expressed supporting guidance supplementing a concise allocation policy. The separation of guidance and policy would also be beneficial in differentiating requirements that are likely to be strictly interpreted, and points which are made to guide development proposals.</p>	<p>Detail is in supporting text. The policy encapsulates how the detailed development management policies of the plan can be met on this particular site. Cross-references are made to particularly relevant policies, but Chapter 8 is clear that the cross-references are not exhaustive, and other policies will apply.</p>	<p>None.</p>

POLICY	SPE2		
All respondents supporting policy	8.98		

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reasons given	The support is welcomed.

POLICY	SPE2			
All respondents <b>raising objections</b> on this policy/chapter	74.24	121.6	200.15	202.38

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
As the Marston SSSI is upstream of this and SPE1, it is very hard to understand how it could possibly affect it. This is far too close to the floodplain of the Cherwell at the western side, and cuts into the wildlife corridor of the Cherwell.	The policy sets out at least a 10m buffer should be retained between built development and the river Cherwell. It also notes that biodiversity enhancement is required, as well as setting out that hedgerows and mature trees should be retained.	None.
Magdalen College supports the principle of allocating the site, and the site red line plan (updated from the current local plan). However, it has a number of concerns about the nature of the allocation. The policy contains a mix of vague guidance and very prescriptive text that will not aid in efficient decision making, or in ability to provide a clear and concise planning application. Even when written as an encouragement there is a risk they will become an expectation, and thus raise expectations. The cross-references seem unnecessary repetition.	Care has been taken in drafting the policy to set out how development on this site (and indeed all site allocations) will be able to meet the expectations of the generic policies of the plan. Where particularly relevant, cross-references to these policies are provided with the intention of being clear and helpful. The policy is informed by urban design and heritage analysis of the site. The site is sensitive, and a site allocation that acknowledges this, whilst setting out how to respond to those sensitivities is a helpful approach, being clear up-front, ahead of the design and planning application stage. It is not	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	considered that any aspect of the policy is over-prescriptive or not justified.	
Comment from Historic England- see separate statement of common ground.		

POLICY	SPE3			
All respondents <b>supporting</b> policy	8.99			

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy – 1 respondent	Noted.

POLICY	SPE3			
All respondents <b>raising objections</b> on this policy	53.13	74.25	199.25	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as needs to take Oxford Brookes reduction in staffing and subjects offered and new (post-Plan composition) ambition to become a one-site university.	Staffing and academic subjects offered at Oxford Brookes University are outside the remit of the Local Plan.	None required
Unsound as not effective - 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.	Comment noted and responded to in the Statement of Common Ground with Historic England.	Minor Modification to para 8.194.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Suggested change in the Urban design and heritage section of the policy: “Development proposals must be designed with consideration of their impacts on the setting of the listed buildings, the character of the conservation area, and on views, particularly from the historic core <u>and the Headington Hills allotment protected view.</u>”</p> <p>In the supporting text (para 8.194): “Headington Hill Hall and Lodge House are both listed buildings and much of the site falls within the Headington Hill Conservation Area. <u>Part of the site intersects with the protected view from Headington Hill allotment.</u>”</p>		
<p>Unsound as not positively prepared, not effective, not justified and not consistent with national policy - Oxford Brookes would like to include an additional use and have requested the following addition to the policy wording:  “Planning permission will be granted for.....  <u>c) The re-use of Headington Hill Hall for academic or complementary commercial uses including hotel use.</u>”</p> <p>Also requested an amendment to the Urban Design and heritage section of the policy wording as follows:  “Policy HD7..... Development should <del>have a positive impact on</del> <u>maintain or enhance</u> the relationship between buildings and the landscape setting. Development that rises above the treeline will need to be <del>very</del> carefully considered and justified.”</p>	<p>The draft policy wording currently allows for additional academic and teaching facilities on the Headington Hill Hall site and indicates that other complementary uses will be considered on their own merits. The additional inclusion of hotel use is not considered appropriate as it would be contrary to the approach of Policy E5.</p> <p>Supportive of the suggestion to replace some of the wording under the design and heritage section.</p>	<p>Minor modification to policy wording.</p>

POLICY	SPE4		
All respondents <b>supporting</b> policy	8.100		

COMMENT SUMMARY	OFFICER RESPONSE
Policy sound (no reasons given)	Noted.

POLICY	SPE4			
All respondents <b>raising objections</b> on this policy/chapter	53.14	74.26	172.13	173.18
	178.42	199.26		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
There is a risk that this may not be effective in the light of recent reductions of subjects and staffing at Brookes, which should be taken into consideration in any changes to the plan before ratification.	Staffing and academic subjects offered at Oxford Brookes University are outside the remit of the Local Plan.	None required.
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	See Historic England SoCG	See Historic England SoCG

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>landscape setting and character of the adjoining conservation area, demonstrating compliance with Policy HD1”.</p>		
<p>See our representations on the Duty to Co-operate set out in response to para 2.3 of the Local Plan, which also applies to Policy SPE4.</p> <p>The site is identified for residential led mixed uses. No residential capacity is identified.</p> <p>It remains unclear why no housing capacity is identified if the policy basis is to allow housing to come forward on this sites during the plan period. This is particularly relevant for a number of sites which are identified in the 2023 HELAA with housing capacity (derived from HELAA Appendix B) but where the corresponding capacity is not reported in the site allocation policy itself.</p> <p>The lack of capacity on such sites means that the policy is not Positively Prepared as it doesn't provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p>	<p>Permitted uses on site allocations consider landowner intentions for the site and anticipated timescales for when it will become available relative to the plan period. As there are no landowner intentions for the site to be bought forward for residential development, a capacity figure is not identified in the HELAA or draft policy.</p>	<p>None required.</p>
<p>Suggested changes to policy wording:</p> <p>Planning permission will be granted for further academic, research and related uses (subject to Policy H10), <del>potentially with linked</del> <u>and/or</u></p>	<p>The City Council suggested a modification could be proposed to say that residential use will be considered acceptable but only if Oxford Brookes University were to vacate the site. This modification would need to be agreed with the</p>	<p>None proposed.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>student accommodation <u>and/or residential development including</u> employer-linked housing, subject to other relevant Local Plan policies.</p> <p>...</p> <p>Boundary treatments could continue the natural style present on the site, e.g. retain and make use of existing hedges and trees as much as possible. <del>The existing row of hedges and trees form a natural border along the western boundary as well as to the north of the site (which are characteristic of the length of Jack Straw's Lane) and should be retained in any development proposals.</del> Public realm improvements should incorporate ample amounts of green features designed to function aesthetically, but also as important resources for biodiversity</p>	<p>landowner. A response to this suggestion has not been received.</p>	

POLICY	SPE5				
All respondents supporting policy	8.101				

COMMENT SUMMARY	OFFICER RESPONSE
Policy is sound (no reasons given)	Noted.

POLICY	SPE5				

All respondents raising objections on this policy/chapter	74.27	202.39			

COMMENT SUMMARY	OFFICER RESPONSE
<p>Unsound, not effective and not consistent with national policy.</p> <p>“Development proposals must be designed with consideration of their impact on the conservation area setting” implies the site is outside the conservation area. We recommend alternative wording.</p> <p>Also note typo “sand” in the subsequent paragraph.</p>	<p>Noted. This is standard wording for the plan and is clear. The policy wording and introduction references the conservation area multiple times too.</p> <p>Minor mod to address ‘Sand’ typo in policy.</p>
<p>The intensification of development directly contradicts Headington Hill Conservation Area Appraisal which refers to, in Part 3, Pullen’s Lane to loss of residential character, and tranquillity. There is simply no point having a Conservation Area if this sort of development is permitted. The area north of Cuckoo Lane was identified in 1973 as an area in which the development of institutions should be restricted in order to</p>	<p>The site has been subject to a site specific, urban design led assessment and the proposed quantum of development is in keeping with the local character and conservation area setting while seeking to make the most efficient use of the site. Permitted uses on this site are residential and accommodation, and are not out of keeping with land use in the area which include residences and educational sites.</p> <p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE
<p>protect the architectural and spatial characteristics of the area and to prevent the growth of traffic. In 1977 this distinction between the north and southern part of the conservation area was referred to specifically in the City Council's summary of the conservation area's significance. It is therefore unjustified as it is directly in conflict with above and cannot be reconciled with the character of the area.</p>	

POLICY	SPE6			
All respondents <b>supporting</b> policy	8.102	34.4	74.44	175.9

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy – 1 respondent.	Noted
<p>The Trust supports the principle of allocating the Churchill Hospital through Policy SPE6. The Trust's aim is to create a comprehensive, modern and vibrant hospital on the Churchill site combining care, teaching and research at high density. The Trust is working on a masterplan for the site and the formal recognition of this in the proposed policy is welcomed. The benefit of this recognition is that it clearly demonstrates the partnership working between the City Council and the Trust to support well planned and comprehensive development of the site. The Trust notes that the policy is relatively long, and that it repeats and cross references many other proposed policies in the Local Plan. Whilst the Trust does not object to this approach to policy writing, it seems unnecessary repetition.</p>	Noted.

COMMENT SUMMARY	OFFICER RESPONSE
The ICB requests an early engagement in any redevelopment of the site. It is to ensure that the ICB and any relevant primary healthcare provider(s) are fully aware of the redevelopment and can have more details of the proposed primary healthcare provision.	Noted.
The non-designated heritage assets should be clearly explained in the supporting text, as in the adopted OLP2036 i.e. "Buildings from the original hospital used during the Second World War have been retained and these are non-designated heritage assets".	Minor modification proposed to para 8.212.

POLICY	SPE6				
All respondents <b>raising objections</b> on this policy.	137.6	153.15	172.19	173.19	199.27

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not justified or consistent with national policy - The site adjoins the Lye Valley, which is designated as a Local Wildlife Site (LWS), Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) respectively. Lye Valley comprises a number of extremely rare habitats, plants and features including tufa springs and rare fen habitats, all of which are sensitive to hydrological changes. It has been found that even small developments in the area have the potential to adversely affect the hydrology. We are therefore concerned about the potential direct and indirect impacts (e.g. hydrology, recreational impacts) development on the meadow might have on the condition and nature conservation interest of the Lye Valley SSSI and LWS.</p> <p>Welcome that the policy recognises the importance of maintaining hydrological flows and that development will be required to fully assess</p>	<p>Impacts on the designated site will need to be addressed in accordance with the overarching policy G6 – this specifically flags the sensitivities of the Lye Valley within the supporting text as an example of the kinds of considerations applicants will need to factor in where applicable.</p> <p>The Council is currently working on a hydrological study of the Lye Valley area and this is expected to be finalised later this year once the monitoring period is over and the findings have been analysed. The findings of the study will help inform any additional</p>	No change proposed

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>impacts on surface and groundwater flows, and use efficient SUDS. We would, however, consider it important that hydrological studies are not only carried out as part of a specific development proposal but that the Council also ensures that water catchment/ hydrological flows study is produced for the Lye Valley to enable a better understanding of the valley's catchment so that it can be protected. This is of relevance to all developments in the area e.g. site allocation SPE7 (Nuffield Orthopaedic Centre) but also windfall sites that might come forward during the Local Plan period.</p> <p>We welcome that the policy requires a buffer to the SSSI during construction however such a buffer should not only be provided with regard to the SSSI but also the adjacent LWS. It should also be applied not only during construction but also during operation. Providing a wildlife-rich buffer will not only help to protect the conservation interest of the Lye Valley but also offers an opportunity for providing a wildlife-rich space for hospital patients and staff in support of the health &amp; wellbeing agenda. This will be especially effective if complimented by an attractive integrated green infrastructure network throughout the site.</p> <p>In line with the latest Local Plan policy proposal and good practice any development should also achieve a net gain in biodiversity, which could potentially be achieved through appropriate management of the adjacent Oxford City Wildlife Site or other nearby habitats of nature conservation interest. We consider that the wording should be amended to reflect the comments above.</p>	<p>guidance to be provided in future to support applicants with meeting the requirements of G6.</p> <p>Net Gain requirements are set out in policy G4 but also national legislation. These will need to be met on any applicable application.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not effective- Use of undeveloped land at the Churchill and Nuffield hospitals will contribute to the area of impermeable surfaces in the Lye Valley water catchment and should not occur.</p> <p>We note the presence of existing single storey buildings in these sites, which could be replaced with taller structures – incorporating soakaways.</p>	<p>The policy identifies that planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI.</p> <p>The policy also identifies that development proposals should reduce surface water runoff in the area and must incorporate sustainable drainage with an acceptable management plan.</p>	<p>None required.</p>
<p>Unsound as not positively prepared or compliant with Duty to Co-operate - The site will be permitted to develop employer-linked affordable housing. It remains unclear why no housing capacity is identified if the policy basis is to allow housing to come forward on this site during the plan period. The output of the masterplan should be expected to identify additional capacity. The uncertainty means that the policy is not Positively Prepared as it doesn't provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p>	<p>As identified in the HELAA Table A, the site has underused areas and whilst further development is expected within the Plan period, the landowner has indicated that their focus at present is on the John Radcliffe Hospital site. HELAA Table B indicates the capacity as 51. This is for the consented scheme on the site which has completed. As there is no landowner intention at present no further capacity is provided.</p>	<p>None required.</p>
<p>The City should be encouraging the Trust to come forward with a masterplan for the Churchill site. There are important green spaces on three sides of the site and at the same it represents one of the larger 'brownfield' sites in the city with redundant/decaying buildings, land given over to poor quality hard standing car parking and limited public amenity. Crucially, current traffic management schemes are simply not</p>	<p>The draft policy identifies that development of the site should be undertaken as part of a masterplan.</p> <p>Enforcement of the traffic management scheme is not within the remit of the Local Plan.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
observed by users of the site (the peak-hour one way system is widely ignored).		
Unsound as not positively prepared, justified, effective or consistent with national policy. Changes suggested to the policy wording to avoid unnecessarily restricting the scope of activity taking place at the Churchill Hospital. Proposed change: b) Other suitable uses which must have an operational <del>and</del> <u>or</u> research link to <del>the hospital</del> <u>healthcare and education</u> and could include:	Agree that the draft policy wording in point b can be amended.	Minor modification to policy text, point b.
The University Hosptial Trust is concerned that the word 'rationalisation' in relation to car parking could be misinterpreted at application stage.	it is agreed that 'consolidation' is a clearer description of what is expected in terms of parking at the hospitals.	Modifications proposed.

POLICY	SPE7				
All respondents supporting policy	8.103	175.10			

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (no further comments provided)– 1 respondent.	Noted
The Trust supports the principle of allocating the Nuffield Orthopaedic Centre (NOC) through Policy SPE7. The Trust's aim is to create a comprehensive, modern and vibrant hospital on the NOC site combining care, teaching and research at high density. The Trust is working on a masterplan for the site and the formal recognition of this in the proposed policy is welcomed. The benefit of this recognition is that it clearly demonstrates the partnership working between the City Council and the Trust to support well planned and comprehensive development of the site.	Noted

COMMENT SUMMARY	OFFICER RESPONSE
The Trust notes that the policy is relatively long, and that it repeats and cross references many other proposed policies in the Local Plan. Whilst the Trust does not object to this approach to policy writing, it seems unnecessary repetition.	

POLICY	SPE7									
All respondents raising objections on this policy.	153.16	172.20	173.20	199.28	202.40					

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not effective - Use of undeveloped land at the Churchill and Nuffield hospitals will contribute to the area of impermeable surfaces in the Lye Valley water catchment and should not occur.</p> <p>We note the presence of existing single storey buildings in these sites, which could be replaced with taller structures – incorporating soakaways.</p>	<p>The draft policy identifies that planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI.</p> <p>The draft policy identifies that there may be potential for the redevelopment of low density buildings in the South-Western part of the site. The policy also identifies that development proposals should reduce surface water runoff in the area and must incorporate sustainable drainage.</p>	<p>None required.</p> <p>None required</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not positively prepared or compliant with Duty to Co-operate - The site will be permitted to include extra care accommodation and residential development, including employer-linked affordable housing. It remains unclear why no housing capacity is identified if the policy basis is to allow housing to come forward on this site during the plan period. The output of the masterplan should be expected to identify additional capacity. The uncertainty means that the policy is not Positively Prepared as it doesn't provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p>	<p>As identified in the HELAA, the site is currently in operational use as a hospital and the landowner has indicated that their focus at present is on the John Radcliffe Hospital site with no plans for residential redevelopment of the NOC within the Plan period. The site allocation is flexible to allow residential on the site if the landowner intention changes but because there is no landowner intention at present then capacity is assumed as zero.</p>	<p>None required</p>
<p>The University Hospital Trust is concerned that the word 'rationalisation' in relation to car parking could be misinterpreted at application stage.</p>	<p>it is agreed that 'consolidation' is a clearer description of what is expected in terms of parking at the hospitals.</p>	<p>Modifications proposed.</p>
<p>Unsound as not justified – supportive of residential development but not clear why this is not employer led as per HD6. Also request a modification to the policy as peat reserves are likely to be in the Lye Valley leading down from the NOC and Windmill Road/ Old Road junction, these must be protected from being washed away.</p>	<p>The draft policy wording states that planning permission will be granted for employer linked affordable housing that supports the main use of the site. The supporting text makes reference to the site potentially being within the catchment of the Lye Valley SSSI and the draft policy wording indicates that any development proposals should be accompanied by an assessment of groundwater and surface water, should reduce surface water runoff in the area and must incorporate sustainable drainage.</p>	<p>None required</p>

POLICY	SPE8		
All respondents <b>supporting</b> policy	8.104	71.17	

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	The support is welcomed.

POLICY	SPE8				
All respondents <b>raising objections</b> on this policy/chapter	74.28	172.21	173.21	193.10	199.29

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Comment received in representation from Historic England, summarised and responded to in the Statement of Common Ground		
Comment received in representation from Quod on behalf of Oxford University Hospital Trust and the University of Oxford (which the representation from Bidwells on behalf of the University concurs with), summarised and responded to in the Statement of Common Ground		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>South Oxfordshire District Council and the Vale of White Horse District Council consider the policy is not positively prepared because no housing capacity is identified, even though the policy basis is to allow housing to come forward on this site. The uncertainty means the policy is not positively prepared as it does not provide a strategy which, as a minimum, seeks to meet the area's needs.</p>	<p>The Oxford Health NHS Foundation Trust will continue to have a significant and important presence in the city performing their primary function, which is mental health care. The Trust has ambitions over the Plan period to upgrade its facilities and utilise its sites more fully. It owns and/or occupies a relatively large number of sites of varying size. Several of these (larger) sites are allocated in the Local Plan. The Trust's plans across all its sites are not yet fully formed. Whilst the Trust is confident about the level of housing it will aim to delivery across its sites, and this has been spread across its sites in the HELAA to add to the calculated capacity of the city, exactly how they will come forward across the various sites is subject to change. Furthermore, ultimately the Trust's primary function must always take priority, and a policy should not prevent upgrade of healthcare facilities if a minimum housing number is not forthcoming.</p>	<p>None</p>

POLICY	SPE9
<p>All respondents supporting policy</p>	<p>8.105</p>

COMMENT SUMMARY	OFFICER RESPONSE
General support – No comment.	Noted

POLICY	SPE9			
All respondents raising objections on this policy/chapter	<table border="1"> <tr> <td>36.8</td> <td>164.39</td> <td>202.41</td> </tr> </table>	36.8	164.39	202.41
36.8	164.39	202.41		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not consistent with national policy, as the justification for the loss of the playing fields is contrary to paragraph 103 of the NPPF.	Appendix A of the HELAA (included in the evidence base), establishes the site as suitable for residential use. The site provides important playing fields for the school's use, however part of the site (the playing field only, not the pitches), could be developed without compromising the open-air playing field provision. The site is therefore suitable, and no change is required to the policy.	None.
Not justified, not effective, not consistent with national policy due to the potential loss of playing fields in this location. Whilst it is noted re-provision of the playing fields is encouraged through the policy, and 'public open space' is also sought, there should be greater importance placed on the protection of green space and recreation provision.	Appendix A of the HELAA (included in the evidence base), establishes the site as suitable for residential use. The site provides important playing fields for the school's use, however part of the site (the playing field only, not the pitches), could be developed without	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	compromising the open-air playing field provision. The site is therefore suitable, and no change is required to the policy.	
This is unjustified as Barton: • Is the most green space deprived suburbs in Oxford, Barton Park even worse • Will be surrounded by Land North of Bayswater Brook development (1500 houses) • Lose green space and add residents via the Sandhills Field Development (150 houses) Is ineffective as: • Is too close to the A40 for health • There is nowhere to re-provision to in Oxford.	Appendix A of the HELAA (included in the evidence base), establishes the site as suitable for residential use. The site provides important playing fields for the school's use, however part of the site (the playing field only, not the pitches), could be developed without compromising the open-air playing field provision. The site is therefore suitable, and no change is required to the policy.	None.

POLICY	SPE10				
All respondents supporting policy	8.106				

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	Support welcomed

POLICY	SPE10				
All respondents raising objections on	137.7	202.42			

<p>this policy/chapter</p>	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Concerned about the potential impacts the development might have on the conservation interest in the area. The site is a short distance away from the Almonds Farm &amp; Burnt Mill Fields Local Wildlife Site and there are fields to the west of the site, both of which include rare habitats that are dependent on appropriate management.</p>	<p>Open space and nature are considered within the site allocation policy. Furthermore, these issues including ecology and biodiversity would have been assessed in detail during the planning application before the site was granted permission. Any mitigation required would be secured by condition.</p>	<p>None</p>
<p>Ineffective policy – already allocated and application approved.</p>	<p>This site has been granted planning permission, however development has not yet commenced. A new planning application could be submitted at any time and the site allocation policy will need to guide any future applications. The site may be removed once the plan is adopted, should development have commenced on site.</p>	<p>None</p>

POLICY	SPE11				
<p>All respondents <b>supporting</b> policy</p>	8.107				

COMMENT SUMMARY	OFFICER RESPONSE
<p>Support, no reason given.</p>	<p>Support welcomed</p>

<b>POLICY</b>	<b>SPE11</b>				
All respondents raising objections on this policy/chapter	66.6	136.41	137.8	202.43	

<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
Concerned that the access requirements for the proposed development as set out in the site allocation policy will negatively impact on the conservation area and any heritage assets in the vicinity.	Heritage issues are considered within the site allocation policy. Furthermore, these issues would have been assessed in detail during the planning application before the site was granted permission. Any mitigation required would be secured by condition.	None
Concerned about the potential impacts the development might have on the conservation interest in the area. The site is a short distance away from the Almonds Farm & Burnt Mill Fields Local Wildlife Site and there are fields to the west of the site, both of which include rare habitats that are dependent on appropriate management.	Open space and nature are considered within the site allocation policy. Furthermore, these issues including ecology and biodiversity would have been assessed in detail during the planning application before the site was granted permission. Any mitigation required would be secured by condition.	None
If there is no junction with the A40, there will be significant transport implications.	Oxfordshire County Council as the local highway authority objected to a junction with the A40. An alternative means of access was sought and approved during the planning application stage.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Ineffective policy – already allocated and application approved.	This site has been granted planning permission, however development has not yet commenced. A new planning application could be submitted at any time and the site allocation policy will need to guide any future applications. The site may be removed once the plan is adopted, should development have commenced on site.	None

POLICY	SPE12				
All respondents supporting policy	8.108				

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	Support welcomed

POLICY	SPE12				
All respondents raising objections on this policy/chapter	202.44				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Ineffective policy – already allocated and application approved.	This site has been granted planning permission, and site clearance has commenced. However, a	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	new planning application could be submitted at any time and the site allocation policy will need to guide any future applications. The site may be removed once the plan is adopted.	

POLICY	SPE13					
All respondents supporting policy	8.109					

COMMENT SUMMARY	OFFICER RESPONSE
Yes. Not answered.	Noted.

POLICY	SPE13					
All respondents raising objections on this policy/chapter	71.11	192.4	172.22	173.22	186.11	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsoundness - not effective.</p> <p>The plan makes no mention of the dimensions of any new building within this allocation. Previous developments on the site, most recently the mosque, exceeded the height and dimensions agreed in the planning permission, impacting on the houses immediately behind the mosque. Any developments in the area need to ensure adequate consultation is done with residents living adjacent.</p> <p>Besides green features, further indication of the size of buildings that would be appropriate for the site, with priority given to affordable housing.</p>	<p>The comments provided would not make policy SPE13 unsound. These considerations, and impacts, would normally be considered during the planning application stage.</p>	<p>None</p>
<p>Unsound - not justified.</p>	<p>The policy allows for residential uses on the site, including (but not limited to) employer-linked housing, and healthcare facilities. Other complementary uses would be considered on their merits. The priority use (after healthcare) would be residential uses.</p>	<p>Check clarity of policies map</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>We support the allocation of the site for improved health care facilities, associated administration, and/or residential including employer linked affordable housing.</p> <p>However, we would like to see the uses broadened to include:</p> <ul style="list-style-type: none"> <li>• extra care accommodation;</li> <li>• student accommodation;</li> <li>• employment uses; and,</li> <li>• academic institutional and education uses.</li> </ul> <p>The redevelopment of the site should not be restricted to the existing building height.</p> <p>Provision of a higher resolution Sites and Policies Map clearly showing the policy designations as they affect the site.</p>	<p>SPE13 does not restrict heights. The policy states that building heights should be made in accordance with Policy HD9 this is not a restriction but rather a consideration.</p> <p>We will review the resolution of our sites and policies map.</p>	
<p>Why is no housing capacity identified if the policy basis is to allow housing to come forward on this site during the plan period. The uncertainty means that the policy is not Posltively Prepared as it doesn't provide a</p>	<p>Whilst there is potential for residential development on the site, the primary focus remains healthcare provision so no minimum housing requirement is set, however the HELAA capacity calculation does make an assumption of 10 dwellings (net gain) and that is counted in the overall capacity calculations for the plan. There are a number of health-related sites where this approach applies.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
strategy which, as a minimum, seeks to meet the area's objectively assessed needs.		
Policy SPE13 is seeking to introduce an improved health-care facilities to the site. If the Council is seeking to introduce a primary healthcare to the site, the ICB requests an early engagement in any redevelopment of the site. It is to ensure that the ICB and any relevant primary healthcare provider(s) are fully aware of the redevelopment and can have more details of the proposed primary healthcare provision.	Noted. This would be best practice to engage early, so does not need to be specified in policy.	None

POLICY	SPE14				
All respondents supporting policy	8.110				
COMMENT SUMMARY	OFFICER RESPONSE				
Sound.	Noted.				
POLICY	SPE14				
All respondents raising objections on	192.5	172.23	173.23		

this policy/chapter		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTIONS</b>
<p>Fails the duty to cooperate and cannot be rectified. Not positively prepared. The site will be permitted to include residential development, including employer-linked affordable housing. It remains unclear why no housing capacity is identified if the policy basis is to allow housing to come forward on this site during the plan period. This is particularly relevant for a number of sites which are identified in the 2023 HELAA with housing capacity (derived from HELAA Appendix B) but where the corresponding capacity is not reported in the site allocation policy itself. The output of the masterplan should be expected to identify additional capacity. The uncertainty means that the policy is not Positively Prepared as it doesn't provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p>	<p>The Oxford Health NHS Foundation Trust will continue to have a significant and important presence in the city performing their primary function, which is mental health care. The Trust has ambitions over the Plan period to upgrade its facilities and utilise its sites more fully. It owns and/or occupies a relatively large number of sites of varying size. Several of these (larger) sites are allocated in the Local Plan. The Trust's plans across all its sites are not yet fully formed. Whilst the Trust is confident about the level of housing it will aim to delivery across its sites, and this has been spread across its sites in the HELAA to add to the calculated capacity of the city, exactly how they will come forward across the various sites is subject to change. Furthermore, ultimately the Trust's primary function must always take priority, and a policy should not prevent upgrade of healthcare facilities if a minimum housing number is not forthcoming.</p>	<p>No action</p>
<p>We consider the list of appropriate uses should be broadened to include:</p> <ul style="list-style-type: none"> <li>- extra care accommodation;</li> <li>- student accommodation;</li> <li>- employment uses; and,</li> <li>- academic institutional and education uses.</li> </ul> <p>It should be recognised that the site can provide a mixed-use development that is aligned to meeting the economic, social and environmental needs of the city, as well as provide a wide range of uses.</p>	<p>The policy allows for residential uses on the site, including (but not limited to) employer-linked housing, and healthcare facilities. Other complementary uses would be considered on their merits. The priority use (after healthcare) would be residential uses. Adequate maps are provided in the Local Plan 2040 and on the interactive policies map on GIS.</p>	<p>No action</p>

Provision of a higher resolution Sites and Policies Map clearly showing the policy designations as they affect the site.		
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<b>POLICY</b>	<b>SPE15</b>		
All respondents <b>supporting</b>	74.29		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>	
The policy is soundly based.	Noted and agreed.	No action.	
<b>POLICY</b>	<b>SPE15</b>		
All respondents <b>raising objections</b>	53.16, 202.45		
<b>COMMENT SUMMARY</b>	<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>	
The policy is not sound as it will impact Conservation Areas.	There are no Conservation Areas in the vicinity and no Conservation Areas or their settings will be affected by the policy. All sites have been assessed for proximity of Conservation Areas, all other designations including environment and heritage.	No action.	
Ineffective because the site is already allocated and an application is approved.	The proposed allocation site relates to the wider Thornhill site which is not subject to planning permission. The policy is sound.	No action.	

<b>POLICY</b>	<b>SPE16</b>				
All respondents <b>supporting</b> policy	8.112				

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reason given.	Support welcomed

POLICY	SPE16				
All respondents raising objections on this policy/chapter	74.30	136.42	202.46		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
In the policy textbox, reference is made to Policy HD1 instead of HD7.	Agreed that it should be Policy HD7 that is referred to instead of Policy HD1.	Minor modification
Typo in the opening line of paragraph 8.277.	Agreed - "it" should be inserted between "as" and "is" in the first line.	Minor modification
Parking restrictions in the area would make developing this site a challenge, although the existing car park is currently under-utilised so there is an opportunity to develop part of the site for high density residential use. This should be for non-student use given the nearby student accommodation site above Tesco.	The site is allocated for residential development and car parking. It is in a suitable location for student accommodation as per the locational requirements of Policy H9 (Location of new student accommodation).	None
There aren't any trees on the southern boundary.	There are trees on the southern boundary of Union Street Car Park, adjacent to Avenue Lane.	None
The reduction of the car park seems difficult to achieve without a severe economic impact as it is normally at or near capacity, therefore	The supporting text and policy acknowledge that public car parking on the site will be minimised but to a level which is reasonable to serve the	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
contrary to Policy C2 - Maintaining Vibrant Centres.	area bearing in mind the public transport connections and its location within a District Centre. Policy C2 expects development proposals to be low car in district (and city) centres as these are highly accessible locations.	

POLICY	SPE17		
All respondents <b>supporting</b> policy	8.113	103.1	136.43

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (with no further comment) - 1 respondent.	N/A
The inclusion of graduate accommodation is an important and welcome addition to existing Policy SP43 in the adopted Oxford Local Plan 2036 in that it adds greater flexibility to the type of residential development that may come forward on the site. This positively contributes towards the “soundness” of the Draft Local Plan as it is: b) Justified – being an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (‘NPPF’) and other statements of national planning policy, where relevant. The College supports the inclusion of its land within the Policy SPE17 allocation in the Draft Plan and is confident that the housing [and other detailed] requirements of the policy can be satisfied, which may come forward individually as a minimum of 26 dwellings each on land in the Jesus College and Lincoln College ownerships (or, if delivered as non-self-contained student accommodation, the number of rooms that equate to this when the relevant ratio is applied).	Noted
Support residential development at Jesus and Lincoln College Sports Grounds (SPE17)... these are very sustainable locations and additional residential units around Barracks Lane may make the area feel safer at night. If playing fields are not retained,	Noted.

COMMENT SUMMARY	OFFICER RESPONSE
we agree that public open space should be provided here alongside housing, and if sports facilities are provided elsewhere they should provide opportunities for public, as well as private, use.	

POLICY	SPE17			
All respondents <b>raising objections</b> on this policy	18.2	36.9	74.31	164.40
	172.24	173.24	202.47	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not positively prepared, justified or effective - College endorses allocation of site for residential development (including graduate accommodation). Suggested quantum of units can be delivered without the dilution of the amenity of the wider sportsground or its function as an area for private sport and recreation. However, the exclusion of car-parking for postgraduate students - many of whom are mature students and have families - may prove problematic. Were the site to be developed for C3 residential use, then the fact that the site is not located within a Controlled Parking Zone would mean that development would be permissible even if it were not "low car development", thereby allowing a deviation from the normal parking standards envisaged by Policy C8. Development of this site for graduate accommodation ought to reflect this - a wholly car-free scheme (except for servicing and disabled spaces) for graduates is not considered reasonable within such a context, given that many graduates are mature students with families. The availability of a limited quantum of car parking (shared bays) would be reasonable if graduate	The site is adjacent to both the Cowley Marsh and Divinity Road Controlled Parking Zones. The draft policy wording indicates that there is opportunity to increase design options by designing a low car scheme and that parking for graduate accommodation should only be available for servicing and disabled. This is to reflect the site's sustainable location close to public transport connections, walking and cycling infrastructure and the District Centre. Any car parking associated with C3 residential development of the site would need to be on land within the College's ownership.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>accommodation came forward on this site. Parking availability could then be regulated by the College and allocated on a basis of need.</p>		
<p>Unsound as not consistent with national policy - contrary to the National Planning Policy Framework paragraph 103. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</li> <li>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</li> </ul> <p>The City Council should re-commission a playing pitch strategy to show the playing field area which is to be lost is surplus to requirements or the area lost should be identified for replacement within this Plan.</p>	<p>The supporting text identifies the potential for residential development whilst retaining the sports pitches. It also identifies that potential residential development on the larger part of the site would depend on the potential to re-provide the sports facilities. The draft policy wording identifies that sports provision must be retained and if pitches can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site could be developed.</p>	None
<p>Unsound as not justified, not effective and not consistent with national policy – 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.</p>	Changes agreed through SOCG.	Main modification to urban design and movement and access sections of policy. Also amendments to the supporting text at para 8.280.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>To address this concern, we recommend:</p> <p>a) Minor amendment to policy wording to refer to eastern, rather than north-eastern as follows:  “A graduation of height, lower on the south-western edge and highest in the <del>north</del>-eastern, would respond to the context of the Crescent Road view cone.”</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>Unsound as not justified, effective or consistent with national policy – OPT is concerned at the further potential loss of sports pitches proposed in this policy. However, the Trust is pleased to see reference to the Bartlemas Conservation Area and nearby listed buildings in the policy. The references to these heritage assets are too closely related to design, failing to recognise that development that has the potential to affect heritage assets is about more than urban design. The Trust considers that is not compliant with the NPPF approach to conserving and enhancing heritage assets. The Trust also has some concerns that development on this site may have an adverse effect on the views, and as such, suggests that reference to building heights and heritage setting is of value.</p>	<p>The Policy already requires reprovizion of the capacity of the sports pitches. Some modifications are proposed to the references to views and heritage value of Bartlemas, in collaboration with Historic England and explained and outline in the Statement of Common Ground.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>To be effective, and compliant with national policy the policy should be amended as follows:</p> <p><i>Open space, nature and flood risk ...</i></p> <p>...It is expected that those requirements will be met in the following ways. <u>The capacity of the sports provision must be retained unless it can be robustly, and independently demonstrated there is no demand for the facility. Any loss of part of the playing field will require enhanced re-provision in accordance with Policy G1...</u></p> <p><i>Urban design and heritage</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 <del>be designed with consideration of their impact on views, the rural setting of the Bartlemas settlement, listed buildings and the Bartlemas Conservation Area. Proposals must demonstrate compliance with policies HD1, HD2 and HD9</del> <u>demonstrate how they will conserve and enhance the significance and setting of the Bartlemas Conservation Area and nearby listed buildings. This will include an assessment of heritage impact and a quality, carefully designed, development proposal (in compliance with policies HD1, HD2).</u></p> <p><u>Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy HD9).</u></p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not positively prepared or effective. Not compliant with duty to co-operate – Unclear how capacity is arrived at or density applied. If the previous capacity were adopted for these two sites, an uplift of 66 dwellings could be delivered at site allocation SPE17. Lower capacities inflates unmet housing need, failing to deal with a key cross-boundary strategic matter.</p>	<p>The density assumption is identified in the HELAA Table B. As identified in the representation, the site is within the ownership of two different landowners, and the capacity assumptions provide for flexibility.</p>	<p>None</p>
<p>Unsound as not justified - Cowley is the most green space deprived suburb in Oxford having only 1.14HA per 1000 residents in 2006 of a city average, then, of 5.75HA, and with a now 11.2% population increase. This is the last large sports facility following the loss of other green space in the area. There is no suitable alternative available. Retaining some of the sports provision is NOT sufficient as it will not be adequate to service the needs of all at peak times, which invariably will mean residents can only use them at unpopular times. Most alternative sites to relocate sports facilities are already earmarked for development. The site policy should be refused, no alternative exists with a growing population.</p>	<p>The sports facilities are in private ownership and not in general public use. The supporting text identifies the potential for residential development whilst retaining the sports pitches. It also identifies that potential residential development on the larger part of the site would depend on the potential to re-provide the sports facilities. Both the supporting text and the draft policy wording identify the green infrastructure features on the site and the requirement for the protection of these.</p>	<p>None</p>

POLICY	SPE18		
All respondents supporting policy	8.114		

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reasons given	The support is welcomed

COMMENT SUMMARY	OFFICER RESPONSE

POLICY	SPE18			
All respondents raising objections on this policy/chapter	39.1	74.32	164.41	202.48

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policies relating to development of the Ruskin College Campus should be restricted to uses by and for the college only. This is because roads in Old Headington are already overloaded with traffic, so accommodation linked to the college and people only visiting the college for Ruskin-related activities would limit this.	The site is no longer occupied by Ruskin College, but by the University of West London. The occupier can't be controlled by planning policies, but policies to minimise parking and to carry out Transport Plans will ensure traffic is managed. This, and the nature of the uses proposed means the development should not create traffic management issues.	None.
Historic England commented and this is summarised (with response) in the Statement of Common Ground		
Concerned the policy does not make the proper reference to conserving and enhancing assets. Also there may be adverse effects on the views and reference to building heights and heritage setting is of value. There should be explicit	The policy refers to policies HD1 and HD2, which set out requirements for listed buildings and conservation areas. The policy says that views through to remaining undeveloped areas that make up the rural setting of the Old Headington	None.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
mention of significant view line and Stoke Place. Impact on Ruskin Field should be considered.	Conservation Area should be retained, so there is considered already to be acknowledgement of view lines and heritage setting.	
The policy is ineffective as it assumes one big development. This would not apply to, say, a moderate extension to an existing building.	The policy does not preclude separate proposals for a part of the site, and nor does it require redevelopment of the whole site, and this approach is appropriate.	None.
Should say low car development.	The parking policy C8 will apply to this site and there is no need for a site-specific reference in this case.	None.
It is unclear if residential development must be linked to academic uses.	The policy does not restrict residential development to that linked to academic uses to give flexibility to respond to any changing circumstances. However, it has been noticed that a typo in the policy accidentally repeats the same wording, so a minor modification is made to correct that.	Planning permission will be granted for academic institutional uses (subject to Policy H10), <del>student accommodation</del> and residential development, including student accommodation, <del>and residential development</del> at Ruskin College Campus

POLICY	SPE19
All respondents <b>supporting</b> policy	8.115

COMMENT SUMMARY	OFFICER RESPONSE
Support for policy (no further comments) – 1 respondent.	Noted

POLICY	SPE19
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All respondents <b>raising objections</b> on this policy		39.2	47.1	160.2	164.24	202.49	
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COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not sound as not justified - The policies for development of Ruskin Field should be tied to Ruskin College by removal of text allowing development unrelated to Ruskin College activities from Policy SPE19. This can be done by amending the first sentence of the policy to read: 'Planning permission will be granted for expansion of the adjoining academic institutional use (subject to Policy H10) which may include accommodation for Ruskin students and employer-linked affordable housing for Ruskin College employees.'</p> <p>Also by amending the <i>Movement and Access</i> paragraph by removing reference to access for general housing, so that the last sentence in this part of the policy reads: 'This means the site is most suitable for expansion of the college or accommodation for Ruskin students and employer-linked affordable housing for Ruskin College employees.'</p>	<p>Ruskin Fields is now owned by University College London, who also own Ruskin College. Given the minimum housing number there is limited scope for other uses, but the policy is flexible because the Field does offer a potential opportunity for expansion of the college campus and a reconfiguration across the sites.</p>	<p>None</p>
<p>Unsound as not positively prepared, justified or effective - The site allocation in the submission draft only allocates land at the southern part of Ruskin Field, UWL believe that the entirety of the Ruskin Field is appropriate for development and therefore request that the extent of the site allocation is amended. Representation includes reference to various studies as supporting evidence demonstrating the suitability and deliverability of the whole site for allocation and development.</p>	<p>The proposed extent of the allocation is the same as that in Policy SP56 of the current local plan. This has not been amended due to the heritage sensitivities of the site.</p>	<p>None</p>
<p>Unsound as not effective - Headington Neighbourhood Plan Policy HCG1 Key Worker Housing seeks to encourage the development of key worker</p>	<p>The policy has been drafted to allow flexibility and includes employer linked affordable housing.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>housing policies in the Local Plan. We request that any development at Ruskin Fields is for the provision of housing for healthcare key workers in Headington.</p>		
<p>Unsound as not effective or consistent with national policy – OPT has concerns about the approach to identification of this site and the drafting of the policy. It is not clear what, if any, development is actually suitable or achievable on this site especially given the heritage constraints and the constraints of the views of Oxford and its green setting. Notwithstanding this, the Trust is pleased to see reference to the Old Headington Conservation Area and nearby listed buildings in the policy, however, the Trust is concerned that the proper reference to conserving and enhancing those assets is not made in the policy. Furthermore, the Trust has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value. Trust also considers it is important that the impact of the development of this site should be considered in combination with the adjacent site (SPE18: Ruskin College Campus) to ensure that the cumulative effects of the two sites can be fully understood and mitigated a necessary.</p> <p>Suggested modification:</p> <ul style="list-style-type: none"> <li>- A heritage appraisal should be undertaken by the City Council to show that development is achievable on the site. If this shows there will be any adverse impact, the site should not be allocated for development.</li> </ul> <p>Notwithstanding the concerns about the principle of allocating this site, for the policy to be effective and compliant with national policy it should be amended as follows:</p> <p><i>Urban design and heritage</i></p>	<p>The policy does refer to the need to preserve and enhance the heritage assets. It also refers relatively extensively to the importance of views, heritage setting and heights:</p> <p><i>‘Development must be well related to the college and carefully and sensitively designed to preserve and enhance the setting of the listed buildings and character and appearance of the conservation area (in accordance with HD1 and HD2). The potential impact on views from the north should inform the choice of siting, height, form and appearance of new buildings, as will the listed buildings, wall, hedges and pond. The view from Stoke Place across Ruskin Fields to Elsfield is one of the most sensitive across and out of the conservation area, and this should inform the choice of layout and built form. Built development should be low-density with several gaps to retain views through and to the north from the buildings on the Ruskin Campus, and views through the site from the north.’</i></p> <p>The policy, in combination with Policy HD1, HD2, HD9 and other policies of the plan does exactly what the proposed amendments do, so no change is proposed.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy HD7 requires high quality design and the following sets out key considerations for achieving that on this site. <del>Development must be well related to the college and carefully and sensitively designed to preserve and enhance the setting of the listed buildings and character and appearance of the conservation area (in accordance with HD1 and HD2).</del> <u>Development proposals must demonstrate how they will preserve and enhance the significance and setting of the Old Headington Conservation Area and listed buildings. This will include an assessment of heritage impact and a quality, carefully designed, development proposal (in accordance with HD1 and HD2).</u></p> <p><u>Planning permission will be granted for developments that demonstrate that they are capable of preserving and enhancing the significance and setting (including its green setting) of the special significance of Oxford's historic skyline, as appreciated within the city, outside it and looking outwards from it (in accordance with Policy HD9)...</u></p>		
<p>Unsound as not effective, not justified -</p> <ul style="list-style-type: none"> <li>- Site allocation unjustified due to reduced need, loss of heritage, conservation and amenity value;</li> <li>- The minimum number of homes is not achievable due to ecological, environmental and conservation constraints;</li> </ul> <p>The policy is ineffective as it defines two inconsistent targets- the supporting text says a density of 30dph is assumed, but at that density 36 dwellings should be delivered.</p> <ul style="list-style-type: none"> <li>- Usage of Stoke Place as a cycleway or entrance to the development will destroy its charm/ inflict substantial harm on the OHCA;</li> <li>- Allocation for academic facilities and space for transport infrastructure is not justified;</li> </ul>	<p>The minimum number of homes assumes a low density in response to the constraints of the site. The policy is clear that Stoke Place is not suitable for vehicle access, but it would potentially be suitable for cycle or pedestrian access, and it is not considered that would cause substantial harm to the conservation area.</p> <p>The minimum housing number also accounts for the likely need to preserve the most significant pieces of green infrastructure in situ, rather than a 30dph density being assumed on the entirety of the site.</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>- Ineffective as states “may include” which means must or could. -Downstream flood risk assessment to Barton Park has not been assessed.</p> <p>Suggested modifications include:</p> <ul style="list-style-type: none"> <li>- Removal of the site from the Local Plan or:</li> <li>- Removal of the target housing no’s.;</li> <li>- Removal of the access road statement and removal of bridleway to cycleway or entrance in policy at Stoke Place north of the barrier (to protect stretch of green lane);</li> <li>- Clarification of the BOAT and its actual status;</li> <li>- Screening of development from Stoke Place bridleway;</li> <li>- Statement of Stoke Place heritage and amenity value;</li> <li>- Clear articulation of requirement not ‘should inform’,</li> <li>- Requirement for a low car development</li> <li>- Removal of multiple mistakes in text</li> </ul>		

POLICY	SPE20		
All respondents <b>supporting</b> policy	8.116	175.11	186.13

COMMENT SUMMARY	OFFICER RESPONSE
<p>Supports the principle of allocating the John Radcliffe Hospital site through Policy SPE20. Aim is to create a comprehensive, modern and vibrant hospital on the site combining care, teaching and research at high density. Working on a masterplan for the site and welcomes the formal recognition of the masterplan in the proposed policy. The benefit of which is that it clearly demonstrates the partnership working between the City Council and the Trust to support well planned and comprehensive development of the site.</p>	<p>Support welcomed.</p>

COMMENT SUMMARY	OFFICER RESPONSE
The ICB requests an early engagement in any redevelopment of the site. This is to ensure that the ICB and any relevant primary healthcare provider(s) are fully aware of the redevelopment and can have more details of the proposed primary healthcare provision.	Comments noted and support welcomed.

POLICY	SPE20				
All respondents <b>raising objections</b> on this policy		39.3	178.43	199.30	202.50

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Unsound as not positively prepared and not justified</p> <ul style="list-style-type: none"> <li>- A number of errors in paragraphs 8.295 - 8.297 with street names.</li> <li>- Text reads as if the site is merely adjacent to the Old Headington Conservation Area, when part of the site is actually within it. The policy should recognize this by changing the second sentence of the Urban Design and Heritage section to read “Development proposals must be designed with consideration of their impact on the adjoining Old Headington Conservation Area <del>and with those proposals on the site located within the Conservation Area subject to the same standards of scrutiny and assessment as elsewhere in the Conservation Area.</del> Views, particularly from..... policies HD1, HD2 and HD9.”</li> </ul> <p>Paragraph 8.293 should also be changed as follows: “the <del>adjacent</del> Old Headington Conservation Area that includes part of the site”.</p> <p>Paragraph 8.294 could have a phrase added that defines the part of the JR Hospital site within the Conservation Area, e.g.</p>	<p>Incorrect street names will be amended as a minor modification.</p> <p>Policy HD1: Conservation areas applies to schemes that affect conservation areas, either directly by being located within the relevant area, or by being in its setting – for example by being directly adjacent or having impacts on views etc. Development proposals located outside the site area covered by the conservation area will already be considered as forming part of the conservation area setting and will therefore require a demonstrated understanding of the context and an assessment of the impact of the development on the conservation area’s significance, as required by policy HD1.</p>	<p>Minor modification: incorrect street names corrected and supporting text made clearer.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>'To the east, <u>the site includes a substantial parcel of land within the Old Headington Conservation Area, stretching from Cuckoo Lane to the boundary with the Headington Village Hall and including the listed Manor House buildings.</u> Tree cover and hedging <u>on the eastern boundary</u> is dense but with some breaks, buffering the site from <u>the rest</u> of Old Headington Conservation Area.'</p>	<p>While the policy wording is not considered to require amendments, it is proposed that the supporting text is amended to make more clear that portions of the site are within the conservation area.</p>	
<p>Unsound as not effective - Modifications requested:</p> <ul style="list-style-type: none"> <li>• Removal of nonsensical justification of retaining car parking based on need to reduce queueing, the Council should not be parroting nonsense.</li> <li>• Reduce parking in exchange for further development as discussed in response to Policy R6.</li> <li>• Amend policy wording “Development of the site should..... to make the most efficient use of land, <u>address the climate crisis and realise essential health, social and environmental benefits.”</u> <ul style="list-style-type: none"> <li>• Protection and mapping of JR Green as Core Green Space</li> <li>• Protection of Cuckoo Lane, Listed Walls, Treelines, significant view lines</li> <li>• Removal of confusion around reduction and mitigation of flood risk in favour of reduction or “net-zero”</li> <li>• Enforce use of SUDS and other systems with policy specifying that civil action will be taken if runoff continues</li> <li>• Errors in street names corrected.</li> </ul> </li> </ul>	<p>Comments noted.</p> <p>Incorrect street names to be amended as a minor modification. Reference to the helipad to also be removed. The supporting text is also proposed to be amended to make more clear that portions of the site are within the conservation area.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<ul style="list-style-type: none"> <li>• Clear parameters for the protection of Cuckoo Lane, Listed walls and original John Radcliffe building and heritage barn near Osler Road/St Andrews junction</li> <li>• Removal of reference to helipad in paragraph 8.297 as this was temporary and has been removed.</li> <li>• Update wording to reflect that the site in the Conservation Area.</li> </ul>		
<p>Unsound as not justified - Amend the first sentence on movement and access in Policy SPE20 so that it reads as follows: 'Improvements to public transport, walking and cycling access to and through the site will be required'.</p> <p>Amend the last sentence on the first paragraph on movement and access in Policy SPE20 so that it reads as follows: 'Additional access points for non-vehicular traffic onto the site should be identified and provided where possible.'</p>	<p>Agree that the proposed changes would be helpful.</p>	<p>Modification –</p> <p>See SOCG with Oxfordshire County Council.</p>
<p>Not positively prepared, Not Justified, Not Effective, Not consistent with national policy. Request the following changes to avoid unnecessarily restricting the scope of activity taking place at the JR Hospital.</p> <p>"Planning permission will be granted for .....b) Other suitable uses which must have an operational <u>or research link to the hospital healthcare and education</u> and are:....."</p>	<p>Agree that the draft policy wording in point b can be amended.</p> <p>Do not agree to amending the reference to 'the hospital'. This is not needed.</p>	<p>Minor modification to policy text, point b.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The University Hospital Trust is concerned that the word 'rationalisation' in relation to car parking could be misinterpreted at application stage.	it is agreed that 'consolidation' is a clearer description of what is expected in terms of parking at the hospitals.	Modifications proposed.

POLICY	SPE21					
All respondents supporting policy	8.117					

COMMENT SUMMARY	OFFICER RESPONSE
Yes. Not answered.	Noted.

POLICY	SPE21					
All respondents raising objections on this policy/chapter	74.33	192.6				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound, not effective. Unclear what is meant by "adhering" to an existing building height. Review wording to comply with paragraph 35 of the NPPF.	Site is 0.21ha and within the district centre, so a density of 100dph is not unreasonable, even taking into account the View Cone constraint.  Main mod to clarify wording about building heights. 'Building heights should take inspiration from the surrounding townscape and help transition from the two storey terraces to the north with the three storey flats to the south.'	Main mod

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not reasonable to expect a “minimum of 21 residential units”. Review what would be delivered without adding more height (if thats the policy intention).</p>		
<p>Unsound, not positively prepared and not justified. Redevelopment of the site should not be restricted to the existing building height. Even respecting the View Cone, height could be increased to match surrounding building heights along the Cowley Road.</p> <p>*Support the redevelopment of the site for a minimum of 21 new homes, this figure should not be the maximum number of dwellings on site.</p> <p>We would like to see the site shown on the Local Plan 2040 Proposals Map; it is not currently shown.</p> <p>*We would like to seek clarification the site lies within the District Centre. This is not clear within the Local Plan 2040</p>	<p>Main modification to clarify wording about building heights.</p> <p>All residential capacities identified in site allocations are minimum figures, there are no caps on site allocation capacities.</p> <p>The Policies Map includes site allocation SPE21 and shows it as being located within the District Centre.</p> 	<p>Main mod</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Proposals Map.		

POLICY	NCCAOF		
All respondents supporting policy	8.118		

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted

POLICY	NCCAOF		
All respondents raising objections on this policy	27.9	74.34	178.44

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
You are going to smother us with new development in the north of the city. We are already getting the Oxford North which will add more traffic and pollution to the northern area.	A lot of these sites are existing allocations. The local plan	None
Criterion j) should be amended to align with NPPF.  Current wording could be problematic for employment sites such as University of Oxford Science Area and Keble Road Triangle, which have a high level of heritage significance.  No reference to nearby Grade II Registered University Park.	These comments are addressed as part of a Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Paragraph 8.312 is incomplete.		
<p>There is an issue in the inconsistency between policies on the areas of focus in respect of reference to the Oxford Local Cycling and Walking Infrastructure Plan (Oxford LCWIP). The Oxford LCWIP was approved in 2020. A statement similar to that in Policies WEAOF, CBLLAOF and MRORAOF is needed here.</p> <p>Add as 'k', or renumber and include as 'a' in Policy NCCAOF: 'Pedestrian and cycling infrastructure improvements, delivered in accordance with the requirements of the Oxford Local Cycling and Walking Infrastructure Plan (Oxford LCWIP). All opportunities to optimise connectivity and permeability for people walking and cycling should be taken'.</p>	These comments are addressed as part of a Statement of Common Ground with Oxfordshire County Council.	Refer to Statement of Common Ground with Oxfordshire County Council for response.

POLICY	SPCW1	
All respondents supporting policy	107.1	8.119

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reasons given	The support is welcomed.
OUD consider the policy sound, legally compliant and compliant with the Duty to Cooperate.	The support is welcomed.

POLICY	SPCW1
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All respondents <b>raising objections</b> on this policy/chapter	199.31		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
The University of Oxford in their representation say they concur with the comments of OUD, which in this case support this allocation. However, they also say that they disagree with a minimum number of homes being included within this policy.	The minimum number of homes in this policy reflects information from the University of Oxford and has been checked and is considered to be easily achievable without compromise to other policies of the plan or the University's aspirations.	None.

POLICY	SPCW2		
All respondents <b>supporting</b> policy	8.120		

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reasons given.	The support is welcomed.

POLICY	SPCW2		
All respondents <b>raising objections</b> on this policy/chapter	112.1		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>SPCW2 maintains the allocation of 'Plot B' under extant policy SP31. The red line plan identifies only part of the overall site at Winchester, Banbury and Bevington Road, and this is not reflective of the site description set out at paragraph 8.319 and given the minimum dwellings number is undeliverable as it stands. Hartford College and the University of Oxford consider that the policies map should be updated to reflect the full extent of the site at Winchester, Banbury and Bevington Road.</p>	<p>The minimum number included in the policy relates to planning permission 22/02849/FUL, on the proposed allocation only, for 130 student rooms (52 C3 equivalent). Therefore, the minimum number is achievable on this site. The text in paragraph 8.319 matches the area of the proposed allocation, not the previous allocation in the Oxford Local Plan 2036, and does not need amending. Landowner submissions in relation to the HELAA suggested there was no longer a wish or at least commitment to bring forward the other parts of the site for additional housing. The intention is to keep the uses as existing, with intensification of academic accommodation, and the benefits of an allocation would seem to be limited, especially given that the southernmost plot is within the area of focus that contains design guidance anyway.</p>	<p>None.</p>

POLICY	SPCW3	
<p>All respondents <b>supporting</b> policy</p>	<table border="1"> <tr> <td data-bbox="672 1131 786 1169">8.121</td> </tr> </table>	8.121
8.121		

COMMENT SUMMARY	OFFICER RESPONSE
<p>General support – No comment.</p>	<p>Noted.</p>

POLICY	SPCW3			
All respondents <b>raising objections</b> on this policy	74.35	138.3	164.43	200.16

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not justified, not effective and not consistent with national policy, as the supporting text does not reflect the site's sensitivity, or take into account proximity to multiple designated heritage assets. A Heritage Impact Assessment would ensure compliance with paragraph 31 of the NPPF.</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>Heritage Impact Assessment has since been carried out for this site allocation, detailing the heritage assets affected by allocation and impact of development upon their significance. The Council has also been engaged in dialogue with Historic England during the preparation of the plan, and post-consultation to address their concerns. Reference has been added to registered parks and gardens and cross reference to policy HD3, provisionally agreed with Historic England via Statement of Common Ground. Additional modifications may arise from this when complete.</p>	<p>Main modification.</p>
<p>While we welcome the minimum number of units allocated for the site, which is in line with adopted policy, we consider that the site has the potential to accommodate a significantly larger proportion of units given its inner-city location and proximity to campuses. GE suggest the minimum unit threshold is increased to 60 residential units (equivalent to c. 150 PBSA units) promote effective use of land in line with Section</p>	<p>Noted. The figure included in the Oxford Local Plan 2040 is in accordance with the NPPF and relevant legislation. Background papers 15a and 15b outline the policy approach taken, which included a robust and bespoke site assessment process with several inputs from the HELAA, Site Assessment (including Sustainability Appraisal) proforma, and urban design assessments. As the</p>	<p>None.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
11 of the NPPF (2023).	plan explains, it is intended that this figure is to be seen as a minimum not a cap and can be exceeded if a proposal meets the other planning criteria. No change required.	
<p>Not justified, not effective, not consistent with national policy, as the allocation is not compliant with the NPPF approach to conserving and enhancing heritage assets. The Trust has significant reservations about the identification of this very sensitive site, which fails to recognise that development that has the potential to affect heritage assets is about more than urban design.</p> <p>The Trust notes that the site is within the historic core and has some concerns that development on this site may have an adverse effect on the views and as such suggests that reference to building heights and heritage setting is of value.</p>	<p>Heritage Impact Assessment has since been carried out for this site allocation, detailing the heritage assets affected by allocation and impact of development upon their significance. The Council has also been engaged in dialogue with Historic England during the preparation of the plan, and post-consultation to address their concerns. Reference has been added to registered parks and gardens and cross reference to policy HD3, provisionally agreed with Historic England via Statement of Common Ground. Additional modifications may arise from this when complete.</p> <p>The policy wording already requires compliance with HD9 (Views and Building Heights).</p>	Main modification.
<b>Flood risk</b> - There is mention of possible ground raising for part of the site. If this occurs, then compensatory storage will need to be demonstrated through FRA. A 10 m buffer is required next to the stream. Suggested policy text: <i>Development should only be located in an</i>	As with SPS2, the policies of the Local Plan need to be read as a whole, including the allocation and any relevant strategic policies such as G7 which requires proposals to take the sequential approach to locating development; ensure no increase in flood risk elsewhere (FRA criteria a),	Minor/main modification.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p><i>appropriate flood zone in accordance with national policy and guidance. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</i></p> <p><b>Ecology and Biodiversity-</b> we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) for the Holywell Mill Stream are included in the development brief. This is especially critical as this section of the brook is likely to be hydrologically connected to the water dependant local wildlife site Magdalen Meadow. The development brief should also have strong protection for the continuity of the river corridor of the Boundary Brook and ensure that any essential new crossings are clear span bridges with no new culverts being created.</p>	<p>and not permitting culverting of open watercourses. <b>To make these requirements particularly clear, we are happy to add a cross-reference to policy G7 into the allocation policy to address your concern.</b></p> <p>Thanks for flagging the buffer requirement, <b>we will ensure that the requirement for ecological buffer strip is highlighted in the policy with cross-ref to policy G2 as we have with other allocations.</b></p> <p><b>We will add wording that sets out that construction impacts that could impact the environment such as the water course and water quality should be mitigated in line with policy R7.</b></p>	

POLICY	SPCW4	
All respondents <b>supporting</b> policy	8.122	33.4

COMMENT SUMMARY	OFFICER RESPONSE
Policy is Sound [reason not stated]	Support welcomed
Planning permission has recently been granted for this site and the development permitted closely follows the boating requirements of this amended policy (albeit not cranage point is likely to be available) and towpath contributions have not be agreed. However as both of these matters remain aspirational the Canal & River Trust support their inclusion.	Support welcomed.

POLICY	SPCW4				
All respondents <b>raising objections</b> on this policy	62.1	74.36	109.1	136.44	139.1

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not justified, effective, because policy only requires contributions towards bridge upgrade over the canal, but Council has not provided evidence that the existing bridge further up the canal can be upgraded to an accessible format (including bikes, as per the Central Infrastructure Area policy). Our evidence indicates this is unlikely to be achievable.	Recent planning application and subsequent appeal for the site indicates it is not possible onsite and therefore a contribution towards off-site provision is appropriate.	None
Not effective because fails to provide sufficient guidance and certainty to developers, landowners, and local residents. Policy should include evidence-based space requirements for each of the community requirements to	We appreciate the frustrations about multiple and unimplemented permissions but the Council cannot stop landowners submitting additional applications.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
encourage implementation of existing permission rather than even more unimplemented permissions.		
Not effective, consistent with national policy, add references to HD1, HD2, and HD3 given the proximity to Worcester college RPG (Grade II*)	References to be added to policy	Main Mods
<p>Not positively prepared, justified, effective, as identified during the most recent planning application process (and also previous planning history) there are competing demands on the site, and in addition heritage, design and other environmental sensitivities limit the final scale and form of what can feasibly be achieved. It is therefore unhelpful that SPCW4 does not specify more precisely the scale and scope of the different uses that are required in particular: Policy SPCW4 is generally permissive of mixed-use development which includes a long list of required uses and features, all of which are required by the wording as drafted. As was very clearly identified during the previous (most recent) planning application process (and also the previous planning history), there are competing demands on the space available at the site and it is simply not possible to accommodate all different elements to the fullest extent possible, without compromises,</p>	<p>This is a very constrained site with several landowners and a lot of 'asks' in terms of the policy requirements. The current planning permission demonstrated that the scheme had significant viability challenges. The site allocation SPCW4 recognises the complexity of this site, the competing demands for land uses, and the constraints, which is why the policy is intentionally flexible about the scale and scope of the different land uses, including being flexible about the minimum number of homes.</p> <p>If there are viability challenges then Policy S4 sets out a cascade mechanism.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>and where there are heritage, design and other environmental sensitivities which act to limit final scale and form of what can be feasibly achieved. It therefore remains unhelpful that Policy SPCW4 does not specify with more precision the scale and scope of the different uses that are required, in particular policy should be amended to:</p> <ul style="list-style-type: none"> <li>• Confirm the minimum quantum of residential development that is expected on the site (extant permission and assumed capacity is 18 dwellings);</li> <li>• Confirm the scale and form of community centre development that is required (scale and key specifications);</li> <li>• Confirm the scale and format of the boatyard that is required (scale and key specifications);</li> <li>• Provide further details and justification for any contribution to be made towards the upgrade of the tow path between the site and Hythe Bridge Street;</li> <li>• Clarify as part of Policy SPCW4 that where justified with reference to a site specific viability assessment there will (to ensure viability and delivery) be flexibility in respect of other plan requirements, including affordable housing, in</li> </ul>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
accordance with Policy H2 (Delivering Affordable Homes) and Policy S4 (Plan Viability).		
<p>Not positively prepared, justified, effective, at part f) of the proposed policy, an additional and new potential requirement for a contribution to the upgrade of the tow path between the site and Hythe Bridge Street is now stated to be required (and was not secured as part of the currently approved development on the site). The need (evidence) for this contribution being required is not provided within the plan or the documents that accompany it, and there is no clarity about the scale of the contribution that is expected. This additional obligation will further challenge the viability of any regeneration scheme on the site. The tow path is a well-used existing pedestrian and cycle route to and from the town centre, rail station and other areas north of the site, and whilst some additional users would arise as a result of development on the site, the requirement for any upgrades required needs to be clearly justified. The only reference to this route upgrade as part of the Infrastructure Delivery Plan (LCWIP Route 1) is linked to a different bridge proposal from Nelson Street and gives a cost of £2.5million,</p>	<p>The towpath has recently been upgraded northwards out towards Cherwell, so the upgrade of the towpath towards the city centre to Hythe Bridge Street will help support sustainable travel options that are safe and accessible.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
but without any additional supporting information.		
Not positively prepared, justified, effective, the viability assessment that accompanies the plan (BNP Paribas Real Estate, July 2023) does not provide a specific assessment of any potential development project on the SPCW4 site, where the policy dictates various community and public open space uses, and where there are significant abnormal costs associated with works to and adjacent to the canal. It is therefore essential for Policy SPCW4 to reflect the need to continue to review and assess viability and deliverability in order to achieve positive outcomes for the site, and where it may not be possible to meet other policy requirements of the plan (such as the 40% requirement for affordable housing being set by Policy H2).	If there are viability challenges then Policy S4 sets out a cascade mechanism and provides flexibility.	None
Not effective, a key issue for local people is community access to boatyard facilities, providing space for locals to do DIY boat repairs, rather than a commercial boatyard alone being developed. We would welcome the inclusion of this commitment within the site allocation policy.	Site allocation policy cannot control how the boatyard is operated. Whilst we understand why the community is seeking DIY facilities this has to be within a properly run business model that is determined by the operator, not via planning policies. The policy also already requires a substantial contribution towards community facilities (the public open space/public square and community centre).	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Not justified, effective, policy wording is too restrictive, need more flexibility eg should include student accommodation. Viability is a key issue, especially with re-providing the boatyard, policy should recognise this.	With the overall plan priority to deliver homes to meet housing need, the priority use for this site is mainstream residential including affordable housing provision. If there are viability challenges then Policy S4 sets out a cascade mechanism and provides flexibility.	

POLICY	WEAOF				
All respondents supporting policy	8.123	46.4	163.9	177.20	147.2

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted
Support policy and consider it provides a positive framework for the delivery of medium- and long-term development opportunities which fall beyond the key allocations identified in the emerging plan. It is considered that this policy, when read alongside Policy S1 provides an appropriate mechanism to support future opportunities.	Noted
The Nuffield sites are fundamental in supporting the delivery of an Innovation District in this key part of the city and assisting to realise the potential of Oxford's West End by supporting Oxford's knowledge economy, provision of commercial space and providing opportunities for a variety of occupiers from SMEs and start-up businesses, research and development/ life sciences occupants to office HQs.	Noted
The criteria are generally supported.	Noted

COMMENT SUMMARY	OFFICER RESPONSE
Support the policy requirements set out for the West End and Botley Road Area of Focus in the Policy West End Area of Focus. This recognises the need for new development to make the best use of urban design and place making opportunities to deliver a strong sense of arrival to Oxford and an improved environment for passengers arriving at Oxford station. The policy requirement to deliver pedestrian and cycling improvements to optimise connectivity to Oxford station and other parts of the city is also supported.	Noted

POLICY	WEAOF				
All respondents raising objections on this policy	96.1	130.6	131.3	136.45	170.11
	186.14				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Plan does not seek to increase residential development in the area.</p> <p>Given levels of Oxford's unmet housing need and its low levels of unemployment, Policy WEAOF does not strike the right balance between new homes and jobs.</p>	<p>The West End forms part of the city centre as such, a range of different uses (including employment and student accommodation) are appropriate.</p> <p>The Plan's overall strategy and employment strategy seek to enable a locational approach to how housing and employment are delivered. Policy WEAOF needs to be read in conjunction with the rest of the plan, which seeks to enable both homes and jobs to be delivered.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy needs to emphasise the need for increased housing, not just student accommodation, taking account of the site's location to development accommodation with limited parking provision.</p> <p>Redevelopment of the station must be based on future access by accessible modes with parking restricted to blue badge holders.</p> <p>Entry to the West End by private cars should be discouraged.</p>	<p>Work is on-going to produce a masterplan for the station which is looking at a number of issues including station parking.</p> <p>County Council Core Schemes delivered under the LTCP including, Traffic Filters and ZEZ are likely to discourage trips by private car here.</p>	
<p>Criteria set out in Policy WEAOF are prescriptive and parts b) and e) should reflect the flexibility set out in Policies HD1 and HD2 relating to balancing heritage harm with public benefits and Policy HD6 relating to views and building heights.</p>	<p>Noted</p>	<p>None</p>
<p>A key development opportunity in the West End is at the Odeon Cinema site on the southern edge of Gloucester Green. Whilst it is not recognised as a specific site allocation, we consider that this site should be prioritised for redevelopment. The site could be key to supporting the identified need for new tourist and visitor accommodation.</p> <p>Appropriate accommodation would include hotels and aparthotels. Critically, redevelopment of the Odeon site could improve footfall to this part of the City Centre and ensure its future vitality and</p>	<p>The city centre is one of a number of appropriate locations for new tourist accommodation under Policy E5. The Plan would therefore support new tourist/ visitor accommodation in this location.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>viability. Furthermore, the redevelopment of the Odeon presents an excellent opportunity improve the public realm of the area.</p>		
<p>This area should be allocated for more higher density housing that contributes to meeting the city’s housing need. It should feature less hotel, retail, leisure and employment uses.</p> <p>Although Oxford’s heritage assets should be protected, some areas may be suitable for taller buildings which could add new interest to Oxford’s skyline while complementing historical buildings.</p>	<p>The city centre should include a mix of uses.</p> <p>Policy WEAOF includes bullet points b) and e) which, alongside the other policies in the plan, is likely to help enable the delivery of well-designed taller buildings (where appropriate).</p>	None
<p>The supporting text highlights support for commercial R&amp;D space however it does not specifically reference the ambition in the West End and Osney Mead SPD to create an innovation district. Paragraph 8.343 should be amended so that it aligns the Local Plan and SPD.</p>	<p>The SPD is a material consideration in planning decisions. As paragraph 8.343 of the LP2040 retains this SPD “to supplement and facilitate the delivery of the site allocations in the Local Plan 2040”, we considered that there was no need to duplicate this aim as it is within the SPD.</p>	None
<p>The ICB requests an appropriate and proportionate mitigation measure should be provided to ensure there is adequate primary healthcare provision to accommodate the population growth. Suggest an additional bullet point is added to Policy WEAOF:</p> <p><u>m) Appropriate mitigation measures should be provided to ensure the primary healthcare provision can support the new population growth, including</u></p>	<p>As part of their representations, BOB ICB has provided a list of potential upgrades/ extensions to their infrastructure. The Council will be reviewing the Infrastructure Schedule which forms part of the Infrastructure Delivery Plan (IDP) ahead of the Local Plan Examination. This update is undertaken to ensure that the IDP captures the most up-to-date infrastructure from all the infrastructure providers. The Council will review the list provided by BOB ICB as part of this IDP update for the Local Plan Examination.</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<u>but not limited to a financial contribution towards the existing primary healthcare premises.</u>	It is worth noting that there is an expectation that infrastructure providers undertake feasibility studies to work out the costs of any infrastructure required to inform negotiations with developers.	

POLICY	SPCW5			
All respondents supporting policy	8.124	8.125	178.45	

COMMENT SUMMARY	OFFICER RESPONSE
Yes	Noted
We welcome the allocation of the Oxpens car park for development as part of this site.	Noted

POLICY	SPCW5				
All respondents raising objections on this policy	73.13	74.37	96.2	164.44	200.18

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Policy as written compromises ability of future generations to meet their own needs. It is unsound to propose a mixed-use development that creates thousands of jobs but only a few hundred homes (including student accommodation). Genuinely affordable homes are needed.	<p>The city centre is an appropriate location for new jobs, homes and student accommodation.</p> <p>The Plan acknowledges that there are affordability issues in the city and that affordable homes are</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>A number of representations consider that more homes should be delivered in in the city centre (in particular on this site) rather than on green fields and meadows. Leave green fields/ meadows alone to support climate/ biodiversity crisis and support well-being and mental health.</p>	<p>needed. The Plan provides policies to deliver them, including site allocations.</p>	
<p>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 LP2040....</p>	<p>These comments are addressed as part of a Statement of Common Ground with Historic England.</p>	<p>Refer to Statement of Common Ground with Historic England for response.</p>
<p>The policy does not insist on the provision of residential, as opposed to just student accommodation</p>	<p>The city centre is one of a limited number of suitable locations for student accommodation as set out under Policy H9. As such, it is appropriate to deliver student accommodation as part of a mixed-use scheme on this site.</p>	<p>None</p>
<p>The Trust has concerns about the balance of residential and employment land proposed for this site. More homes should be proposed as the site is in a highly sustainable location appropriate for residential development.</p> <p>The Trust considers a new masterplan should be developed and the focus shifted towards a residential-led mixed-use development focusing on the delivery of much needed affordable new homes.</p>	<p>The policy allocates at least 450 new homes to be delivered in this sustainable city centre location. Given its city centre location, it is also suitable for a range of other uses.</p> <p>Noted</p>	<p>None</p>
<p>We have concerns about this site because the “access and egress” route is through an area of flood risk. The site is surrounded by FZ’s 2 and 3. The hazard rating is not low.</p>	<p>These comments are addressed as part of a Statement of Common Ground with the Environment Agency.</p>	<p>Refer to Statement of Common Ground with</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
		the Environment Agency for response.

POLICY	SPCW6			
All respondents supporting policy	178.46			

COMMENT SUMMARY	OFFICER RESPONSE
We welcome the allocation of Worcester St car park for development	Noted

POLICY	SPCW6				
All respondents raising objections on this policy	74.38	163.10	164.45	172.26	173.26
	200.19				

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>More detail required on spread of dwellings between the three sites that make up this allocation. Evidence needs to make clear how 59 dwellings would be delivered.</p> <p>We understand that the Land South of Frideswide Square is a new allocation within the Central Conservation Area. This is in a sensitive location and merits proportionate heritage assessment.</p>	These comments are addressed as part of a Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>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>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.</p> <p>The view from the Castle currently connects with the floodplain and this makes an important contribution to its significance.</p> <p>Also, the land currently used as a car park itself is of heritage significance linked with its former use as a Canal Wharf.</p> <p>Heritage impact assessment provides the mechanism through which connections with that past land use can inform the site's future.</p> <p>Clarity is needed about the buildings that would be retained (or not) across the Nuffield sites.</p>		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The supporting text states that a masterplan should be developed, but this has yet to be required in policy.</p> <p>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>Supporting text makes reference to the “High Buildings Area” in paragraph 8.372. This needs clarification as not mentioned elsewhere in the plan</p>		
<p>Paragraph 8.374 sets out the infrastructure interventions for the Nuffield Sites. The location of bus stops, pedestrian crossings or any associated highway interventions, are outside of Nuffield College control and rest with Oxfordshire County Highways department, albeit support is given to aspirations for such improvements. Notwithstanding this, it is considered that the wording should be updated to reflect that infrastructure interventions in the control of Oxfordshire County Highways department cannot be delivered by Nuffield College.</p> <p>Paragraph 8.378 should be rephrased. This paragraph lacks emphasis and should make it clear that the masterplan overall secures the minimum number of dwellings. The text should be revised accordingly.</p>	<p>The County Council has the responsibility to deliver highway improvements as the Local Transport Authority but there is an expectation that redevelopment at the Nuffield sites will fund them through relevant financial contributions.</p> <p>The paragraph is included to ensure that all homes are delivered across the three sites and suggests that a masterplan should be produced to show how this can be delivered.</p>	<p>None</p> <p>None</p> <p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>It is proposed that the reference to the minimum number of dwellings should be extended to state ‘The minimum number of dwellings to be delivered is 59 as part of a masterplan (or if delivered as student rooms, the number of rooms that equate to this when the relevant ratio is applied)’ for clarity and to align with comments noted above with respect to paragraph 8.374.</p> <p>The following text should be removed from the last sentence of the first paragraph of the policy under ‘Open space, nature and flood risk’ as we note this is a duplication of subsequent wording in the policy.</p> <p>Wording suggested for deletion: The Castle Mill Stream runs through the site and opportunities should be taken to improve access to it.</p> <p>Wording to remain: Opportunities should be investigated to demonstrate how access can be improved to Castle Mill Stream from the Worcester Street Car Park site.</p> <p>We note that the policy includes reference to the Hinksey Hill view under the Urban Design and Heritage section of the policy. We do not consider this view to be the relevant view for consideration pertinent to Nuffield Sites and request that revised text is incorporated which acknowledges the need for views to be assessed but which allows a review process to take place to enable relevant views to be agreed with OCC for assessment.</p>	<p>Do not consider the need to add the phrase ‘as part of a masterplan’ as the supporting text already suggests a masterplan should be developed.</p> <p>There is a slight difference between the emphasis of the two sentences. The first relates to general opportunities to improve access to the Castle Mill Stream while the second reference to the Castle Mill Stream seeks investigations to demonstrate how access can be improved from the Worcester St. Car Park.</p> <p>Both references should remain as they fulfil slightly different roles.</p> <p>While the view from Hinksey Hill was historically an important view (most famously painted twice by Turner in his lifetime), it is now the site of the Hinksey Interchange and contains overgrown trees. As such we consider a minor amendment should be made to this policy to remove the specific reference to Hinksey Hill.</p>	<p>None</p> <p>Minor</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	<p>Amend wording as follows:  Development proposals must also be designed with consideration of their impact on views, <del>particularly from Hinksey Hill</del> <u>into</u> the historic core, from views out of the historic core and from further views of the site.</p>	
<p>Nuffield sites are very sensitive as they site within several key views in and out of the city. Site is also sensitive in other ways and reference should be made to previous historical context and conservation plan 'Castle, Canal &amp; College' (June 2008).</p> <p>Policy SPCW6 needs the following added to make it sound:</p> <p><b>Urban design and heritage</b>  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) <del>will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9</del> <u>will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.</u></p> <p>Development must be designed with consideration of its impact on the Central Conservation Area and nearby listed buildings <u>with specific</u></p>	<p>Proposed changes shift text away from current alignment with Policy HD9</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
reference to the study: 'Castle, Canal & College' (June 2008) (Policy HD1 and HD2).	While clearly a reputable source of information, this study 'Castle, Canal & College' (June 2008) was produced by OPT, Nuffield College and Oxfordshire County Council and it provides a useful background to the area. However, its age (published in 2008) means that it refers to expired City Council Planning Policy documents (e.g., the West End Area Action Plan) and does not reflect current landowner intentions for the site. As such, while the document provides an interesting and useful historical context, it does not merit a reference in the policy.	
<p>The minimum number of homes to be delivered is 59. The output of the masterplan should be expected to identify additional capacity. The uncertainty means that the policy is not <i>Positively Prepared</i> as it doesn't provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.</p> <p>Fails the duty to cooperate and cannot be rectified.</p>	<p>This site allocation includes a minimum number of homes which can be delivered on site. As it is a minimum, the opportunity exists to deliver more homes, but at least this number must be brought forward.</p> <p>Noted</p>	None
We have concerns about this site because of access and compensation. Land raising is proposed and set this could increase risk elsewhere.	These comments are addressed as part of a Statement of Common Ground with the Environment Agency.	Refer to Statement of Common Ground with the Environment Agency for response.

POLICY	SPCW7
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All respondents supporting policy	8.126		
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COMMENT SUMMARY	OFFICER RESPONSE
Yes	None

POLICY	SPCW7				
All respondents raising objections on this policy/chapter	73.14	74.39	96.3	164.46	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Unsound – does not give precise reasons	Noted	None
Given the site’s proximity to and potential relationship with the remains of Osney Abbey, Scheduled Monument, reference should be made to HD.  Supporting text paragraph 8.385 refers to Osney Mead being partially located “within the city’s High Buildings Area”. Not clear what is meant by this.	These comments are addressed as part of a Statement of Common Ground with Historic England.	Refer to Statement of Common Ground with Historic England for response.
Policy does not insist on provision of homes (subject to flood risk concerns). Policy fails to recognise the importance of making more effort to meet Oxford’s housing needs in the city.	Noted	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Policy does not emphasise the need to protect mature trees, especially along the towpath which play an important role in biodiversity and carbon capture</p>	<p>Trees on the riverbank form part of the Osney Conservation Area and as such are protected by it.</p>	
<p>Trust notes that this is a very sensitive site in terms of heights and any proposed development. Particularly in views from western hills.</p> <p>Amendments required to make policy sound are needed under the urban design heading, as follows:</p> <p>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) <del>will be required to provide extensive information so that the full impacts can be understood and assessed as listed in Policy HD9 will only be permitted in exceptional circumstances. Proposals will be required to provide extensive information which should demonstrate a clear need for them and that there is a public benefit arising, so that the full impacts can be understood and assessed as listed in Policy HD9.</del></p>	<p>Proposed changes shift text away from current alignment with Policy HD9</p>	<p>None</p>
<p>ODD fully endorses the aspirations for Site SPCW7 Osney Mead as an innovation quarter. However, we are of the view that reference to “248 dwellings” is too specific and should set a broader capacity guide, which will be ultimately established by comprehensive masterplanning.</p>	<p>The number of homes in the policy is caveated with the following statement “unless further flood risk work undertaken cannot find a solution to ensure the safety of residents”. The previous local plan Inspector required the to City Council to include minimum</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	housing numbers on the majority of site allocations. As the situation has not changed significantly from the previous local plan, we consider the number of homes is appropriate (especially given the caveat).	
We have concerns about this site about whether safe access can be provided and is there sufficient space for level-for-level compensation (unlikely to be able to increase built footprint without increasing flood risk elsewhere). There is a significant proportion of FZ3b and that the access and egress hazard rating include 'danger for most' in many areas.	These comments are addressed as part of a Statement of Common Ground with the Environment Agency	Refer to Statement of Common Ground with the Environment Agency for response.

POLICY	SPCW8				
All respondents supporting policy	8.127	164.47			

COMMENT SUMMARY	OFFICER RESPONSE
<p>(164.47) The Trust is cautiously supportive of this policy and welcomes the references to heritage assets, and the important views into, out from, and within the City.</p> <p>The Trust is acutely concerned however, that there will be pressure in this location to develop at height, and this must be very carefully managed. Building at height, must only be in exceptional circumstances – as we have set out in response to proposed Policy HD9.</p> <p>The Trust will be watching applications with interest, commenting when</p>	Support is welcomed.

COMMENT SUMMARY	OFFICER RESPONSE
appropriate, and offering help where it can, to help facilitate good, well design and appropriate development.	

POLICY	SPCW8				
All respondents raising objections on this policy/chapter	87.1	96.4	130.7	136.46	204.9
	200.21	178.47			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(87.1) Policy SPCW8 states that the Botley Retail Park is not suitable for use for housing. It contains area which are classified as Floodzone 3b. However some of the site is classified as Flood Zone 3a and so it could be used for housing if an exemption test was applied.</p> <p>The site would make an ideal mixed development. The exit routes in case of flooding are significantly safer than the nearby site of Osney Mead, which also has some areas designated at FZ3b, but which has been designated as safe for housing use.</p> <p>This is inconsistent.</p> <p>Botley Retail Park should be designated as a mixed use development area suitable for office / research labs, housing and cultural use.</p>	<p>The Osney Mead site is University owned and any housing on the site will be managed accommodation – which allows bespoke procedures and plans for flooding response tailored to the needs of occupiers and the local conditions. Any housing delivery on the site will also be subject to agreement with the Environment Agency that it is ultimately suitable. SPCW8 does not meet the criteria to allow for managed accommodation and the delivery of general housing on the site in the absence of has the potential for placing vulnerable occupants at risk.</p>	None
<p>(96.4) The policy does not recognise the need to seize any opportunity to create stretches of separate, adequate and dedicated pedestrian and cycle ways along the southern side of the Botley Road, not just through the retail park.</p>	<p>The guidance for the placement of the building line as set out in the policy wording and development brief text is considered as the best option for the enhancement of active frontage on Botley Road, and improving the streetscene by enhancing the presence of buildings on Botley Road. Botley Road is already served by footpaths</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>The policy needs to be amended to insist that in future developments retail units and car parking must wherever possible be set further back from the Botley Road to enable the creation of sufficient space for adequate, separate, dedicated cycle and pedestrian ways along the southern side of the Botley Road.</p> <p>These would both improve access to the retail units by pedestrians and cyclists, and improve bicycle and foot journeys along the Botley Road into and out of the City Centre.</p> <p>This is more appropriate than the existing proposal to move the buildings closer to the Botley Road.</p>	<p>and cycleways and the policy encourages the development and improvement of connections through the site.</p>	
<p>(130.7) Policy SPCW8 makes reference development proposals having consideration for the policy and spatial guidance contained within the Botley Road Retail Park Development Brief (TAN 17) (2022). On adoption, the policies contained within the new Local Plan will carry greater weight in decision making on account of the Local Plan being more up to date than the Development Brief and the nature of the Development Brief being guidance only. This policy weighting should be acknowledged within Policy SPCW8 for the avoidance of doubt.</p>	<p>The development brief does not have the status of a statutory document. As such it can be updated and amended as needed to take account of the adoption of the emerging adopted Local plan and other changes to the wider policy context.</p>	<p>None</p>
<p>(136.46) At the Botley Road retail park (SPCW8), we support plans for a less car-centric development. We would like to see developers encouraged to explore with the Environment Agency the possibility of expanding floorspace to allow for shorter buildings near to residential streets, given that so much hardstanding car park will be removed, so hard surface area will not be increased.</p>	<p>The policy wording and development brief contain guidance on the massing of buildings and the placement of the building line in relation to Botley Road and the neighbouring residential properties.</p>	<p>None</p>
<p>(204.9) Quod welcomes the site specific support within Policy SPCW8 (Botley Road Retail Park) for research led and other economic employment uses within this</p>	<p>Piecemeal development implemented without due regard for other schemes can adversely affect the ability of the site to deliver on its overall potential, and as such some</p>	<p>Minor modification:</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>location.</p> <p>Oxford City Council is aware that the Retail Park falls within multiple landownerships, and that applications have already been submitted and approved for the redevelopment of specific sites within the retail park. Therefore, reference to a coordinated masterplan within Policy SPCW8 does not correlate with the current planning position of the Retail Park and does not align with the principles of the [Development] Brief. This coordinated masterplan reference should be removed, as several schemes have been already been approved individually.</p> <p>and it is proposed paragraph 2 and 3 of Policy SPCW8 are amended as follows to reflect this:</p> <p><del>["Developers are encouraged to follow a coordinated masterplan approach for the site to encourage holistic development and avoid a situation where proposals coming forward in a piecemeal way.]"</del></p> <p>Development proposals should have consideration for the policy and spatial guidance contained in the Botley Road Retail Park Development Brief (TAN 17). Development coming forward on this site needs to consider how it will be undertaken to ensure that it does not preclude or sterilise the wider redevelopment of the retail park and its enhancement."</p>	<p>level of coordination with reference to a unifying framework will be in the view of the council be essential. The landownership situation, and the approvals of schemes on the site is acknowledged, and the brief was developed with this in mind.</p> <p>The text will be clarified to more clearly link a coordinated approach to the site with the guidance contained in the development brief.</p>	<p><del>["Developers are encouraged to follow a coordinated masterplan approach for the site to encourage holistic development and avoid a situation where proposals coming forward in a piecemeal way.]"</del></p> <p><del>Development proposals should have consideration for the policy and spatial guidance contained in the Botley Road Retail Park Development Brief (TAN 17)."</del></p> <p>Developers are encouraged to have consideration in their proposals for the policy and spatial guidance contained in the Botley Road Retail Park Development Brief (TAN 17), to ensure that development across the site is not delivered piecemeal but in a coordinated and holistic manner.</p>

CHAPTER	Policies map		
All respondents supporting policy	8.129		

COMMENT SUMMARY	OFFICER RESPONSE
Policies map considered sound (no reasons given)	

CHAPTER	Policies map			
All respondents raising objections on this policy/chapter	100.10	146.1	180.5 + (181.5, 182.6, 183.6, 184.6)	162.9
	12.5	24.1	24.2	6.2
	85.7	119.1		

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
(6.2) Site (2 New High Street) should be included in the Headington DC via a small extension to the proposed centre designation.	This location is predominantly residential in character, and does not form part of the active frontage that currently comprises the district centre.	None required.
(12.5) The Association has serious concern at the re-drawing of the flood plain boundaries in Oxford following the Council's own analysis, particularly changes to the boundary of zone 3b (the functional flood plain). We see from the interactive policies map on the Council website that the extent of zone 3b on the eastern side of the River Cherwell running through New Marston Meadows has been reduced. The new outline of zone 3b appears not to include areas locally known to be subject to frequent flooding. At a time of climate crisis with more intense and longer periods of extreme weather / rainfall any reduction of the extent of the functional flood is very risky. We consider the draft Local Plan is 'unsound' in this respect.	The flood zones shown on the map are derived from models developed by specialist consultants and are not as a result of designations by planners.	None required.

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(24.1, 24.2) Site ID 381, land opposite houses at 4, 6.8. 10. 12. 14, 16 Lye Valley:</p> <p>Land in question is identified as 'accessible Natural Green space' This area in fact comprises privately owned gardens/land plots.</p>	<p>Descriptions contained in the 'Subtypology' attributes on the policies map are not related to any policy requirements and will be removed.</p> <p>The land is still considered to form part of the Core GI network as defined by Policy G1.</p>	<p>Minor modification: subtypology attribute to be removed from policies map.</p>
<p>(85.7) We consider this section of the Local Plan to be unsound as the policy maps do not include heat or the most suitable zero emissions heating systems for the city. We would therefore like to see, as part of the local plan, Oxford City Council implement a heat zoning strategy which would map the city identifying the most suitable heat technologies for different areas.</p> <p>Similarly to the Scottish Local Heat and Energy Efficiency Strategies, Oxford City Council should look to 'heat zone' the city, identifying the most suitable heat technologies for different areas. Such a heat zoning strategy should take into account things like heating technologies (and their efficiencies and decarbonisation potential), local grid constraints installation and running costs, heat density of areas, proximity to heat source and building types.</p>	<p>The policies map displays information that relates to specific policies in the plan. The policy approach in the plan with respect to energy comprises development of operationally net zero buildings and mitigation of embodied carbon. Heat zones are not part of the policy approach and as such are not necessary to map.</p>	<p>None required.</p>
<p>(100.10) We note that the Policies Map does not identify all the green infrastructure assets within the Parish boundary in relation to this policy. Nor does it identify opportunities to invest in better connecting these assets with other within and around the Parish</p>	<p>The policies map shows identified existing GI sites and is not intended to indicate the location of future provision.</p>	<p>Minor modification: Remove active frontage from BBL to be consistent with policy C2.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>edges or in local biodiversity net gain projects (per Policy G4) or anticipate how local nature recovery may be supported through new development. The Parish Council will look to address these deficiencies through its BBLNP.</p> <p>We are further concerned that although §7.8 to Policy C2 recognises that ‘retaining active frontages in a centre is a key tool in achieving vibrancy (and) securing activity at a ground floor level’, the Blackbird Leys district centre is unique in the policy not proposing to define such frontages here. It explains that this is ‘because the nature of that centre is as a vital community hub with a wide range of important community functions, many of which are not Use Class E’. But, the consented scheme does include a new commercial ground floor frontage that was argued to improve on the existing parade of shops.</p> <p>We therefore OBJECT to the proposed definition of the District Centre on its current boundary and to the absence of a defined active frontage on the Policies Map.</p>	<p>The rationale for the extent of the district centre and the absence of a defined active frontage is set out in Policy C2 and the supporting text.</p>	
<p>(119.1) The designation of many areas of publicly accessible greenspace within the Plan area as 'supporting green infrastructure' is wholly inappropriate, not least given the need for all local authorities to comply with the Natural England Green Infrastructure Standards (part of the Green Infrastructure Framework), which is integral to the</p>	<p>The loss of sites designated as ‘supporting green spaces’ would be resisted and would only be considered if reprovision can be carried out to an equivalent standard or higher, ideally onsite. Having this designation indicates that the site is already carrying out a necessary green infrastructure function – even if it is not at the level of a ‘Core’ GI space - and is thus unlikely to be considered as surplus, notwithstanding any future changes.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>legally binding Environmental Improvement Plan of HM Government (Environment Act).</p> <p>A key example is Valentia Road recreation ground. To take this space away from local residents would damage their mental and physical health as there are no other viable options. Creation of 'green features' on that site if it were to be built upon could not provide anything like a comparable value - no one can play a game of football in the middle of a load of buildings, or find the solace found within a hectare of grass and trees (as per the current recreation ground).</p> <p>Suggested changes: Designate all existing areas of publicly accessible greenspace as G1A Core Green Infrastructure, unless there is a designated and well-publicised public consultation to identify whether there is duplication with an equivalent space with equivalent accessibility. It is unsound and illogical to have a Green Infrastructure Policy for the city, but then to remove existing publicly accessible greenspace - especially in a housing area that is relatively less-well off and for which residents don't have the means to travel to access green space.</p>	<p>Note that Valentia Road recreation ground is not proposed as an allocated site in the plan.</p>	
<p>(162.9) Re: 234 Botley Road (Cat 2 employment site)</p> <p>the draft policies map only highlights the existing building rather than the site itself. For developments to make the best and most efficient</p>	<p>The general approach for mapping category 2 sites is to indicate the building or site footprint directly involved in the related employment or economic use.</p>	<p>None required.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>use of land, in line with Policy E1, then it is imperative that the policies map highlights the whole site so that it is clear that the whole site is categorised as a Category 2 Employment Site. The proposed amended boundary is shown at Figure 2. [see letter for map]</p> <p>In addition, the Oxford Local Plan 2040 Policies Map continues to designate the existing building and the wider 234 Botley Road site as different Flood Zones. Quod suggests that the flood designations should be consistent across the site rather than separating the building.</p>	<p>The flood zones shown on the map are derived from models developed by specialist consultants and are not because of designations by planners.</p>	
<p>(180.5) [See letter for full rep]</p> <p>Omissions and areas of peat inaccurately mapped known to us:</p> <ul style="list-style-type: none"> <li>· OCWS ‘Boundary Brook Corridor- Mileway Gardens –shown without peat but we know it is there.</li> <li>· LWS Lye Valley and Cowley Marsh LWS alongside the Boundary Brook to the south west of Churchill Hospital-shown without peat but we know it is there.</li> <li>· R6 Peat Reserves inaccurately mapped in Lye Valley SSSI North Fen unit and in the Northern section of the LNR/Lye Valley and Cowley Marsh LWS.</li> <li>· R6 Peat Reserves off to the west of Lye Valley Road adjacent to Boundary Brook are inaccurately mapped in areas where we know there is no peat and not mapped in areas we know there is peat.</li> <li>· R6 Peat reserves are inaccurately mapped both in Lye Valley South fen SSSI unit and in the Lye Valley and Cowley Marsh LWS adjacent to the Boundary Brook as it runs through the south section of Oxford Golf Course.</li> </ul> <p>FoLV are very willing to work with the City Council in</p>	<p>The peat deposit areas mapped are based on the most up to date data derived from Natural England sources. A study is currently underway and the policies map will be updated if the outcome of the study determines different peat deposit sites than what is shown.</p> <p>Descriptions contained in the ‘Subtypology’ attributes on the policies map are not related to any policy requirements and will be removed.</p> <p>The land is still considered to form part of the Core GI network as defined by Policy G1.</p> <p>The redline maps for site allocations indicate land ownership boundaries and do not necessarily indicate maximum developable areas. Relevant policy requirements based on environmental or other</p>	<p>Minor modification: subtypology attribute to be removed from policies map.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>improving the mapping of Peat Reserves in this area of Oxford, and to help with advice on re-wetting and restoration projects.</p> <p>Other Inaccurate Mapping of areas on the Local Plan Interactive Map 1. Long gardens of houses off Lye Valley Road down to the Boundary Brook (including the 0.5ha South Fen unit of Lye Valley SSSI) are mapped as Green Infrastructure network with the subtitle of 'Accessible Natural Green Space'. All this land is private, so this latter definition is definitely wrong for the gardens area including the South Fen SSSI unit.</p> <p>2. Churchill Hospital Field. The red line margin on the south side of the Churchill Hospital site SPE6 is drawn over part of the Churchill Hospital Field which is mapped as an Oxford City Wildlife Site in the interactive map and is a Provisional Local Wildlife Site extension to 'Lye Valley and Cowley Marsh LWS 50M02'. ...The red line needs to be moved back to the edge of the urban concrete road area of the hospital site to fit with the OCWS/pLWS mapped boundary.</p>	<p>constraints will apply to development even if they lie within site boundaries.</p>	
<p>(146.1) It has been brought to our attention that the map for the local Plan 2040 is showing our private garden area opposite 14 Lye Valley as accessible green space - area being referenced Site ID: 381. This is the same for nearly all of this green space along this road as most of it is owned by various different private owners. This needs to be corrected to avoid any confusions and disagreements about this location now and in the future</p>	<p>Descriptions contained in the 'Subtypology' attributes on the policies map are not related to any policy requirements and will be removed.</p> <p>The land is still considered to form part of the Core GI network as defined by Policy G1.</p>	<p>Minor modification: subtypology attribute to be removed from policies map.</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>(202.51) The Green Space Survey of 2007 (Oxford City Green Space Study, Report For Oxford City Council, 2005, updated 2007) was an in depth survey of Oxford’s Green Space which:</p> <ul style="list-style-type: none"> <li>• Recommended 5.75 h.a. of green space (1.98 h.a. unrestricted, 3.77 h.a. restricted) and per 1000 residents, approximately the status in 2005 (p.5-6)</li> <li>• Found many “Urban Villages” in Oxford were green space deprived leading to inequality</li> <li>• Recommended MORE unrestricted green space should be found (p.5-7)</li> <li>• Recommended the Council should seek to find MORE open space by change of access, or new green space due to an estimated increase in population between 2001-2011 of 2.8%</li> </ul> <p>In contrast, the Green Infrastructure Study (GIS) 2022, part of the evidence base for OLP2040 and informing the Policy Map, is wholly deficient, factually wrong, presenting derived, and incorrect, information without explanation or evidence:</p> <ul style="list-style-type: none"> <li>• Relying on cut and paste methodology and text, with a fundamentally flawed methodology and data. • The unscientific and illogical green space marking can be shown below, comparing policy pap green space with actual provision.</li> <li>• For example GIS Fig 13, has too many errors to even list and GIS Fig 14 incorrectly lists Oxford’s Green Space</li> <li>• This was pointed out the multiple errors in the survey consultation and ignored. The incorrect mappings are subsequently duplicated on the OLP2040 Policy Map.</li> </ul>	<p>Comments noted.</p>	<p>None required.</p>

CHAPTER	SA
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All respondents <b>supporting</b> policy	8.130, 75.8		
<b>COMMENT SUMMARY</b>		<b>OFFICER RESPONSE</b>	
The Sustainability Appraisal is acceptable.		Noted and agreed.	
<b>CHAPTER</b>	<b>SA</b>		
All respondents <b>raising</b> <b>objections</b> on this policy/chapter	9.5, 28.24, 30.23, 32.9, 53.15, 58.11, 58.12, 73.3, 81.4, 84.12, 89.26, 108.2, 129.4, 141.1, 153.17, 172.28, 173.28, 180.6, 181.6, 182.7, 183.7, 184.7		
<b>COMMENT SUMMARY</b>		<b>OFFICER RESPONSE</b>	<b>PROPOSED ACTION</b>
<p>The Sustainability Appraisal is flawed and not sustainable. The Sustainability Appraisal relies on decarbonisation of the grid and adoption of electric vehicles without any evidence regarding the viability of sharing renewable and low carbon energy between sectors. The Local Plan should therefore address these and other issues, such as retrofitting, not contributing to climate change, issues of embodied carbon and lack of delivery on the potential for supporting more renewable energy generation.</p> <p>A revised SA should show how a (revised) Local Plan would meet Oxford's zero carbon goals and how this would be monitored. It should show the impact of any exported housing through so-called 'unmet need' on zero carbon and nature</p>		<p>The Sustainability Appraisal (SA) has assessed the social, economic and environmental impacts of the strategies and policies in the Oxford Local Plan 2040. It considers ways in which the Local Plan can contribute to improvements in environmental, social and economic conditions and options for mitigating impacts. The Sustainability Appraisal has been regularly revisited as part of the plan-making process. The methodology has been set out in the Sustainability Appraisal and Sustainability Appraisal Appendix. Chapter 6 of the SA assesses the Local Plan policies and sites. Chapter 7 sets out mitigation of the Local Plan's impacts which have been incorporated into the Local Plan strategy and policy where possible. Table 7.1 provides details of this. Monitoring</p>	No action.

restoration for the districts. There is no carbon accounting done here. This must change.	will be undertaken on a range of themes as set out in Table 8.1. The Sustainability Appraisal is sound and the Local Plan 2040 is sound.	
The Sustainability Appraisal is not sound because it should ensure all development deliver biodiversity gain, only build on brownfield land, not developing unbuilt land, increasing the biodiversity of unbuilt land and delivering sustainability. Lack of biodiversity and environmental targets. Lack of targets to assess and measure water use, sewage, flooding capacity and sustainable development goals.	The Sustainability Appraisal (SA) has assessed the social, economic and environmental impacts of the strategies and policies in the Oxford Local Plan 2040. It considers ways in which the Local Plan can contribute to improvements in environmental, social and economic conditions and options for mitigating impacts. In light of the objectives of the Local Plan 2040 in shaping development, it is not reasonable nor proportionate to require new buildings on only brownfield land. The overall strategy, in response to the challenges, constraints and opportunities identified in the evidence base is set out in the Local Plan 2040, including Chapter 1 (Introduction and Spatial Strategy), and Chapter 8 (Site Allocations). SA Chapter 7 sets out mitigation of the Local Plan’s impacts which have been incorporated into the Local Plan strategy and policy where possible. Table 7.1 provides details of this. Monitoring will be undertaken on a range of themes as set out in Table 8.1. The Sustainability Appraisal is sound and the Local Plan 2040 is sound.	No action.
The Sustainability Appraisal is not sound because it has not complied with the duty to	The SA is not a development plan document and so is not the subject of the tests of soundness.	No action.

<p>cooperate. Not positively prepared because it has not been informed by agreement from all other authorities. It relies on an outmoded and outdated growth model instead of steady-state planning. The Council should reconsider its trajectory with its neighbours and identify a more sustainable long-term approach. More land cannot be released for housing than necessary when it is also required for other vital issues such as climate mitigation, food production and the health and wellbeing of people and nature.</p> <p>A re-write of the plan and SA is required to ensure that Oxford creates only those homes that would provide for natural growth in the population. Forced economic growth is not the will of the people of Oxfordshire. Oxford should plan only for those homes that can be accommodated within the city as it is not sustainable to regard the surrounding Green Belt as an area for commuting from dormitory towns.</p>	<p>Instead, it forms part of the evidence base for the plan.</p> <p>Matters of the duty to cooperate have been addressed elsewhere in this consultation statement. The Council has agreed statements of common ground with adjacent authorities where appropriate. The Sustainability Appraisal (SA) has assessed the social, economic and environmental impacts of the strategies and policies in the Oxford Local Plan 2040. It considers ways in which the Local Plan can contribute to improvements in environmental, social and economic conditions and options for mitigating impacts. The overall strategy, in response to the challenges, constraints and opportunities identified in the evidence base is set out in the Local Plan 2040, including Chapter 1 (Introduction and Spatial Strategy), and Chapter 8 (Site Allocations). SA Chapter 7 sets out mitigation of the Local Plan's impacts which have been incorporated into the Local Plan strategy and policy where possible. Table 7.1 provides details of this. Monitoring will be undertaken on a range of themes as set out in Table 8.1. The Sustainability Appraisal is sound and the Local Plan 2040 is sound.</p>	
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<p>The Sustainability Appraisal is not sound because it does not consider the reasonable alternative of using the standard method due to environmental constraints and traffic. Not effective because it does not assess the impact of a high housing requirement and economic requirements. Not consistent and not legally compliant because it fails to properly assess whether development outside of the city will be sustainable. To minimise carbon emissions (eg from cement and soil disturbance) and to protect land-use for nature and agriculture, housing units should be created as much as possible from the existing built-environment whilst simultaneously retrofitting these buildings for energy efficiency and renewables.</p>	<p>The Sustainability Appraisal (SA) has assessed the social, economic and environmental impacts of the strategies and policies in the Oxford Local Plan 2040. It considers ways in which the Local Plan can contribute to improvements in environmental, social and economic conditions and options for mitigating impacts. Alternatives considered have been identified in the Sustainability Appraisal in Chapter 1 and Chapter 5. This included various options resulting in different strategies in planning for housing development.</p>	<p>No action.</p>
<p>The SA is flawed. Delete SPS13 and the Sustainability Appraisal may be sound.</p>	<p>The overall strategy, in response to the challenges, constraints and opportunities identified in the evidence base is set out in the Local Plan 2040, including Chapter 1 (Introduction and Spatial Strategy), and Chapter 8 (Site Allocations). SA Chapter 7 sets out mitigation of the Local Plan's impacts which have been incorporated into the Local Plan strategy and policy where possible. Table 7.1 provides details of this. Monitoring will be undertaken on a range of themes as set out in</p>	<p>No action.</p>

	Table 8.1. The Sustainability Appraisal is sound and the Local Plan 2040 is sound.	
The Sustainability Appraisal is unsound as it has not identified that some green field sites, if within the Lye Valley catchment areas are vitally important for comprehensive water infiltration to recharge the limestone aquifer. Development should be directed away from green aquifer recharge areas to preserve the Lye Valley biodiversity to comply with Policy G6.	The overall strategy, in response to the challenges, constraints and opportunities identified in the evidence base is set out in the Local Plan 2040, including Chapter 1 (Introduction and Spatial Strategy), and Chapter 8 (Site Allocations). SA Chapter 7 sets out mitigation of the Local Plan’s impacts which have been incorporated into the Local Plan strategy and policy where possible. Table 7.1 provides details of this. Monitoring will be undertaken on a range of themes as set out in Table 8.1. The Sustainability Appraisal is sound and the Local Plan 2040 is sound. Policy G7 also seeks to protect biodiversity, which is also a sound approach.	No action.
The Council has failed its duty to cooperate, which also applies to the Sustainability Appraisal. Clearly the Duty to Cooperate test has been failed by Oxford for many reasons as outlined in a number of our representations. But this is not surprising if the City Council has denied that it exists and is content to say as much (see table 1.6). At the previous Regulation 18 Housing Need Consultation, we raised serious concerns about the development of the Oxford Local Plan and the evidence that Oxford	The SA is not a development plan document. As such it is not subject to the tests of soundness or the duty to co-operate. Instead, it forms part of the evidence base for the Oxford Local Plan 2040.  In relation to the duty to co-operate, Paragraph: 029 Reference ID: 61-029-20190315 of the NPPG states:	No action.

<p>relies upon. We also clearly set out that we thought that they were failing the Duty to Cooperate. In subsequent meetings in March 2023 our critique of the HENA was replied to later in 2023 with a legal opinion, this is despite us not raising legal concerns about the methodology. The City Council has published a 'Statement of Common Ground for Duty to Cooperate Live Document' (August 2023). It contents contain a utopian picture of alignment and agreement but it is effectively a defence of the City's approach, with no reference at all to the fact that its neighbours have raised serious legal concerns about the Duty to Cooperate. This is a serious flaw with the Local Plan amounting to a legal failure to fulfill the City Council's duty to cooperate, and this cannot be rectified.</p>	<p><i>The duty to cooperate was introduced by the <a href="#">Localism Act 2011</a>, and is set out in <a href="#">section 33A of the Planning and Compulsory Purchase Act 2004</a>. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.</i></p> <p>The overall strategy, in response to the challenges, constraints and opportunities identified in the evidence base is set out in the Local Plan 2040, including Chapter 1 (Introduction and Spatial Strategy), and Chapter 8 (Site Allocations). The Council does not deny the Duty to Cooperate exists and has fulfilled all of its legal duties. In response to regulation 18 comments, the Council responded with a legal opinion to demonstrate that it was complying with all legal duties at a very early stage, including the methodology. That continues to be the case.</p>	
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CHAPTER	Other		
All respondents supporting policy			

COMMENT SUMMARY		OFFICER RESPONSE	
CHAPTER	Other		
All respondents raising objections on this policy/chapter	10.1	10.2	
COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION	
Not justified, effective, and fails Duty to Cooperate. What you call our duty to cooperate is ill-conceived, and ought to be a duty to conserve what we have, as a beautiful and rich county that is replete with heritage. Due to astronomical cycles, we are headed for a number of decades of extremely cold weather and we do not need the spurious pretexts - global warming - that you provide to destroy the countryside that we cherish. If you want to change anything, perhaps you could put all households on the cleanest and 'greenest' energy source of all, hydrogen power (and there is known to be vast reserves of naturally occurring hydrogen in Europe and other continents) instead of ruining ancient wildlife habitats and other aspects of ecology with oceans of solar panels. Most of all, we need	Environmental considerations are central to the strategy of the Plan, as set out in chapter 1. <i>The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.</i>	None	

proper discussion. You have a ridiculously one-sided approach.		
What is meant by "non-compliance with the duty to co-operate is incapable of modification at examination"!!! How can non-compliance be "capable" or "incapable" of anything???	Non-compliance with Duty to Cooperate cannot be remedied at examination.	None

CHAPTER	Omission sites and policy		
All respondents supporting policy	n/a		

COMMENT SUMMARY	OFFICER RESPONSE
n/a	

CHAPTER	Omission Sites and policy			
All respondents raising objections on this policy/chapter	118.4	122.3	126.2	133.19
	136.47	161.3	177.21	178.48
	195.3	197.5	199.33	200.22
	202.52	203.9	250.2	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Plan should include a policy on key worker housing (not just employer-linked)	Key worker housing can be provided within the intermediate housing element of the affordable housing contribution, so does not need its own separate policy. Add definition of key worker housing to glossary.	Add definition to glossary

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>Not effective, positively prepared. Plan should include a new policy to encourage co-living accommodation, and recognise the role of it in meeting the housing needs of those working with/at the university and teaching hospitals, and other young professionals and graduates (a need identified in the HENA). It would also help prevent existing homes from being converted into HMOs. There is not enough purpose-built rented homes to meet demand.</p> <p>We note the absence of any policy encouraging co-housing, which is more space efficient and generally encourages more sustainable modes of living.</p>	<p>Co-living and purpose built rented homes are different models of housing. The supporting text of policy H14 is supportive of co-housing, but an additional bespoke policy approach is not considered necessary because there is already a sufficient policy framework to consider such proposals. Policy H5 recognises the contribution of affordable rented homes for those in sectors including the universities and teaching hospitals, and allows employers such as the hospitals and university to bring forward ‘employer-linked housing’, which would be to rent at affordable levels for their staff.</p>	<p>None</p>
<p>The removal of previous policy G5: Existing open space, indoor and outdoor sports, and recreation facilities, creates a policy void. Without a replacement the plan is not consistent with national policy and does not have a clearly articulated strategy to promote sports participation and healthy lifestyles. the Local Plan should contain a positive strategy which promotes healthy lifestyles, and wellbeing. A key part of this strategy should be to protect existing sports provision, and to</p>	<p>Policies to address these issues are now covered in Policy G1 Protection of Green Infrastructure, and C3 Protection, alteration and provision of new local community facilities. Healthy lifestyles is also a key theme through the Plan as a whole, as reflected in the vision and objectives.</p>	<p>None</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
actively support the improvement and introduction of new sports facilities across the city.		
Why is there not a specific policy in Chapter 3 focusing on the Universities and Colleges given the contribution they make to the Oxford economy. For example, Policy E2 (Teaching and research) of the adopted Local Plan 2036 specifically supported the growth of the hospitals and educational institutions. We question why a similar policy has not been carried forward to this Local Plan.	The supporting text in Chapter 3 recognises the contribution to the economy from the universities and medical research and the hospitals. Any proposals for growth would be assessed under Policy E1 and any relevant site allocation policies. A policy specific to those uses is not necessary. Policy E2 in OLP2036 has not been found to be a necessary policy in decision-making.	None
We agree that new student accommodation and older persons accommodation should be required to provide financial contributions towards provision of affordable housing (Policies H3 and H4). But this should also apply to holiday and short-stay accommodation (referred to in Policy E5). There is no justified reason for treating holiday and short-stay accommodation more favourably than student accommodation. We urge the Council to add a further policy, specifying that, for development of new sites of more than 10 holiday or short-stay accommodation, the City will 'seek a financial contribution towards affordable housing to be delivered elsewhere in Oxford'.	Student accommodation and older persons accommodation are part of residential use classes, and are counted as part of housing supply and meeting housing needs. So they are also treated the same as mainstream residential in terms of contributions towards affordable housing. Hotels and short stay accommodation are not counted as housing, they do not house residents of Oxford they just provide rooms for short-stay visitors. Short stay accommodation would still be liable to CIL contributions, if creating 100m2 or more gross internal floor area.	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
We would like to see policy setting out how new sites can be added to the Green Infrastructure Network, particularly in parts of the city less well-served by existing green and blue sites.	The Green Infrastructure network of sites is defined on the Policies Map. If new sites arise, for example if new GI is generated via development of a site, then the GI would be protected by planning conditions and would be incorporated into the GI Network on the Policies Map in the next update of the Local Plan.	None
We would also like to see policy enabling parklets and restricting the paving over of front gardens with non-permeable surfaces.	There is already national guidance about permeable surfacing of front gardens <a href="https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance">https://www.gov.uk/government/publications/permeable-surfacing-of-front-gardens-guidance</a> The Local Plan does not constrain provision of Parklets if a landowner wishes to. Usually they are provided as part of a wider planning application.	None
We are keen for the council to consider how there can be independent oversight of ecological assessments submitted by developers, as too often the process where developers hire their own inspectors can be open to abuse.	Ecological assessments submitted as part of planning applications would be assessed by specialists at the planning application stage.	None
We are disappointed there is no longer a policy on delivering public art as part of larger developments.	In OLP2036 the proposed policy about public art was removed by the Inspector at the examination hearings, so this OLP2040 instead addresses public art in Appendix 1.1 Design Checklist.	None
Pullens Lane Allotments should be allocated for development; it is available and suitable for development. Morrell notes that allotments are not statutorily protected in national policy. Policy G1 does not properly reflect the 'balancing' exercise which can take place when considering the potential loss of green space	The majority of the allotment sites in Oxford continue to have waiting lists which illustrates generally a high demand. Oxford is a compact city and, unlike rural areas, there is a higher proportion of flats and many properties have very small or no gardens. Considering the garden sizes in Oxford, the likely increase in demand for allotments from new housing and population growth, the GI opportunities, and the sustainability benefits of local food production, their loss could have a significant negative impact upon the local	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>such as allotments. Also, contrary to what is suggested above there are likely to be locations to (re)provide allotments in the city, especially in Green Belt locations. In the site-specific assessment of #30, it is not disputed that the site is in the Headington Hill Conservation Area, it is part of the current Green Infrastructure network, and the Allotments are currently in use (but this is not at capacity). None of these matters precludes development. It is suggested that there is limited vehicular access via Pullens Lane. First, Pullens Lane would not be considered as the primary means of access to the site; Morrell has access rights via John Garne Way to the west. Second, it is accepted that Pullens Lane is a single lane carriageway, but it is maintained to a high standard, moreover, there is the potential in this location to consider a reduced vehicle type development similar to those which the Council is promoting elsewhere. Therefore there is ample access to the site. The site is recorded as available and viable, and both matters are agreed. Finally, however, the site is assessed as being not suitable for development because the entire site is part of the GI Network. There is no reason to preclude this site from development simply because it currently</p>	<p>community and sustainability. Allotments contribute to the social sustainability of places by creating healthy, inclusive communities and as such it is considered that the approach of LP2036 and LP2040 is consistent with the NPPF. This allotment site is still in active use, as indicated by the website <a href="https://www.scadaa.org.uk/">https://www.scadaa.org.uk/</a></p> <p>If the Council were minded to release this site for alternative use, it would then need special Secretary of State permission before it could be disposed of.</p>	

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>performs a GI function. The allotments are underutilised, and other GI functions can be provided on the site when it is redeveloped, including new gardens, publicly accessible open space, and landscaping. The omission of the site is not robustly justified in evidence.</p>		
<p>The Faculty of Music, St Aldates should (continue to) be allocated for development; it is available and suitable for development, and that development is achievable within the plan period. It is acknowledged that the site is currently owned by the University of Oxford, but ChCh has agreed terms for its purchase. We would also like to highlight that this representation to the consultation has been shared with the University in advance of its submission and has been agreed between the University and ChCh.</p>	<p>HELAA has been updated to reflect these broad intentions but without certainty about residential uses, timescales, and capacity there is insufficient evidence to include a site allocation. In any event the site could be brought forward for residential proposals without a site allocation.</p>	<p>Update to HELAA (2024)</p>
<p>Would like to see a policy on the restriction of hot food takeaways</p>	<p>See full response in SoCG with Oxfordshire County Council about steps taken to investigate this and why a policy is not included in OLP2040.</p>	<p>None</p>
<p>Oxford Stadium site should be included as site for new purpose-built R&amp;D/life sciences facility</p>	<p>The employment strategy set out in Chapter 3 and Policy E1 does not seek to allocate new sites for employment-based uses because delivering housing is a priority for Oxford. Instead the Plan focusses on additional employment floorspace through intensification and modernisation of existing sites. So whilst the landowner may be willing to develop the site for R&amp;D, it would be contrary to Policy E1 and the OLP2040 strategy to deliver housing. HELAA</p>	<p>Update to HELAA (2024)</p>

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
	Table A has been updated to reflect landowner proposal that site could be available for R&D.	
Consider preparing and adopting a Local Development Order (LDO) to cover all the science related sites in the City to provide a clear basis for their future growth, and as required, their redevelopment to meet the science and technology needs of the future. This will help streamline the planning process, reduce the need for the current detail of planning applications by setting out what is needed within the LDO.	The Plan already recognises the significance of this sector in Chapter 3. Any proposals for life sciences uses would be assessed against policies in the Plan, no need for an LDO.	None
Omission Sites - Faculty of Music - St Aldate's, and SPCW2: Land at Winchester Road, Banbury Road and Bevington Road	Faculty of Music – there is insufficient certainty for a site allocation.  Banbury Road sites - Landowner (via the HELAA update) indicated there was no longer a commitment to bring forward the other parts of the site for additional housing, and there is still no certainty from the landowners about the mix of uses and whether this will result in a net gain of housing. The likelihood seems to be that the uses will remain as existing, with intensification of academic accommodation, and the benefits of an allocation would seem to be limited.	None
Omission policies: <ul style="list-style-type: none"> <li>• A standalone policy for the Oxford Flood Alleviation Scheme (OFAS)</li> <li>• A standalone water policy</li> <li>• Policy to address water quality.</li> </ul>	These policy issues are all covered in the SoCG with the Environment Agency	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<ul style="list-style-type: none"> <li>• Policy to address the protection of water courses and water dependent habitats/ environment.</li> <li>• Policy to address the protection of ground water resources.</li> </ul>		
<p>Missing site specific policies for:</p> <ul style="list-style-type: none"> <li>• OXFORD BROOKES UNIVERSITY CAMPUS</li> <li>• OLD ROAD CAMPUS</li> <li>• VALENTIA ROAD</li> <li>• COOLRIDGE CLOSE</li> <li>• WOOD FARM HEALTH CENTRE</li> </ul> <p>(reasons not specified)</p>	<p>Oxford Brookes University Campus – no significant change proposed to necessitate a site allocation</p> <p>Old Road Campus – is designated a Category 1 employment site</p> <p>Valentia Road, Coolridge Close, and Wood Farm Health Centre – too small for a site allocation, unlikely to achieve 10+ net dwellings, can come forward as windfall.</p>	None
<p>PROPOSED NEW WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT: “Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and</p>	<p>This text is not considered necessary in relation to site allocation policies. Talking to infrastructure providers early is best practice in terms of bringing a site forward for development, so does not need to be specified in the local plan. Similarly, scheduling necessary works to respond to likely growth is required of infrastructure providers so does not need to be specified.</p> <p>The Oxford STW is located wholly within the administrative boundary of South Oxfordshire District Council. As such, it is highly unlikely that any “off-site upgrades” that directly relate to the Oxford STW will be delivered within the City Council’s administrative boundary. However in the event that any infrastructure upgrades that require planning permission are located within Oxford, then Policy S3 relates to all infrastructure upgrades and as such there is no need to include a specific requirement for water and wastewater infrastructure. It sets out that work is supported in principle as infrastructure</p>	None

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
<p>wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.” (rep 203)</p>	<p>needed to mitigate the impact of development under the requirements of Policy S3: <i>Infrastructure delivery in New Developments</i>.</p>	
<p>Oriel College has longstanding ownership of the Former Bartlemas Nursery School (allocated as ref. #346 in the Housing and Employment Land Availability Assessment). Given the limited number of sites in its portfolio that the College has upon which to deliver such accommodation, the prospect of the Nursery Site being sold to a developer to provide market housing is remote. The College would sooner retain the site and wait for an opportunity to meet its own needs. In this sense, with the right policy context the site is both available and deliverable if allocated either for graduate accommodation (which would overcome the conflict with Policy H8 of the Current Local Plan 2016-2036 as well as Policy H9 within the Draft Local Plan 2040) or for employer-linked affordable housing within the scope of Policy H5 of the Local Plan.</p>	<p>Updated HELAA to reflect landowner intentions. Site is not appropriate for student accommodation or employer-linked housing as it does not meet the criteria for H9 or H5.</p>	<p>Update to HELAA (2024)</p>

CHAPTER	Evidence base and supporting information		
All respondents supporting	198.2		

COMMENT SUMMARY	OFFICER RESPONSE
Stantec considers the HELAA methodology to be robust. The City Council has been proactive in identifying potential sites for development and we consider the estimated capacity to be optimistic but realistic.	Noted

CHAPTER	Evidence base and supporting information				
All respondents raising objections	150.1	156.2	157.4	159.1	164.50
	186.15	189.16	194.11	197.6	200.23

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Inclusion in the Infrastructure Delivery Plan (IDP) of the need for a new health centre within the Cowley district centre to permit co-location of Donnington and Temple Cowley practices at a site which is accessible to the practices' patient populations using sustainable forms of travel.	<p>Modification proposed to site allocation policy SPS12 to include a health centre as one of a number of uses that are appropriate to be located within a district centre.</p> <p>The IDP will be updated ahead of the Local Plan examination hearings to ensure it captures the most up-to-date infrastructure projects from all the infrastructure providers.</p>	<p>Main</p> <p>IDP to be updated to inform examination hearings.</p>
Due to a variety of factors (age of premises, poor public transport access), new premises are needed (the ideal location	Modification proposed to site allocation policy SPS12 to include a health centre as	Main

<p>would be Cowley Centre) as it has good accessibility from a range of modes of transport including active travel and public transport.</p> <p>OLP2040 including IDP does not make provision for the relocation/ regeneration of SEOxHA Primary Care Network, comprising Donnington Medical Partnership, Temple Cowley Medical Group and The Leys Medical Centre.</p>	<p>one of a number of uses that are appropriate to be located within a district centre.</p> <p>BOB ICB provided a list of potential infrastructure projects as part of their Regulation 19 representations. These schemes will be reviewed as to their suitability for inclusion within the IDP, which will be updated ahead of the Local Plan examination hearings to ensure it captures the most up-to-date infrastructure projects from all the infrastructure providers.</p>	<p>IDP to be updated to inform Examination hearings</p>
<p>To ensure that the Local Plan is deliverable, the transport evidence base should demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required to deliver the Local Plan development.</p>	<p>Transport evidence undertaken to support Local Plan HRA focuses on the impacts of the plan on the A34 shows a minimal impact on SRN as a result of additional growth proposed in the plan (less than 1,000AADT)</p>	<p>None</p>
<p>Agree with the submission made by the GPs at Donnington Medical Practice and Temple Cowley Medical Group about the lack of any mention of the primary healthcare facilities in South East Oxford</p>	<p>Noted.</p>	<p>None</p>

<p>The possibility of a new Health Centre as part of the development on land South of Grenoble Road (in South Oxfordshire District Council) should be included in the plan.</p>	<p>Oxford City's Plan can only influence development within the city's boundary.</p>	
<p>The Trust is not raising an objection on the grounds of the Duty to Cooperate, but it does suggest that more evidence is required to demonstrate that all strategic matters have been effectively engaged with, and there is an agreed way forward in meeting the County's housing needs, and in particular, the very important need for affordable housing for key workers.</p>	<p>Noted</p>	<p>None</p>
<p>Policy SPE15 is seeking to introduce a residential-led mixed use redevelopment on the remainder of the Thornhill Park site.</p> <p>Thornhill Park site is subject to an extant full planning permission (21/01695/FULL) for the erection of 402 new homes.</p> <p>The ICB does not consider that there are any CIL contributions allocated to fund healthcare. The ICB would request the Council to revise the IDP based on the ICB submission to ensure that adequate primary healthcare services can be provided in the local area.</p>	<p>BOB ICB provided a list of potential infrastructure projects as part of their Regulation 19 representations.</p> <p>These schemes will be reviewed as to their suitability for inclusion within the IDP, which will be updated ahead of the Local Plan examination hearings to ensure it captures the most up-to-date infrastructure projects from all the infrastructure providers.</p>	<p>None</p>
<p>The IDP should have more details of the primary healthcare provision as currently there is only one project identified in the Appendix C Infrastructure Delivery Schedule6 which we understand cannot now be implemented.</p> <p>Due to the complexity of the ownership issue, the proposed healthcare project in Diamond Place is also unlikely to be deliverable.</p> <p>There is a H1 Primary Healthcare project in the IDP related to the relocation of Wolvercote Surgery to Wolvercote Mill development.</p>	<p>BOB ICB provided a list of potential infrastructure projects as part of their Regulation 19 representations.</p> <p>BOB ICB did not submit a list of schemes previously, despite the fact that this information was requested by the Council in December 2022 following a series of</p>	

<p>However, as stated above, this cannot be implemented as the ICB notes that there is already an extant planning consent to convert the proposed healthcare provision to flats.</p> <p>The number of primary healthcare project in the IDP Schedule is significantly disproportionate to the new housing development set out in the Draft Local Plan 2040 and is contrary to the vision of the Draft Local Plan, which is to ensure the equal opportunities for communities in access to healthcare.</p> <p>2.11. The ICB has identified a list of healthcare scheme including the upgrade of the existing premises and the provision of new premises to support the population growth. The list is attached to this representation. The ICB would urge the Council to update the IDP Schedule to ensure adequate primary healthcare services are provided to the community. [See list of healthcare schemes appended to original rep]</p> <p>The ICB welcomes an opportunity to discuss being a recipient of Community Infrastructure Levy (CIL) contributions towards Primary Care developments with Oxford City Council.</p> <p>3.2. The ICB would also welcome an opportunity, as part of the Local Plan review, to revise the IDP so that a better understanding of up-to-date primary care development costs can be incorporated into subsequent section 106 Agreements.</p>	<p>meetings which took place from July-December 2022.</p> <p>BOB ICB was provided with space to deliver healthcare facilities but was unable to deliver them as part of the Wolvercote Paper Mill scheme and as such the developer sought to convert this land to housing.</p> <p>The Council is grateful to finally receive the information it requested in December 2022, and we will review it and consider it for inclusion in the IDP examination update.</p> <p>It is worth noting that there is an expectation that infrastructure providers undertake feasibility studies to work out the costs of any infrastructure required to inform negotiations with developers.</p>	
<p>One weakness of the draft Oxford City Local Plan is the absence of transport modelling to test the Plan proposals. We note that this gap has arisen from the lack of an up to date Countywide transport</p>	<p>Transport modelling undertaken to support the HRA shows that the additional development proposed as part of the Local</p>	

<p>model. This raises questions about the ability to deliver the City Local Plan and other neighbouring Local Plans.</p> <p>This gap can be expected to undermine the ability of the draft Local Plan to meet the tests set out in NPPF para 35 of being a) positively prepared, b) justified and c) effective. If the Plan cannot be shown to be deliverable it may be judged at Examination to not meet the NPPF tests.</p> <p>IDP: There is a growing gap between the level of planned housing and economic growth in Oxfordshire and the availability of energy and grid supply and water supply to avoid water stress.</p>	<p>Plan 2040 is not likely to have a significant impact on the transport network. As such, further transport modeling work was not considered to be required.</p> <p>The plan includes policies to minimise water use and reduce energy consumption in new developments to help avoid water stress and minimise carbon emissions.</p>	
<p>Concerns raised in Representations about the Water Cycle Study and SFRA.</p>	<p>These comments are addressed as part of a Statement of Common Ground with the Environment Agency.</p>	<p>Refer to Statement of Common Ground with the Environment Agency for response.</p>
<p>Unsound as not justified and not effective - CBRE considers that preparation of policies in the DLP utilising the LPVA evidence base creates two primary risks for failure of the tests of soundness, as follows:</p> <ol style="list-style-type: none"> <li>1. Placing reliance on a brownfield-led housing land supply to meet the requirements in the DLP that, based on the available evidence, is demonstrably financially unviable and undeliverable without public sector intervention and subsidy, which is by no means secured or guaranteed. This is contrary to the NPPF and Government's guidance set out in PPG.</li> </ol>	<p>The Local Plan Viability Assessment takes a holistic look at “whole plan” viability. It is not meant to go into the level of detail or granularity that would be expected to support a planning application. On the whole it demonstrates that sites are generally viable given the suite of policies proposed in the plan.</p>	<p>None</p>

<p>2. Setting an affordable housing policy within Policy H2 that is not justified based on the available evidence, and therefore places at risk the deliverability of sites within the land supply and ultimately, the Plan. The interrelationship with CIL charging rates should not be ignored and is a significant contributing factor.</p>		
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## Appendix 5 – Preferred Options Part 1 – Summary of In-depth Consultation Responses

### Summary of In-depth Consultation responses

The questionnaire was designed to allow respondents to leave in-depth comments on each set of preferred policy options, the supporting documents and overall evidence base. Where several comments have been received on the same issue or with very similar wording, they have been aggregated for the sake of brevity and ease of reading. A number of representations were made separately by email, and these have also been collated as part of the summary.

### Policy Options Set S1 to S3

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
Introduction	0.1			Not clear what the starting date for the Plan 2040 is	2	The Plan should reference development on boundary of Oxford especially Kidlington & Botley to avoid duplicating services (15 min neighbourhoods)		OCC - the OLP should be consistent with the Oxfordshire strategic vision and evidence base from OP2050	2		
				Plan end date should be 20 years post-adoption as this would give greater certainty in plan-making across Oxfordshire and allow for a comprehensive strategic approach to delivery of Oxford's unmet housing needs.		SODC/VHDC - the strategic vision must mention affordable housing and how it is to respond to the challenge of delivery.	2	It would be better to have a transport, connectivity and infrastructure referenced in the vision and objectives not just an add-on in chap 8. What about reference to CPZs we must work closely to deliver infrastructure - county	1		
				Is OLP2040 consistent with the strategic vision for Oxfordshire, and other strategies/ plans e.g., county transport plan (COTS,) good growth, etc.? How does OLP2040 respond to agreed ambitions of Good Growth, strategic vision etc.		Disappointment that the OLP Preferred Options document makes no reference to our Summertown Neighbourhood Plan (NP). Therefore the key issues of concern, set out in our NP concerned with housing (affordable, small-units & elderly), protect green spaces, protect character of area, need for new community centre and health centre, and place-making are not taken into account in the planning of the city. As such the PO document is unsuitable for consultation with the community.	1				
				To what extent will OLP2040 implement/ deliver the LIS? What extent of employment growth does this imply and what are the implications for other matters?		Concerned that quantity & spatial distribution of proposed development is not clear.	1				
				Are there any draft policies/ options/ strategic options from the Oxfordshire 2050 plan that meet the city's requirements but also those of neighbouring districts?		Wolvercote residents concerned about affordable housing & green spaces as set out in Neighbourhood Plan.	1				
				Previous consultations e.g., Oxfordshire Plan 2050 should be acknowledged in the OLP2040 and by other districts.		Need for greater acknowledgement of changing working patterns and its consequent impacts such as less demand for work parking spaces and less need for office space					

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				A lot of issues covered, which is welcomed, on a wide range of topics however it must be overwhelming for the majority of people who are being asked to make a reasoned contribution to the future of their city.		No policies on foul sewerage, water quality, hedgerows & solar panels.	1				
				Disappointing at lack of acknowledgement of neighbourhood plans, which are made by people with an understanding of the needs and characteristics of their areas.		Process: New Marston (South) Residents Assoc, strong reservations about PO consultation process. Consider documents fail to fully explain the options & implications of policy options. Not all residents received leaflet, which is poorly designed. Main PO Document not suitable for public to understand.	1				
				15-minute neighbourhood concept needs to include or make reference to, the work of transport groups to show how this relates to getting about more widely throughout the city. Document also needs to set out how essential workers will commute on a clean rapid transport system and how citizens will be able to move about the city in a safe, well-maintained public realm.		Content: Question value of LP 2040 given aim for substantial housing and employment growth for Oxford, which is incompatible with global economic crisis and challenges of Climate Emergency. Partial mitigation measures are an insufficient response to growth which will add to circle of environmental decline.	1				
						Difficult to see how Local Plan can proceed in the absence of a strategic plan for the County or an agreement with Districts on amount and location of development. Plan should not rely on Districts meeting some of city's housing and employment needs.	1				
						Do not accept that City should be pursuing economic growth, in context of climate change & biodiversity emergencies, water supply & sewerage issues, need to level up opportunities and backdrop of Brexit and cost of living crisis.	1				
Where we are SWOT: Natural Environment	1.1-1.2			The SWOT analysis should include OU and OBUs contribution to POS and sport facilities and consider POS coming forward as part of planned developments around the edge of the city and access to open countryside.	1						
Built Environment				The historic estate of OU should also be considered as a Threat which requires active management and leadership through the OLP owing to the net zero carbon commitments from the OU and colleges. The innovative way sites have been developed is an opportunity.	1						

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				<b>Historic England:</b> suggest the LP is more explicit about the multi-faceted contribution of the colleges in shaping the identity of the city. The network of related historic buildings in such a concentrated area has a major impact, which is not fully recognised in this section.							
Community, culture and living		Lack of capacity in the city to meet housing needs is a key threat.		The presence of OU/OBU and their cultural contribution e.g. museums, should be highlighted as a strength. As should the universities meeting their targets to house the majority of students. Development beyond city boundaries to address unmet need is a major opportunity for the city.	1	The affordability of housing should be added as a weakness, also an analysis of transport and movement related issues including private car use, public transport patronage					
Economy				Constrained land supply should be included as a threat as it could constrain the growth of the knowledge economy in 21st C. The OU contributed £15 billion to national economy <a href="https://www.ox.ac.uk/research/recognitions/economic-impact">https://www.ox.ac.uk/research/recognitions/economic-impact</a> The SWOT analysis should align with the OES (p 7)	1						
Economy	bullet points			Bullet point list should include Tourism as a strength	2						
				<b>Historic England</b> recommend that Oxford's heritage is mentioned in any such section on opportunities. Currently the Preferred Options insufficiently acknowledge the contribution made by the city's heritage to its local economy. They point to evidence available on their website relating to heritage counts and set out that there is scope to consider this in local context in more detail.							
Vision	1.3 -1.5	Support: The Plan has more merit than previous one and broadly supported, but concerns about scale of economic and housing ambition.	1	<b>OU Development:</b> Support aspiration to be net zero by 2040 but needs better definitions as 76% emissions from existing buildings. Costs need considering in full as does balance between heritage and environment.	1	Do not agree with growth-led vision driven by City Council and Oxford Colleges. Likely to increase housing beyond city boundary, increase house prices, and damage biodiversity. Likely to result in significant urban pressures. This approach is opposite of what is needed to address the various emergencies (e.g., climate) that have been declared.		Plan should give more prominence to contributions of Universities. Allowing housing on campus and academic sites will detract from their role.	1		

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.	Comments in disagreement to an option	No.
		Support: PO presents significant improvement on current LP, includes more ambitious responses to climate change, nature and recognition of wider health / well-being benefits.	2	Reference the Oxfordshire Strategic Vision by the FOP setting out ambition for the county and will set long-term, strategic economic infrastructure and environmental priorities. Needs more emphasis on design quality	1	An alternate vision is to ensure that we maintain full employment for people who already live in the county while preserving the countryside and only building those homes and new business premises that really need to be there and ensuring supporting infrastructure is put in place to cope with limited growth.					
						Three key strands of the plan should be 1. Addressing our climate/ nature emergencies; 2. Addressing unaffordable housing - no evidence that simply building more homes will reduce prices; and 3. Levelling up - no reason for spin-off industries associated with the university to be located close to it. E.g., R&D for Nissan takes place in Japan with manufacturing in UK. Same approach could be for Oxford. Spin-offs could be located elsewhere.					
		Support: for vision particularly 15 min. neighbourhood concept.	1								
						The Plan needs to address the imbalance between housing and jobs in Oxford and the associated problems with in-commuting.	1				
	1.31-1.33			Support over-arching threads, providing the 15 min concept does not result in a failure to invest in good public transport and cycle routes.	1						
	Figure 1.1			Add reference to improving sustainable transport	1						
				<b>Historic England:</b> suggest the figure currently implies that historic environment contributes only to the environmental and social pillars of sustainable development. This fails to recognise the economic dimension. Assuming Figure is carried forward into the OLP, the simplest way to address this they suggest would be to delete the headings in capital letters replacing the current text simply with Theme 1, Theme 2 and so on. The current approach over-simplifies the breadth of the six themes.							
Objectives & Strategy	1.7			Healthy & Inclusive city - more emphasis on need for higher density of development and efficient use of land.	1						

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	1.8	Plan needs to include flexible and realistic housing policies. City Council needs to work with neighbouring authorities to provide required housing.									
	1.10	May be more appropriate for smaller dwellings to be delivered in city and district centres at higher densities.				Other sites are suitable for high density developments other than CC and DCs - each site should be looking to maximise density	1				
	1.12-1.13					Need for greater acknowledgement of changing working patterns and its consequent impacts such as less demand for work parking spaces and less need for office space	1				
Green Biodiverse City				Clear target for BNG and should reference 10% minimum	1						
	Fig 1-2	Support	1	Plan should show key sites outside city boundary including Botley and Kidlington look beyond boundaries to ensure policies are effective	2						
				Oxford North: part near Canalside incorrectly shown as R & D site, should be residential as approved. Additional area next to Joe Whit's lane shown incorrectly.	1						
	1.19	Agree with para ensure appropriate densities and high quality design	3								
	1.27			Although 15/20 mins neighbourhood is a good theme must consider green field sites on city boundaries which may reduce its effectiveness as a concepts	1						
				Intent to improve connectivity and reduce need to travel is understood but question the value of this concept as an 'overarching thread'. Shouldn't be implemented at expense of recognition of Oxford being a global player in education and R&D.							
Overarching Threads	1.32 & 1.34	support for objectives / golden-threads on climate change and 15 min city, but impossible to be achieved if jobs are in Oxford whilst people live outside in surrounding towns	2								

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		Support for all 3 golden-threads, climate change, reducing inequalities (affordable housing) and 15 min city	1	15 min neighbourhoods must consider needs of the elderly who cannot walk or cycle.	1	The 15 minute city concept should not be used to justify development in the GB					
		Support for 15 min city concept, which takes a sustainable approach to travel & support both LTN's and better cycling provision.	1	OCC - transport policies need to be clearer to ensure consistency with county policies	1						
	1.37	Support for statement that sets out significant need for housing and employment and limited land means it should be prioritised	1	City must prioritise housing on any site that becomes available	2	Objectives need to link with principles of Transport & Connectivity Plan (OCC) which seek to reduce need to travel. Addressing imbalance between jobs and housing would then reduce the need to travel.	2				
				Support 15 min city which must complement delivery of sustainable transport links to support city also thin beyond boundary as many residents may commute out to Harwell/Begbroke		PO needs to be more flexible lead by market forces general locations for uses should be mapped on key diagram and ensure compliance with para 23 NPPF and policy delete		15 min city fails to address access issues for people outside city			
Vision	Figure 1.1	Support however apparent conflict between heritage and climate change themes.	2								
		support vision in particular focus on environment and creating a healthy and inclusive city									
Objectives & Strategy	1.6 - 1.30	It is vital that the strategy of the Plan and policies supports the vision welcome 15 minute neighbourhoods and initiatives which promote the most efficient use of land and delivering a healthy and inclusive city.	3	The Plan should give more prominence to the OU & OBU as significantly contribute to environmental, heritage, culture, leisure, employment opportunities	1	Object to the scale / ambition for economic growth and the adverse impact on climate change, green spaces and wildlife. This ambition also increases the demand for housing.		Correct disconnect between draft objectives and evidence by explicitly stating support for growth of both OU and OBU; resolve shortage of land by promoting compact living and intensification of and have positive management of the historic environment to reach net zero.			
		support first objective - A healthy and inclusive city to live in	2	More emphasis in the Plan on safety, crime and road safety to support more vulnerable residents also increase emphasis on equality of outcomes and improved educational opportunities for all.	1						

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	para 1.10	Agree there are different site and area contexts.	2	Welcome a greater emphasis on safety in this document.		Disagree that only city centre and district centres are suitable for high density developments. Making efficient use of land in the City is a key policy aim. Each site should be looking to maximise density within the context of the surrounding area.	2				
	Figure 1.2	Welcome recognition that Arc Oxford is a Key economic site.		It would be useful for the plan to show the key sites outside of the City boundary, especially those at Botley and Kidlington as these may influence policy thinking. The Plan must look beyond its boundaries to ensure policies are effective	3						
	Para 1.19	Agree that land is a limited resource in the City and must be used wisely and at high but appropriate densities and with high quality design.	3								
	Paras 1.23 - 1.25			<b>Historic England:</b> These paras do not fully capture the essence & significance of Oxford's heritage, and the relationship between its heritage and the people who live, work and pass through the city - though acknowledge this may not be aim.							
	Para 1.27	Agree that a 15/20 min walking distance is a useful measure to focus development in such zones. Need to consider centres beyond the City Boundary so avoid duplicating uses.	2	Given the lack of large scale greenfield development within the City boundaries the use of the 15/20 min concept may have limited benefit for the Local Plan?	2						
				Supportive of this but acknowledge v aspirational, if Rose Hill parade and Oval are seen as local centres they should be improved. Support Kassam and SP being a DC which will serve BBL and Grenoble Road development.	1						
	para 1.29	Strongly supports the need to ensure the City retains its attraction for the tourist market									

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	Theme 6 - heritage-related objectives			<b>Historic England</b> comment that current wording of the heritage-related objectives in the 6th theme is insufficiently broad to recognise the potential of the city's heritage - fails to acknowledge potential for heritage's contribution to the local economy and the economic pillar of sustainable development. Suggest further thought is given to broadening the second objective of this theme. Also, in terms of specific changes, suggest reference to valued and important heritage being 'conserved and enhanced' to align with the language in the NPPF. Alternative wording suggested: "Valued and important heritage is conserved and enhanced, not only to protect key assets but also to shape future development"							
Overarching Threads	1.31-1.34	<b>Natural England:</b> Support overarching threads, particularly commitment to reduce impacts of climate change. Guiding development towards sustainable solutions and assessing impacts of proposed land change is fundamental to achieving aims. Flag the use of BNG metric 3.1 and Environmental Benefits from Nature tools at this stage of plan as ways to appraise impacts of proposed policies/allocations. Advise that as much evidence is gathered as possible to assess current assets in area, opportunities and threats.				15 minute neighbourhoods are secondary to the protection of the Oxford Green Belt - vital to ensuring the continuing sustainability of the whole City and its surrounding settlements.					
		General support for the three overarching themes (climate change, decrease in inequalities and 15 minute City).	2	County & City need to agree common terminology around 15/20 minute neighbourhood.	1	We question the usefulness of the 15 minute City concept in Oxford? some areas such as Marston and Barton are further than 15 mins from DCs list of principles relies upon other policies.	3				
		Support the need to improve cycle and pedestrian facilities across the City and beyond; protect/provide green infrastructure and protect/provide community assets as set out in Fig 1-4.	2								
		<b>Historic England</b> support the threads interweaving throughout the plan.									

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	Fig 1.5			Wolvercote NF Area is not shown as part of 15 min neighbourhood area. Five-Mile Drive and far east area has no access to buses. Policy through S106 agreements to require developers to contribute to bus services.							
Strategic policy options	1.35 -1.37			In the absence of O P 2050 evidence base all Oxon LPAS need to work together to support policies in plan and discuss how to establish robust evidence base	2	There needs to be homes in Oxford not more jobs so that the LTCP vision to reduce 1 in 4 car trips by 2030 and deliver net zero transport and travel can be achieved, current proposals would do the opposite.	2				
<b>Strategic policy options: Directing new development to the right location</b>	S1	Support various aspects of this policy including: - a sustainable, healthy and inclusive city; - car-free developments; - high quality public realm; - directing locations for growth for specific land uses (e.g. R&D in city centre).	4	The Plan does not go far enough to protect academic sites from alternative uses, the core mission of OU/OBUs and operational estates must be acknowledged and protected in OLP2040.	1	Policy should be more explicit about making best use of its scarce land as well additional policy clarification emphasising the importance of HE to the City and retaining and developing existing higher education sites: particularly campuses and colleges, which provide a cluster of services, should be highlighted.	1	There needs to be more homes in Oxford rather than jobs to reduce travel so get the right balance between jobs and homes. West End has true potential to be a housing area	2	Need to have a change in direction. Away from growth and towards protecting the natural environment. Risk of irreparable damage to Oxford's natural environment.	
	S1	Welcome approach of achieving 15 min city with facilities and development clustered in centres accessible by PT, walking and cycling	2	General support for notion of directing development to the right locations. However given the acknowledged limited opportunities for development in the city, question whether this is such a guiding principle for new development.	2	Suggest policy is deleted as unnecessary.  Question whether the Local Plan should only focus development that attracts people to be located at existing hubs that are well served by public transport?  Policy is overly restrictive and does not enable market forces to be effectively realised.	2	many of the disadvantaged areas of Littlemore are not within 400m of facilities or regular 15 min bus service v difficult for disabled and elderly to walk 400 m.			
		Direct development to location that reduces carbon emissions	2	Support idea of overarching policy but it should not impede ability to deliver sites outside of designated areas or on GB land	5	Best route to more housing is intensification we must protect our green spaces and the environment	1				
		Support given to principles of policy approach towards strengthening existing district centres.		Reference to R&D should be expanded to include business space as well to ensure economic ecosystem aims are fully supported.		Spatial strategy should encourage housing on commercial sites and retail sites. Housing should be prioritised.	4				
		Support PO	16	New local plan should continue to support the delivery of economic growth/ job creation in the city centre as the key location to deliver a vibrant Innovation District that supports the city's economic ecosystem focussed in the West End.		More detail need in policy as to how net zero is to be achieved particularly use of EUI calculations. More development will make reaching net zero difficult for all of Oxfordshire authorities.	2				

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				OCC- The Reg 19 Plan should include all county strategies and update info on all changes in Oxford including Vision Zero , transport should feature more strongly, and LTCP policies	1	Need to consider development outside city and how it relates to existing areas. How will strategic sites outside the city boundary relate with existing services and facilities? Will Barton provide facilities for Land North of Bayswater Brook for example? Plan should address this.					
				Generally support 15-minute city concept but it should not override the importance placed on the Green Belt, which is vital to ensuring continued sustainability of Oxford and surrounding settlements. The need for facilities should not override the need for green spaces, which should be protected some specific sites with allocations referred to as needing to remain green- Bertie Place, Ruskin Field. Needs should not be pushed into Green Belt of the surrounding area.	9	A number of comments were opposed to the idea of 15 minute cities because of coverage in the press, social media etc. that has conflated the concept with the County Council's consultation on traffic filters (and Low Traffic Neighbourhoods) and they are opposed to the perceived idea that they will need permits to leave their zones, or they do not like the idea of traffic filters or LTNs.	24				
				Support intention to strengthen local hubs to achieve 15-minute neighbourhood with clustered facilities. What are essential facilities? How can gaps be filled? Is there sufficient footfall to support commercial enterprises at each hub?		Council should encourage conversion of empty offices in city centre to flats let at affordable rents above commercial premises. Should promote higher density housing in the city than in surrounding villages.					
				Car use will still be essential for older, less mobile, those outside Oxford, trades people, those needing to carry heavy and bulky goods; including access to facilities/green spaces	6	Cars are needed, e.g. for hospital workers and the city has a responsibility to support the working of the hospitals.	1				
				Support principle of 15 min city - emphasise importance of allowing supporting ancillary uses at ARC Oxford as part of creating a vibrant location, with nearby facilities in accessible walking distance.		<b>Historic England:</b> objection on the basis that this does not mention sustainable development and suggest it is referenced. The need for ensuring balance is acknowledged and they suggest reference to Sustainable Development could help to ensure that this is met, and that the environmental sensitivities of a location are taken into account. They also raise the query as to whether policy S1 and S5 might be usefully combined.					
				Too much housing has been built without infrastructure and we need more services within walking distance. Infrastructure is needed to make this work.	1	Concern about dividing the city further					
				For this to work better bus services are needed- between different parts of the city (not just to centre), more frequent to some areas, more reliable, better connections.	5	Need to consider impacts of restrictions on cars in city pushing traffic onto ring road and causing congestion					

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	Figure 1 - 5			Future policy should also show the areas that are within a 15 min walking/cycling radius to the centre as areas just outside a 15 min walk are still accessible/ sustainable locations where development should be encouraged.	2	Should provide new housing only within boundaries. No additional housing outside the city's boundary.					
Defined district centre, city centre and local centres	Para 1.38-139			Several comments were made about areas that do not have this accessibility and/or should be considered as district/local centres, including Littlemore, Rose Hill, Lye Valley, parts of South Hinksey, Kennington (not in the city).	7						
Approach to greenfield sites	Para 1.40										
<b>Strategic policy option set 2: approach to greenfield sites</b>	<b>S2 PO assess all greenfield sites and set out reasons for protection</b>	The Universities support an evidenced approach having regard to the scarcity of land within the City and the emergence of new opportunities for recreation and biodiversity around the City boundary.	2	Right to maximise delivery on PDL but where housing and employment needs cannot be met on such sites, consideration must be given to development on appropriate green field sites such as Allotments. Council notes there are limited opportunities for PDL dev. in Oxford but a high level of housing and employment need. Simply waiting for PDL sites to be delivered before delivering green field sites will just delay the council providing housing. This would significantly impact the 5yhls and potentially the HDT results.	1	Opposed to further review of the Green Belt, city should restrict housing growth to its own boundaries.	23	support Option B - Alternative Option protecting open spaces/ biodiversity important, plenty of employment/jobs/shops, irreplaceable, needed for mental health, opportunities to retrofit existing should be taken, don't want to add to traffic congestion.	56		
		<b>Natural England:</b> preferred option is a) - look forward to providing comment when further detail on greenbelt review is available. Fully support approach of directing development away from greenbelt and policies to maximise efficient use of brownfield sites.		welcome flexibility offered through option a) given need for development in city , consider a hybrid approach less distinction between brownfield and greenfield encourages use of both where most appropriate	2	The PO is unclear there needs to be reasons developed for green field protection, which is not supported.	1	Should seek to capitalise on GB as a resource for local residents, seeking to enhance and recognising the role it plays in people's mental health and well-being.			
		support preferred option - agree not all greenfield/Green Belt sites should have blanket protection and should be considered for development where appropriate	7	Underlying assumption that growth is an aim for the city. It would be healthy if the Plan recognised that many people disagree with this.		No need to review the GB again. Districts should not have to release more GB land. Not a lot of GB left within city boundary. Concerned about further GB release within Oxford city.				Do not support Option B - Could result in a potential delay in bringing forward greenfield sites.	1
		Support	15	<b>Morrell Family Trust:</b> Support a brownfield first principle for development as set out in national policy but suggests that even when development is maximised on such sites, as it should be, there will remain a need for green field sites to compliment the plan strategy and deliverability of development.	2	There should be no further loss of Green Spaces crucial within the calculated rain water catchment of the LV SSSI and LWS fens, any green areas within fen catchment are essential infrastructure as linked to hydrogeology of fen and such areas need full Catchment protection from development. Groundwater pollution is a serious issue in LV	1	Concentrate building on brownfield land and re-use for housing all redundant retail buildings in city centre plus build on car parks. GF sites must be protected: land to west of Hill Farm and Mill lane essential green buffers, carbon stores and part of the groundwater supply system		Support for option b is premature - SODC/VWHDC has not discussed unmet need with city so cannot make assumptions.	2

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		Homes are needed so should review.	4	<b>Oxford Local Nature Partnership:</b> Whilst PO rightly commits to assessing all greenfield sites and sets out reasons for their protection, it is not clear whether, having assessed a site as not currently performing sufficient functions to make it worthy of protection, sites will be assessed for their <i>potential to be improved</i> . All sites have potential for enhancement, those within recovery zones of the NRN should be protected for their potential value in increasing habitat connectivity and contributing to the NR. Equally there could be other sites capable of providing greater ecosystem services, this should be considered rather than automatically assuming they are suitable for development.		Protect green belt and greenfield land/ Greenfield sites should not be built on- economy/jobs should go elsewhere for levelling up.	20					
				Ok, but when developed must lead to improvements elsewhere.	2	Doubt expressed that Oxford's true housing need justifies building on greenbelt/greenfields in or around city	11					
				Hospitals or schools should be the only things allowed on greenfield sites.		Too much of a carte blanche for developer.						
						Oxford housing need should be met within city boundaries on brownfield, not on surrounding green belt beyond Oxford	8					
						Particular concern about loss of greenbelt/green field in specific areas, e.g. between Begbroke and Yarnton, Kidlington.	3					
						Sports facilities in green belt should be protected						
						<b>Historic England</b> object, flag that text currently doesn't mention archaeological remains - unclear if potential for these remains are being considered in assessment of greenfield sites. Should be clarified and made explicit/included. Flag that, Alternative option (b) refers to allowing development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites. This approach is unlikely to be justified & could also have heritage impacts. It would be better to ensure archaeological remains are given due consideration in the preferred option. Also note the proposal for review of green belt - flag that LP2036 inc acknowledgement of green belt offering protection for historic setting of city and that it must be protected where it is important in this aim - they						

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						assume and look forward to same approach being taken for new LP.					
						Should never develop on flood zones.					
				A combination of option A and B is required. The Local Plan should assess sites in a hierarchical approach, starting with brownfield ones and then looking at greenfield. Setting out which greenfield sites should be protected will be key.	2	Don't build on GB. ONS shows slowing in UK population from 9.6% to 3.2% until 2030				A hierarchy would not be appropriate, better to plan proactively and look comprehensively at all opportunities considering there is insufficient land to meet all needs.	2
<b>Delivery and infrastructure strategic policy option S3</b>	<b>S3 infrastructure considerations in new development to be set out</b>	A general policy seeking appropriate infrastructure to support development is supported.	11	The potential additional cost of redeveloping brownfield sites (e.g. in terms of demolition, contamination etc.) vs greenfield should be considered and be reflected in any viability policy to incentivise brownfield land to come forward.	3	Concern that infrastructure provision could come under pressure if growth objectives are not reviewed.					
	S3	Local energy planning is required to ensure that there is sufficient grid capacity for development to draw down electricity to deliver full electrification.		Like other Council's in Oxfordshire an SPD dealing with Developer Contributions would be useful to ensure consistency and transparency as to the Council's expectations.	4	Should come from council tax and not be charged to developers.					
		Support		Emphasise the importance of timing and phasing of supporting infrastructure delivery	1	Don't understand option/jargon used.					
				Local communities should be involved in CIL so it is not taken over by narrow interest groups.		CIL payments corrupted.					
				Don't use planning obligations to overrule common sense.	1	Too much red tape.					
				Infrastructure should include- bus routes, active transport, improved footpaths, green/walking networks, street trees, dance, warehousing and logistics, shops and amenities.	10	There should simply be no planning permission if there is not enough infrastructure. Need to sort out current issues.	6				

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				All infrastructure must be necessary as there are impacts on the environment.	2	Must be careful not to make developments unviable.	2				
				Support policy where viability considerations taken into account but that do not lead to viability negotiations on a site-by-site basis.	2	Infrastructure is lacking because the university own land and they don't want to provide.	2				
	S3 (and R6)			<b>Thames Water:</b> support the bespoke policy approach, but consider that there needs to be a separate policy to cover both water quality, wastewater infrastructure and water supply infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the network are delivered alongside development could result in adverse impacts from sewer flooding; pollution of land and water courses; and/or low water pressure. Important not to under estimate the time required to deliver necessary infrastructure (e.g. local upgrades around 18 months and Sewage Treatment & Water Treatment Works upgrades 3-5 years). <i>See their submission for recommended policy wording and supporting text for a water supply/wastewater infrastructure policy.</i>		Option will take away from social housing and green infrastructure, both of which should be from general funds, leaving the developer to pay for other infrastructure.					
				Generally agree. Civic Society launched a campaign for the introduction of land value capture.		This hasn't worked in the past so assume it will not in the future- not enough healthcare, education. Need healthcare funding.					
<b>Viability considerations strategic policy option S4</b>	S4 Policies in the plan to be drafted in context of plan wide viability	Support approach	13	Important that Council considers viability of OLP2040 policies	2	No viability assessment is needed as scope is set out in Government guidance only reason to have it if major changes in houses prices	2				
				Having a clear policy that sets out a cascade to various measures is useful to ensure development is delivered in the face of the changing economic circumstances being faced currently and likely to be faced over the plan period. The policy must take a flexible approach as it can't predict all eventualities.	2	Approach not clear, too vague, jargon, what is an open-book exercise.	6				
				Broader wording needed to allow developers and the Council necessary flexibility to present a case for viability and maximise the opportunities for development to progress.		Approach won't be effective at delivering affordable housing. If affordable housing not viable, don't approve scheme.	8				

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				In cases where viability is an issue, LPA needs to be flexible about which priorities are to be met. There may be instances where the city's need for homes will only be met if other requirements are relaxed rather than the no. of affordable units delivered.		All housing should be affordable/50% rented and the rest not for profit. Affordable housing is not affordable.	7				
				Potential for viability to have impact on net zero aspirations.	2	Comments that it was ok to relax some but not other parts of the policy, i.e. not ok to relax carbon, not ok to relax affordable housing, car free should be prioritised.	9				
				Viability statements submitted with planning applications should be reviewed by a 3rd party to avoid delays		Allows developers too much profit.	4				
				ensure support for future bus services is referenced and rail improvements, recognise value of Redbridge HWRC, consider car use and safety issues	1	Just a means for developers to by-pass critical safeguards of social and environmental concerns. Worry about loopholes.	25				
				objects to options that allow developers opportunity to relax planning contributions and affordable housing		Low parking restricts employment options, ability of employers to attract good staff, cars needed for social care etc., cars just clog streets if no parking.	9				
				Needs to specify a rigorous, transparent means of testing. Developers putting in viability assessments should fund independent checks of accuracy and credibility. Open book should be open to public to comment. Needs to be as rigorous as possible, firm and clear.	3						
				In addition to consideration of site specific circumstances, give regard to difference between residential and non-residential schemes.							
				"Affordability" needs redefining. Affordable housing is a priority for the future economy of Oxford.							
				There should be a limit to how many developments can go through this process.	2						
				Viability arguments are often used by developers having overpaid for the land. Requirement to provide necessary infrastructure for a site should be mandatory for applicants. The NPPF seems to support viability assessments based on land values set by precedent, rather than residual							

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				valuation after planning policies have been complied with.							
Presumption in favour of sustainable development	S5 Presumption in favour of sustainable development	Support the approach	13			Policy approach simply duplicates NPPF. Not required/not worth saying as should be implicit to all developments.	4				
						<b>Historic England</b> object, state that the text currently does not mention other elements of the Development Plan e.g. minerals and waste plans. Suggest referring to the Development Plan rather than solely the Local Plan and NPs, and to refer to national policy rather than only the NPPF. Also query if this policy could be combined with policy S1.					
						Hold up development until issues resolved.					
						Too arbitrary and difficult to measure/gives Council too much discretion. Should be part of building regulations/if policies are out of date review, don't ignore. Should not be pass normal considerations.	12				
						Bias towards sustainability will ignore other legitimate concerns. Welfare and other things are a higher priority and should not be overridden.	3				
						Related ecological emergency. No development is sustainable, especially on greenfield. Presumption should be in favour of protecting green sites.	6				
						Need to define sustainable development.	4				
						The NPPF has not led to sustainable development.	2				

Policy Options Set H1 to H16

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Introduction and wider context				Lack of evidence around housing need makes it difficult to comment on options yet	2	Support principles but reality in Littlemore v different, residents' health much poorer than other parts of the city	1	Banbury and CDC has taken enough unmet need for Oxford and requiring the surrounding DCs to take all the unmet need is not sustainable in the medium long terms	2		
				Housing affordability crisis is being escalated by City Council's plans for massive employment growth. This will increase demand for homes and houses prices and further strains on infrastructure.				Introduce more flats above offices and shops to reduce the need for building on green field sites	1		
				Instead of focussing on new housing sites, need to improve the existing stock, unlock landbanks and re-purpose other use classes.							
	Figure 2.2			Figure 2-2 should show Littlemore as an area of deprivation 2021 census indicates parts of Littlemore are in the highest 20% of areas of deprivation in England.		Need to balance housing delivery and the damage to the natural environment.	2				
				Significant housing delivery could be achieved by redeveloping existing employment sites for housing.		Housing need should be calculated using standard method and most up to date census data and ONS population forecasts and consider working patterns and economic factors. OLP2036 used out of date pop figures which exaggerated need, no exceptional circumstances exist to justify further inflation of the figures or how they are calculated.	2				
The Housing need and housing requirement intro paras/general		The Universities support the principle that exceptional circumstances justify an alternative approach to calculating housing need, given the importance of the City and the Region to the national economy, the transformational strategy put forward in the LEP's Local Industrial Strategy and the lack of affordable housing, we consider a departure from the Standard Method is justified and urge all Oxfordshire authorities to move quickly in resolving how that need will be met across the different Local Authority boundaries.	1			OCC - need more clarity in this doc as to how unmet need will be addressed.	2	Ox City should accommodate all its own needs for housing	2		
	para 2.5	We agree that there are clear economic circumstances that justify using an alternative method to calculate housing need in Oxford and Oxfordshire. This approach should continue. To rely on the Standard Method will significantly impact on the economic success of Oxford and Oxfordshire.	5	Set out what the figure using SM would be and how that compares to other Oxfordshire LPAs	1	Retail loss will continue and will soon provide numerous sites for housing		Get a better understanding of the demand for housing and ensure most efficient use of land in the city	1		
				Going beyond SM will simply result in more unmet need for neighbouring authorities as Oxford's housing requirement is proposed to be constrained by a capacity-based target.	2						

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				Unmet need for previous plan (OLP2036) is currently allocated in neighbouring Local Plans, but will the districts keep the allocations in their emerging plans?		New housing will put increased strain on local services/infrastructure which is unable to cope.	11				
				Population figure are not discussed and neither is the location of commerce, business and enterprise, under the wider issue of "levelling-up".		The scale of housing proposed will result in increased congestion on our roads, detracting from the city centre which is a tourist attraction	2	Need to build affordable homes for first time buyers	1		
<b>H1The Housing need and housing requirement</b>	<b>Preferred Option - a) Set a capacity-based/constraint-based housing requirement</b>	Support - housing requirement must be based on sound evidence and ensure policies bring forward sites to meet a range of housing needs.	3	Unmet need must be identified and form the basis of discussions with neighbouring Districts as to where that unmet need can be met.	2	Scale of housing appears significantly above standard method, should be lower. Oxford should provide for its own need within its boundaries	12	Option B should be the preferred option, higher housing no they should increase densities and use land more efficiently, rather than off-loading to neighbouring authorities/increasing commuting	5		
		Oxford must meet its identified housing need. May result in requirement being lower than identified need, with the surplus being delivered within the surrounding districts. Must deliver as much housing as possible.	4	Broadly support PO but policy should have a "fall-back" position allowing for higher density development in the case that neighbouring authorities are unable to meet any shortfall in identified need.	3	Whichever option selected the impact on the SRN must be considered - people in the services sectors cannot afford the time, childcare, transport costs of commuting to Oxford	2	The HDT is not used to inform the soundness of a new plan, has every effort been made to reduce, some policy preferences expressed in consultation document may be compounding the poor supply.	1		
		support capacity-based target/the preferred option	15	Standard Method should be the starting-point, but sites available may be limited. City Council should however do everything possible to identify sites that can deliver the quantity of housing required, including employment growth sites.	4	Options are flawed. Need additional option which looks at a lower figure (than SM) due to over-delivery anticipated to 2031 and declared emergencies (climate etc.) and constraints on delivery in city.	9	A hybrid option should be included which recognises the extent of identified housing need for Oxford, commit to meeting its need and set out level of unmet need to be accommodated elsewhere	1		
		a capacity-based approach may provide confidence to neighbouring authorities and residents that a thorough assessment of capacity has been undertaken, and all sites have been assessed on an equal basis	1	Support option a: But consider Council should do all it can to meet its own housing need. This should include encouraging denser development, taller buildings where appropriate, making better use of land supporting climate-proofed housing. Neighbouring Districts however also should play a role in helping city meet its housing need through development close to the city boundaries.	4	All employment sites in the city should be released for housing and not protected, no more GB should be sacrificed to meet Oxford's unmet need, Oxford should do more to meet its own unmet need. There is not sufficient infrastructure to meet the planned housing to 2036 across the county. Neighbouring districts (e.g. CDC) cannot accommodate any more housing for Oxford.	32	The housing strategy for Oxfordshire should be dispersed nationwide OU should invest in areas where there is a need for work and job and land available.	1		
				Must explore all opportunities to deliver housing in the city, before seeking to deliver outside. Includes prioritising sites for housing rather than employment, maximising densities, and exploring alternative uses for existing sites (e.g., Botley Road)	1	Already providing more homes than needed. No more homes needed to 2040.	4	If more homes are needed then more should be built. Housing should meet need not arbitrary targets or a statistical model. Support requirement based on identified need.	7		
				Must take into account climate, biodiversity, health emergencies, democratic wishes, flood plain, Green Belt, and over-delivery in some areas in relation to Growth Deal. may even be lower than SM figure	7	it is not the number of homes but the kind of homes, smaller dwellings are required, or particular types of homes	2	should be willing to embrace expansion of the city	1		

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				Proposed version of option (a) is too weak, & therefore unacceptable in its present form, should provide guidance on how housing capacity within the city can be maximised.	1	9000 homes will lead to sprawl	1	housing need should be the driver but limited to capacity especially not impinging on green belt and not exceeding transport infrastructure	1		
				Why has the requirement decreased from 10,884 in OLP2036 to 9,147 dwellings in OLP2040?	1	How is there room for 9000 more homes without building on greenfield sites?	1	before building new homes, should return HMOs to single use, and incentivise conversion of redundant offices/commercial, and free up long term empty homes	3		
				support a capacity based target but not the specified number of dwellings	8	Strongly object to the target approach because it allows for 'flexibility' over other policy commitments in the plan e.g. protection of green belt or green infrastructure. The level of development sought is at odds with addressing the climate emergency. Methodology is also questionable eg erroneous ratio applied for average student occupancy rate.	1	Lack of evidence to justify that oxford cannot accommodate even the lowest possible housing need. Have you tested building over above and around private and public car parks? How many additional moorings could be accommodated? How many homes could be added to industrial estates and science parks on empty sites and disused buildings? How many homes can be added above shops or empty shops?	3		
				Councils needs to 'leave no stone unturned' in finding housing sites in the city (including a re-examination of employment sites to identify those suitable for housing) and should not extend to higher targets based on the city's 'policy on' choice of seeking significant growth	3	insufficient data to be able to set a target	1	with current developments and birth rates falling we might not even need new housing in future	1		
				Does the PO have detrimental impacts on housing affordability?	1			should not just assume that growth of city and population is good	1		
				Support PO but all new homes should be affordable	1			option b is more realistic and takes into account lives of those who live here	1		
				Please clarify if the housing requirement for citizens or students?	1			Reassess housing need in line with changes to people's working/housing patterns since COVID. Growth plans don't feel realistic post pandemic. the LIS and other national policy changes can no longer be considered up to date	1		
				housing requirement should be flexible, reviewed every 5 years	1			in light of the climate emergency, biodiversity protection and biodiversity growth should be prioritised	1		
				should prioritise council, social and affordable homes for people living in Oxford now rather than commercial or university interests	1			Do not accept the assumptions in methodology. development should be the absolute lowest possible figure necessary to address genuine housing need not forecasts	3		

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				Need to also consider housing needs of older people in the calculations	1			Need a better balance between jobs and homes, and no further encroachment into green belt. e.g. Oxford North does not give primacy to homes	2		
				set a constraint based target that can be met within boundaries	1			need to explore more alternative options e.g. moving employment and higher education out of Oxford City to other parts of county, to reduce housing need in city	1		
				Infrastructure capacity should be the first consideration, then sites available, and then set a capacity figure.	1			the evidence base for unmet need to be met in neighbouring districts needs reviewing and updating	1		
								housing need calculations are not justified / flawed	3		
Housing Need	para 2.5					Ox City cannot solely make determination about housing need required to serve all communities in Oxon and cannot build on the GB to solve the problem. Recognise the need to limit growth	2				
H2 Housing need for the plan period	<b>No Preferred Option - a) Define Housing Need using the Standard Method OR b) Define Housing need using based on need calculated by seeking to achieve and support economic growth</b>	Support option B	27	Concerned that some Oxfordshire authorities will limit their support for the established growth agenda.	2	Scale of housing need should be lower than standard method / below SM needs to be considered	7	If Oxford is to meet its significant AH need it will result in the displacement of large numbers of new homes resulting in increased affordability and congestion and commuting into Oxford	1		
		support Option A	21	Support Standard Method as starting-point, but sites available may be limited. City Council should do everything possible to identify sites that can deliver quantity of housing required, including on employment growth sites. No assumptions should be made that neighbouring councils are able to deliver unmet need.	2	No exceptional circumstances exist to justify further inflation of the figures or how they are calculated, City council must explain the impact that any factors not captured by standard method. No evidence to support a departure from the standard method. The GD money has not been released so risk that infrastructure will not be delivered and no housing needs assessment has been undertaken.	4	continued expansion of the population is unsustainable, should focus instead on families having fewer children	1		
		Don't know enough/understand to decide between them	4	As unmet housing need "met" until 2031. Another 9 years' worth of unmet housing need will need to be met with support from surrounding districts. Using 2014 SHMA as a base, future unmet need could be in the range 6,600 - 10,300 homes.	1	Option B is undeliverable & perpetuates idea that economic growth is the way to affordability.	1	should be no economic growth in the SE	1		

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		SM already includes a 40% uplift for AH. don't push up numbers to meet arbitrary growth ambitions, especially when no capacity in city	6	Option A (SM) but with flexibility e.g. to take into account labour shortages after Brexit, economic downturn etc.	4	Housing need should be set at the lowest possible to meet genuine need. There are 'exceptional circumstances' for using a figure below standard method. meet need only rather than trying to bring growth	5	economic growth cannot be the long term goal for the city	2		
				Growth Deal exists until 2031, this plan stretches 9 years beyond that date. No reason to suggest that GD should extend. Housing required to meet GD is already covered in existing commitments which will see Oxfordshire delivering new homes well above identified need for the next decade.	1	Consider that below SM calculations can be justified by "exceptional circumstances" such as the city's tightly constrained administrative boundary, and other physical constraints (flooding etc.). Also, districts have already committed to meeting a very high amount of city's unmet need and should not be asked to provide more housing for Oxford city.	1	should focus on cheap housing to help bring prices down (purchase and rent)	1		
				Housing need is incidental as provision is fixed by availability of sites. Calculating the need or requirement only affects the number of homes which adjacent authorities provide under Duty to Cooperate.	1	should not assume that growth in physical size and population is good	1	Neither option - A is arbitrary, B is for developers.	1		
				Lack of enthusiasm from neighbouring authorities could lead the way to increasing densities in the city.	1	Don't support housing need based on affordable housing need or employment need because previous estimates have been grossly exaggerated.	1	housing provision should respond to housing demand not planning assumptions about projected growth	1		
				set housing need in relation to quality of life and affordability for low waged workers, not with aim of supporting economic growth	1	LIS predates Covid, Brexit and Levelling up agenda so can no longer be considered up to date evidence	8	housing need should be based on evidence about incomes	3		
				priority should be given to meeting AH in full/support meeting AH needs (option B)	3	question approach of taking economic growth as a given		Need "transformational adaptation" not growth based on economic growth	2		
				better to work to a higher housing requirement (B) with the opportunity provided by growth deal/HIF to deliver infrastructure (preferably up front)	1	not just about housing numbers - need a more integrated approach to sustainable development	1	Neither - A doesn't always reflect need. B doesn't include all those economically inactive.	1		
				B is better but take into account capacity and don't pursue economic growth at all costs	1	housing growth should not be based on proposed economic growth, growth should be curtailed - oxford does not have capacity	2	Don't need more housing as workforce all move out and tourism is reducing	1		
				SM does not sufficiently capture scale of housing need in city and complexity of the situation	1	SM does not sufficiently address AH / AH should be a key factor in housing numbers	4	build communities rather than building on community spaces or causing overcrowding	1		
						plans for economic growth are not justifiable	1	climate emergency - just provide housing needed but not increase economic growth	3		
						SM does not capture the unusual mix of medium term students and key workers and lecturers/researchers. no allowance for this in SM	1	should be an independent calculation of housing need not one set by city	1		
								set housing growth rate relative to economic growth - constraining rate of housing growth to outpace demand growth, to compensate for existing unmet need	1		

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								should only build for current population and review every 10years	1		
								neither option as neither is within city's ability to meet	1		
	para 2.6					No discussion about unmet need have been had with SODC prior to commissioning the study, <b>we remain open to engaging with the City on methodology.</b>	2				
Delivering AH	para 2.7					The development in Littlemore skews this mixed and balanced communities concepts. Approach needs to be city wide to include affluent areas.	1				
H3 Affordable Housing - Overall Requirement	<b>No Preferred Option -</b> <b>a)</b> Prioritise aff housing, similar split <b>Or b)</b> No first homes <b>Or c)</b> Maximise affordable housing overall rather than focussing on Social Rented <b>OR d)</b> maximise Social rented <b>OR e)</b> do not maiximise affordable housing requirements <b>OR f)</b> no policy	support Option A	29	Policy option to be subject to viability testing, cascade approach useful	3	Littlemore has received no CIL from all the AH and schemes in Littlemore, we have taken enough development.	1	Support Option B, examples of other authorities which are constrained and unaffordable not considering FHs (Camden and Brighton & Hove	2	first homes and shared ownership are some options but what about many other innovative solutions from community groups including cooperatives and products like mutual ownership where people buy equity share based on income rather than value of home	1
		Support Option A but level/mix of affordable housing should be determined on a site by site basis & defined at time of planning app. Consider that First Homes approach should be flexible and agree with comment that First Homes do not help those in greatest housing need.	1	Issues around grant funding where Homes England – the key funder of affordable homes – do not fund “policy compliant” homes so the policy does not necessarily help to maximise additional subsidy.	1	Need to deliver socially rented homes. Housing register measures poverty affecting families and should not be used as evidence to build new houses unless developments include a sizeable amount of social housing.	1	Do not include a policy requiring AH. Any new development will increase the housing stock, thereby increasing affordability of all housing. focus on quality of housing not quantity	1	Do not support options: Do not feel that building First Homes or intermediate forms of AH should be a priority, given high need for social rent. New alternative proposal: given Government support for F Homes suggested amendment 75% social rent & 25% F Homes, affordable rent or shared ownership.	1

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		Support option F	4	Delivery of First Homes has a number of issues. It can reduce the number of "genuinely affordable homes"; sidelines shared-ownership and fails to add same value to a scheme. Support Option B	1	Option A unlikely to be viable. Need to delivery truly affordable homes.	1	make sure developers stick to the agreed delivery	3	Is AH really affordable - needs to be cheaper to buy or rent in oxford	2
		Support option B	12	OXPlace has provided a detailed technical Appendix about viability concerns in relation to First Homes. See Appendix in relevant Folder.	1	Families on housing register are unable to buy market housing. What they need is social housing.	1	we need social responsibility to become intrinsic to housing policy and delivery	1	Many young professionals e.g. nurses have to rent but would like to buy. is it possible for example to require people to live in a house x years to prevent buy-to-lets?	1
		Support option C	3	Will need robust justification if Council chooses not to pursue First Homes as it is a national policy requirement.	1	Private/shared ownership should not be prioritised.	4	Oxford should move to ONLY allow affordable housing and ban building of new large single family homes (there are enough and we don't have room).	1	these options skew the market and penalise the middle classes	1
		Both A & B sound reasonable	10	OCC - AH should be for a range of needs including kinship foster carers	1	prioritise social rent	10	Design housing for particular needs - not just affordable but for older people, young families etc.	1	creating mixed and balanced communities should be the guiding principle, with emphasis given to affordable housing	1
		Support option D		Given increased costs and other requirements, no scope to increase AH requirement.	1	larger proportion of First Homes and smaller proportion of social rent	1	Only AH should be built for next 5-10yrs. buyers on open market can find anywhere in Oxfordshire.	1	prioritise homes for NHS staff	1
				Maximise availability of AH, and secondly maximise SR. First homes are lower priority	1	Options E & F not acceptable	3	Move to 100% very low cost housing via council purchase of housing, use of empty homes, and other acquisitions from lower end of quality in rented sector. Car-park based apartment blocks. Work with 3rd sector to deliver eg housing cooperatives, housing associations, specialist charities.	2	Can city council provide social housing themselves without worrying the housing market/investors?	1
				Option A but is 50% going to be economically feasible?	1	target should be 50% of which 75% for rent	1	Both rented and affordable first homes are needed.	1		
				A and B sensible but need flexibility to respond to housing demand	1	first homes policy is ridiculous	1	encourage more HMOs	1		
				90% social rent/10% intermediate	1	is 50% really deliverable?	1	stigma of social rented, how can this be managed	1		
				C - there are many people in oxford on reasonable salary who cannot get on the housing ladder, need more intermediate housing	2			Should set variable AH targets eg in lower value areas	1		
				all new housing should be affordable	5			difficult to comment without housing needs or viability studies	1		

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				A - should include more first homes and shared ownership	2			Specialist housing e.g. older people should be exempt from first homes and starter homes (not appropriate to mix those in schemes for older people with communal facilities, communal living etc.)	1		
				Option B but raise the overall target eg 75% of planned developments	4			homes must be genuinely affordable by reference to incomes and interest rates	1		
				Support (a) maximise social rent but do not support First Time homes	1						
Housing need H4 student contributions	Preferred Option - a) Seek financial contribution from student accommodation for affordable housing	Support A	31	Essential that exceptions in current policy are maintained (i.e. no contributions on existing/proposed campus sites etc.)	4	it is not appropriate to require affordable housing contributions on university academic sites which would not reasonably be brought forward for market or affordable housing.	4	Support either option C or D. Imposing additional costs on PBSA deters landowners providing more student accommodation. Can result in an increase in student HMOs	1	financial contributions is a good thing but also a perverse incentive against other council commitments (climate crisis) by encouraging development in order to extract development cash	1
		Support option B in combination with option A / sequential approach i.e., on-site where possible otherwise supported by a financial contribution.	5	Allow student accommodation to be delivered without a contribution where the institution has demonstrated that the accommodation in question is required to meet a specified need.	1	Proposed policy does not include the exemption for campus schemes as OLP2036 H2. Without this it will add unreasonable financial burdens to providing student accom. in campus developments which will make schemes unviable. Exception must be maintained is OLP2040 is to be deliverable.	2	put a levy on all new developments not just students	1	Need bespoke accommodation for entire student and junior health workers population - for those sites should be no other contribution apart from local physical infrastructure	1
		Support option B	11	Contributions from Student accommodation could dis-incentivise building PBSA. This could result in more students taking up housing places in the general housing market.	2	Question appropriateness of a requirement for affordable housing from student acc. PBSA can help to alleviate pressures on housing market. Given existing and proposed policies which restrict locations for PBSA, PBSA highly unlikely to take up land which could be used for general housing.	2	Support Option D	5	student housing should be prohibited on any greenfield sites or on green belt	2
		Support option C - its important the universities provide student accommodation and are not penalised for this. Reduces need to house in private accommodation etc.	1	If contributions to affordable housing are required from residential development, it is necessary for a requirement on student housing too. However concerned about viability consequences. Viability implications must be tested and understood	2	financial contributions will dis-incentivise institutions from developing their own accommodation	3	don't support C or D	3	all accommodation on site to be rented to both students and non-students - shared spaces (kitchens etc.) like NYC apartment blocks	1
		option A for designated sites, Option B for non-designated sites	1	Where PBSA is delivered on institution owned land, often no profit-motive and build quality often higher than speculative PBSA.	1	smaller colleges have less viability	2	No new student accommodation, already too much	1	Where is "elsewhere". if student accommodation means displacement of residents out of the city then does funding get transferred to other councils?	1
				Where colleges build PBSA, there is a desire to integrate new buildings with existing historic fabric of city. Determining land value capture equitably is more difficult when viewed over a longer time horizon (e.g. over 100yrs) and when there are higher build costs due to wishing to create newly built heritage for the city.	1	The University and Colleges should not be penalised, for reducing competition for other land in the city by releasing their own land and resources which can help reduce land values and speed up the promotion of sites to meet more general housing need, through land value capture.	1	colleges need to be part of the solution - expansion of colleges makes it harder for people that work there to be able to live within reasonable commute	1	levy the colleges with larger financial reserves (>£20m) to support new student housing	1

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				Only a small number of sites (outside of university- owned/ controlled) where student housing likely to compete with market housing. Lots of positives about delivery of PBSA including reducing pressures on housing in city. Any contributions applied should not be punitive.	1	Further student housing, which in itself puts pressure on available land, should not be seen as a way of funding AH.	1	If developers are asked to subsidise social housing, they'll build lower quality so they can squeeze out profit still.	1		
				No discussion about potential impacts on affordable housing delivery of rising costs for the building industry, slow completion rates in all districts etc.	1	If AH contributions are required for student acc it should only be imposed on net increase in units	1	Support option B: since option 'a' assumes a suitable site for provision is available elsewhere, rarely the case.	1		
				need assessment of how much student accommodation is needed	1			if ask for AH on site you may get fewer student developments	1		
				support A could even lower threshold to 25 or even 15 rooms / 10 self-contained units	1			universities should provide their own students accommodation	4		
				financial contribution for delivery within same area (but not onsite)	1			Bespoke student accommodation releases other housing so should be enabled not restricted	1		
<b>Housing need H5 employer-linked</b>	<b>Preferred Option - a)</b> Allow employer-linked affordable housing on certain sites	OU is currently working to deliver new developments that will accommodate staff. Both Universities support the Preferred Option (a), subject to the detail of the Policy coming forward.	2	Option A provides for employers of key organisations in the City to help address affordable housing issues, which is generally supported subject to seeing the detail.	2	Potential risks to employees such as housing attached to work could distort employer/employee relationship non-transparently e.g. could encourage lower wages or corruption or dodgy employment rights, wary of linking security of tenure to conditions of employment.	5			Object to not including a policy	1
		A policy that allows key employers to provide affordable housing is positive, will help stimulate development and support emerging policies on reducing the need to travel	1	It may be good to widen the scope of this policy to other employers beyond the OU and Hospital Trust	2	attractive for a few but no benefit to others	1				
		Support Option a has the potential to minimise travel and carbon emissions.	4	But require approach to be actively encouraged rather than just permitted.	1	too much micromanagement, should not be any employer linkage	1				
		Support Option A	36	Support Option a, but another option exists which is to include a criteria-based policy.	1	The Council should consider a policy approach that allows for employer linked housing where a need can be demonstrated, and said employer agrees to retain those homes in perpetuity.	1	Support Option B: although option 'a' works well for sites like hospitals, concern that policy will be used to avoid providing AH. Employees should be obliged to live in employer provided housing, so that they are not left at a disadvantage after leaving a job which provides housing.	1		

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		Will be very useful for key workers	1	Issue about double counting since Employer-linked AH is considered to be a proxy for AH.	1	Support B (no policy)	5	BMW request that any proposals to identify the MINI Plant under H5 are considered by BMW	1		
		Given the anticipated growth of short-term research employment in the City this would enable a more mobile workforce	1	Potential for a college 'internal' housing market, with certain rents being charged at different levels (social, discount and full). Such employer-linked AH could then be rented via means-testing.	1	Employees should be more independent of work when off duty	1				
		Employer-linked encourages loyalty and ability to train and retain staff	1	Scope too broad, it should only apply on mainstream hospital sites eg JR	1	Tied housing means residents wouldn't be able to leave their job for fear of losing their housing. Leverage other pressure points to encourage landowners to bring forward developments	2				
		Nurses and teachers need homes	1	How would you keep track of rent compared to salary, to prevent employers exploiting the policy?	1	It is the employers duty to employ and the council's duty to provide accommodation/facilitate development for others to build houses. the policy would detract employers from locating in Oxford.	1				
		Vital that the hospitals and universities provide more housing	1	Good idea - it means that parts of the University that don't have students (so not captured by H4) also have to contribute to the housing solutions	1	If a company wants to provide accommodation (e.g. nurses accommodation) they already do that, how does this policy help. If forcing employers to provide, it may risk them relocating elsewhere	1				
		Support option A, some of the College's holdings in East Oxford may have potential to accommodate such development	1	Such sites should be car free too	1	Why should the council decide to help employees of specific organisations? this should be solely for the organisations concerned	1				
				Good idea but how applicable is it	1	Housing should not be linked to a particular employer. land-owning employers should seek to increase the general stock of housing across Oxford	1				
				Need permanent safeguards against properties being exchanged at open market values, to avoid profiteering	1	Tied accommodation owned by Aston University was later sold off as they got more from selling the land than from employee rents. this is likely to happen in Oxford	1				
				Support for key organisations to Oxford e.g. university, schools, hospitals, but not for corporate employers	1	Employees should be free to live where they wish. this policy would herd people into one locality and eventually trap them into living onsite due to affordability	1				
				We should support the principle of homes for NHS staff/key workers	1	This panders to the university to allow green belt development	1				
				rent needs to be truly affordable i.e. 50% of market rate	1	The universities and hospital trusts have sold residential land and property which could have accommodated staff and students. if those institutions wish to bring forward land for development they should contribute to general needs affordable housing, this policy would undermine social housing delivery as it gives a loophole	1				

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				Should also proactively encourage the conversion of parking at the Headington hospitals and brownfield land, but not greenfield land	1	Employers should be required to demonstrate why the site would not be suitable for general market/affordable housing and has to be employer-linked. It would be inappropriate if, for example, the universities sought to use policy to subsidise wage bills at the cost of access to housing for the wider community and exclusion of a more diverse community as the sites this concerns are held by such a limited number of institutions	1				
				Equal importance should also be given to housing essential workers like cleaners with fewer qualifications	1	policy will not work in our society	1				
H6 Mix of Housing Sizes	<b>No Preferred Option -</b> <b>a)</b> Set a mix of housing types for affordable only <b>Or b)</b> Set a mix for both market and affordable <b>Or c)</b> Do not specify a mix of unit sizes but require 2 or 3 unit types in all proposals over a certain threshold <b>Or d)</b> Focus on mix of affordable housing types which is responsive to housing list <b>Or e)</b> No Policy	Support option A	11	The provision of AH should respond to the site context in terms of the location and type of scheme.	5	setting a mix on smaller or complex sites is problematic and could have perverse consequences e.g. Jericho Canalside	1				
		Support option B	14	Housing register must be taken into account when deciding on the mix for a development	4	A mix of sizes makes sense but units need to become smaller to accommodate more people. Large need for high quality small studio flats for singles, small one bed flats for couples, and 2/3 bed flats for families only. anything beyond 3 bed should be an exception for large families	1				
		Support Option C	6	Suggest a requirement for larger housing sites to be tenure blind.	2	Why is D detrimental? reduces risk of developing affordable/social rent homes which residents don't qualify for because need a different number of bedrooms	2				

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		Support Option D	5	A carefully drafted policy could set out reasonable expectations for the size of both market and AH whilst avoiding being too prescriptive	1	too much micromanagement - focus should be on 15min neighbourhood, transport and sustainability	1				
		Support option e - no mix policy.	8	Staff housing proposals will need own mix	1	Oxford benefits from incoming wealth, with which comes a requirement for a small number of large houses. surely this should continue along with expansion of social housing	1				
				Need to understand this policy in context of other policies (e.g., First Homes and parking policy)	1	not option C	1				
				A but a mix should be mandated in highest density areas	1	Most existing terraced or semi-detached homes do not have mixed number of bedrooms, and those streets work fine. Why change?	1				
				mix of A & B	3	Risk of this policy becoming too complex and difficult to implement	1				
				If homes are to be of different sizes, need architecture to reflect this to maintain quality	1	developments should be terraced, dense, but with retained and created hedgerows and tree cover	1				
				specialist forms of housing are unable to accommodate a mix of unit types in 'in block'	1	have more smaller units and few large (4+ bed) units	1				
				mix of B & C	1	Many people, especially those on short term contracts, will feature on the housing register so its not a good indicator of need. Better to concentrate on the needs of early career professionals and key worker demand (use demographics and letting agency enquiries).	1				

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				B, but on sites of 25+	1						
	2.12					Statement that Oxford can never meet its full housing need are <b>ambiguous, premature and unambitious</b>	1				
H7 Loss of Family Dwellings	<b>Preferred Option a)</b> Resist net loss of family dwellings except for specific reasons	Support A	27	Support 'a' but with option 'c' to restrict unlicensed/unregulated short-stay accommodation (Airbnb)	6			Support B	5	object to D	
		support A & B	1	If PBSA is to be expanded theoretically this releases dwelling which are licensed HMOs. this would add to the stock of housing for families	1	micromanagement, too hard to implement such a policy	1	Subdivision can allow for more efficient use of homes but shouldn't be allowed to Airbnb's.	1		
				Generally support keeping family homes	1	treat on case by case, some family homes might meet housing needs better if converted to flats	1	Why is B detrimental? tourism is important in Oxford and for peripatetic university and hospital staff, so why resist Airbnb	2		
						family dwellings should be preferred over institutional use (e.g. university or school institutions in north oxford)	1	why is B detrimental - short lets destroy communities and push up rents/house prices	5		
				A&B - retain family homes more near schools, with other areas (e.g. city centre) sub-divisions more acceptable	1	A has no teeth	1	Support C	13		
				amount of family homes should be based on need	1	A could be too inflexible	1	B could prevent a useful conversion of very large north oxford houses into flats	1		
				if ancillary accommodation is needed, such as nursery places, it should not result in loss of family housing stock	1	why resist subdivision - it can help meet housing need without more environmentally damaging building work.	2	short-term lets means tenants do not have responsibility to neighbours	1		

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				H8 will deal with concerns about HMOs and short term lets	1	as a single person, why should families always be prioritised	1	Shortlets need to be better regulated and contribute to community costs e.g. could we tax Airbnb's differently, or regulate e.g. check fire safety like other BnB's?	3		
				Sub-division can split homes into more affordable units. Families are often smaller now.	1	Airbnb takes homes out of the rental market	1	Support D - Let market decide / have no restrictions on splitting, subdivisions, short lets etc.	4		
				demand for HMOs, single bed houses etc. is best met by custom-built development (not subdivision) so resist subdivision	1	windfall large family plots can help deliver higher density housing in sustainable locations, be careful not to hinder brownfield development	1	HMO linked to provision of student accommodation - PBSA releases HMOs	3		
				just resisting net loss assumes there is an adequate supply of family homes at the moment	1	why resist subdivision - lots of homes built in 1930s/1970s could be subdivided to house 2 or more families	1	subdivisions are often done badly on the cheap rather than promote neighbourhoods, and often not big enough for WfH	1		
						Airbnb fulfils a demand which supports the economy and allows competition with hotels	1	support B or C	1		
H8 Houses in Multiple Occupation (HMOs)	<b>Preferred Option - a)</b> Prevent additional HMOs in an area by only allowing a certain percentage of HMOs within street frontage (currently 20%)	HMOs are an important element of housing choice and, whilst the Universities support Preferred Option (a) in light of the successful delivery of PBSA, scenario may change cf OUs comment H10)	1	Ensure policies consider parking stress and impacts on street parking	1	limit total number of HMOs	1	No need to control the loss of dwellings. Instances of such a loss are likely to be low. Current policy has had unintended consequences on several schemes. Other policies in the plan will control changes of use in certain locations.	2		

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		HMOs are a necessary part of the housing provision in Oxford, given availability and cost of market housing.	2	PO should be strengthened by reducing the maximum proportion of HMO's allowed within a frontage from 20% to 5% or 10%.	1	what's wrong with HMOs, sometimes its the only viable option for people	1	Support Option D - No Policy HMO's provide an important role in the City in meeting housing need in a highly efficient and regulated manner. Other aspects of HMO's e.g. bin, car parking and cycle stores etc. can be controlled via the Development Management role.	2		
		Support option A	36	LTNs make it hard for families to live in central location because of lack of parking for tradespeople & visitors, so likely to be sold off and divided into HMOs	1	clustering minimises disturbance	1	Support D - no restriction	8		
		Concentration of HMOs brings lack of community, avoid clustering. healthy communities need mix and balance, and stability	7	Support A&B combination	8	each application for an HMO should be based on own merits and local consultation	1	Support C	2		
		HMOs help meet demand without depleting sites	1	HMOs should not be concentrated too much, but more central locations allow for a higher % as tend to be more densely populated and with young people and students	1	HMOs drive up house prices due to the multiple rent income generated beyond affordability for families	1	Support B	9		
		HMOs are a necessary part of housing provision in Oxford due to availability and cost. essential to the local economy	2	HMOs are fine if balanced with family housing and longer term residents	1	HMOs tend to request additional parking per property, often over-ruled at appeal if council refuses, this is contrary to the plan trying to reduce traffic	1	in option B what would 'appropriate locations be'. HMOs should be restricted in family neighbourhoods	1		
		the current 20% limit should be retained	10	Limit to 10% of frontages. if there is enough affordable/social housing, enough PBSA, then less HMOs needed and the market will return them to single use	1	many students have happily lived within and benefitted from experience of life in local community	1				

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				have varying thresholds depending on location	1	limit HMOs to a few areas	1				
				option A but define specific reasons and ensure community groups are part of decision making	1	purpose built HMOs in appropriate locations are better than ad hoc provision	1				
				Split into professional HMOs and student HMOs. student HMOs should be very limited if at all.	1						
				A but reduce the % to lower than the current 20%	1	stop allowing HMOs in residential areas	1				
				need a whole range of criteria, not just one metric of 20%. e.g. number existing, character of area, traffic	1						
H9 location stud accom	<b>Preferred Option - a)</b> Restrict locations where new student acc would be allowed to: existing campuses, existing student accommodation, city and district centres	Support and as car free must be in sustainable locations, enforced by a CPZ	1	No distinction made between undergraduate and graduate accommodation.	2	Too limiting, other locations should be considered as for visitor accommodation.	2	Support wider Option B - to include arterial roads. This would place student accommodation in locations with good accessibility while avoiding main residential neighbourhoods.	3		
		Support option A	39	Widen policy wording to make clear that student accommodation. is also supported on <i>proposed</i> campus sites		May limit graduate accommodation from coming forward in suitable locations.		Support option c (including from OU/OBU), evaluate proposals on a case-by-case basis using criteria set out in OLP.	10		
				Restricting the location of PBSA should not be done to the detriment of providing previously agreed identified need of student accommodation.	1	The University and Colleges should not be penalised, for reducing competition for other land in the city by releasing their own land and resources which can help reduce land values and speed up the promotion of sites to meet more general housing need, through land value capture.		Support relaxation of policy through options B or C as this would allow delivery of student accommodation of a range of suitable sites and acknowledge limitations on land availability in Oxford	2	Do not support option D which would significantly constrain delivery of PBSA	1

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				support continuation of existing policy approach which allows PBSA on sites 'adjacent' to existing campuses and includes support for allocated sites for PBSA	2	The university and students are assets. Don't mind students. They should have freedom to live where they like. No restrictions.	7	Support Option C to ensure OUS can expand and not constrained	1		
				Important that this policy does not become more restrictive than existing.	2	Focus should be on social rented housing.		Arterial roads as a sustainable location for student accommodation development should be identified.			
				Where colleges build PBSA, there is a desire to integrate new buildings with existing historic fabric of city. Determining land value capture equitably is more difficult when viewed over a longer time horizon (e.g. over 100yrs) and when there are higher build costs due to wishing to create newly built heritage for the city.		No expansion. Fear creeping institutionalisation. Have enough student accommodation already.	3	Support no parking. The alternative option to restrict locations to existing campus sites, student accommodation sites is preferable.			
				Policy should be drafted more flexibly to enable discretion in respect of such sites where local amenities and facilities are nearby and where Stud Acc would not result in harmful amenity impacts to the character of residential neighbourhoods.				Restrict to campus only so don't lose amenity elsewhere.	9		
				new student housing should not be delivered on sites which could deliver affordable homes.							

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				More PBSA has the potential to release existing houses (e.g., student HMOs) for use by families and workers in the city.							
				Graduates have different accommodation needs, especially postgrads.							
				Must be enough bike parking and sustainable travel access	2						
				Concern about design and need for expert design panel expressed.	2						
				Policies on student housing need to recognise that there are a large number of academic institutions which are NOT the two universities and about which there seems to be little knowledge of student numbers.							
H10 Student Accommodation and New Academic Facilities	<b>Preferred Option - a)</b> set thresholds for university students living outside of university provided accommodation and prevent expansion of academic facilities if threshold is breached. <b>and b)</b> Only permit new academic facilities that will facilitate growth in student numbers if it can be demonstrated how students will	Support a/b/a+b	3/13/2019	Council must make it easier for universities and colleges to provide student accommodation. Policy ok as long as it doesn't harm top universities.	2	not clear what is intended from Preferred Approach. Moreover, the Preferred Approach does not allow for future changes in the size and shape of the Universities, nor does it establish if there will be sufficient sites or capacity to allow the Universities to grow and support the knowledge economy as the Plan intends. H4 impact on viability is also not assessed.	1				

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	be accommodated.										
				Agree but make it strict so that only 3rd years and post-grads can live out.		Promote student developments outside the city at transport hubs.					
				Extend so university has to show how new workers will be accommodated and travel without cars.		Limiting accommodation for students is potentially discriminatory due to age.					
				Whilst a long standing approach it has failed because it has not been monitored properly-exacerbated as more part time and distance students. Policy should be around the % of the needs in purpose built student accommodation.							
				Decide local rules with community groups.							

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				Broadly support preferred option a) and b) providing the Council considers making policies relating to the location of new PBSA more flexible.		It is difficult to clearly identify if a new building is to support expansion or to support existing activity. The new test will introduce uncertainty into all planning applications if the purpose of the building is disputed. The test fails to meet the tests of soundness.	1	Universities support expanded scope of this option and include sites adjacent to existing campuses included.	1		
				Ostensibly good but needs thought as don't want to separate town and gown.		If a cap is needed policy H9 must be more flexible more discussion needed.	1	Support option c (no policy) - if policy to be included more dialogue is needed.	1		
				Support PO: but would also like to see this expanded to include language schools/schools/international colleges as well as Universities, given their recent expansion.	3	Danger of universities dominating too much.	1				
H11 Managing New Student Accommodation	<b>Preferred Option - a)</b> restrict occupation of new student accommodation to full-time students on courses of one academic year or more <b>and b)</b> Require a management regime to be agreed	General support part a/b	22/8	Broadly supports preferred option subject to removal of requirement for a management plan in relation to other occupiers (outside of term time). And criteria around car parking (dealt with by other policies).	3	Unis and students an asset and should not be restricted. Don't have management restrictions council can't manage them anyway).	4	Need more detail before supporting N.B. some students require transport for placements	1		
		PO b) will prevent speculative building of student accommodation.	1	No good reason for students to bring cars into city. Term-time vehicle data must surely show this.				More details needed	1		
		Support subject to reviewing detail of the policy- car free schemes need to be enforced by implementation of CPZ.	2	Support PO: but would like to see developers encouraged to include car provision in student accommodation.	1						

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				Universities should accommodate all their students - should not be allowed to profit from developing greenfield sites that are not necessary							
				part time and those on shorter courses should not have restrictions on living in student accommodation/more flexibility needed for part time/remote students/outside of term time (to maximise use/reduce Airbnb	5						
				Also ensure short term accommodation for university staff is provided.							
				Do not agree there should be parking restrictions (too restrictive/they just clog streets).	4						
H12 Gypsy and Traveller Accommodation	<b>Preferred Option - a)</b> Do not allocated sites and include a criteria-based policy	Support PO	13	Technical evidence to be prepared to identify future need within the city				Support Option B: clear need for a site for gypsy & traveller accommodation, to better meet their needs & manage unauthorised incursions. Needs to be discussed with surrounding districts. We should be searching for sites as they won't just come forward	3		
				Depends on what groups want and need. It's important these groups don't feel ostracised.	2			Existing sites should be expanded and maintained (improve existing Redbridge site)			

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H13 Residential Moorings	<b>Preferred Option - a)</b> Do not allocated sites and include a criteria-based policy	support PO	13	policy needs to be consistent with Canal and River Trust.		Should just be allowing all moorings, letting people live on the water.		Support Option B: Many people wish to live on Oxford's waterways for cultural / affordable reasons. More opportunities should be provided.	29		
		Canal and River Trust agree with approach that doesn't allocate sites.		Needs to be in combination with b.							
				Ok, but m sites should have- facilities., biodiversity, well managed sites, only boats in good condition.	4						
				Need to co-operate with neighbouring authorities to increase the number of moorings.							
H14 Elderly Persons and Specialist Housing	<b>Preferred Option a)</b> Include a supportive Criteria-based policy	Support Option A	37	Support encouragement for provision but leave up to the market to decide locations		Leave to market to decide location	1	Support provision of AH on larger sites to meet specialist housing need.		Option C could be detrimental to delivery if reliant on revenue funding first being secured.	
		The part ensuring quality is very important.	3	Support principle of mixed / balanced communities but difficult to comment until need has been identified. Some people may however have specialist needs best met in non-mixed settings.	1	Disgusted by ageist tone of the policies, with their clear bias towards the elderly, who are statistically the richest.		OLP provides opportunity to identify a specific site for older person's accommodation in some form	1	Alt option c on elderly person's accommodation and other specialist housing needs, implies the city Council imposing policy on large strategic sites outside the city. Please remove.	2
				Ok as long as people aren't forced into a community with people they don't relate to. . People should be able to stay in their own homes, with fast adaptations until they need nursing care. Fibre broadband to avoid isolation.	2	Don't do anything. People should be able to stay in their own homes. The market should decide.	3	It's clear there will be an increase in this group of the population so should require specialist accommodation.	1		

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				Incorporate parts of b/c too.	3						
				support option a with a more positive approach to include the amount of older people's housing needed within policy alongside a commitment to meet those needs. By recognising need and monitoring supply it would aid decision-makers and make plan more effective		Restrict elderly accommodation as there's enough- new should be for singles, couples, families.					
H15: Self Build & Custom House Building	<b>Preferred Option - a)</b> Require a proportion of housing on large sites to be self-build plots	Support	14	suggest the 12-month sales period is reduced as it is possible that certain thresholds of development may be completed sooner (e.g., a builder may have completed a 50-home development within 12 months and therefore wish to be off site).	2	Concerned that there will be delivery difficulties on some sites.		The Universities support a flexible approach to self-build housing. Not be suitable for all development types. Employer-linked housing sites, should not be required to provide self-build plots available.	1		
		Support but unsure whether it is viable in the city.		Interface with other policies needs careful consideration. Suggest a demonstration project is undertaken to work out what really works.		A need for self-build homes should not automatically lead to a requirement. Rather should encourage their provision.		Support <b>option C</b> a criteria based policy which support the approach but does not require custom or self builds	12		
				Support PO: but would like to see more larger sites for self-build coming forward. The smaller sites limit options.	1	As so many sites in Oxford are small it would be more effective to complement this approach with small site allocations could be combined with Option C	1	Support Option B or specific site allocation	1		

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				Need to have a robust understanding of supply. In some areas, sufficient plots come forward on windfall sites, in which case a supportive policy is required.		There is no reason to support self-build at all/only good if it's for co-operatives	4				
				Self-build register should be up-to-date. Potential to over-estimate demand.		Not good if lowers density. Could instead adapt flats for shared ownership or have o/s Oxford.	2				
				need to consider feasibility of all sites delivering self-build. Suggest that flatted development is excluded from self-build requirement.							
				Delivery of self-build plots can be difficult, including practical difficulties such as Health and Safety.							
				There are not enough opportunities for self-build.							
				must have the same requirements general	2						
				support aspects of PO, in particular re-marketing of unsold plots							
<b>H16: Community-Led Housing</b>	<b>Preferred Option - a)</b> Generally supportive policy. No specific requirements	Support PO	17	Community-led housing is vulnerable to viability arguments.		Do not support preferred Option. Not possible to deliver community-led housing through traditional methods. Does not appear to be proper understanding of this type of housing and the benefits it can bring.		Support Option C: providing officers ensure no abuse of policy. It could support greater densities / feasibility, and support communal facilities. Promotes sustainable living.	1	Option d) while positive, does not go far enough. Need to require provision of community-led housing.	

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				Need to consider potential for community-led housing on City Council land.		There should be no policy or requirement. No need, not a priority.	5	support option b) as best way to deliver. Suitable site size thresholds will be the key to ensure delivery success. Would support requirement for all sites not just large.	10		
				no relaxation of standards or requirements of any housing type. Community-led housing must deliver the same standards as all other housing.	3			Preferred Option should be a combination of options b) and c) however do not support that encouraged delivery of 'sub-standard' homes.			
								In favour of relaxing requirements	7		

Policy Options Set E1 to E9

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<b>Intro paras and wider context along with any other comments</b>				Plan period should be clearly set out in the LP2040, uncertain when the starting point is. Important in understanding how housing and employment needs will be delivered.	2	Lack of evidence about employment needs makes it difficult to respond in full but OUD concerned by prioritising housing over employment as its a key strand of OLP vision	2	WODC - support for employment sites being more sustainable outside of Oxford as would reduce congestion and travel - we would like to discuss options for accommodating employment needs with you. Policies in the plan should consider the mitigation of impacts arising from development of sites on the boundaries, early consultation is needed, S106 agreements should be used to ensure appropriate infrastructure is secured.	1		
				Significant demand for employment land in Oxford and Oxon. Current lack of supply in Oxford as demand increases and buildings are adapted to new uses.		In light of unmet demand concerned by approach to prioritise housing at expense of employment, given importance of encouraging new occupier to the wider economy of Oxford.  Oxford North capable of accommodating a significantly higher level of employment floorspace by making more efficient use of land and including areas of land that sit outside of the planning permission boundary.		The economic ambitions of the council should be scaled back and residential housing should only be built on brownfield land, offices and commercial space should be used for housing.			

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						Strongly disagree with unrealistically high figures in the Interim ELNA report (Lichfield's). Question the conclusion that the business-as-usual approach is the right approach for the LP to follow, employment projections too high. Does not take account of COVID, and the high proportion of office and R&D workers that work from home, which requires less floorspace needed.			
E1: Employment strategy	<b>Preferred Option - a)</b> Attempt to meet employment needs, but prioritise other uses, in particular housing, rather than employment, even if employment needs cannot be met in full.	Seeking to meet Oxford's employment need is vital to the local economy to meet market demand where it is generated, otherwise businesses will go elsewhere and possibly draw other existing businesses with them.  Important to retain employment uses in the city and seek to increase to meet the identified need especially if the housing figure is enhanced to maximise economic growth.	9	It is important to support the intensification and expansion of existing prime employment sites in and around the City, these can also be prime buildings and not just Category 1 or 2 employment areas.	3	PO favours housing over employment too much. Needs to be more balanced. Employment land is very important aspect of city and local economy.	1	Support Option B whereby employment-generating uses are supported throughout the city	4
		support preferred option from a transport and climate action perspective want to encourage less travel, supportive of 20 m neighbourhood approach	2	Oxford's contribution to the national economy seem to be constrained by a) recruitment difficulty owing to high cost of housing and availability of suitable premises. a balanced strategy is needed.	2	It is not appropriate to adopt a 'Business as Usual' scenario when considering the Oxford Economic Strategy and the Local Industrial Strategy. More ambition will be needed to fulfil the potential of the region and to ensure the region remains competitive internationally in key sectors. Not only will this mean discussions with neighbouring authorities about unmet employment need, but existing and proposed employment sites will need protected from competing uses. This is distinct from where mixed use neighbourhoods are purposely being encouraged, but not at the expense of strategically important employment space.		Support an approach that further examines the need for employment numbers, and space in the city. If needs cannot be met through allocated sites the 'windfall sites' in the city and discussions with neighbouring authorities must find solutions.	
		Support PO, the Local PPlan 2040 has an important role to play in meeting local housing need, but this should be balanced against the need to protect and sustain Oxford's knowledge & innovation sector. But clear need for more R & D space and innovation districts which are important to the national and global economy, Oxford needs to make its contribution.	1	It would be good to accommodate live/work models, with an emphasis on living close to where you work. Not just home working.	1	<b>Oxford Health NHS Foundation Trust:</b> Whilst a balance between employment and housing is acknowledged, it should not operate to the extent that Oxford's economic potential is compromised.	1	Support option D rely on national and other local plan policies.	1
		support option a, which would prioritise housing over employment provision	33	Any solution must be met within Oxford's boundary and not on green belt land.	1	Both options have downsides. Option A is potentially unsustainable and could increase the need to travel. Also has potential to reduce potential for organic growth of universities/ colleges. Whereas Option B lacks a proper monitoring framework.		OUS states if the City is to meet the terms of the Industrial Strategy and Oxford Economic Strategy, more opportunities for employment-generating uses will need to be found, this will require discussions with neighbouring authorities, but there needs to be an appropriate and evidenced balance struck in terms of provision.	1

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		Support option A, particularly support housing in spaces above City centre shops.	1	Support PO but consider that no further new employment sites should be proposed, as this creates more demand for housing.	1	Retain existing sources of employment & link to future housing needs. But do not encourage urban sprawl, growth or new growth / generating businesses.	1	<b>Logicor:</b> support option 'c' which seeks to apply protection to employment sites including warehouses & light industrial sites. Important to preserve a broad employment base, which is a strength of Oxford's economy.	1
		Supportive of policy, but needs greater support from schools & other community areas. The larger sites are generally chosen for vast land but are soem distance from amenities.	1	Important to consider difficulties faced by employers in recruiting and retaining staff. Balance therefore needs to favour housing provision over employment.	1	Do you need a policy as have E2 & E4	1	OUS support the principle of intensification but it cannot be at the expense of sacrificing the employment base unless provisions for such employment is made or there is a qualitative improvement in employment reprovision.	
		Housing could be on employment sites providing people are not tied to jobs.	1	But question meaning of 'attempt to meet employment needs', already plenty of jobs for people living in city. Intensification of employment sites could add to housing need. City Council should encourage redevelopment of existing employment sites into housing.	3	Not clear why there should be a change from OLP2036 which emphasises 'a strong need to protect existing employment sites' despite competing demands for land, esp. for housing. Both options should take account of international status of Oxford, otherwise there is a risk of underestimating demand for suitable employment land and the importance of this to the prosperous city.		Important to deliver housing but its delivery should not frustrate delivery of critical employment growth in the city centre on prime employment sites.	1
		Historic England support prioritisation of an inclusive economy, encourage explicit mention and consideration of the heritage sector and that LP should be proactive in identifying/exploring how it might help heritage sector recover. Also support need for ESP plans and encourage recognition of the role that traditional skills and the wider heritage sectors as one aspect of such plans.	1	Support this option to allow housing but wish to see a thorough assessment of all employment sites to explore development potential for housing on all or part of employment sites.	1	Need more housing in the city. Too little development has taken place on employment sites in the last five years. Employment need exaggerated previously (see CDWA rep for details). Some employment land could be redesignated for housing without impacting available space. Numerous sites including Business Park, Science Park, Osney Mead/ Oxpens and Oxford North could all deliver this.	5	Support option 'c' broad employment base	6
						<b>ARC Oxford</b> disagrees with principle of PO - must continue to promote employment generating dev. in city and invest in sustainable transport solutions to ensure access to employment opp. by means other than private car. ARC Oxford does however support employment land review to re-evaluate sites if required (see ARC response on Policy E2 also)		<b>BMW</b> support option 'c', provide a broad employment base and protect a wide range of employment-generating uses, including warehousing and small industrial uses as well as Mini Plant Oxford and Science Park.	1
						Oxford will have difficulties attracting a workforce with restrictions on travel & high house prices. Greater democratic freedoms needed.	2	Support option c	1
						opportunities for employment should not be restricted		Alternative option: focus on Oxford providing a broad employment base, protecting a wide range of employment-generating uses, including those that do not make efficient use of land such as warehouse sites & small light-industries as well as major sites, Mini Plant & Science Park.	2

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						Oxford cannot sustain current employment growth, it should be directed to other centres.	1	Support alternative option c: particularly the importance of protecting manufacturing uses	1		
						City Council should work with BMW more closely given anti-car approach	1	Need an approach that seeks to return underused office & commercial properties to housing stock	1		
						University provides many employment opportunities but housing for employees is lacking and should be a priority.	1				
						Important issues but don't see how the Plan can push against market-driven forces.	1				
						Do not understand, there are two alternatives proposed but should only be one.	1				
						Employment needs can be met through remote working, using less land. Employment growth should occur slowly, using existing buildings & facilities and not on greenfield sites. Promote more barriers to private car & restrict parking.	1				
						Public transport is key. Difficult to commute to work outside city by public transport.	1				
						Build whole communities not small congested areas.	1				
						If employment makes city unliveable, then shouldn't add new sites. What is lacking is employment for less skilled people in deprived area of Oxford. The jobs for tradespeople, delivery riders & creative artists need to be supported by skills development. Many will work from home or away from City centre.	1				
						<b>UBS</b> does not agree that housing should be prioritised at the expense of strategically important employment sites. Critical mass of employment sites important to delivery of Innovation Districts. City centre key location for knowledge economy uses.	1				
						Disagree, the plans for massive job growth will ruin city and its surroundings.	1				
						Slightly absurd to consider the Council can create any kind of employment other than for itself.	1				

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E2: Making Best Use of Existing Employment Sites	<b>Preferred Option - a)</b> Seek to meet employment needs on Category 1 and 2 sites, which are named in the plan. Where Cat 3 sites become available, allow their loss to other uses (including housing) <b>and b)</b> no new employment-generating uses outside of existing sites (i.e., no loss of housing sites to employment uses)	Support loss of category 3 employment sites to housing.	6	Policy should also seek expansion of existing employment sites and not simply within the current boundaries.	1	Concern about the scale / ambition of economic growth	1	Plan should provide a positive policy framework which allows key sites to deliver viable employment led growth. The need to present a justification over loss of any existing uses, which may be sought for protection as part of wider Local Plan policies, should be resisted.			
		support option A - important to retain as much employment use as possible, and seek increase to meet identified need. If housing need is however greater than employment need then support the loss of Cat 3 sites	9	Need to ensure that no negative impact on plan objectives through loss of lower value employment sites which could result in small businesses being forced out of Oxford.	3	The yield of homes under current policy has been meagre and maintaining this approach may not be flexible enough to respond to changes in market conditions. Document states the Oxford is the most sustainable location for jobs but it conflicts with the need for home these policies will result in more jobs in the city and people having to travel in which is unsustainable.	2	Support option c, which would provide maximum flexibility in terms of identifying land for housing.	12		
		<b>Logicor:</b> support option A, important to protect Cat 1 sites, such as the Mini Plant / Unipart given their contribution to national and regional economy.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Support for local businesses critical. City centre retail should be re-let and Botley Rd developed for Affordable housing. Concern about LTN's and bus gates.	1	Support option 'c' which allows jobs in Mini Plant but also for small businesses	1		
		<b>ARC Oxford</b> support and has undertaken studies that confirm potential for intensification, modernisation and regeneration of some of its plots		Support the PO but need to show how the Plan will meet employment need. (OUs cf response to E1	1	<b>ARC Oxford</b> does not think Option C would work, need to retain categories of employment sites to assist with creation of complexes as ARC Oxford.		Support option 'd'	1		
		<b>Oxford Health NHS Found:</b> Support Option A, since the exceptional strength of Oxford's economy, in life sciences means the city should seek to optimise its potential and contribute to the national and international economy.	1	Support PO but must include a requirement to provide housing on site where possible for Hospitals & Universities.	1	The PO does not allow the flexibility to build housing on low-density retail sites.	1	Alternative option: do not categorise sites. Instead provide protection for by Use Class, focusing on protecting locally important (B2) employment sites to ensure a broad economy. Do not try to prevent loss of Class E, except in District centres through frontage policy. Class E is very broad and now allows c/u to residential.			
		Support PO a & b	6	Support: but complete loss of Cat.3 sites should be considered desirable.	2	Do not understand, there are two alternatives proposed but should only be one.	1				

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		<b>BMW</b> support both option 'a' and 'b' and the focus on the importance of Cat.1 sites and not allowing their loss.		Request that 234 Botley Rd (New Barclay House) is categorised as an Category 1 employment site		housing should always be prioritised over other uses	1				
		Support option b	3	Request that Botley Rd Retail Park is categorised as an Category 1 employment site - given increasing significance of this location for new employment uses.		there are limited options & no vacancies in South East.	1				
		Support PO subject to 100% renewable energy and policy approach to phase out private car parking and promote more sustainable travel modes.	2	Support option A but to be effective policy needs to be supported by other policies in the plan. <b>Oxford Science Park</b> concerned that without a co-ordinated approach to infrastructure investment in the south of the city, this policy would not be effective. Further evidence needed on why use Class B8 is excluded from policy option A, and extent to how this complies with PPG.		<b>UBS</b> supports general aspirations but questions ability to meet all employment needs through intensification/redevelopment of Cat1 & 2 sites only. These sites should however be protected solely for employment uses.	1				
		Support option 'a' given potential regeneration benefits to poorer areas of city.	1			Already large influx of employment into city, better to build housing on housing sites					
		Support Option A, but needs to be supported by comprehensive survey of property / space available, resulting from more staff working from home. Focus should be on R & D / Lif Sciences & key sectors of Oxford's economy, but allowing for diversity.	1								
E3: Allowing housing on existing employment sites	a. Allow an element of housing delivery on existing employment sites	Support option A - but policy duplicates part of E2, therefore is a standalone policy needed?	2	Support flexible approach to providing housing on employment sites.	1	When a site is only academic e.g. OU science area housing would not be appropriate	1	<b>BMW</b> support option 'b' since housing on Mini Plant Oxford is not appropriate.	1		
		support option 'a' because of the priorities given to the delivery of housing	25	PO does not allow for housing on former retail sites	1	This approach in OLP 2036 has yielded limited housing	1	<b>Logicor</b> support alternative option 'b' concerned about potential loss of employment sites to housing, important to ensure firms can continue to contribute to the economy.	1		
		Support PO. Locating housing close to jobs can bring benefits for local services.	3	Support 1a but question meaning of 'attempt to meet employment needs', already plenty of jobs for people in city. City Council should encourage redevelopment of existing employment sites into housing.	1	where are these sites when employment sites are functioning	1	Support option B	1		
		Support option 'a'	12	There could be scope for allowing some housing on employment sites provided it supports the economic function.		<b>UBS:</b> opposed to blanket approach to allow housing on all employment sites. Plan should protect all cat1 and 2 sites solely for employment.	1	Support option b City Council should work to retain integrity & availability of employment sites	5		

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		Support Option 'a' plus desire for more mixed-use developments with shops / offices on GF with residential above.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	<b>Oxford Health NHS Found:</b> Disagree, need to optimise development on existing sites particularly hospitals. Collaboration between hospitals, Universities and commerce defines the exceptional contribution that Oxford can make to national economy.	1	Policy approach should not leave commercial property vacant but use them for housing.	1
		Support option 'a' given potential regeneration benefits to poorer areas of city and benefit 15 min city concept.	1	Support PO providing there is an assessment of the impact of his housing on existing residential areas.	1	OUs object policy should not be applied in a compulsory fashion to non	1		
		Support, consider residential should be built at Science & Business Parks, with accommodation above buildings.	1	Build housing above employment sites, so not losing employment. Housing above Mini Plant car park an idea.	1	OUs state this would be distinct from a specific mixed use objective for a site, agreed with a landowner.	1		
		Support mix of residential and commercial uses	1	Focus for residential should be on empty employment sites and vacant sites. Others left alone.	1	Hope small shops won't be priced out by housing.			
		Support PO subject to 100% renewable energy and policy approach to phase out private car parking and promote more sustainable travel modes.	1	Support but consider the three Headington Hospitals have large amounts of car parking that should be used for employer-linked housing. Any other spare land not used for employment should be used for housing.	1	opportunities for employment should not be restricted	1		
						Policy approach appears to support conversion of offices and commercial properties to residential	1		
E4: Location of new employment uses	<b>Preferred Option - a)</b> Support new employment uses through intensification and modernisation of existing sites <b>and b)</b> Do not allow new employment generating uses outside of existing sites	Support Option A as the most appropriate places to intensify and modernise to provide new and additional employment space	13	Add in OU Collegiate sites to list		Need evidence if this policy is to be effective. Changes to UCO is a weakness not sufficiently recognised. Some employment sites might be better for housing.	1	OUS objects to this policy	
		Support Option A intensification and modernisation play an important role in regenerating areas of the city and making more efficient use of land. Support Botley Road Retail Park to help meet R & D need in the future.	1	Intensification of use must be accompanied by housing where ever possible. No disincentive for Universities and Hospitals to continue expanding, which have resulted in considerable infrastructure costs, which do not necessarily benefit wider community.	1	Release employment sites for affordable housing.	1	Support option D	1

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		Approach would retain a geographic focus of employment uses in existing centres and employment locations. May provide capacity for much of the employment space needed without requiring additional land which could be used for other purposes. One potential departure from this could be any development opportunities at the new rail station.	1	Until unmet employment and housing need are known these options should be considered	1	Not enough detail provided	1	Support option 'c'	3
		Support PO subject to walking & cycling provision made & limits on private car use.	1	Support Option A - but q. whether policy is required in addition to E1 - could it be instead of E1?	2	No intensification of sites, already heavily built, hospitals	1		
		support option b	2	Take opportunities to improve transport links	3	Loss of housing land for new employment creation should be strongly resisted.	1		
		Support both a & b, option b considered crucial	6	Policy should also allow expansion of existing employment sites	1	Do not support office / R&D in the West End or Oxpens	1		
		<b>BMW</b> support option 'a'	1	Innovation clusters must include arts buildings & organisations, to reflect the collaborative approach to research between the arts and science.	1	The lease of land and businesses is essential for economy but come at a cost of losing land for housing.	1		
		UBS supports Preferred Option focusing on optimising output and value of key employment sites. Greater flexibility could be allowed on other less valuable sites.		These policies should be set in the context of traffic filters into the city & site-specific characteristics. Intensification of employment uses along Botley Road / Osney in the absence of lower parking levels will compromise sustainable & active travel aims. Strategic sites such as Osney Mead Estate should be considered as mixed-use allocations with residential and retail together with employment.	1	<b>Historic England</b> object, flag that text needs to acknowledge intensification may be constrained in some locations - e.g. where it leads to unacceptable harm to historic env.			
		Support Preferred option both 'a' and 'b'	3	Any solution must be met within Oxford's boundary and not on green belt land.	1	No new employment sites or intensification / modernisation of existing sites should be allowed, unless employer can show no extra car journeys are generated. No parking to be allowed, with employees needing to use public transport or active travel, funding sought for new segregated cycle lanes.			
		<b>Logicon:</b> support Preferred Option (a & b) intensification of existing brownfield sites offers most sustainable approach to development.	1	If sites are intensified then need to improve access to and from sites, such as JR2 now impossible by car	1	Housing needs should be prioritised over employment needs.	1		
E5: Warehousing and storage uses	<b>Preferred Option - a)</b> New B8 uses on sites not already in the lawful use only allowed where use is essential to the operation of a Category 1 site <b>and b)</b>	<b>Natural England</b> pref option a in comb with option c. With regard to pilot of freight consolidation - would be happy to provide further comment on this policy when detail is provided regarding the possible locations of the centres and any potential impacts on designated sites		OUS support all employment needs being met.	1	Do not understand terminology B8 or Cat 1?	1	Support option 'c' & progressively reduce B8 sites. Promote freight cargo options. Develop B8 sites for housing and develop network of walking and cycling routes & limit private car parking	1

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	introduce a specific exemption to Option A to enable a pilot of freight consolidation										
		Support both a & b. Option b needed for freight consolidation, net-zero, air quality & cycle safety	10	Support option but there is also need to recognise need for B8 uses.	2	Property is at a premium & investments massively oversubscribed.	1	Support option 'c'	4		
		<b>ARC Oxford</b> agree with a and b but might not be case on other employment sites and a general presumption against B8 uses should not be resisted whether they are not detrimental (option c).		Support option A but if more traffic on SRN this must be modelled with a worst case scenario in terms of trip rates.	1	Reasoning & options ignore the accelerated transition from shopping to deliveries. Deliveries to homes reduce the need for a car.	1	Support option 'c' but prioritise use of warehousing sites for housing.			
		support PO a	3	In exceptional or essential circumstances (to be defined), sites may be designated as lawful use.		<b>Logikor:</b> question preferred approach. Options supporting text refers to reducing inequalities, policy approach should therefore encourage flexibility & diversity. B8 uses have a key role to play in ensuring mixed & viable industrial sites. Seek re-wording on policy that does not automatically exclude B8 uses, particularly Cat 1 sites and allow for modernisation / regeneration and expansion of B8 uses.	1	Support Option E	1		
		<b>BMW</b> support option 'a'	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Let market decide. Change of use from B8 to other uses should be allowed, regulation not required.	1	Don't know	1		
		Support option b	2	Support option 'a' but with the proviso that a requirement should be added to consider the impact of new B8 uses on traffic & environment.	1	Would not support Freight consolidation centre on green-field sites.	1				
		Support option 'a' recognised that Oxford has delivery needs within its boundaries but may ultimately require freight consolidation hub to manage these needs and to promote active travel.	1			Release warehouse sites for affordable housing.	1				
		Support Preferred option but will require City to work actively with neighbouring authorities to help meet logistic / warehousing need for Oxford.	1			Impossible to respond to incomprehensible set of proposals.	1				
		Support PO but need to ensure that it fits in with sustainable transport options.	1								
		Support option b on freight consolidation although need several sites across the city.	2								

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	Page 74 - Para 3.20	Reference to the Oxford Living Wage, this is not a planning matter, doesn't need to be controlled by the LP	3								
E6: Employment and Skills Plans	<b>Preferred Option - a)</b> Introduce a policy requiring applicants to submit an Employment and Skills Plan	Support requirement for Employment and Skills Plans. Such plans have significant positive impacts on the local economy and will contribute to reducing inequalities through additional training and support.	28	Suggest that careful and enforceable details are established to make sure promises given at planning stage are delivered for the benefit of the city.	1	Do not encourage or require an ESP	2	Facilitating green skills centres can increase skills in green technologies.	1		
		Support option 'a' but alongside skills development with a focus on Blackbird & Greater Leys to help reduce poverty.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Loophole for developers	1	<b>BMW:</b> support option 'b' to encourage CEP's			
		Supportive of PO but need to ensure that you create educational partnerships with University & Colleges. This will benefit employee and employer alike by offering transferable skills / qualifications.	1	Support PO but could go even further	1	Ambitious plans that never help those intended, which talk up reasons for development.	1	<b>Logicor:</b> support option 'b' to encourage CEP's, PO overly restrictive.			
		<b>UBS</b> supports aspiration for providing affordable workspace but consider it should be encouraged rather than made mandatory. If policy does make it essential it should be subject to viability testing.	1	Suggest a TAN is produced that includes a template, criteria and best practice examples		more red tape / bureaucracy	2	support option b	5		
		<b>Historic England</b> support prioritisation of an inclusive economy, encourage explicit mention and consideration of the heritage sector and that LP should be proactive in identifying/exploring how it might help heritage sector recover. Also support need for ESP plans and encourage recognition of the role that traditional skills and the wider heritage sector as one aspect of such plans.		More consideration should be given to the sort of jobs created that are sustainable. Greater need for retrofitters rather than builders.	1	unfeasible and likely to be ineffective	1	Support option c	4		
		Support PO - especially in areas of low educational attainment i.e. Littlemore		More details as to scale and type of employment requiring an E & S Plan	1						
				Depending on policy wording - could be more difficult for R&D development that draws on a wide range of skills. Further evidence required on how a mandatory planning requirement would be justified and relevant to companies in R&D sector given increase in companies developing their own Environmental, Social and Governance (ESG) strategies.							

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				This policy may be encouraged rather than enforced. The affordability of land will be important so as to enable employers to seriously consider their commitment to the local employment market.					
				Too easy for employers to comply with letter of policy but not spirit.	1				
E7: Affordable Workspaces	<b>Preferred Option - a)</b> Introduce policy requirement for affordable workspaces to be delivered as a percentage of all large commercial development <b>OR b)</b> Encourage employers to deliver affordable workspaces <b>OR c)</b> Do not incorporate affordable workspaces concept into plan	support option a	18	Support option a but not on greenfield sites & promote live-work uses on car parks and industrial / science sites.	1	Option A not supported - the imposition of a % for all large commercial dev. in Use Class E would significantly reduce flexibility/ ability to ensure optimal uses at the most appropriate sites.			
		Support option a: it would secure maximum affordable workspaces, but LA should be prepared to refuse applications. Mechanism for delivery not clear, needs further policy development. Similar approach should be applied to retail units to make them more affordable, to encourage independents.	1	Encouraging an element of Affordable workspaces may not be appropriate on all sites and could have an adverse impact on delivery.		Affordable work space is a thing of the past as people are working from home	1		
		Support option 'a', together with a clear mechanism & viability evidence so that policy approach can be promoted.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	more red tape	1		
		support option b	9	There should be greater use of currently redundant spaces for affordable workspace.	1	More definition is needed as to what this is	2		
		Support option C	1	This requirement should be delivered through site allocations/masterplans	1	Must be market-led. Should not set percentage on large schemes. Could be affected by viability. Encouragement will maintain a market-led and flexible approach.	3		

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		Support option C - a policy requiring affordable workspaces as a % of all large commercial developments would not be appropriate to a science park location where individual dev. need to be seen as part of a wider ecosystem.	1	Affordable workspace not solely to do with size of space provided but the interplay other factors. Some of which sit outside of planning controls.		Do not encourage or incorporate concept of affordable work space.	2				
		<b>Logikor</b> consider options 'b' & 'c' to be the most appropriate approach. There needs to be a balance between policy compliance & viability. More nuanced approach required which recognises employment site categorisation, together with an understanding of the environmental and economic considerations.	1	Important that quantum of affordable workspace a development should consider is always subject to a viability assessment, plus consideration is given to appropriateness of uses being able to accommodate affordable space due to layout and neighbouring occupiers. Also important that the policy does not specify a specific stage when the affordable workspace should be delivered, this could compromise scheme viability esp. for schemes that are to be delivered in phases.	2	Council's should subsidise art spaces to be 'inclusive' and provide opportunities for all to add to culture of Oxford.	1				
		support - such an approach would likely secure the most affordable workspace and help facilitate an inclusive and diverse economy	2	Defining 'affordability' is challenging, flexibility is key, co-working space, licenses not leases and business support.		Unnecessary complication, focus should be on housing and environment.	1				
E8: Short-stay accommodation (new)	<b>No Preferred Option -</b> <b>a)</b> Allow new sites for holiday and other short-stay accommodation in the city and district centres and on main arterial roads <b>OR b)</b> Allow new short stay accommodation in city and district centres only <b>OR c)</b> Support new accommodation anywhere in Oxford <b>OR d)</b> resist new short-stay accommodation anywhere in the city <b>OR e)</b> No Policy	Support option A	16	Arterial roads as a sustainable location for visitor accommodation development should be identified. Need tight parking policies to control parking on street.	2	If housing is a priority for Oxford no short stay acc should be allowed	1	Requires research into city's tourist capacity to be able to give an informed opinion.	1		

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		Support option 'a', but feel it would be hard to sustain if bus gates are introduced.	1	Any solution must be met within Oxford's boundary and not on green belt land.	1	Additional policy required for developments of more than 10 units for holiday & short-stay accommodation a financial contribution should be sought for affordable housing.	1				
		Support a & b but exclude Airbnb's	2	Short-stay let's should be licensed.	1	City has enough short-stay accommodation, focus should be on local residents. But any further need should go to P & R's	1				
		Support more short-stay accommodation in principle, in combination with a reduction in taxation of Airbnb's. Support tourist tax on hotel bedrooms.	1			New developments should be on allocated sites only	1				
		Support option 'a' and to a limited extent with the aspirations of option 'b'. Coach parks should be located next to P & Rides. City centre hotels should provide small transport vehicles for guests. New accommodation encouraged in City centre, rather than outskirts of Oxford.	1			Oxford too crowded. Benefits of tourism do not outweigh the negative impacts of increased traffic, pollution & crowding.	1				
		Support 'a' which controls short-stay accommodation but does not resist it.	1			Support short-stay accommodation only on allocated sites	1				
		Support Option b	6			Oxford has lost too many amenities in City centre to hotels, loss of Boswells. Other beneficial uses should be found	1				
		Support option c- this would encourage improvements of peripheral neighbourhoods & make more amenities viable	1			Needs to be a presumption visitors will come to Oxford by public transport. So sites need to have easy access to Central Oxford by bus. Hotels with parking only supported on or near ring road.	1				
		Support option 'c' but need more cheap B&B accommodation.	1			Ban / restrict Airbnb's	6				
		support Option c - short-stay accommodation anywhere	2			Turning large long-term empty homes into short-stay accommodation would be acceptable, but not building more hotels at the expense of affordable housing	1				
		Support option d	6			Hotels are good for tourism & housing those unable to access property that results in expensive costs.	1				

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		Support option 'd', given priority for housing consider new short-stay accommodation should not be allowed since the land could be used to meet housing need.	1			There has been a lot of new hotels being built in Oxford, why is there a need for more.	1				
		Support option d as it is important to control the loss of residential properties.	10			Disagree, not clear that there should be a policy, why is existing framework not sufficient?	1				
		Support option d: hotel rooms already increased significantly in recent years. Concern about potential damage to housing rental market from Airbnb & guest-houses. Option b on non-residential sites would provide a sustainable approach.	2								
		Support option E	2								
E9: Short-stay accommodation (existing)	<b>Preferred Option a)</b> Do not include a policy protecting existing short-stay accommodation in the city	support PO	9	A degree of flexibility is required to enable delivery of other plan priorities. Ensure parking is controlled	2	Not sure of meaning	1	Letting the market decide could have a detrimental impact on tourism across the county	1		
		<b>Historic England</b> encourage Council to strengthen evidence base on heritage tourism i.e. helping to identify the contribution made by the city's heritage to the tourism (domestic and international)		Any solution must be met within Oxford's boundary and not on green belt land.	1	Do not expand short-term accommodation	3	Reject PO but support option b which aligns with vision of encouraging tourists to remain in Oxford to contribute to local economy. Level of need must be established and policy reflect it. Suggest introducing tourist tax to be used to mitigate environmental impact & promote better wages for those working in tourism sector.	3		
						Problem with Airbnb's	1	Support alternative option 'b'	6		
						Short-stay accommodation consequence of broken families, deprivation and refugees	1	Support alternative option 'b' but with a requirement to promote a range of accommodation and a sustainability requirement.			
Tourism general comments						Ban Airbnb unless in spare room of house.	1	Support option B, but only to protect existing accommodation.	1		
						New short-stay accommodation means more jobs & less space for housing.	1	There should be a policy protecting existing short-stay accommodation, while not allowing expansion of existing short-stay accommodation; to ensure potential residential land is not developed on.	1		

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								Protect existing short-stay accommodation, visitors important to local economy	1		

## Policy Options Set G1 to G10

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Intro paras and wider context along with any other comments		support defining G & B infrastructure network	3	Which spaces are under threat, most spaces are in floodplain +/- GB and thus protected, policies should respond to context and also consider sites beyond the city boundary that support policy objectives.		The OLP lacks vision to tackle climate change and support BNG which should be 20%					
				No opportunity to designate a local green space (as per NPPF) or to comment on performance of current net gain policies.		The plan should ensure there is appropriate protection for SSSIs, LWS and SLINCs a SPG should be written to safeguard these crucial water supplies					
		County - city internal officers must engage with County officers in drafting policies.		Support for ambitious policies, which improve on policies in previous Local Plan. Particularly welcome greening urban area & ensuring greater access to nature for all. Concern however about exemptions, which may allow developers to circumvent these good policies. But chapter does appear to be focused on mitigating impact of climate change, rather than measures to prevent it.	1						
						Any additional restriction should be based on quantifiable benefits and national policy standards, not opinion.	4				
	Para 4.28	strong support for this to support those living in poverty	1								
				No specific mention of hedgerows in the policy, needs to be rectified.	2						
	Fig 4.1	Plan limited to Oxford boundary and does not appear to take account of access to green spaces on the edge of the City. This may have resulted in a skewing of the outputs. Account should be taken of accessibility to land outside city boundary.	3								

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	Fig 4.2 -4.3	Figure 4-2 (Options Paper) and Figure 14 (OCC Green Infrastructure Study 2022) incorrectly show Headington House as green space although it is almost invisible, and omits Ruskin Field (Site 463) which has high amenity and green corridor value. There are multiple errors in the entire study which presents no details as to its methodology or how it reached its conclusions, it is not fit for purpose and must be given a competent company to do correctly.				The GI Network (Fig 4.2/4.3) shown bears no resemblance to reality. The only green space allocation should be via a site allocation in a Local Plan and this should be wholly exceptional.					
		The GI Network (Fig 4.2/4.3) shown bears no resemblance to reality. The only green space allocation should be via a site allocation in a Local Plan and this should be wholly exceptional.		Involvement in the LNP will help to radically enhance nature in the city and its positive impact on climate	1						
	Paras 4.1 - 4.6			<b>Historic England</b> feel there is a risk that focus is too narrow and could miss opportunities for natural env and historic env to be considered together. Feel that historic env considerations in GI section are lacking. Para 4.6 mentions constraints but does not mention registered parks and gardens, HE emphasises need to consider connections holistically.		The figure 4-4 showing sites of ecological importance on the GIS 2020 is laughable, bearing no resemblance to reality.					
G1: Protection of GI network and green features	<b>Preferred Option -</b> a) Identify network of green and blue infrastructure for protection, informed by the GI study b) In addition to the network, have a series of separate policy protections based on different types of greenspaces. <b>and c)</b> only allow loss of trees, hedgerows, woodlands where it is clearly justified	Support preferred options	34	<b>Natural England</b> Consider that all the identified green spaces, and others which may not have been identified, will have importance for a variety of reasons and recommend policy supports the protection of all existing open space typologies regardless of if they are part of the network or not, particularly due to the difficulty in creating new green space. Should ensure allocations do not conflict with protected GI or at least ensure that sites retain network and offer betterment. The GI strategy can identify where funding is needed for targeted improvements e.g. biodiversity and reducing inequalities in access to GI. Plan should avoid building on open space of public value as outlined in para 97 of NPPF.		County - we recommend policy approach most effective in protecting and enhancing GI, also consider how connections between POS can be added to the network, e.g. tree lined streets, watercourses, PROW. PO should be a, b and c. It is essential that playing fields are protected.	1	c) OU object to option not positively prepared. Include potential to improve tree planting			

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		<b>The Woodland Trust</b> supports the preferred options A, B and C above. Having a defined network of green and blue infrastructure sites is vital to understanding and delivering nature recovery across Oxford and into surrounding districts. Within this network, it is important to define and protect biodiversity sites, natural greenspace, and in particular as identified in option C, woods and trees. Oxford City and the county of Oxfordshire have some of the lowest tree canopy cover in the South East, yet increasing canopy cover has been identified by the UK Committee on Climate Change as essential.		It is best to define open spaces individually rather than apply a blanket GI approach. Clarify which sites are under threat which don't have protection.	3	Blanket approach too onerous and would prevent delivery of affordable sustainable homes.		Support e) which either defers to national policy or provides a very specific look at individual cases.	5	No to Option D	
		support option a	2	<b>Natural England</b> suggest that consideration be given to extending the policy to include features included in the proposed protected GI network and any priority/irreplaceable habitats within the plan area, for example Urban Mosaic Habitat		There is a policy omission – the Local Plan needs a specific new policy on hedgerows. Specific mention and targets relating to hedgerows should be added in, with both protection for existing hedgerows but also commitment to the creation of new hedgerows.	5				
		Support option c	16	Preferred option “a+b+c” sounds reasonable, but the green/blue network is very narrowly defined in the Local Plan 2036 and excludes many important green areas such as the Barton Triangle and Ruskin Fields, and other areas worthy of protection. It is also contradicted by the greenbelt/field policy (Policy Set S2) above.		Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.					
		Support option B	3	<b>Oxford LNP</b> state that it appears that the proposed Green Infrastructure Network corresponds well to the draft NRN mapping. Suggests further analysis of any differences which might result in minor adjustments to this network to ensure closer alignment, resulting in a more coherent strategic environment and delivery of further additional benefits.		We draw attention also to Oxfordshire Treescapes Our Land, Our Future report which says that meeting the 40% increase recommended by the CCC means: “Increasing the proportion of the county’s field boundaries that are hedged from 47% to 66%, giving us 18,200 kilometres of hedges compared to the current 13,000 kilometres”.					
		<b>Environment Agency</b> support combination of a, b and c but feel that option b should more strongly reflect protection of rivers/streams and their riparian corridors including guidance for developers, expectations on ecological buffers, long-term management plans and opportunities for de-culverting. Examples of recently adopted policies elsewhere provided for illustration - see their detailed response for more info. Under option c, they propose adding 'rivers and stream corridors' to policy wording not granting proposals that involve their loss (alongside ancient woodland/ancient/veteran trees).		<b>Oxford Preservation Trust (OPT)</b> would support preferred Option b to ensure that green spaces and the infrastructure are strongly protected. Option a does not provide a clear definition of what constitutes a 'green space' and so option b would provide more clarity and detailed guidance. The purposes and roles of different types of green space vary, and their nuances would not be picked up by an overarching general policy. For example the purposes of the Green Belt are different to the purposes of an allotment.		<b>Historic England</b> object, want new OLP to continue current approach recognising historic sites form part of city's GI network. Flag that use of term 'designated' sites needs to be careful not to cause confusion (e.g. could be various reasons for designation - environmental or historic). Repeat emphasis of need for holistic approach, reference to loss of hedgerows/trees does not currently reference historic environment for example.					

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				Policy should favour community governance of amenities of at least certain types of green space	1	Preferred options but not c). Enact a City wide Tree Preservation SP Guidance for all trees over 6 feet in height. Strong constraint on avoidable cutting back of such trees, with consent required from the Council when specific conditions are met eg any actual risk to the public; actual existing blocking of footpath or road; only outside the nesting season unless conditions are considered to be exceptional; fines for any evidence of deliberate tree damage to secure removal, which should be substantial to deter others, etc.					
				On new developments, developers should be required to plant hedgerows and hedgerow trees around the borders and be obliged to protect and maintain them for at least the first five years.	2	Broadly supportive, but why is the Council not inviting respondents to identify sites for identification and protection as Local Green Space					
				would welcome bespoke policy on hedgerows setting out increases of 40% by 2050	2	But the Green Infrastructure papers for the Local Plan 2040 are inadequate because they fail to identify sites that should be included. In the Old Headington area, Ruskin Fields and the JR site should be included. There are no doubt similar areas in other parts of the city.					
	Other	<p><b>Natural England</b> have flagged the requirements of NPPF around need for strategic approach, and have also flagged the new Green Infrastructure Framework which is being launched in Jan 2023 and should be used to help inform LP along with the local data and tools.</p> <p>They welcome the continued high level of inclusion of Green Infrastructure considerations throughout the Local Plan 2040 consultation and supplementary documents, and the recognition of its importance in achieving the overarching aspirations of the Local Plan 2040. Also welcome the production of the Green Infrastructure Study 2022 and the identification of a potential green infrastructure network for the city. Also encourage management and maintenance arrangements for existing and new GI to be built into the GI strategy.</p>		<p><b>Green Party:</b> Generally support PO, but concern that option a allows "poor quality spaces" to be built on. Appears to contradict para.4.8 &amp; option b, which would see spaces afforded different weights. More clarity &amp; detail needed.</p>	1	There is, however, a policy omission to this option. In addition to the protection of trees, woodland and hedgerows there also needs to be consideration given to the protection of important freshwater habitats and minimising detrimental impacts on waterways.	4				
				Need to protect green spaces in the city. Council has an obligation to consult with the local community about these spaces, but has not done so. Green spaces are important for residents and are being lost at an alarming rate. Contradicts the Council's claim that they are seeking to protect important green spaces.	5	Safeguarding of the natural environment, its wildlife habitats and preserving local green spaces is very important to many people. No overall strategy for preserving habitats and enabling connectivity through wildlife corridors. Decision-makers do not seem to be listening to these concerns.	7				

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				Under preferred option b waterspaces should be included. Any emerging policy should recognise the different issues and constraints relating to canals and rivers and recognise them as multi-functional GI spaces. Any policy should be written with the agreement and cooperation of the Canal & River Trust and Environment Agency and recognise that different types of waterway may have different requirements.		Consider the protection of green and blue infrastructure is not secure in new Local Plan 2040 approach. Need /provision of housing appears to override all other considerations such as flooding and Climate Change.	1				
G2: Provision of new GI features	<b>Preferred Option - a)</b> Require green and blue infrastructure features on all new development	support preferred option and maximise opportunities for innovation - green roofs/walls et	27	Option A is most flexible approach. Most sites in city are constrained. An onerous standard for open space may render constrained sites incapable of delivery. Account should be taken of ability to access open space within a reasonable walking distance of the sites. Flexibility is key to the success of this policy.	6	Concerned that PO would be very complex and difficult to understand/ manage by both developers and planners.		Support Option b) because some smaller developments have significant issues with viability and other constraints.	2	do not support option d	
		<b>Woodland trust</b> - Support the preferred option and would strengthen with requirements for a) a target % for tree canopy cover, as a minimum on larger/less urban sites. We commend the exemplary Canopy Cover SPD adopted by the former Wycombe District (now part of Buckinghamshire Council). b) access to natural greenspace including standards for woodland access. The Woodland Trust has produced a model Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: - That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. - That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.		It is not clear from the consultation document how much urban greening would be required through the use of the Urban Greening Factor, whether this would area specific, or how it would relate to the 10% Biodiversity Net Gain (BNG) required by the Environment Act.	2	Potential administrative burdens on applicants through overlapping policy areas and potential viability concerns.		Support Option B - inclusion of principles enables requirements to be flexible	1	Do have a policy but no strong opinions on which	
		<b>Environment Agency</b> support option a highlighting that tailored requirements would enable considerations on specific sites in relation to topics like re-naturalisation of river/stream banks; buffer zones to promote connectivity between green spaces and rivers; re-connecting rivers with flood plains and creating wetland habitats. Also state that rivers and streams should be included in the Defra biodiversity metric where relevant and a baseline should be created through an appropriate river corridor survey. 10% net gain should be achieved in each of the unit types.		Not possible to state preference as further detail required. For example what percentage of green space etc.	3	Long-term maintenance required wouldn't match limited value for biodiversity and access by residents.	1	Support option b - larger developments potentially offer the biggest opportunities for achieving new, worthwhile open space in the city - ensuring these are captured with a requirement for a specific level of open space helps contribute to new open space provision.	2		
				Necessary to establish a suitable measurement baseline. Risk of 'double-provision', without careful management, which could impact viability.	2	Option C not flexible enough ( as PPG17) to maximise GI and open space in Oxford		Support preferred option, but alternative might also work			

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				<b>Oxford LNP</b> strongly supports the approach to prioritising areas that could benefit from green infrastructure. This rounded and equitable approach addresses areas most at need, and where most benefit could be delivered in terms of health and wellbeing.	1	<b>CBRE on behalf of Redevco</b> do not support Option A because it requires GI and BI to be specifically quantified against targets not accounting for site constraints and making the most of opportunities. Option A may prevent the optimum GI and BI to be put forward, missing site specific opportunities because of stringent requirements		Prefer Option 4: Do not include a policy for providing new green infrastructure, defer to national policy/standards.	3		
				<b>Green Party:</b> Generally support PO, however like to see further details on how decisions about appropriate amount of blue/green spaces are made & about "bespoke tools".	3	A Hotel or business would not want any green space for example		Open space requirements should be required on sites over a certain size. To avoid hindering the redevelopment of previously developed land we consider public open space should not be required on sites of under 0.5ha in urban areas.		We request that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places.	
				Need to take account of existing under-provision in certain parts of city	2			Support option c - but why considered detrimental			
				<b>Historic England</b> are looking to ensure that new GI also takes account of and integrates positively with the local historic environment. Flag that the provision of new GI needs to be sensitive to place. Careful consideration and planning are needed to ensure that any targets do not result in unintended consequences - e.g. avoid wrong tree in wrong place.	1						
				<b>ARC Oxford</b> consider option a to be too subjective - flexibility needed for site specific circumstances. Policy also not clear as to the level of urban greening that would be required through use of UGF plus whether it would be area or use specific plus how it would relate to the 10% BNG. Plus without knowing the level of greening that may be required on site its difficult to now how it may impact on development viability.							
				Oxfordshire/ Oxford has some of the lowest levels of tree canopy cover in the South East. Woodland Trust supports the CCC's recommendation of an increase in UK woodland cover from its current 13% of land area to 19% by 2050. LP should set a target for tree canopy cover – to include retention on new development, replacement where appropriate and new provision. More information in the Trust's 2020 publication The Emergency Tree Plan.							

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	<b>Preferred Option - a)</b> Incorporate use of an Urban Greening Factor (UGF) into policy <b>and b)</b> define mandatory areas of application	support option a	6	<b>Natural England</b> support use of an UGF but would suggest this is applied across all non-householder applications within the City to provide greater clarity for developers/ applicants and a consistency of documentation required with an application. Suggest it could be tailored to provide greater recognition of certain features.		UGF not required on all sites. Small sites should be encouraged (not required) to use UGF to inform design.		Amount of green space in a development should be best dealt with during application process. Not appropriate or useful to use the UGF tool on most sites in Oxford. It does not take account of those sites that are already have significant amounts of green on them. No policy is required.	3	do not support option d	
G3: Provision of new GI features – Urban Greening Factor		Support option a but don't think this should be limited to a selection of sites/ areas (option b).	8	Introduction of a new policy tool needs to be easily understandable. Option B seems appropriate.	2	Inappropriate to use where specific provision has been agreed as part of an application. Instead UG should be a result of site surveys, and resultant landscaping and greenspaces provision.		Support option D	2		
		Support preferred options	9	<b>Oxford LNP</b> supports the requirement for new green infrastructure (GI) features in all new developments, and agrees it is right to use guides for their design. They flag Building with Nature as a framework of standards for good GI (reasoning in their response) and suggest that it serves as a supplementary requirement for developments, as a way of achieving the Urban Greening Factor.	1	the exemptions to the UGF requirement are "vague" and specified only by example in the "preferred option	2	Option C - UGF tool should be mandatory everywhere	9		
		Support option b		<b>Green Party:</b> Support PO but like to see lower socio-economic areas used for UGF tool, given they have less access to green space in city.	1	Urban Greening requirements should be required on sites over a certain size. To avoid hindering the redevelopment of previously developed land we consider public open space should not be required on sites of under 0.5ha in urban areas.	2				
				See <b>ARC Oxford</b> comments for G2.							
		<b>Woodland Trust</b> Strongly support the preferred option for an Urban Greening Factor and happy to advise on its component factors. We commend the CAVAT tool as one way to assess the value of existing mature trees and the potential contribution of new tree planting.		<b>BMW</b> support the idea of the UGF but advise that the City Council carefully consider the strengths and weaknesses associated with the policy and ensure that it would add value to future proposals and developments when compared with the existing policy.  The City Council should engage with BMW should they identify the MINI Plant and its surrounds as suggested in Preferred Option b.		The working and terms need better explaining	2				
				The implementation of such a policy would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. Many areas would benefit from urban greening, as evinced by the current Broad Street project.	1						

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				<b>Environment Agency</b> are concerned about lack of condition grading in UGF, which could lead to inappropriate greening, particularly around watercourses causing overshadowing, with potential negatives for ecology and conflict with BNG requirements. Might be able to support option a if a requirement to balance the needs of both people and wildlife so that additional greening ensured additional biodiversity value including for watercourses and their corridors.							
	<b>Preferred Option - a)</b> Set out a hierarchy for how 10% net gain should be delivered, particularly where on-site net gain is not possible	Option A is the best way to progress, that allows for delivery on constrained sites that may not be able to provide on-site.	7	This should be tested through the viability assessment of the plan to ascertain if it can relate to all sites or only those over a certain threshold.	4	unable to fully support 10% requirement. Consider that net gain should be a minimum of 20% across all developments. Although Ox City constrained consider development of a habitat bank to deliver off site BNG.	6	support option c - no need for local policy.	5		
G4: Delivering mandatory net gains in biodiversity in Oxford		<b>Natural England</b> pref option a - welcome the inclusion of mandatory 10% BNG within policy and encourage ambition in delivering in excess of the minimum where possible. Flag that LP's approach should be compliant with the mitigation hierarchy set out in NPPF as well as other guidance (doesn't apply to irreplaceable habitat, approach to European sites should be dealt with separately to BNG provision). Recognise reference to Local Nature Recovery Strategies and flag that these will be key mechanism for planning and local delivery of Nature Recovery Network in future. Flag the work on draft Nature Recovery Network Map by Oxfordshire.		Supportive of clear guidance for how to meet 10% BNG (including support for off-site measures where on-site is not achievable). Do not support exceeding mandatory levels.	3	You can't offload to other local authorities, just as you would not want others to offload onto you.		Strongly support option b, Oxford should be aiming for well above minimum biodiversity gain.	23	certian sites may not be able to achieve more than 10%	
		<b>Environment Agency</b> support option a and ask that policies also support requirement of the metric to achieve minimum 10% net gain in habitat, hedgerow and rivers and stream units when appropriate as directed in the guidance. Would support a policy that encourages as much net gain as possible onsite with remainder as locally as possible.		Council seems to take what developers are telling them at face value. Not clear if any resource is being allocated to reviewing BNG/UGF calculations put forward through legislation.	3			None of these options are acceptable, needs re-drafting. Minimum 10% (option c) where possible should be higher 20% as option b.	2	Why is option B considered detrimental	4
		Support option A	12	Support option a (PO) but because BNG is a legal requirement no need to duplicate through local policy. Also no need to go beyond 10% in policy. Any additional BNG should be discretionary for developers if they see fit.	5	Is there scope to consider a higher % in parts of city or where sites have been taken forward outside of the city to meet unmet housing need.	2	Should set a minimum of 30% overall net gain through onsite mitigation and enhancement if then off set	2		

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				Suggest wording included in final policy to ensure that all habitat retained, enhanced or created (whether on or off-site) is retained in perpetuity (i.e., for at least 125 yrs). Otherwise net gain is only temporary and over time will lead to a loss of biodiversity.	1	<b>Oxford LNP</b> supports (b) the alternate approach (considered detrimental) within this option set, rather than the preferred option. Consider 10% set out by DEFRA as the absolute minimum necessary to ensure confidence that a new loss in biodiversity would be avoided. As part of the OP2050 work, the Biodiversity Advisory Group, which is now an OLNP subgroup, secured support for a 20% net gain policy; Similarly, the Oxfordshire Leadership Group of the Ox-Cam Arc also agreed adopting a level of 20% net gain for planning decisions. Further, there is precedent within Oxfordshire of the Planning Inspector approving a development with 25% net gain for Salt Cross. Also flag the City Council's own discourse around 'ecological emergency' and therefore 10% net gain represents a lack of ambition and policy should require 20% Biodiversity net gain instead. They are currently collating further evidence to support targets in excess of 10% - see submission for more details.	1				
				<b>BMW</b> support Preferred Option. However, BMW recommend that careful consideration is given to how this would work on brownfield sites that are in manufacturing use.							
				<b>Historic England</b> would not support alternatives, but policy option needs to take account of historic environment. Offsite solutions could have harm for archaeology if presence of remains not considered. Also text does not currently detail type of blue infrastructure being considered.							
	Other			<b>Natural England</b> advise mapping biodiversity assets and opportunity areas to ensure compliance with national policy and to clearly demonstrate the relationship between development sites and opportunities for biodiversity net gain. Should refer to Conservation Target Areas and draft Oxfordshire Nature Recovery Map as well as proposed GI network in city.							
				<b>Green Party:</b> Generally support PO, policy is aimed in right direction, but too many "get out" options for developers. Concerned about "off-setting" both inside & outside city boundaries, could undermine aim of potential biodiversity net gain. Mitigation hierarchy required, & "off-setting" avoided.	1						

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	<b>Preferred Option - a)</b> Include policy that seeks to ensure applicants identify/ assess/protect any existing habitat of value on a site. <b>and b)</b> Set out prescriptive requirements to secure biodiversity features on site.	<b>Natural England</b> pref is option a in comb with option b - welcome the proposed requirement for applicants to identify protected habitats as part of development proposals and the use of checklists to secure enhancements on site with prescriptive requirements	1	Require the good management of any biodiversity features on the site	1	Consider the scale of economic growth and level of housing development could adversely impact on ability to protect and enhance biodiversity.	1	As there is a requirement for biodiversity surveys and BNG on sites, protection of important elements on any site will be highlighted. As such we do not see a need for this policy. If required, some encouraging wording (rather than a requirement) should be added to G4.	4		
G5: Protecting and enhancing onsite biodiversity in Oxford		Green Party: support PO, checklist is a good idea, encourages developers to be ambitious & imaginative. Support options a + b together.	1	support option b (prescriptive requirements)	1						
		Support a	3	<p>BMW support Preferred Option a (in combination with c):</p> <p>"a. Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site".</p> <p>"c. Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/or how much/or the standard of those measures. Could potentially be supported by updated TAN".</p> <p>In order to be effective, planning policy should be flexible with its biodiversity requirements. Preferred Option B would invariably fail to account for site-specific features and will subsequently result in inappropriate 'tick-box' mitigation.</p>	1	<p>There is no such thing as a general ecological enhancement if you are referring to the natural environment; it is all dependent on habitat and biodiversity.</p> <p>Note, as above, that</p> <ul style="list-style-type: none"> <li>• 2.4.15 The best way to preserve biodiversity and habitats is not to build on good sites, or to threaten them with excessive building or traffic near them.</li> <li>• 2.5.6 The net-gain system, though mandatory, is not fit for purpose, as the BIODIVERSITY METRICS system currently operates to the detriment of biodiversity through its failure to move beyond habitat indicators. As an example of the critique of biodiversity indicator assessment, see, for example, Sobkowiak, 'The making of imperfect indicators for biodiversity: A case study of UK biodiversity performance measurement', 2022.</li> </ul>					

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		Support B	5	Suggested measures, particularly porous driveways unless article 4 directions are brought in to restrict permitted development which allows up to 50% to be built on without even entering the Planning System.	2	The issue with all of these options is that developer surveys for sites is limited and often only takes place one, often during parts of the year when species are not visible. Species often get missed. A more realistic and comprehensive approach is required.					
		Support preferred options	20			the 'points list' approach and the references to bird and bat boxes, does not inspire confidence that the City Council understands where the points of failure are and is moving to address or eliminate them.					
	<b>c) Alternative option in combination with a</b> Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/ or how much/or the standard of those measures. Could potentially be supported by updated TAN.	<b>ARC Oxford</b> support option C with A - option C would allow greater consideration of site specific circumstances	7			some broad overlap with the approach to BNG. Do not support full prescriptive policy but rather support flexible approach. Support maximising onsite biodiversity as far as possible. Checklist and TAN useful.		OUS support this option more flexibility in achieving target of 20%BNG			
		<b>Environment Agency</b> support option a in combination with c in relation to rivers and streams. Would be happy to support Council in identifying biodiversity features which might be beneficial for rivers/streams, but caution that a prescriptive list could be difficult as huge variation in what might be appropriate for different water courses. Where potential dev impacts a watercourse, the river and its corridor are likely to have most potential for biodiversity and should be priority in terms of enhancement.									
	<b>d) Alternative option in combination with a</b> <b>e) option do not include policy</b>	a) in conjunction with b)	5					support option e no policy needed	8		

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		<b>Natural England</b> pref is option A, but understand that further work to review, define and clarify network of ecological sites in city is ongoing. Flag that policy should clearly distinguish between international, national and local sites and that these should be identified on proposals map in context of allocations and policies for development. Designated sites should be protected, with appropriate mitigation and enhancement commensurate with their designation and Natural England are happy to comment when further details are available		Local sites require protection. national sites are protected through other legislation/ NPPF etc.	3			option 6		Option D preferred incorporating 10% net gain integral provision for biodiversity should be prohibited unless the site for redevelopment (a) re-uses existing structures (b) has no current provision.	
	4.24			I strongly support Option A but particularly draw attention to section 4.24 "hierarchy of ecological sites, from the internationally and nationally important Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSIs) to more locally valuable designations, such as Local Wildlife Sites, Oxford City Wildlife Sites <sup>8</sup> and Local Nature Reserves. The ecological sites not only form an integral part of the wider green infrastructure network but are valuable in themselves for the role they play in supporting our flora and fauna and should be protected from development which could compromise their special features". This applies as much as, or perhaps even more so, in the green areas of other Councils surrounding Oxford, and the City needs to take particular cognizance of these when attempting to site new housing developments where it would impact upon such sites.							
<b>G6: Protecting Oxford's ecological network</b>	<b>Preferred option A</b> - Include a policy which protects the city's network of national and local designated sites from development.	Support as it protects SAC, SSSIs	4	<b>Oxford LNP</b> support Option A, but recommend widening the definition of the ecological network within this policy set to include the core and recovery zones of the draft NRN map. Agree that it is appropriate to ensure the level of protection is proportionate to the level of ecological interest but would hope that consideration is given to offering a certain level of protection to the recovery zone areas of the draft NRN map which provide significant opportunity for biodiversity enhancement. Consider that the Oxford LP should include clear policies with respect to how the Oxfordshire NRN will influence development.	3	The Lye Valley SSSI has not been protected from development, depending as it does on water percolation through limestone to create unusual conditions suited to rare fenland plants, also insects, amphibians etc. The Warren Crescent development is very likely to reduce water flow through limestone into this area. Attempts by Friends of Lye Valley to have a Special Planning Guidance for the entire water catchment have yet to yield results, despite preparation of a relevant document and discussion with council officers. Permeable frontages on homes are needed to manage water flows more effectively; this approach may well be valuable in many parts of the City given low quality maintenance of drainage by the water industry, and the 75% cut in Environment Agency funding since 2010. However, we need to look forward to 2040 with more restoration of valuable sites including Oxford's distressed peatlands, forming a rewilding approach which requires a Special Planning Guidance for the City to engage with all relevant bodies and the public.		Option B - National standard	2		

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		support Preferred option	26	Broadly support preferred option but consider that text on local sites could be stronger. Core Strategy placed a high level of protection on Local Sites and that should continue in this plan. Also wildlife corridors need to be protected in the same way that locally designated biodiversity sites.	5	This has been covered in over policies					
		<b>Environment Agency</b> support option a and flag that the inclusion of rivers and streams within this policy would be beneficial because of vital role in connecting sites. Also support additional protection for non-designated sites which are managed for/or have a high biodiversity value.		<b>Historic England</b> flag that supporting text of this policy has opportunity to acknowledge that effective decision-making on land use and in planning decisions depends on considering the natural and historic environment in an integrated way - e.g. taking into account archaeological considerations in sites known for natural beauty.		As well as protecting existing sites, new sites should be designated and existing sites expanded to maximise environmental protection across the county.					
				Suggest addition to list in PO (option a) - "loss of ecological connectivity" ensure reference is made to connectivity. Working about hierarchy should change to the importance of the development that dictates whether an immitigable impact is accepted. Avoid, mitigate, compensate. If the development is of local importance it cannot go ahead if mitigated impact has significant impact on site of regional/international importance	2	Too many developments have been permitted that allow run off into the Lye Valley.					
		<b>Green Party:</b> support PO	1	<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.		The wording about the hierarchy needs to be changed- it's not the level of protection that varies but the importance of the development that dictates whether an immitigable impact is accepted.	1				
	4.1			Extreme intense rainfall events beyond that predicted years ago is now happening and Oxford must prepare for the worst case scenario in terms of flooding due to the city's vulnerable situation next to a network of watercourses, flood risk sites such as Bertie Place and Park Farm Meadows should not be allocated for housing - there should be no building on even marginal floodplain.	1						
<b>Climate resilience into paras</b>	4.26	<b>Historic England</b> acknowledge and agree Oxford's main risk from future climate change is primarily flooding and overheating. Flag concern about maladaptation of traditional buildings, which should be avoided - e.g. through poorly considered flood-proofing. Also feel that overheating risk focus is too much on new developments, should be broader to consider urban heat island - LP should consider overheating more widely.									

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		<b>Natural England</b> preference is Option (a) in combination with (b), (c), (d) and (e) or (f). Support of the proposed policy to prevent culverting of open watercourses and discourages the use of functional floodplain for certain types of built development. However, would support the approach described in this policy regarding the built footprint of development if it can be demonstrated that risk of flooding is demonstrably decreased.		The PO should considered surface water and ground water flooding.		OUS object - no need for a policy	1			County - Support for 20% BNG if viable.	1
	4.30					<b>Environment Agency</b> strongly advise that development is not located within the 1% AEP plus an appropriate allowance for climate change. Where this is not possible, would expect the Sequential Test, and where appropriate the Exception Test, to be completed for any allocated sites located within Flood Zones 2 and 3 as part of an updated Level 2 SFRA. They are also uncomfortable with sentence: <i>But there are decisions to be taken as to what levels of risk we as a city are happy to accommodate</i> and whilst they appreciate that city is facing development pressures, flag the need for SFRA to provide evidence on whether works are required in flood risk areas and if needed, ways to manage this. Flag the NPPF wording about some existing development being unsustainable in long-term and need for seeking opportunities to relocate development in future.					
	4.31					<b>Environment Agency</b> are concerned about implications of suggestion there may be occasions where development in flood zone 3b might be acceptable such as brownfield areas, particularly in absence of up-to-date SFRA. Feel that clarity should be provided on what is proposed to be included in emerging Local Plan. In addition, appropriateness of the existing local policy should be explored in local plan review, taking into account housing need alongside increases in flood risk due to climate change and the increased starting point for defining Flood Zone 3b from 5% to 3.3% annual exceedance probability (AEP). Ideally, when a site in Flood Zone 3b is redeveloped, would recommend that flood risk is reduced through appropriate design measures (e.g. raising floors). Would be strongly against (and would object in principle) to increasing number of dwelling in FZ3b - so not supportive of allowing increases in built footprint in FZ3b which they would also object to.					
	4.32			<b>Environment Agency</b> pleased to see acknowledgement of OFAS, though would be useful to note that Oxford City Council are part of the 'partnership' to show support for the scheme. Future iterations of the Local Plan as it develops should reflect updates on the scheme as it moves through planning process.							

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G7: Flood risk and Flood Risk Assessments (FRAs)	Preferred Option - a) Reiterate national policy and set out requirements for when an FRA will be required and b) set out key principles for extensions in FZ3b and c) Prevent self-contained basement flats in areas at risk from fluvial flooding. and d) Prevent culverting of open watercourses and e) allow limited scope for redevelopment within FZ3b (no increase in built footprint) or f) allow limited scope for redevelopment within FZ3b (no restriction in built footprint)	Support option a - it is essential to protect the city from flooding. essential to re-iterate national policy and set out requirements for FRA	3	Council should not be allowing development in FZ3a or 3b without developers securing a net reduction (e.g. 10%) to overall flood risk.	4	Stop building in flood zones	7	Prefer to keep all greenfield sites protected - I would prefer the Alternative option which outlines protecting greenfield sites. However, I would add that water compatible uses and essential infrastructure works could be carried out as this seems appropriate! Just no more building like we saw by the University by the rail station.		Reconsidered the Oxford Flood Scheme	
		a,b,c,d) with f) preferred.	5	Policies should be used to diversify surface drainage channels for benefit of upstream storage, e.g., lower reaches of Boundary Brook could be restored/ remodelled to a naturalistic channel.	4	There have been many houses built on flood plains in Oxford recently		No need for a policy which simply repeats national policy. options consider different aspects of flood risk which could be picked up on a case-by-case basis through site-specific FRA and mitigation plan.	4		

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		Prefer option c	1	<b>Thames Water</b> flag the NPPF requirements of sequential approach and that considerations need to include flooding from sewers. Flag that flood risk sustainability objectives should accept that water and sewerage infrastructure development (or upgrades) may be necessary in flood risk areas. Policies should make reference to sewer flooding and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. Also reiterate importance or reducing quantity of surface water entering the sewerage system (e.g. through SuDS) in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. <i>Thames Water have suggested some wording for a policy in relation to surface water - see submission.</i>	4	Manage water flows upstream to mitigate flood risks and development in city should contribute to these measures.	2				
		<b>Green Party:</b> support PO	5	<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.	1	Preferred, but suggested measures, particularly porous driveways are ineffective unless article 4 directions are brought in to restrict permitted development which allows up to 50% to be built on without even entering the Planning System, cumulatively this is a very large area converted to hard standing (rooves etc.)	2	More mandatory use of semi-permeable surfacing, where possible, would at least help alleviate the situation. Discourage removal of front garden vegetation for car parking, which increases run-off and decreases carbon capture.			
		Support A to D	3	Support refer to County standards and guidance for surface water drainage		There is growing evidence and concern that climate breakdown is bringing high intensity rainfall and flash flooding that needs to be modelled to update the Flood Zone system.	1				
		Support option e	3	Option e (in combination with a, b, c and d): Allow only water compatible uses and essential infrastructure in undeveloped flood zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within zone 3b, with high standard of mitigation, where built footprint of a site is not increased and where risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposal would conflict with safe access and egress requirements, it would be refused.	3						
		Support F - most flexible	3	SuDs reduce run off but if they are not maintained then they are ineffective. Re-greening of previous hard surfacing across city should be a priority of the plan to compensate loss of green fields from development.	1						

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		<b>Environment Agency</b> support options a, c, d, and aspects of e and g (but not b and f). Regarding option a, agree national policy should not be repeated but very supportive of additional clarification being provided on how flood risk in Oxford is to be managed. Suggest a number of topics for policy to cover including requirements for FRAs, Sequential/Exception tests, sequential approach on sites, approach to functional flood plain, need to assess impacts of climate change for lifetime of dev, how developers should manage/adapt to flood risk, any other considerations from new SFRA and any plans for flood risk infrastructure. Option c - very supportive due to danger from flooding of basement flats. Option d - very supportive as it is in line with EA position statements. Concur that option h should not be pursued as a local policy provides opportunity to address flood risk and climate adaptation in local context.		<b>Environment Agency</b> support options a, c, d, and aspects of e and g (but not b and f). Option e, whilst supportive of some of this and welcome that footprint should not be increased, evidence should be provided via SFRA to support this policy. SFRA should explore whether safe access can ever be achieved in FZ3b. Would also be opposed to increasing vulnerability of the site or increasing number of units as would put more people at risk of flooding. Clarification should be provided on how Council would measure that 'risk is demonstrably decreased'. Option G - would be supportive if it is demonstrated all development can be built in FZ 1 and 2 only. Again need for new SFRA and flood risk sequential test to demonstrate if this is possible. Would not support development in brownfield Flood Zone 3b over greenfield Flood Zone 3a as the flood risk to occupants would be higher and any increases in flood risk elsewhere would be worse. Would be preferable to remove Flood Zone 3b existing footprint and relocate development into Flood Zone 3a.		<b>Environment Agency</b> support options a, c, d, and aspects of e and g (but not b and f). Regarding option b, more clarity on whether this is in relation to permitted development or not is needed. If only in relation to householder minor development, they do not think option is appropriate as cumulative impact of multiple extensions in Flood Zone 3b would result in a loss of floodplain storage in areas likely to experience more frequent flooding, leading to increases in flood risk, potentially in residential areas. Option not supported by evidence, in line with NPPF and is unlikely to be deliverable as mitigation for loss of floodplain storage is unlikely to be possible. Current policy R3 sets out no increases in built footprint and they support this approach. Also, strongly opposed to option f as there should be no increase in built footprint within FZ3b. No evidence (up-to-date SFRA) to support the req for development in FZ3b, this would increase number of people in highest flood risk and be difficult to compensate in terms of lost floodplain storage. Feel option is contrary to NPPF, not deliverable or justified and would be unsound if included in Local Plan.					
<b>G8: Sustainable Drainage Systems (SuDS)</b>	<b>Preferred Option a)</b> Require SuDS on all new developments (including minors) <b>and b)</b> Require Foul and Surface Water Drainage Strategy on all development over certain thresholds.	<b>Natural England</b> fully support the requirement for SuDS on all new development and recommend that SuDS are linked up wherever possible (including with other greenspace) to achieve greater benefits. Also advise considering whether developments could be supported and encouraged to replace existing (older) surface drainage systems with sustainable urban drainage systems (SuDS)		Include requirement for SuDS in allocation policies (as OLP2036). SuDS are always feasible, parameters should be provided to encourage a SuDS Management Train to identify a minimum number of different SuDs measures that water must flow through before discharging to an existing watercourse to ensure water quality is managed.	5	hierarchy style approach to SuDS design needs defining		Rely on national planning policy and LLFA guidance for planning applications.	4	A assessment of cumulative loss of green/garden and replacement with hard standing (housing etc.) must be undertaken as part of this Local Plan.	
		<b>Environment Agency</b> support option a and flag that where SuDS features are biodiversity enhancing, they will contribute to biodiversity net gains.		<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.		Consider drainage requirements for peat system in Lye Valley	1	Proposed policies fall short on foul sewerage issues. Policy should require foul water to be separated from surface water on development sites. Should include separate policy on foul sewerage.	2		

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		Support preferred option	17	<b>Thames Water</b> advocate an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits	1	While options a and b are good, these should not be allowed to justify allowing development which infringes option set G6.		Soak-aways for new housing, and offer assistance to unblock or add soak-aways on 100+yr old properties.	1		
		support option A	6	Require sewage connections for dishwashers and washing machines as these are plumbed into surface water drains and has a detrimental impacts on stream water quality and ecology.	2	Thresholds set out in B enable developers to avoid requirements by ensuring that their developments fall just under the relevant size threshold.		Support option C	5		
		Support option B	2	Option A should include requirements for the level of wildlife benefits expected from SuDS schemes, including details of these requirements.	2						
				<p>BMW support Preferred Option a.</p> <p>In terms of Option b, it is unclear in the policy options and the evidence base where the '7,200sqm' figure was derived from. Further, planning policy should not include guidance for developments – this is more appropriate to include in an SPD.</p> <p>Planning policy should be distinct from the validation requirements. The local validation checklist should set out when a Foul and Surface Water Drainage Strategy is needed, and policy should only include the locally-specific flood risk mitigation requirements that are not previously covered in national policy.</p>							
				Green Party: support a + b together, further details needed to define "feasibility".	2						

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G9: Groundwater flows and sensitive sites	<b>Preferred Option - a)</b> Require assessment of impacts on ground/ surface-water flows where a development is in proximity of a protected/ sensitive site <b>and b)</b> Include a bespoke policy for the Lye Valley to consider the impact of development upon the hydrogeology of the Lye Valley SSSI	Support protection of groundwater to ensure Lye Valley's habitat is protected	8	Suggest that a bespoke policy is included for lowland fens as there are a number within and around the city. Of particular note in the city is Lye Valley and Rivermead Nature Park. Lye Valley is very rare. Susceptible to development also trampling and increases in dog-fouling and air pollution and changes to the grazing regime. Fens need protection through local plan policy or SPD	5	We fail to see why only two protected / sensitive sites are mentioned in the policy. NM(S)RA is highly protective of New Marston Meadows and its SSSI / SLINC. WE would like to see all the protected and sensitive sites named in the policy including NMM.				Do not support alternative options	
		<b>Green Party:</b> strongly support this policy	2								
		Support preferred options	14								
		Support B	11								
		Support option A	3	The Lye Valley is a key biodiversity and carbon storage site through the naturally formed peat deposits. This site is at risk and is currently emitting CO2 as the site is drying out. There are many other important sites in addition to the Lye Valley. All of Oxford peat sites need to be assessed and use an integrated catchment approach to preserve these sites		<b>Historic England</b> object and ask if archaeology has been considered. Flag that para 4.37 focuses on ecological sites, but that water levels can also impact historic sites which LP should acknowledge. There are sites within city likely to contain archaeology that will be sensitive to groundwater levels.					
	Other	<b>Natural England</b> would welcome early engagement on the policy approach with regards to development within the hydrological catchment of the Lye Valley SSSI. Flag that this SSSI is particularly vulnerable to hydrological changes due to the urbanised nature of its catchment and development pressure in the area. They are currently seeking to better understand the boundaries and functioning of this catchment and look forward to continuing our partnership approach with the Council to best shape this study so that it can inform planning policy to help protect the SSSI.		Suggest that NRN policy approach set out now defunct Oxfordshire 2050 Plan is incorporated into Oxford City Local Plan in particular the Core and Recovery Zones should be taken forward. Suggest taking forward PO from OP2050 which commits to							

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		<b>Environment Agency</b> support options a and b as they afford best level of protection to the SSSI and other sites. Unclear why Lye Valley has been mentioned only, also unclear who will carry out the hydrogeological risk assessment mentioned in option b - will EA be consulted? Are many applications expected within the Lye Valley that would be affected by requirement for additional hydrogeological appraisal?		Support a note impacts on designated sites via hydrological changes are not always related to development in close proximity. Oxford Meadows SAC refer to previous groundwater studies including HRAs of previous LPs and OFAS. Policy should require assessment of impacts on ground and surface water flows. Support Option B - consult County LLFA when Lye V study available.							
G10: Resilient design and construction	<b>Preferred Option - a)</b> Set out a discrete adaptation/ resilience policy, whilst continuing to address risks in other policies where relevant <b>b)</b> Require major developments to achieve certification against a recognised sustainability assessment	support PO	24	If major schemes are required to comply with standards, there should be flexibility for alternatives (e.g., Oxford University Sustainability Guide, WELL standard, etc.)		plan should include a policy on resilience		Most of options likely to be addressed by other policies and/ or building regs. No need for plan to duplicate.	6		
		Support a	6	Can all types of building be required to have solar fitted at construction	1	to be effective an early engagement and outreach is required particularly for domestic applications or permitted development		ARC Oxford - option C most effective - whilst recognised as important is likely to result in unnecessary duplication of policies, with many covered by other policy options.	1		
		Support option b	3	Support objectives of policy but some aspects may be better covered through existing assessment mechanisms (e.g., building regs).				suggest option d is reconsidered as building regs now require assessment of climate resilience (Part O, Overheating systems)	2		

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		<b>Environment Agency</b> would support option a and welcome that flood resistance/resilience measures are mentioned - would recommend finished floor levels are including here - usually recommend setting FFLs 300mm above the 1% AEP plus an appropriate allowance for climate change flood level, this should be discussed in new SFRA. In relation to option d, flag it is important that Local Plan actively raises awareness of impacts of climate change (as set out in PPG). Recommend specific climate change policy which addresses climate change concerns to be included in Local Plan as well as policies to ensure all development contributes to mitigation and adaptation to climate change.									
	Water efficiency element of G10	<b>Thames Water</b> have flagged that Oxford is within a water stress area and consider that the 110 lppd water efficiency target as set out in Building Regs needs to continue to be applied, this should be implemented through a condition attached as standard to all planning approvals for new residential. They highlight that BR allow for demonstrating that the target has been achieved in two ways (calculation method and fittings approach) - they consider 'fitting approach' to be the more reliable. They set out some recommended wording for the Local Plan that specifies the 110 target and that this is met using 'fittings approach' - see their submission for more detail.		need to ensure no duplication with other policies here. A full review of PO document needed ahead of next consultation stage.				Support Option C No need for another policy on this issue. Suggest that impacts of climate change are sufficiently dealt with elsewhere in the plan.			
				<b>Green Party:</b> Support PO but would like Council to specify a 'certifying body'. Reference should be made to nature-based adaptations like street trees & green roofs.	1			Support option D	2		

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		<p><b>Historic England</b> support and flag that they have published a range of resources (see their submission) which Council is encouraged to use and refer to in LP.</p>						<p>BMW support the following Alternative Option:            "Address climate risks as theme purely through other policies, e.g. design flood risk, green infrastructure. No requirement for specific policy addressing issue".</p> <p>This policy should only be added in the event that it cannot be included in other topic-specific policies.</p> <p>Also, policy should ensure there are no overlaps with national Building Regulations (e.g. water conservation).</p>			
				<p><b>Natural England</b> flag that the LP should give appropriate weight to the roles performed by the area's <u>soils</u> and value them as finite resource underpinning wellbeing/prosperity. Development decisions should take account of impact on soils. LP should safeguard long term capability of best and most versatile agricultural land.</p> <p>Also advise that protection and enhancement of <u>valued landscapes</u> is included as an issue to be addressed by the plan; need to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development.</p> <p>Also <u>access and Rights of Way</u>, whilst linked to GI, advises that the Plan should specifically include policies to ensure protection and enhancement of public rights of way and the Thames Path National Trail. LP should recognise value of rights of way and access to the natural environment, seek to link existing RoW and provide new access opportunities.</p>							
Other comments				<p><b>Green Party:</b> would also like to see policies to designate new sites to be part of Green Infrastructure network in parts of city with less green / blue sites; enabling parklets; restricting the paving over of front gardens &amp; non-permeable surfaces.</p>							

Policy Options Set R1 to R8

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	<b>Fig 5.1 Infographic on carbon emissions in Oxford</b>			Also encourage a bottom up approach by residents, esp. regarding unregulated energy also need education and encouragement to get residents buy in.	1	There should be a new policy on the protection of peat and carbon storage in sites with city or land owned by city council. OCC has declared a climate emergency and this should be reflected in policy. A layer of peat only 30 cm deep can contain more carbon than a tropical rainforest of same area. Within city limits (JW) calculate 16.31 ha of peat in spring fens.	2				
Intro paras and wider context along with any other comments	Fig 5.2	Support proposed energy hierarchy	1	Climate change should be given higher priority in planning and design. Document fails to give convincing arguments for the use of Design Codes, which together with local knowledge could bring together the aspirations of residents and deliver a responsive built environment.							
				Reference should be made to loss of hedgerows from development and need for planting in new development.							
				Significant improvements on existing policies. Fully support policies on retrofitting listed buildings. But concern about "get outs". Consider focus should be on emerging new developments having very low emissions rather than just mitigating impacts. Para.5.8-5.9 consider Local Plan should refer to definition used in City Council motion which refers to UK Green Building Council, which includes embedded carbon to replace 'operationally net zero'.	1						
	Para 5.4	Explore policy options for reducing transport emissions such as adopting more sustainable/active travel choices		Building fabric must be designed to standard of ultra-low energy demand, to achieve this energy budgets must be set , unregulated energy must be considered, thermal comfort and risk of overheating must be assessed.							
				<b>Historic England</b> welcome acknowledgement of the importance of the built environment to carbon emissions							

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R1: Net zero buildings in operation	Options - a) Mandate net zero operational regulated energy from adoption of the Plan OR b) Mandate net zero total operational (regulated and unregulated) energy from adoption of the Plan OR c) Mandate 'net zero ready' buildings in line with the definitions set out in the Future Homes/Buildings Standard OR d) Accept offsetting of unmitigated carbon emissions associated with operational energy use OR e) No local policy on net zero carbon	Support options a and b.	12	This policy should be tested via the whole plan viability assessment as it has large implications for developments.	4	Do not support option b (regulated and unregulated) as difficult to measure unregulated contribution once operational.		d) support this option as offsetting will be needed owing to challenges presented by historic buildings of OU	1	Maximise all resi and commercial roof space before new solar farms around Oxford are permitted.	
		support option a	1	Policy should be flexible to adapt to changing technology over the plan period, costs, Building Regulations and availability of equipment/suppliers etc.	6	Do not support option d as it could add significant cost to development proposals. May also be difficult to identify projects to deliver identified carbon savings. Would need viability testing.		Option C to be zero carbon ready most appropriate - hard to model unregulated energy and not always possible to include on-site renewables, esp. on historic buildings or adjacent to them.	2	Option: Specify design in accordance with energy hierarchy principles. Mandate net zero operational regulated energy from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as the primary calculation.	

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		General principle of option b supported but narrative considered onerous, policy should seek to maximise on site generation in envelop of what is considered feasible/ viable, incl. potential carbon offsetting payment.		Clear benefit in standardising approach to sustainable design and construction to meet Governments net zero 2050 ambition.		Do not support options a) or b) as these would add significant undue complexity to the planning process in Oxford.		Support options c or d. Options a) or b) which suggest mandating net zero operational development unlikely to be deliverable	2	Don't accept offsetting.	3
		Option c of being 'zero carbon ready' is likely to be the most appropriate - policy has significant implications for R&D buildings. e.g. Solar panels on listed buildings.	3	Significant cost implications of building to Passivhaus standards. Where sustainability benefits are elevated significantly this should be offset against any land value capture to encourage building to the highest environmental standards.		Net zero is too rigid		Support option a. Agree EUI is a more realistic comparison. Support moving to non-fossil fuel heating. Also support introduction of Option D (offsetting) for difficult sites.		Reject final option (no net zero option)	2
		option 1 only	6	Concerns about introduction of unregulated operational energy as difficult to monitor once home is occupied.		Too many more economically pressing issues at this time to allow this.		Support option a (regulated only).		Permit no fossil fuel use.	2
		a b and c are good	3	OCC advocates that achieving net zero carbon policy should consider the whole life carbon performance	1	Against the zero carbon policy options we need sustainable energy sources.		support option b	2		
		Would prefer option b to cover both regulated and non-regulated energy use when existing buildings are repurposed, renovated or extended.		Support option a: options a, b & c represent marked improvement on ex. LP policies. Welcome recognition that percentage changes are meaningless. But consider reference should be made to "fabric first" approach, vital to building net zero homes. Homes should be built which only need minimal heating, being well built and insulated.	1	A policy that helps residents and domestic applications be engaged and educated early on in the pre app process.		Support option e as it does not add additionally financial or commercial burden on delivery of homes.	2		
		Support option B	3	<b>Historic England</b> support ambitious approach to addressing climate change - however LP needs to be clear on when this applies to conversions/extensions - 'where appropriate' wording needs to be defined in as much detail as possible. Also support embedding energy hierarchy principles, subject to suitable retrofitting policy. Flag that approach regarding renewables needs more explicit articulation, including policy for how these should be brought forward. If it is assumed that policy will likely result in increased uptake of solar PV, LP needs to be clear on its strategic approach to this type of development. Wording indicates aversion to solar PV on roofs in CAs/near LBs, might, in effect, rule out a lot of the city. Also flag that occupant behaviour can influence regulated energy, as well as unregulated but this is not mentioned.				Support e - carbon issues should be one for national legislation.	9		

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		No new buildings unless carbon neutral.		Should also consider a bespoke renewable energy policy encouraging renewable energy schemes in urban areas as opposed to on greenfield sites e.g., farmland being used for solar panels as opposed to food growing. Need to require renewable energy on residential, commercial and consider a bespoke policy on this topic would be a useful addition (See CPRE response for full details)				Option d - Accept offsetting of unmitigated carbon emissions associated with operational energy use as a last resort, where measures to reduce carbon on site have been exhausted and with strict principles for how/when this would be accepted.	1		
				Generally supportive. Strongly support for a retro fitting. Unable to support prevention of fossil fuel heating until a national policy is in place for an affordable, safe, secure system.	2			Option: Accept offsetting of unmitigated carbon emissions associated with operational energy use as a last resort, where measures to reduce carbon on site have been exhausted and with strict principles for how/when this would be accepted.			
				Caveat that for some R&D work where gas is required.				Support option c			
				New buildings should be zero carbon when the infrastructure is ready							
				ARC Oxford notes the cited complexity options a and b would place on planning process in Oxford, without ability to monitor or assess against a policy it cannot be considered effective or deliverable.							
				The Government are creating strong guidelines for this. If Council does get involved it should be addressed appropriately and in detail at the statutory phase of delivery.							
				Premature to ban fossil fuels before acceptable alternatives are available. Need greater capacity as a nation.	3						
				Option: Specify design in accordance with energy hierarchy principles. Mandate 'net zero ready' buildings in line with the definitions set out in the Future Homes/Buildings Standard. Measure compliance with submission of SAP/SBEM calculations demonstrating carbon reduction over notional buildings prescribed in Building Regulations. Permit no fossil fuel use.							
				Encourage net zero unregulated energy through sufficient on-site renewables to meet total operational energy needs and for this to be demonstrated via Energy Use Intensity calculations.							

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R2: Embodied carbon	<b>Preferred Option - a)</b> Include high level principles for limiting embodied carbon <b>and b)</b> set more specific requirements for major development	OUs support but policy wording must consider the OUs historic estate. Consider drafting an SPD in place of TAN	1	Any approach must align with updated Building Regs/ National Policy.	5	Having a requirement for major development to undertake a measurement of embodied carbon during construction goes beyond what is required to make development acceptable in planning terms.	2	Support option c	6		
		Support option a which sets out high level principles.	18	Option B is the most appropriate approach but the assessment of embodied carbon is time consuming and expensive and needs specialist officers to interpret the findings.	4	Not a top priority for us	1	Embodies carbon should be minimised, target set and lifecycle modelling carried to to assess it, align with LETI Embodied Carbon Primer	1		
		support PO with option B	8	b) Recognise that carbon reduction can be achieved by existing or other proposed investments across the OU estate.	1			Should be national policy Some old houses' energy efficiency level is really low and quite hard and expensive for individuals to improve it. Government should provide certain guidance and support to improve it if you want to retain existing buildings.	2		
		Support option A but various existing guidance docs already published and should review whether needed in TAN. In relation to demolition, policy should recognise inherent limitations of retrofit options e.g. retail does not convert well into workplace/ resi accommodation	2	Having a degree of flexibility in the assessment process is key.	3						
		Support option B	2	Should be considered as a part of an overall consideration of sustainable design and construction techniques.	2						
		Support option B and C		Embodied carbon should be addressed nationally rather than through local standards.							
		support option a - use existing buildings	6	Flexibility should be allowed with regard to the demolition of buildings. It should be allowed where there are significant benefits from doing so (e.g., building cannot be re-purposed).							

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		Retain buildings where possible		Any policy on embodied carbon should encourage the use of more sustainable construction methods rather than further burdening developers to measure amounts of embodied carbon.							
		Development on areas with high peat content such as the Upper Lye Valley to the immediate west of The Slade, Ruskin Fields and other lowlands would release stored CO2 – this needs to be incorporated in the policy. It hard to see how the policy can be effective without clear metrics.		RE: embodied carbon target, it is important that the LPA understands how this is likely to interface with the choice of materials etc., on developments.							
		Support PO	1	Support option b however suggest that site size threshold should be 750 homes as it will add significant technical and commercial burden on smaller developments. Assessment should be provided at reserved matters (not outline) and it is necessary that appropriate skills are at the council in order to ensure applications are dealt with in a timely manner.							
				<b>Historic England</b> support preferred option, but would welcome stronger wording than 'where possible' - clarity also needed on factors that determine where this might be possible.							
				The combination of high level principles and technical advice note feels a little thin in terms of operationalization of this aim. there should be targets, incentives and KPIs associated with the measurement and minimisation of embodied carbon in construction. if it is to work, it can't just be woolly policy that has no teeth							
		Support in principle		Carefully worded policy needed to ensure it does not hamper the redevelopment of existing buildings on brownfield sites. Therefore, the wording ' <i>retaining buildings where possible</i> ' is an important flexibility that should be kept within any future policy.	2						

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				<p>As such we would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can be justified by the council. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment.</p> <p>Recommendation:</p> <p>Ensure the policy is properly assessed within the forthcoming viability assessment that must also include a proper assessment of viability of older person's housing.</p>							
		Support option a	1								
R3: Retrofitting existing buildings including heritage assets	Preferred Option - a) Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets and b) set out that carbon reduction measures for heritage assets etc. will be considered as benefits that outweigh harm	OU supportive of retrofitting but note the need for careful balance between heritage and retrofitting.	2	Key issue. Encouragement could have greatest impact on green agenda of plan.	2	Its key that existing buildings including heritage assets are retrofitted.		support option c - no local policy	2		
		support PO	13	Useful to have a positive policy approach. It should be a 'presumption in favour' style policy.	1	Do not support Option A - aware of poor recent practices resulting from retrofit of existing buildings e.g. office to resi results in low quality housing		Support retrofit and off setting this could secure funding to deliver mitigation measures such as retrofitting of existing buildings.	1		

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		Support option B	5	The Plan could simply rely on national policy and the normal heritage policies, but Option A would clearly set out a clear marker.	2	Option B (part of PO) is an interesting approach but the assessment of benefit and harm will vary depending on the value and setting of the heritage assets. As such we would question the overall benefit of this approach.	2	Leave heritage sites alone	3		
		Support option a	5	Retrofitting listed buildings presents significant challenge in responding to climate emergency and should be referenced in doc.	3	Option C is not supported - its appropriate to have a clear policy addressing retrofitting/ heritage assets.				OU and other rejects option c	2
		Support PO A & B	11	Sometimes its not always viable to retrofit existing buildings - sufficient flexibility should be incorporated into the policy where buildings are proposed to be retrofitted/ refurbished for planning app's.							
				<b>Historic England</b> support po, subject to additional criterion along lines of - <i>where an understanding of the buildings existing fabric and condition has been demonstrated, and the materials/measures are shown to be demonstrably appropriate, particularly in reference to heritage assets and/or traditionally constructed buildings</i> - again flag a range of material they have published which Council can make use of.							
Efficient use of land	para 5.16			Needs stronger emphasis on the policy density delivered in a way best suits the site and surrounding area							
				Added to this should be a preference in favour of council, community and area-led efforts to develop municipal and/or area-level carbon reduction and energy-generation/efficiency measures (e.g. municipal heat-pump or heat-exchange systems).							
				Should not be mandatory							
				This could have very negative consequences on Oxford's listed buildings.	2						

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				a) and b) but raises question of how enforcement will occur when properties are being fully refurbished. Ideally, this should require planning permission and clear guidance to those involved about standards and requirements. If not, makeovers will continue to suit the owner rather than addressing Climate, ecological or indeed human needs for the long term. If the Council still has just 2 planning enforcement officers, how is this going to be done?							
				Support option A even if in the conservation area							
				Other more pressing economic issues at this time.							
R4: Efficient use of land	<b>Preferred Option - a)</b> Have a policy requiring that development proposals make the best use of site capacity <b>and b)</b> have minimum density requirements for city and district centres only.	Option A is the most appropriate approach. Minimum density targets could be indicated in the text to the policy.	12	Promoting density in OU and colleges should be included in policy	1	support option c (minimum density requirements)	8			Support an assessment of compatibility with the surrounding area.	
		Support Options a and b. add wording best use of site capacity	11	need to review how this interfaces with design guidance on heights to ensure density aspirations are not compromised		Cap densities where possible / no minimum densities	4				
		Support option A but clarify what is not an efficient use of land.	2	Logicor wish to stress to the Council that achieving appropriate densities cannot be applied to all land use types. Whilst it is understood that the Council is seeking to deliver higher residential and employment densities to try and combat housing and employment land shortfalls, it is not considered that applying density requirements to industrial proposals is an appropriate or justified approach.							
		Support option a and b but suggest policy should support seeking to optimise floorspaces on site as this will minimise the potential of future unplanned greenbelt release	3	Support option a in combination with option c, which would apply minimum density requirements across the whole city, for various types of location.		Generic densities could be tricky	1				
		Support option A & C - The plan should spell out the benefits of higher density developments.	8	PO document doesn't set out densities. Suggest target density should be between 70-100dph / what are the densities going to be?	2						

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		Support PO	6	Don't make retrofit mandatory, people will retrofit if energy prices remain sky high.							
		Support option B	1	Support option A but it needs to explicitly state that sites in city/ district centres are the most sustainable locations to make efficient use of land							
		Support option A	3	Consider HMOs as part of this use of this policy.							
		Agree with PO but avoid inflexibility	1	The term 'best use' is too vague and could be manipulated.							
				Consultation with the local community should be considered before intensifying certain areas.							
				Only with explicit and enforced restrictions on building height. Existing height restrictions have not been enforced in relation to some recent developments.	4						
				Be as explicit as possible as to where and when building height can be either built or rebuilt above the existing norms for that region of the city, so as to encourage densification.	1						
				Efficient use of land must include zoning of car parks for conversion to housing - either completely, or building around/above such sites. The area of surface car parks in Oxford is immense - see for example BMW and Unipart - and offers space for employer related homes - and as part of conversion of industrial areas to meeting the primary social need of people in Oxford for housing they can actually afford.							
				In general, support the principle of making best use of existing developed sites, but this should be aligned with the requirements for green infrastructure and biodiversity net gain. In particular, there should be a policy presumption for the retention of existing mature trees and hedgerows on site.							

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R5: Air Quality Assessments and standards	<b>Preferred Option - a)</b> Air Quality Assessments (AQAs) will be required for all major developments, or any other development considered to have a potentially significant impact on air quality. <b>and b)</b> Require all new major development within the city's AQMA to comply with local air quality standards	Support option a in combination with b	4	If a policy is necessary it should cover mitigation. Air quality assessments must acknowledge the greening of the vehicle fleet and buildings over time. There is potentially limited impact individual buildings can do to go beyond current limits in a wider area.	2	Littlemore seems to be missing from map R4 for levels of NO2 pollution data requires updating.		Producing an AQA is a requirement of the validation checklist for all major applications in any event. Is a policy necessary as well?	3		
		Support PO	21	Consider outside of the boundary too.	1	Don't overburden developers	2	All development should comply with NICE's Air Pollution standards.	2		
		<b>Historic England</b> broadly support this approach.		Policy should consider all elements of pollution that come on site i.e. for transport and deliveries.		Do not include a policy about air quality assessments but rely on other regulatory regimes.	4	Limit building to improve air quality within the city	1		
	Other	<b>Natural England</b> expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional emissions as a result of increased traffic generation, which can be damaging to the natural environment. Flag the importance of traffic projections to assess impacts from roads. They consider that the designated sites at risk from local impacts are those <u>within 200m</u> of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification - refer to their national guidance.		Need to find balance between this policy and more requirements within a planning application. If new requirements are introduced, important that approach to monitor and enforce is understood by all.				BMW support the following Alternative Option: "Do not include a policy about air quality assessments but rely on other regulatory regimes".  Planning policy should be distinct from the validation requirements. The local validation checklist should set out when an AQA is needed, and policy should only include the locally-specific air quality mitigation requirements that are not previously covered in national policy.	1		

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		Support option A	3	Air quality in the city is below acceptable standards in several areas. Policy should include options to make more rapid improvements to air quality, e.g., more monitoring and encouragement of more school streets.							
		Support option B	3	Support PO a but reserve comments on whether it is viable in combination with option b							
		Support A with combination of B	2	Note that LTNs currently lead to build up of poor air quality in certain areas.							
				As well as trying to achieve national air quality objectives, Oxford should consider the much more stringent WHO guidelines on air pollution. The ultimate goal should not be legal compliance, but improving the health and wellbeing of residents.							
		Support B with the combination of A	2	Links to an increased reduction in transport and therefore carbon.	3						
				Please include a PM 2.5m standard included and have the extra emissions that traffic generated and resultant the traffic congestion considered. Pm 2.5 pollution, recent research show, is a major killer for example being the main cause of lung cancer for non-smokers (the 8th most common cancer for non-smokers).	3						
R6: Water Quality	a. Set out a policy approach that incorporates issues around water quality into policies about managing the impacts of development, as well as requiring measures to limit water use	<b>Natural England</b> prefer option a. State that the Local Plan should be based on an up to date evidence base on the water environment and the LPA must have regard to the relevant River Basin Management Plans using it to inform the development proposed in LP. Also state that the LP should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.		Littlemore is suffering from lack of maintenance of pipes and systems resulting in flooding and loss of water supply	1	do not support option a		support option b - bespoke water quality policy	19		

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		support PO	22	See comments against S3 for <b>Thames Water</b> . They will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development - but need to be aware of potentially long timescales. Developers can determine costs for new connections from TW website, and recommend early engagement with them on any application to determine: demand for water supply and network infrastructure both on and off site; that demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and that surface water drainage requirements and flood risk of the development both on and off site and can it be met.		<b>Environment Agency</b> support option b and consider it important to have a bespoke policy for water quality. Flag the pressures on the water environment from development and risk to meeting WFD objectives, achieving sufficient bathing water status and increasing instances/volumes of storm overflows. Specific policy should flag importance of water quality and commitments to not allow development where there is insufficient capacity in Sewage Treatment Works. Flag that Oxford treatment works is site of high concern in terms of performance and that any additional flows will pose environmental risk. Would like to see commitment between Council and Thames Water to ensure Oxford STW is resilient to future demand and get work underway to resolve current problems before new dev occurs.		Need more details on what the bespoke policy would be			
		<b>Historic England</b> broadly support this approach.		<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.							
		Due to the need to consider both water quality and quantity early engagement with the Canal & River Trust's Utilities team should be promoted if discharge to the Oxford Canal is an option as part of a SuDs scheme. Any new discharge will be subject to a commercial agreement.		Grey water should be used to flush lavatories in all new buildings / water re use in new builds is crucial	3	New Marston has an antiquated sewerage system, which already suffers from overflow with heavy rainfall. Needs a new sewerage system to deal with present problems and future growth expectations. Important not only for both public health and green and blue infrastructure reasons.	1				
		There is no policy option here. The impetus should be to separate all foul and rainwater drainage in the city and to permit no combined systems ever. Don't forget sewage.	2	Press Thames Water about water quality and water loss	4						
		Agree with Preferred option in principle but SUDS require maintenance so it is not clear how this would be effective – This needs to be more stringent for the catchment of the Lye Valley specifically and other sensitive areas, not just one Oxford policy.									
		Add in (resilient design and construction) and measures to capture surface water runoff and clean this via introduction of Sustainable Drainage Systems (SuDs).									

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R7: Land Quality	<b>Preferred Option - a)</b> Include a policy approach that requires the submission of details of investigations of any site suspected to be contaminated and details of remedial measures which must then be carried out.	Support	24	Support PO: but would like to see the ability of land to sequester carbon assessed under this policy as a factor in whether land should be developed.	1			Support alternative option which is rely on national policy	3		
		These policies should be taken into an updated Jericho Canalside SPD.		<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.		<b>Historic England</b> object, note that there may be archaeological dimension to this policy (particularly industrial archaeological remains), which should be included in the LP. Also, Oxford includes peat resources which could be encountered - these have natural env and historic env benefits (good at preserving archaeology as well as carbon). These considerations need to be factored in.					
		This must also include analysis for peat, calcareous strata and groundwater and surface flows.									
		<b>Environment Agency</b> support option a because it gives more confidence that there will be some site investigation works done on suspected sites in cases where the EA is not involved - the EA may not be a consultee on all sites within city based on their internal consultation criteria.									
R8: Amenity and environmental health impacts of development	<b>Preferred Option - a)</b> Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc.	support PO	31	No mention of how plan proposes to protect "dark skies" in the countryside. Need to include a policy to minimise light pollution from new developments and reduce existing light pollution and protect dark sky areas such as South Park.				All developments should comply with NICE's guidelines on Physical activity - walking and cycling.	3		

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		These measures are essential and need to be enforced. Amenities in Littlemore are sparse and have not been improved by developments	1	<b>Thames Water</b> support policy approach a. but highlight that this should also include odour impacts: <i>Development within the vicinity of Sewage Treatment Works and Sewage Pumping Stations.</i> They flag that the new Local Plan should assess impact of any development within the vicinity of existing sewage works/sewage pumping stations in line with the Agent of Change principle set out in the NPPF, paragraph 187. <i>They set out specific recommendations for where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station and whether an odour impact assessment (to establish any impacts on new residents' amenity) is required as part of planning app - see their response for more info.</i>				Support national policy	4		
other		NM(S)RA applauds the intention of the policy but draws attention to the growth strategy in a city with a Victorian sewerage system where Marston has a long history of sewage flooding on its streets and footpaths. The policy makes no sense to Marston folk where expansion of the city without a new sewerage network (or measures to reduce surface / ground water entry into the sewers) means even more frequent overspill of filth onto public spaces in our neighbourhood and into watercourses and rivers.		Additional policies: on the impact of the Conservation Area on attempts to decarbonise buildings; and a localised energy grid with localised generation, like Project LEO	1						
		However there is no mention of protection of the "dark skies" in the countryside which surrounds the city.  There should be both a policy to minimise light pollution on new development but also to reduce existing light pollution, to protect existing dark sky areas and to identify additional areas of importance.	5	Should be additional specific policies on Foul Sewerage and Noise Pollution.	1						
		Would extend the policy to add that there should be no unacceptable impacts on the natural environment.	1	<b>ARC Oxford</b> suggest that policy option set may not be needed if National Development Management Policies are implemented by Central Gov - this policy may be a duplication.							
		Must include increased emissions and traffic.		Add into policy need to minimise light pollution and support dark skies	1						
				Oxford must remain a family-friendly city, which means active measures to limit impacts on amenity from noise, dust, fumes etc.	1						

Policy Options Set DH1 to DH15

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Intro paras and wider context along with any other comments				Any design guidance checklists or documents need to consider the standardised visual impact against a range of increasing carbon reduction requirements from Planning/ Building Control.		National Grid - To ensure that Design Policies remain consistent with national policy include in policy the following " taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."		Arterial roads should have much higher density housing to provide visual improvement to the city from every direction. OLP should be more proactive to encourage this aim for four storey villas and blocks of housing and student accommodation - proactive policy need to encourage four storeys and increased densification. If areas' character is weak new development should seek to improve it.			
				Important that any guidance shows and balance between heritage and sustainability constraints. Existing guidance should be re-assessed.		More reference to design and heritage of Littlemore should be included especially in relation to St John Henry Newman. Concerned about the dereliction of the historic Littlemore Priory site	1				
				Strongly support the protection of Oxford's heritage assets and 'dreaming spires', but consider policies risk limiting affordable housing & social housing in new developments by affecting viability of projects. Policies should focus on support for intensification, relieving pressure on areas of flooding, Green Belt & urban sprawl. Developers need to focus on delivering a built environment that is affordable and sustainable.	1						
	6.1 and 6.3 (and UD & heritage BP)			Some v desirable goals that must apply across the whole of the city including Littlemore.	1	<b>Historic England</b> feel that the approach outlined does not fully recognise the potential of the city's heritage and fails to acknowledge the potential for heritage's contribution to the local economy/economic pillar of SD. POs do not address heritage at risk, and do not appear to make case for heritage role in regeneration. Also 'heritage and archaeology' heading implies archaeology is additional to heritage, 'historic environment' is a better heading. The Urban Design & Heritage BP also risks unclear/unhelpful terminology, in places, reference to 'historic environment' would often suffice.					
	Figures 6-1, 6-2			Text resolution poor on keys	1						
	6.11					<b>Historic England</b> flag that in reference to 'heritage assets or conservation areas', Conservation Areas are a type of heritage asset. May be simplest to amend the example to listed buildings i.e. '... to the presence of heritage assets such as listed buildings					

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	6.20 - 6.28			Outdoor space in Littlemore v important to residents' wellbeing, further building would be detrimental to residents and we welcome the HIA to ensure all developments are assessed to ensure they are healthy Littlemore Priory is of great historic importance and has been allowed to deteriorate it should be on the list of historic assets.	1						
DH1: Principles of high quality design of buildings	<b>Preferred Option - a)</b> Expand and strengthen the current checklist.	Link relevant TNAs to checklist, make more effective use of IT to improve application process	1	This should apply to all developments, not just majors.	1			Option D is the best way forward especially given the increased emphasis on this in the NPPF, The National Model Design Code and Design Guide. There is no need to list out the criteria to cover but refer to National Guidance.	4		
		support option a	32	Any new approach should be introduced in a way that involves stakeholder consultation.				Support option B	2		
				Design guide should include a significant element of design for biodiversity			1				
				<b>Historic England</b> support po and framing the elements covered by the current checklist as more akin to expectations. Support option to expand/strengthen, flag it will be important to make suitable connections in the text to how those other elements consider heritage/support positive heritage strategy, whilst taking care to avoid repetition.							
				Expanded checklist could include detailed air quality and noise monitoring data and an inclusivity test for claims made about facilities for pedestrians and cyclists (8-80 age group, non-standard bikes, wheelchair and mobility aids)							
				Work of Design Review Panel should be more transparent and involve more/ improved consultation with local organisations/ local communities.							
				Suggest some measure of flexibility as there is a general wariness of the danger of Design Guides in the hands of architects and developers.							

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				<p>The <b>Canal and Riverside Trust</b> recognise that development adjacent to some types of spaces (specifically waterspaces) may need a different design approach. The Trust promote the need for good waterside design and new development should;</p> <p>positively address the water  integrate the towing path and open up access to the water  link waterside space and the waterspace  use the waterspace itself  incorporate access and other improvements  engage with and tease out the qualities and benefits of being by water  reflect the scale of the local waterway corridor to the wider neighbourhood"</p>							
				Nature-based design: Think/plan a development's green infrastructure first.							
				<p><b>BMW</b> support the Preferred Option. Design Checklist or Questions should include hierarchy of design priorities and consider various scales (major/minor) and types (residential/commercial) of development. However, BMW would question whether the proposed checklist will be more effective than the existing questions in securing good design."</p>							
				"It is important to design for disability, as the population is getting older and there are parts of Oxford with many sick and disabled people. But householder developments should be exempted, as few can afford architects to do the required design work. It might be worth setting up a design education for tradesmen programme."							
				Support preferred option and this request that this checklist should include concepts around beauty. Please incorporate the findings of the UK Govt's Building Better, Building Beautifully Commission ( <a href="https://www.gov.uk/government/groups/building-better-building-beautiful-commission#reports">https://www.gov.uk/government/groups/building-better-building-beautiful-commission#reports</a> ), particularly the Living with Beauty report.	3						
				The expanded and strengthened checklist should be incorporated in the updated Jericho Canalside SPD. The policies should also emphasise Design Review and the use of the Design Review Panel in addressing significant strategic sites where design considerations are especially important. This again emphasises the role of the updated SPD in addressing consideration of St Barnabas Church (Grade I Listed), the Jericho Conservation Area and the heritage of the Oxford Canal.							

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				<p>"UBS acknowledges the importance of high quality design of buildings but would maintain that any checklist should not be overly prescriptive so as to unduly restrict or constrain development and innovation.</p> <p>It reserves its right to comment on any expanded checklist but suggests that the current approach of setting out a series of questions for developers and assessors to consider is sufficient for defining what good design is. This would subsequently be further assessed through the submission of any planning application.</p>							
				Do not exempt householder applications from the change of use checklist.							
				<p>The checklist should emphasize that the quality standards required may be met by alternative routes of the developer's choosing. The checklist should have sustainability high on the agenda (see previous comments on Passivhaus and BREEAM).</p> <p>The City Council should also make provision for a list of buildings that are not listed but which are nevertheless notable buildings of local interest, chosen and listed for their architectural and/or historical interest. It should be a checklist requirement that the local interest list is taken into account in any development.</p>							
				Exclude 3rd paragraph. In order to achieve Climate goals, houses being rebuilt internally should be required to follow a detailed checklist of measures for sustainable retrofitting. This may require a SPG to ensure this is part of the planning system. Since the Council says 76% of carbon emissions are from buildings, then it should behave as though it intends to reach its own goals for the City. However, 2040 is too far away.							
				Design guides should include provision for natural as well as built environment features, including street trees and urban greening. This should include guidance on the appropriate location, planting and species choices for urban trees, based on the principle of the right tree in the right place.							
				Like idea but concerned about value of it when implemented				Reference NMDC and DG in policy or text	1		

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DH2: Specific design guidance for areas	Preferred Option - a) Develop design guidance/codes specific to an area or type of development, e.g., areas of the city that are particularly sensitive and/or where significant change expected.	Support PO	19	Design guidance for certain areas is supported but these should be via SPD's in the same way as that for the West End and Osney Mead SPD. There is no need for this to be set out in policy in addition.	3	OUS object such an approach unnecessary, geographical proximity is not the same as strategic connectivity and interaction lacks clarity		support option B - option A is too onerous and does not take into consideration existing national policy/guidance	2		
				Note county design guidance	1						
				More efficient for council to specify expectations for particular sites, e.g., discourage housing development close to railway linked to London to avoid new housing being used for commuters.							
				Develop design guidance/codes specific to an area or type of development... The work of the Design Review Panels should be more transparent and involve more/better consultation with local organizations and communities. Rather than council officers coming up with location-specific design guides, help and encourage local people to come up with their own codes (a simplified aspect of a neighbourhood plan).							
				Include policy encouraging substantial new developments to design neighbourhood access in a way that encourages active travel -- for example, reserving the shortest or quickest access routes for car-free modes.		Jericho Canalside SPD addresses an area which is clearly 'particularly sensitive and/or where significant change is expected'. SPD's roles include providing additional detail which cannot be included in the Local Plan. It has been demonstrated that updating the Canalside SPD is not onerous and will not require extensive officer time. The community has expressed its clear expectations many times. Having an updated SPD places clear and robust planning requirements on the landowner rather than leaving it to the market to determine planning and public infrastructure priorities.					
				Historic England support po, flag that undertaking a heritage assessment in some cases will help inform guidance, identifying assets that may be impacted by development and significant features. Look forward to engaging with development of relevant SPDs/design guides as appropriate.							

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DH3: View Cones and High Buildings	<b>Preferred Option - a)</b> Continue to define Historic Core Area (1,200m radius of Carfax) <b>b)</b> Continue to refer to High Buildings TAN11 <b>and c)</b> Continue to define view cones	OUS support tied and tested approach	2	If the City is to face some of the challenges given limited land then more flexibility on height is needed, whilst seeking to protect the key views of Oxford which is a heritage asset.	3	Figure 6-4 should be move to align with policy		Using the TAN in combination with Option C is the most appropriate approach.	3	Option c contrary to national guidance as it doesn't allow for balancing exercise. Object to d & e options for same reason	1
		Support options A, B and C	3	Policy needs to be elaborated and further defined to enable developments to justify where the 18.2m datum may be breached and opportunities to deliver some bulk without negatively impacting the skyline.	2	The policy sounds reasonable but Marston has bad experience of officer and member 'flexibility' in application of / protection of view cones and implementation of past measures for heritage asset protection.		Option E would best protect views across the city	2	UBS would strongly oppose the introduction of a policy containing an absolute height limit. Such a blanket approach would not align with the requirement to optimise the use of individual sites by allowing a technical assessment of suitability.	
		Support of preferred options	16	LPA needs to seek an appropriate balance between preserving heritage and delivery of affordable homes.	1			"Option E will better protect the views across the central conservation area. The view cones are too limited to be effective, they only cover the very central towers and spires- Magdalen Tower is not included.  The 1.2 km and the Central Conservation Area are not the only areas of Oxford with an important skyline. There are important church spires in the North Oxford/Jericho conservation areas too.  The context of the central conservation area from the viewpoints (outside the City) are important too- the relation to farmland and the hills in particular."		Do not include a policy relating to view cones or high buildings.  Spires visibility should not prevail on providing sufficient number of dwelling, even if this means building high buildings.	
				Support PO's with additions: policy needs to support necessary intensification to deliver built environment, to support 15 min city, improve social housing and avoid building on greenfield sites. Although policy approach is supportive further guidance to developers for development on strategic sites together with scope for appropriate additions to skyline would be beneficial.	1			Respect viewing cones and don't break them for expediency (Blavatnik)			

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				<p><b>Historic England</b> support emphasising care needed with tall buildings and continuation of preferred policy approach to defining 1200m area around Carfax Tower. But also encourage the addition of policy option e, to include in the policy details about what is expected in retaining the significance of views out from key points in the central conservation area, specifying some key (publicly accessible) viewing places (St Mary's Tower, Carfax Tower, St George's Tower and the Castle Mound). Welcome statement about identified view cones not representing exhaustive list (encourage policy consideration along lines of 'there may be other significant views'). Point to GPA2 and GPA3 as a reference to go into the LP txt to help users fully appreciate impacts of setting. Also emphasis that tall buildings TAN could be strengthened (suggestions in submission).</p>				Support of alternative options - D, E, G	16		

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				Suggest a more relaxed approach to view cones and high buildings. Rigid restrictions would exclude innovative and exciting architecture creating uniformity.				<p>"Oxford Preservation Trust (OPT) consider that taking elements from preferred options a, b c and e would result in a policy that best protects and preserves the sensitive skyline of the city and its landscape setting.</p> <p>OPT would note that it is important to recognise within the policy, or supporting text, that the 10 views as defined by the view cones, are not the definitive, and only views, and that others exist beyond these and that these views need equal consideration and protection.</p> <p>Any site where views of the skyline, or landscape setting are available, and/or there is public access should be protected by the policy text. Viewpoints can occur from ground level, up to elevated positions upon the top of buildings, or from the landscape setting.</p> <p>The foreground of views is also something referred to within the TAN and this should be reflected within the Policy text.</p> <p>No reference appears to be made to the overall 'character' of the view. Whilst the skyline is acknowledged as being sensitive, the wider foreground/setting also contributes to the overall experience of a view - these should also be protected under the relevant policy framework.</p> <p>OPT agree with the options for Policy approach e, and feel an element of this should be included within the final policy text for the final proposed policy relating to building heights and view cones. It is disappointing to see that one of the potential negatives for policy approach e is that ""additional resources that might not be available"". OPT consider that the views are so significant that resources should be found for the additional work - as this investment will help with the consideration of applications going forward.</p> <p>The use of 3-D modelling should also be encouraged - as this helps with a full assessment and understanding of proposals.</p> <p>In conclusion OPT would support a policy that incorporates elements of options a, b, c &amp; e.</p> <p>OPT would also note that the plan shown at Figure 6-4 is not clear, and that reference needs to be made that these views are not an exhaustive list, and that other views do also exist."</p>			
				Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area.....							

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				I note that in the past the council has agreed development which actually interferes with the view cone, so the plan should be very specific as to what heights are appropriate at what elevation. The council must also make this non-negotiable so that developers must abide by the plans. (The Oxford Brookes developments at John Garne Way should not have been permitted to the extent that they have been.)							
DH4: Public Art	Preferred Option - a) Develop a distinct public art policy, with requirement for provision from qualifying proposals			Either option would work. Having certainty over public art provision is useful.	3	Consider suggested 20 home threshold could be difficult on smaller more challenging schemes.	1	Support option b as it would allow a more tailored approach.	4		
				Support PO with addition: policy should support scope for using public art budgets for bespoke designs/or functional pieces in new developments, to include fencing, seating, shelters or enhanced surface design. Artists should engagement both existing & new communities.	1	I am neutral on this. Public Art can be attractive, but in my experience some of it has been commissioned just to fill in space, sometimes not very successfully, where there isn't a lot of space spare. And, instead of being an artistic focal point becomes just another meeting point ("I'll see you at the X ...") without being otherwise appreciated. Public art also needs to be looked after, and funding will need to be allocated for that, too.		Support option c - don't require provision but set out the role public art can play in the design of public spaces.			
				<b>Historic England</b> provisionally support and welcome development of distinct public art policy, but flag it is vital such art is sensitive to its surroundings, which should be reflected in the approach to policy wording and the supporting text. Encourage reference to community engagement in the delivery of this policy, to enable commissions to respond to local opinion and be strengthened by local support.		We remind the Council of the role of viability assessments as stated in the PPG (Paragraph: 002 Reference ID: 10-002-20190509).  Requirements for public art should therefore be incorporated into the Whole Plan Viability Assessment.		Option C preferred. Reason: the quality of art procured in the past does not enhance the local environment. It is better to put the money into good urban design and architecture.			
				Public art is a policy that would benefit from local consultation and involvement. This is just the sort of policy that would benefit from a clause about local involvement.		Public art should not be required. Provision of green space and biodiversity is of far more benefit to health and wellbeing of residents than public art and developers should be encouraged to provide accordingly.		Support of option B	5		
						Too much red tape; and too likely to result in poor quality public structures, usually rusting away. Instead, develop a scheme with the University (e.g. Ashmolean and Ruskin) to promote and fund (with levies on developers) art of strong artistic quality and coherence.		Support option C	8		

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						Public art should be at discretion of builders and architects		I do not believe Oxford Council should be involved in detailed policy decisions regarding distinctive public art - the beauty and appreciation of any particular artistic piece is anyway largely down to individual taste. NPPF requirements are adequate			
DH5: Bin and Bike Stores and external servicing features	<b>Preferred Option - a)</b> Require that bike and bin stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs...	Comments made in support of the preferred option	34	The PO reads as guidance, stronger focus needed on wider cycle parking facilities, including town centres and mobility hubs.	1			Not sure stand-alone policy is required. Include references within design policy if needed.	3		
		In residential areas, particularly those with HMOs, bins and bikes frequently litter/block pavements and are a hazard to pedestrians. Additionally, they are a blight on the streetscape. Developers/landlords must be required to provide appropriate storage and some form of checking exists to ensure enforcement.		Need to accommodate non-standard cycle designs such as trailers, tricycles and mobility vehicles. Security of e-bikes is a concern due to high cost of bikes and batteries.							
				Option A supported in principle but add that any specific requirements for bin/ bikes stores and servicing should include flexibility and not overly rigid to allow for specific site design considerations							
				Secure cycle storage is important for a number of reasons - it supports low/ zero carbon agenda as encourages cycling and can help with blighting of street-scene from too many bicycles/ bins on the pavements.							
				<b>Historic England</b> provisionally support, again flag it is vital this takes account of the historic environment to ensure that the design is suitable and in keeping with its surroundings. They note that (potential) impacts on the historic environment are not made explicit at this stage.							

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				Many cities in the Netherlands allow residents to dispose of household waste in underground containers, using a pass. This saves a lot of space and stops pavements and front gardens from becoming clogged up with endless wheelie bins. I'd encourage the city council to explore this moving forwards							
				The policy should require a practical design that doesn't detract from the street scene. Recent permission for conversion of dwellings to large HMOs have required large, unsightly roofed structures for the storage of wheelie bins on the property frontage (they are then rarely used and become dilapidated). Wheelie bins do not need a roof covering.							
				Option a should be applied to city council owned garages, especially "requiring fire safe spaces with adequate electric supply for charging" which is not the case in Blackbird Leys.							
				When considering bin stores, please apply the learnings and recommendations from the "Bin-Lorry Effect" paper: <a href="https://www.createstreets.com/wp-content/uploads/2021/01/The-bin-lorry-effect-2.pdf">https://www.createstreets.com/wp-content/uploads/2021/01/The-bin-lorry-effect-2.pdf</a>							
				Bike racks and storage need to be at least doubled to cope with present demand. If you intend to encourage more people to cycle they will have to increase further. Use existing derelict commercial properties for cycle storage.							
DH6: Bicycle parking design standards	<b>Preferred Option - a)</b> Require high levels of secure bicycle parking <b>and b)</b> Set some more specific requirements fro type of bike parking for residential developments and workplaces	Support PO	3	Cycle parking requirements should be flexible and take account of nearby provision. Having a cascade to review provision at various stages of the development process providing a base amount at the start and increase as needed would be more efficient than over provision to begin with. Include a cascade in policy	4	Cycle parking standards already set by the County Council. No need to duplicate/ undermine these.					

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				<b>TWO and ONV</b> support provision of cycle parking standard needs to take account of the occupation of buildings, location and cycling demand rather than based on volumetric criteria. E.g. the Life Science Market often has low occupancy levels per sqm compared to office uses. Applying a rigid metric based on sq m will result in excessive amounts of parking for such uses, leading to street clutter and unnecessary cost.		Do not go beyond current standards. No justification from further increases.					
		Support PO	38	Ensure access is considered need space between aisles	1	Cycle infrastructure should not be considered as afterthought in design					
				Should point more strongly to internal storage options as default provision. External storage sheds/ bikes are prone to break-ins and can be an unsafe environment for vulnerable cyclist.		Visitor cycle parking needed on every street for carers/visitors when they visit.					
				<b>Historic England</b> acknowledge the need to consider impact on the historic environment in the design and location of bike parking.							
				Principle of options A and B supported but cycle parking for different use classes to be reviewed to ensure no over provision of cycle parking							
				If we are to encourage more cycling then more cycle parking is needed.							
				And have them be accessible, no bike stands in which bikes are floating front wheel above back wheel, but standing on the ground.							
				Also require that lower quality, visitor bike parking is added to new developments. This does not need to be indoors but does need to offer space for a variety of bicycles.							
				I would like to point out that bike rack like these ( <a href="https://blog.sportsystemscanada.com/hs-fs/hub/319534/file-740645069-jpg/bike_rack-1.jpg#keepProtocol">https://blog.sportsystemscanada.com/hs-fs/hub/319534/file-740645069-jpg/bike_rack-1.jpg#keepProtocol</a> ) can park a lot more bikes than the bike racks often used throughout the city.							

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				Preferred Option b (in combination with a). But is 1 space per 5 staff enough? Are we expecting the other 4 to be either walking or travelling by public transport. Based on my limited experience of working in offices in various locations around the city, a 1 in 2 would be a better target.							
				Extend option b to include space for mobility scooters as well different kinds of bicycle.  Also motorcycles are ignored in DH6 and DH7. We should encourage the use of them instead of cars to reduce congestion (particularly electric mopeds, scooters and motorcycles). Space to put chain up cargo bikes would also be enough space to chain up motorcycles.							
				Please change all references to "bicycle parking" to "cycle parking", in conjunction with supporting tricycles, trailers, cargo cycles, etc.  Please ensure that developments provide dropped kerbs for easy movement of cycles between the road and the storage provided. There are some people who can't easily lift their cycles up a kerb to access parking: disabled people with adapted cycles, older people with heavy e-bikes or tricycles, parents or carers with tandems or trailers, tradespeople with heavy loads in cargo bikes, and so forth.							
				Racking should be accessible by all (i.e. not awkward vertical racks which require upper body strength to use)							

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				<p>Please change references to "bicycle parking" to "cycle parking" to include all types of cycles such as tricycles, trailers, cargo bikes, disability-adapted bikes etc.</p> <p>Please ensure that developments provide for easy movement of cycles between the road and storage, as some people can't easily lift the cycles up a kerb to access parking, such as disabled people with adapted cycles, older people with heavy e-bikes or tricycles, parents or carers with tandems or trailers and tradespeople with heavy loads in cargo bikes.</p> <p>Please also include requirements that cycle parking is:</p> <ul style="list-style-type: none"> <li>- undercover</li> <li>- well lit</li> <li>- physically secure</li> <li>- CCTV protected</li> <li>- ensures personal safety in its positioning and design with particular consideration for the needs of women, e.g. not out of view in a hidden area and doesn't create a 'trap'</li> <li>- more conveniently placed than car parking, e.g. closer to the main building and quicker and easier to get to</li> </ul> <p>I think 1 cycle parking space per 5 staff is woefully inadequate and should instead provide for a much higher % of staff, e.g. 75% minimum.</p>							
				<p>Please refer to Oxfordshire County Council's New Parking Standards policy on cycle parking. These are outlined in 4.11 here - <a href="https://mycouncil.oxfordshire.gov.uk/documents/s62491/CA_OCT1822R10%20Annex%201%20-%20Draft%20Vehicular%20and%20Cycle%20Parking%20Standards.pdf">https://mycouncil.oxfordshire.gov.uk/documents/s62491/CA_OCT1822R10%20Annex%201%20-%20Draft%20Vehicular%20and%20Cycle%20Parking%20Standards.pdf</a> :</p> <p>Also support the provision of e-bikes, trailers, cargo bikes etc.</p>							

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				<p><b>Planning Bureau:</b> The option for the policy approach looks to require high levels of secure bicycle parking (e.g. at least 1 space per bedroom, 1 space per 5 staff) either indoors or external for residential and non-residential schemes to achieve best design outcomes.</p> <p>Older Persons housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Were an older person likely to cycle on a regular basis it would be unlikely they would require extra care accommodation.</p> <p>A survey of 242 McCarthy Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments.</p> <p>Whilst we can understand the rationale behind encouraging cycling in the general population and that cycling is probably a preferred means of transport especially for young students in Oxford, we consider that a requirement for cycle spaces in all residential schemes including in in specialist older persons' housing to be inappropriate and unnecessary. A McCarthy Stone retirement scheme has within it an internal mobility scooter store for use by residents which is a far more relevant requirement and in the handful of instances that a resident has used a bicycle it can be stored securely in this area.</p> <p>We consider that cycle parking requirements of 1 space per bedroom for older persons' housing would constitute overprovision in our experience and cycle parking should be limited to staff and visitors accordingly for the policy to be effective and justified.</p> <p>Recommendation: That the Council's considers the car and cycle parking requirements of specialist older persons' housing on a case-by-case basis or provides an exemption within policy for cycle parking for older person's schemes."</p>							

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				I support the "downward pressure upon public car parking provision city wide" and the encouragement of alternative modes of transport. But there needs to be more recognition that cycling will not be appropriate for great numbers of people. I support Option A in combination with Option B. I appreciate that the regulation of buses is outside the powers of the City Council, but the City should push for greater regulation and co-ordination. We need frequency of appropriately sized buses, according to times of day and public demand. At present there is far too much overlap of competing services within the City Centre, which results in roads like the High Street being dominated by an excessive number of buses.							
DH7: Motor vehicle parking design standard	<b>Preferred Option - a)</b> Seek car free residential development across the city, subject to accessibility criteria for public transport and local shops. Seek low car developments in locations not suitable for car free. <b>and b)</b> Do not allow any additional parking on non-residential sites	Support, refer to County parking standards	2	A mix of car free and low car developments dependant on accessibility to public transport/alternative means would be most appropriate.	3	Totally car free developments are not inclusive as many people require vehicles for work purposes and such a policy would discriminate against such people.	3	Need a clear uncomplicated policy in the OLP and ensure compliance with County standards. Still need the parking TAN non resi parking requires a standard which is simple and restrictive. Provision should be made for car shares.			
		Support preferred option	2	If the council can demonstrate economic benefits, and viability of car-free development then a criteria-based approach to car-free development may be appropriate (where it would be permissible to provide parking!)		Given the proposed Zero Emissions Zone and greening of the vehicle fleet it is wrong to say that allowing cars will lead to noise and air pollution increases. Should be factored into Air Quality policy.	3	"Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments.  At the moment (and probably for a long time) Oxford is unable to provide affordable and effective public transport for all needs. In many cases a car is the only way people have to get where they need to go in reasonable time. Unless a capillary tram/underground network is provided this is unlikely to happen. Buses are not a good alternative to cars, and not everybody can ride a bike safely."			

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		a) and b). Plus recognition that the rise in SUV use has added to greenhouse gas emissions, parking spaces needed and the protrusion of vehicles from frontages into pavements throughout the City. Car parking standards should not accommodate SUVs or indeed Vans. They should be in multi storey car parks, on properties with existing adequate space and in marked parking bays at a premium rate of payment compared to existing CPZ charges. Such bays can only exist where road space permits, requiring planning permission. Similarly, car parking charges for SUVs and Vans should be far, far more than for normal sized cars.		Noticing reduction in value of properties without parking and likely difficulties in selling properties (particularly shared ownership).		Is there an alternative approach in which developments begin as low-car and have a strategy for how they could be converted to car-free over time as infrastructure measures are completed/ delivered?		Strongly support 7c, consider starting-point should be an expectation for car-free development in Oxford.	2		
		Broadly supportive of policy direction, provided it does not discriminate against low income and/or low mobility households and small businesses		Policy approach needs to be equitable so that specific groups can have access to parking.		<b>Oxford Science Park object</b> - none of the options would support role and function of the science park. Unrealistic to expect globally significant companies to remain in Oxford if their employees are unable to access their place of work. Science Park encourages EV charging. Further evidence needed if Plan adopts any of proposed policy approaches for employment sites.		Option C is not appropriate and is not supported.			
		Support plans for zero emissions/car reduction		How car clubs will work on a longer term basis in the context of private developments needs to be understood.		This set of policy options only deals with cars. It does not cover buses, vans or motorcycles.  On vans, we have many tradespeople living in the Leys and Barton. They need to be able to park their vans.  Motorcycles are a good way to reduce congestion for those who need to get someone quickly or travel outside Oxford. There use in deliveries reduces the need to own a car to drive to supermarkets (a car club will do). So there should be more motorcycle parking places.		Option D can only be successful when applied in context of a coordinated public transport and accessibility strategy.			
				Support PO but controlled parking zone should cover whole of city.	1	UBS would oppose the introduction of a policy which requires all development to be car free. Some development will need to include some car parking and to impose a blanket policy position would act as a barrier to the realisation of development, the ability for the City to attract certain occupiers and potentially limit the success of other policy objectives (such as Innovation Districts).  A measured framework of enhancements to public and sustainable modes as well as reduced private parking will help to continue to achieve modal shift over time.		Prefer option: Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments. Residents should be allowed to have cars!			

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				Policy should include a criteria-based approach where car free development may be appropriate and also set out where it would be permissible to provide parking for cars.				Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments.  The automobile is not expiring any time soon as a primary mode of transport for the majority of residents (especially those with a commute or with a large family). OCC need to acknowledge this, before they impose punitive regulations on future residents. Imagining Oxford without cars--given its geographical location and the need to access its satellite towns and villages--is like imagining London without the underground network.			
				Will require continuation of adoption of CPZs. Concerned that re-wording of existing policy may lead to opportunity to dilute intention of car-free ambition.				There is a possibility of building with future reductions in car ownership in mind. E.g. car parks positioned in such a way/configuration that they could be used for building housing in future when they become redundant.			
				<b>Historic England</b> acknowledge the need to consider impact on the historic environment in the design and location of motor vehicle parking.							
				Support but needs an effective PT system	1						
				Option A generally supported but policy approach should allow flexibility to meet needs of varying site locations and varying housing types.							
				Option B generally supported but should be reviewed to ensure does not impact on viability or operational requirements of non resi sites	1						
				Support option A only	1						
				Consider the installation of a tram in Abingdon Road. Or beside the train track using the present rail from Cowley works beside the Kassam stadium. A plan to reduce the traffic on Abingdon should be brought forward							
				Preferred option favoured. However, this should not be at the expense of losing important green space around dwellings. The policy should require a defined amount of open amenity space in all new developments, and minimum space standards for private outdoor space.							
				Jericho Canalside should be car-free and is accessible by pedestrian and cycle modes, with bus services within 15 minutes walk.							

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				Let's remove as much on-street parking provision - essentially vehicle storage - as possible. This will have the knock-on effect of providing better cycling and walking provisions as there won't be vehicles using up both road and pavement space. This would require off-street parking provisions but this has been achieved in other places where on-street parking is illegal (e.g. Tokyo).							
				Support option B but in context of <b>ARC Oxford</b> and wider South AOF, CBL extension is fundamental to delivering a reduction in car parking. In absence of investments and initiatives, there may be continued reliance on the private car. Council should therefore be accommodating of transitional arrangements until such time that the benefits of PT improvements are realised.							
DH8: Privacy, daylight and sunlight	<b>Preferred Option - a)</b> Extend the policy to also include expectations for daylight, privacy and sunlight for new non-residential buildings	Support option A	14	Any new approach should have regard to 2022 Building Regs.	1	No need for new policy	3	Maintain policy for residential developments only (option b). Commercial developments would need to demonstrate appropriate levels of light at the design stage and can tolerate lower levels of light dependant on use.	3	Consider drone uptake for deliveries	
		BMW support Preferred Option, noting that typical industrial units do not achieve the building heights that would compromise residents' privacy or daylight. In such instances where this would occur, an assessment of impacts will be prepared and submitted with any planning application.  As such, 'non-residential buildings' should exclude manufacturing and warehousing (as proposed).		Extend policy to include expectations for daylight	1			<b>Planning Bureau:</b> The preferred option looks to extend the existing policy approach – policy H14 of the adopted Oxford City Local Plan to include non-residential buildings. However, the council also need to be mindful of part O (Overheating) of the building regulations and how overheating is balanced alongside daylight and sunlight.  <b>Recommendation:</b> It is recommended that option C is taken forward 'Do not include a policy on privacy, daylight or sunlight for any type of development'. This is because this area is now covered via Part O of the building regulations and the plan should not seek to amend or go beyond the building regulations.			
				Enforcement should be well resourced so planning controls are not meaningless	1			Planning consents should take light into account as before			
				Add a constraint that prevents overshadowing of commercial premises to a degree that necessitates the continuous use of artificial light.	1						
				I'd also like to see consideration of protection of starlight and night spaces. Not all animals appreciate bright lights all night. This includes humans.							

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				Support PO but not clear why it doesn't include residential developments.	1						
DH9: Internal space standards for residential development	<b>Preferred Option - a)</b> Apply Nationally Described Space Standards. In flatted schemes, require communal areas to be designed to enable neighbours to meet and interact.	Support preferred option A	28	Agreed, providing this meets the "Secure by Design" principle and does not create spaces used for criminal or antisocial activity.		Do not include a policy on internal space standards. Communal spaces that you have to walk through to access your flat are good if they work, but sometimes they don't and can be frightening.					
		I agree with the preferred option - with the proviso that if the space standards become smaller the council should be free to set more generous standards.		<b>Historic England</b> highlight the importance of protecting heritage significance, when considering making any changes to historic buildings.		We would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509).  Recommendation: Introducing all flatted development to deliver communal areas etc. must not be so inflexible that it deems sites unviable and any future policy needs to ensure it does not affect viability to make sure it is consistent with NPPF/PPG and can be justified by the council. Therefore the policy should not go beyond the Nationally Described Space Standards.					
				But please don't fit all those content into a small land. You need to provide which standard is compulsory first.		Some bespoke accommodation does not require good internal space standards, for example short term stays by specialists in accommodation.					
DH10: Outdoor amenity space	<b>Preferred Option - a)</b> Include an outdoor amenity space requirement for all residential units, with size standards.	Support preferred option A.	31	Do not extend to non-residential schemes.	2	Do not set requirements	2	Support Option b - broad principles but no size requirement.	3		

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		Providing this meets the "Secure by Design" principle and does not create spaces used for criminal or antisocial activity.		Support PO but concerned it could be over descriptive & affect viability of plans, with social housing being cut. Therefore support minimum requirements with flexibility built in, such as for flats.	1	What we found during the pandemic is the importance of access to nature, areas we can walk through - rather than small gardens. Setting minimum on site space requirements might interfere with that. Options b + c would not.		BMW support the following Alternative Option: "Do not set requirements for non-residential amenity space".  In terms of the alternative options, securing accessible communal outdoor amenity space in larger non-residential developments is feasible in certain instances but would be met with challenges of delivering tranquil / private spaces with unrestricted access to goods and services.			
		The corollary of this is that outdoor amenity space must be properly maintained and managed, attractive and safe. Much might be achieved if there were the possibility of residents themselves becoming involved in gardening and planting schemes, to introduce greater variety and to give a particularity of place, rather than all such spaces being subject to similar straitjacket patterns of municipal planting.		Policy should include requirements regarding the biodiversity and GI expectations of that amenity space.							
		Support but care in execution and application of the policy is required to ensure that spaces defined for biodiversity and/or net gain are not denuded by amenity usage		Pref option. Plus: Retain greenfield sites as part of amenity for all, with biodiversity additions where physically possible. Re-create greenfield from industrial wastelands, to ensure amenity for new homes.							
		<p><b>Woodland Trust:</b> "Support the principle of setting standards for outside amenity space and this should include standards for access to green space including natural greenspace.</p> <p>Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:</p> <ul style="list-style-type: none"> <li>- Of at least two hectares in size, no more than 300m (five minutes' walk) from home.</li> <li>- At least one accessible 20-hectare site within 2km of home.</li> <li>- One accessible 100-hectare site within 5km of home.</li> <li>- One accessible 500-hectare site within 10km of home.</li> <li>- A minimum of one hectare of statutory local nature reserves per 1,000 people.</li> </ul> <p>The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:</p> <ul style="list-style-type: none"> <li>- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes." </li></ul>									

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DH11: Accessible and adaptable home	<b>Preferred Option - a)</b> Seek to ensure that a % of affordable homes and market homes are constructed to accessible and adaptable homes standards <b>and b)</b> Introduce specific exceptions to the requirement	Support option b) being introduced alongside option a)	10	Support policy but must remain flexible to take account of likely demand on any scheme, viability and practicality of delivery. As pointed out provision of lifts may not be feasible or viable in some schemes.	4			Support of alternative option	4		
		Support and OCC welcome a discussion about adult social care	1	support exceptions as set out option b)				<p><b>Planning Bureau:</b> Preferred Option A 'seeks to ensure that a % of affordable homes and market homes (dependent on needs, viability and practicality but currently 100% affordable and 15% market) are constructed to accessible and adaptable homes standards set out in Part M4(2) and M4(3) of the Building Regulations. For M4(3) for Social Rent these should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation'. Option B seeks to introduce some exceptions such as lifts for smaller blocks of flats that may deem the site unviable. Option C identifies having specific policy and to rely on NPPF requirements or National Design Guide as template. Summary paragraphs 6.22 identifies that 'Providing opportunities for residents to maintain their independence is very important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs.'</p> <p>The council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework</p>			

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								<p>in line with the proposed policy Set H14: 'Elderly persons' accommodation and other specialist housing needs' will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing</p> <p>We would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). M4 2 and 3 Housing has a cost implication and may serve to reduce the number of apartments that can be provided further reducing viability</p> <p>Recommendation: Option B that seeks to introduce some exceptions should be chosen as the preferred option. This should include an exception for older people's housing to ensure that the policy does not institutionalise an older person's scheme. The draft policy must not be so inflexible that it deems sites unviable and therefore would be inconsistent with NPPF/PPG.</p>			
		I strongly believe in the desirability of older people and people who develop special needs being able to remain in their homes as long as they wish to do so, provided that there are properly supportive services and communities around them.	1	Part M(2) to become mandatory standard. - no need to refer to this standard in local policy. Council will need to justify amount of M(3) homes required.							
				Support option A - policy wording should include the approach noted with respect to feasibility based on site specific circumstances.	1						
				I agree with the preferred options. But this needn't be aggressively pitched as an alternative for some houses only: handrails on stairs, level floors, toilet and bathing facilities on each level, etc. are all practical features, and people who are young who don't usually require adaptations might at times require them (for example following a broken leg or ankle) and are of course helpful as one ages.							

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				<p>We would respectfully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>The costs for housing to being built to Part M4(2) and M4(3) should be appropriately allowed for in the Whole Plan Viability Assessment.</p>							
				<p>Pref options but exclude market requirement as City needs 100% very low cost homes.</p>							
DH12: Healthy Design/Health Impact Assessments (HIAs)	Preferred Option - a) Require an HIA for all developments over a certain size	Maintain current policy for HIA's over a set size of development.	6	<p>Consider all the requirements for validation this is another burden</p>	2	<p><b>Churchill Retirement Living Ltd:</b> "Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.</p> <p>The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.</p> <p>Notwithstanding this, the questions within Health Impact Assessment toolkits are overwhelmingly geared towards strategic housing sites and have little relevance to smaller developments. We would encourage HIA's to be limited to sites over 100units or in excess of 1ha."</p>		<p>support option c - no need to produce HIA</p>	5		
		<p>We request that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places.</p>		<p>Support option A - size should equate to 'All Major Planning applications'.</p>		<p><b>Planning Bureau:</b> The council should note that there is a common misconception that older persons housing places an additional burden on healthcare infrastructure and therefore if preferred option A is chosen any screening or checklist introduced should recognise this and/or the threshold for screening of such housing should be set much higher (say 75 units). There is much evidence to support this such as from the Homes for Later Living report, September 2019 which identifies that 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year'.</p> <p>Recommendation: If preferred option A is chosen the policy sets a higher threshold for older person's housing or the policy should recognise that older person's housing reduces the financial burden on healthcare.</p>		<p>Support option b - consider HIA should include an assessment of the standard of provision of biodiversity and GI outcomes of the development as these are important in delivering a healthy living environment.</p>	10		

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				<p><b>Historic England</b> have undertaken research showing that the interaction with heritage or the historic environment can be a positive factor in supporting individual and community wellbeing. They highlight more information in a link to their Wellbeing and Heritage Strategy (see submission).</p>							
				Suggest area by area HIA for existing communities based on poorer health conditions in some parts of Oxford, needing interventions.							
				City should do better at prioritising vulnerable communities.							
				Depends on size - suggest any development over 3 dwellings							
Intro paragraphs to heritage section of chapter	Heading and paras 6.26, 6.27, 6.28			<p><b>Historic England</b> flag heading would be simpler as 'the historic environment' to better encapsulate archaeological remains as heritage asset.</p> <p>3rd sentence of 6.26 does not make sense, but agree with the point about a high proportion of highly graded assets in city as it seems to be trying to say. Also feel archaeology is treated as a 'throw away' line and merits its own para with more nuanced language.</p> <p>Para 6.27 - should say heritage assets not historic assets - to better align with NPPF. Refers to background paper but feel it is weak on detailing protection for heritage in national policy - but applaud reference to historic features being viewed as a strength. Welcome the text highlighting the importance of maintenance of historic buildings and the need for them to respond (in a sensitive manner) to the changing needs of their occupants.</p> <p>Para 6.28 - need to correct wording - archaeological remains are type of heritage asset.</p>							
	Paras 6.31 and 6.32			<p><b>Historic England</b> flag that precision in terminology is needed throughout, references to archaeology, but this is study of remains, should say archaeological remains. Section also fails to adequately set out the basic principles that drive the policy approach in this regard.</p> <p>Also, wording in paragraph 6.31 could imply that harm to remains is inevitable. To align with NPPF, the plan needs to support the avoidance of harm in the first instance. Flag guidance in new Advice Note (see submission for a summary which includes a hierarchy to guide approach to considering suitability of allocations and ways development could take place).</p>							

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	Overarching comment			<b>Historic England</b> also note the number of conservation area appraisals that were done over ten years ago and may merit review, and absence of conservation area management plans. It would appear that further work is needed to satisfy section 71 of the Planning (Listed Building and Conservation Areas) Act 1990. They look forward to learning more about the Council's plans in this regard.							
DH13: Designated Heritage Assets	<b>Preferred Option - a)</b> Include a policy relating to designated assets that reflects the NPPF, that sets out how impacts on designated heritage assets will be assessed	Support PO	20	Tension between historic/ heritage assets and wider objectives (e.g., net zero carbon).		No justification for a more onerous policy over and above the NPPF approach. Any Oxford specific detailing will be reflected in the Heritage Assessment so no need to specify in a policy.	2	A policy that reflects the advice in the NPPF is appropriate. (Option B)	3		
						<b>Historic England</b> object, feel that a more powerful policy approach would be to develop a set of bespoke policies for each type of asset that sets out the approach tailored to specifics of each heritage asset (including one for registered parks and gardens). This should provide opportunity to recognise specific characteristics/features for which they are protected, as well as set out the differences in decision-making approaches required (in line with NPPF) in considering different grades of asset and ensuring that those assets of greatest significance are afforded the most protection. All the policies should include Oxford-specific detail - for example, they are not clear why option b does/could not including Oxford-specific detail - encourage combination of options a & b. Potential positives of option b do not follow or relate to policy option. Policy option C is not supported or appropriate.					

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DH14: Local Heritage Assets	<b>Preferred Option - a)</b> Include policy requiring development to consider heritage assets of local importance. Policy would include criteria for assessing whether an asset has locally important heritage interest.	Support PO	6	Such policy would add clarity and highlight the importance of local assets and ensuring something of their significance is reflected in new proposals.		Existing process works well - need clarity about criteria for OU to form a view	1	All heritage assets have protection under other legislation and the requirements in the NPPF. There is no need for a further policy on local heritage assets. Support Option B	3		
						<b>Historic England</b> object (comment applies to para 6.30 too), whilst they welcome inclusion of policy on assets that are of local importance, more clarity is needed on policy approach to non-designated heritage assets. Feel there is an in-built dissonance when equating NDHAs with those on the local heritage list (the OHAR). Encourage text to set out commitment, preferably in policy, to review and update the OHAR. Also flag that NDHAs can include buildings, monuments, sites, places, areas or landscapes, which should be made clear in the LP, so that it is not limited only to 'buildings and structures' - and highlight that not all NDHAs may be on the OHAR. They do not support option b or feel it appropriate.					

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DH15: Archaeology	<p><b>Preferred Option -</b></p> <p><b>a)</b> Continue to define the City Centre Archaeological Area</p> <p><b>b)</b> require a holistic management plan for key historic college owned and occupied sites with this area.</p> <p><b>c)</b> require sufficient information to define character, significance and extent of suspected features or deposits</p> <p><b>d)</b> only support development proposals where harm to such deposits/features can be eliminated/mitigated</p>	OUs support this approach	2	Support PO: however consider policy could benefit from being expanded by option 'e' or blanket policy beyond historic city centre.	1	Option B (part of PO) is too onerous and would be too costly and time-consuming, particularly for OU Colleges.	3	Do not think policy is required. If policy is required. It should be based around Option C (review and record) only.	2		
								Support option c as sets out from the start of the process what is expected from developers.			

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		Support option A		<p><b>Historic England</b> support elements of po - however there are elements they do not (and do not align with NPPF). Broadly support the continued use of a City Centre Archaeological Area, but emphasise the point (also identified in the option's analysis) that there is potential for archaeological deposits across the city - text accompanying ref to CCAA needs to specify this. Also, suggest combining options a and c - unnecessarily complex to separate. Reference is needed to the need for field evaluation where appropriate - at present the bar is set notably lower than that prescribed by paragraph 194 of the NPPF by requiring a DBA only if initial assessment suggests it is relevant, whereas paragraph 194 requires a DBA for all applications on sites which include or have the potential to include assets with archaeological interest.</p> <p>Also, whilst they welcome the thrust underlying a holistic management plan as outlined in option b, they are unclear on how this would be triggered. More information is needed on the thinking behind and implementation of this criterion for us to comment in detail. Decisions should take into account the constrained nature of the city centre and acknowledge the pressure to 'build down. May be value in requiring holistic management plan for other large sites too (not just college sites). Careful thought needed that could support decision-making that could inform masterplanning of significant sites, especially in the location of basements.</p> <p>Policy option d does not currently consider the level of significance of the remains. Should the Council propose a separate policy on scheduled monuments and NDHAs of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, this could support clearer language in a policy related to archaeological remains. Suggestions for improvement to DH4 LP2036 policy given (see submission). They do not regard options e or f as appropriate.</p>				Support options c & D	1		

Policy Options Set C1 to C10

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Intro paras and wider context along with any other comments		Support approach need to find common language between county and city 15/20 min neighbourhoods.		Littlemore is poorly served in terms of amenities and facilities, particularly primary health care. It is poorly connected, limited amenities, green infrastructure and has poor educational attainment	3					
		Support concept as long as these are contained in the city boundaries and not in the Green Belt.	1							
				Choice of district and local centres will be affected by future changes in transport such as the opening of the Cowley Branch line which would make Greater Leys near the Kassam Stadium and may enable other areas to become local hubs such as Littlemore.	2					
				Approach neglects areas such as Littlemore, Rose Hill, Risinghurst and Barton which are already disadvantaged with a lack of infrastructure and amenities. Levelling up is required.	3					
		Support approach but needed dedicated cycle and pedestrian routes needs additional infrastructure and repair of existing e.g. tow path		Includes positive policies but misses opportunities to empower community groups to give greater agency over community spaces. There are no policies on how users will be consulted which is important.	1	No further hubs are needed, the city has enough and they should be allowed to develop naturally.				
				Wolvercote does not fall within 15 min walk to facilities, therefore policy needs to stress importance of bus services to this area.						
				For the 15 minute city principle to work, excellent affordable public transport to each hub should be accessible, with each centre being able to provide for a broad range of needs including grocery, retail, and healthcare provision.	2					
						Do not understand why the 15 minute walking areas are larger for district centres than local centres. The centre and not the edge of the community should be taking as the defining criterion which will show that transport opportunities are not feasible.	1			

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				New Marston RA support and welcome the concept of 15 min neighbourhood, but consider it cannot be applied to Marston at present. No surgery, dental practice, supermarket / general store, and limited leisure facilities. Will require significant infrastructure investment, how will this be achieved? Emerging local traffic / transportation policies, together with reduced bus services will make concept even harder to deliver and mean Marston will be less equal than other neighbourhoods.	3					
				Poor provision for young people in deprived areas of Oxford - need youth centre for Blackbird Leys (and Greater Leys and Littlemore).						
	Figure 7.1					Map difficult to interpret - several areas of Littlemore are not within a district centre. Littlemore should be a local centre with facilities to match this. Encourage more shops as a priority.				
						Not in support of district centres which restricts free movement around the city and segregates the people of Oxford. Those that live on the border of the proposed neighbourhoods cannot access the centre of these by 15 minutes via car. The schools cannot cater for the catchment area and parents may wish for their child to go elsewhere - further than 15 minutes away.	5			
						The proposed bus gates will imprison the less mobile people in their own area and cause ongoing oppression well beyond 2040 as well as increase congestion and CO2 emissions.	2			
						Local communities should have more say in how their communities are developed – not the remit of the Council	1			
				Concerned about the redevelopment of Templar's Square Shopping Centre, which if gentrified, will undermine the ability of people on a modest income to live in Oxford. Will also have a knock-on effect on the employers who rely on such workers.	1					
				Just concentrate on improving the city centre. Allow short term parking to help tradesmen and markets as not everyone can shop using cargo bikes.	1					
				Essential that all planning policies enable flexibility. Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation, it should be accepted that a facility is not needed/ viable for its current use and policies within the Plan must support the principle of alternative uses for NHS land and property.	1					

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<b>C1: Focusing town centre uses in our district centres</b>	Preferred Option - a) (Define the district centres as on the map) b) (Define local centres) and c) (sequential approach)	Support location for student accommodation	3	Uses in District and Local Centres should be protected, but market forces affecting areas also need to be considered. A positive proactive policy is encourage and not be overly prescriptive. Also note owing to the changes to UCO other measures are needed for policy to be effective.	3	Introduce a hub at Kassam/Science Park area to support housing in these areas also ensure Grenoble Road development is well linked to city and footpaths developed	2	Approach is set out in NPPF. No policy required.	3	b) Student accommodation should be allowed in district centres as within walking distance of some campuses and colleges. c) student accommodation should be excluded from sequential test	2
								Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.	4		
		Support PO	12	The concept of 15-minute neighbourhoods is supported. Housing development should not be excluded from local centres as it can help to enable facilities to be provided.	5						
		Support PO, particularly support 'c', which discourages out of town retail sites.	3	Need hubs o/s ring road, to help areas deprivation and limit travel in. Consider new centre around Kassam/Science Park to support area and GRoad development. Help the currently disparate areas work together. link hub with suburbs and into South with bus and tunnel/crossing	2						
		Support option (a)	6								
		<b>Historic England</b> acknowledge the contribution made by heritage to the character of a place and look forward to this contribution being acknowledged as appropriate in the emerging OLP regarding the city's district centres.		Should encourage better concentration of local facilities within 15 minute walk/ cycle and encourage shift to active travel.							
				Policy would be stronger if it identified gaps in provision at each centre and took measures such as rate relief to encourage take-up.	2						
		Support concentration of amenities in centres/satellites to support 15 minute city principles. Town centres may need to be expanded to implement this.	3								
		Support the explicit support for all Use Class E classes, incl. offices in District Centres and a policy that sets out a sequential approach for new town centre uses.		Option A - would be beneficial for a cross reference to be made to Templars Square/ Cowley Centre site designation to link acceptable uses and reinforce 15 min city concept. Offices and R and D uses should be added to list of acceptable uses and mixed development should be allowed unless there are significant problems with them.	4	<b>CBRE on behalf of Redevco</b> - Do not consider there is a need for design guidance for Cowley Centre, which comprises Templar's Square, Templars Shopping Park and properties along Between Towns Rd. Templars Square likely to be only element that is redeveloped in the Plan period and is within one ownership.					

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				Option A – General reduction in car parking required to achieve a 15 minute city. Hotels are traffic generation hubs and should not be located in district centres – more B&Bs should be provided to increase quality stays in Oxford.	1					
				Require any new development to include a master plan and a physical model in the community hub centre to enable more to comment.	1					
				Support Preferred Option but there should be some control of new retail that consists of souvenir shops selling unsustainably produced goods that detract from the quality of retail experience that a city like Oxford should be promoting.	1					
				Option b – Increase pedestrianisation and make cycle paths wide enough for cargo bikes	1					
				Option b – Other areas such as Wolvercote, Cutteslowe, Lye Valley, Risingshurst, Woodfarm, Littlemore, Donnington, New Hinksey and Marston need to be added to ensure that they have the facilities needed by local residents within a 15 minute walk.	3					
				Option c – Should contain more criteria to restrict duplication of the same type of facilities, e.g. Cowley Road has a considerable concentration of restaurants and takeaways.	1					
<b>C2: Active frontage</b>	<b>Preferred Option - a)</b> (Designate frontages in city and district centres) <b>and b)</b> (set criteria for what is expected)			A positive proactive policy is encourage and not be overly prescriptive. Also note owing to the changes to UCO other measures are needed for policy to be effective.	1	Do not restrict the conversion of empty commercial properties to housing.	4	Support Option D as not always possible to secure mortgages for properties above commercial units.		
		Support PO	16	More definitions are needed as to what is a community facility.			1	Support Option D - object to having active frontages policy. Should be left to the market or the local communities to determine.	7	
		<b>Historic England</b> broadly support the preferred option (and para 7.6) and would welcome reference to the contribution made by historic shop fronts to the character of a place or street.		Option A supported but clarification sought on what comprises 'a high proportion' of class E units at Ground floor in terms of active frontage, in light of various uses permitted in Class E. Clarification to also acknowledge inclusion of entrances to upper floors and fire escapes.				Support option c	1	
				More control of frontage designs to present some sense of cohesion and integration (without a uniform approach) could enhance the attractiveness of the centres. The public realm and retail element of the city centre	3					

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				especially are of poor quality, especially given the city's heritage and tourist value.						
				Interesting window displays, planters etc. can add vibrancy and individuality to shop fronts.	1					
				Tradition view of 'active' frontages should be replaced with 'positive' frontages acknowledging that different types of frontages can have different impacts and functions dependent on location. Criteria for assessing impacts of development proposals should therefore be less prescriptive and on a site-specific basis.	1					
				Support use class E on ground floor in city and district centres. Residential on upper floors can help bring back vibrancy to centres. Force persistently empty units to be retrofitted for housing.	5					
				Should also be restrictions on advertising hoardings, especially where these do not promote vibrancy and footfall.	1					
				Support policies that lead to a mixed land use in centres, with fewer fast-food shops	2					
				Too interested in shops that will attract visitors rather than residents. Owners should be fined monthly and charged rates until they rent it out or sell it.	1					
C3: Protection and alteration of existing local community assets	Preferred Option - a) (Protect local community assets against loss) and b) (set out criteria for alteration and expansion)	Important that these assets are kept and developed for the mental wellbeing of everybody.	3			Could policies C3-C10 be merged into fewer policies?	1	Support Option C - houses, shops and restaurants are more needed than swimming pools or tennis courts.	3	
				Approach recognises importance of local community assets. These should be protected from loss.		The exceptions in option a are worrying. Possible for those who control a site to restrict use of it or make it less attractive so that fewer people use it, justifying its abolition on the basis that there is no need for it. Recent example is what has happened with the Blackbird Leys Community Centre.	1			
		Support PO	14	Link assets to transport	1	Who decides if there is no longer a need? Concerned that the Council is not equipped or resourced to challenge or vet viability assessments submitted by developers.	2			

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				Allotments, and other green informal areas and recreational spaces should be included as community assets in need of protection.	4					
		<b>Historic England</b> flag that there is a potential link between community assets and the OHAR i.e. protecting historic buildings as non-designated heritage assets.		Planning policies should actively support the strategic plans of local health commissioners and new health facilities to meet the needs of the population should be supported.  Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use. Policies within the Local Plan must support the principle of alternative uses for NHS land and property.	1	Reject the part of Option b) which suggests that units being 'lost to housing' is a problem. There are a lot of duplications of certain types of businesses such as restaurants, cafes and a lot of empty shops and homes in need of sustainable retrofits for housing.	1			
		Support (a) - resist their loss	15	Historic pubs should have specific protection for that sole use.	1					
				Look at assets on a case-by-case basis. Some assets such as the Hinksey swimming pool are well utilised and should be protected. Others such as the South Oxford bowling club are not used and could have a preferential alternative use such as a new park for children.	1					
				Some of the intended facilities will not fit into a 15 minute neighbourhood. What is the list of essential requirements of such a neighbourhood and has the use of space been modelled to check whether this is feasible?	1					
C4: Provision of new local community assets	<b>Preferred Option - a)</b> (General support for provision of new local community assets) <b>and b)</b> (seek community use agreements)			support active travel by ensuring cycle maintenance/ repair facilities are within range of all communities in city.				academy trusts may not be set up to have community uses on their facilities.		
		Support PO	19	General support for new local community assets in the city. They should be accessible by private vehicles as well as not all residents can walk or cycle. The presence of community assets can support positive health and wellbeing benefits.	2	Should still be able to use the other assets and not just those in each area. People don't just live in their 15 minute walking area, they live in Oxford and enjoy all of Oxford's communities. Some things are too niche to have access to them in every local area – not all sports can be played in all places etc.	1	Prefer option c – do not have a policy	4	
		Prefer option a	6	Support (a), but needs additional text to cover those areas outside 15 min neighbourhood area, such as Wolvercote. In areas within a 15 min neighbourhood area, where new development provides a community asset then financial contribution should be sought to subsidise an asset in area nearby but outside 15 min area.	4					

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		Prefer option b	2	Policy needs to be more specific. For example, with planned intensification in the West of the City, reserving areas for such provision is needed along with mechanisms to ensure they are delivered.	2					
				Where community assets are to be provided in mixed use schemes through private sector development, it is essential that the Council clearly articulates the assets required and the priorities and balance of other uses, or the community elements will be crowded out because of development pressures.	1					
CS: Protection and alteration of existing learning and non-residential institutions	Preferred Option - a) (protect existing learning and non-residential institutions against loss) and b) (set out criteria for alternation and expansion)	Support PO:	13	PO a & B - is it intended to include or exclude C2 institutions?	1	Criteria supporting the loss of such facilities to facilitate investment elsewhere should be included.	1	Refer to national legislation about the disposal of school playing fields - see County comments for process	1	
		Historic England broadly support the preferred option, subject to suitable consideration of the historic environment.		Resist loss of existing facilities in particular there is a need to protect libraries	5	Don't make kids only go to school in the 15 min zones - you will segregate them too much and cause animosity	1			
				There are already enough places of worship. Protect other community facilities.	4	To preserve the workforce in state schools close to the city, need to ensure that teachers (the majority of whom cannot afford to live close to their workplaces and who would find commuting by public transport impractical) can continue to commute by car. Otherwise the viability and desirability of working at such institutions long-term will decline.	1			
				Don't abandon churches. Should be recognised that places of worship, in an increasingly mixed ethnic city, provide a vital function for the preservation of national cultures but also a function for the meeting of cultures and the building of cross-cultural understanding, not least through their social outreach.  In addition, the different religious congregations, such as those on Hollow Way and at the Cowley Road end of Magdalen Road collectively manage the use of these locations well. The dispersal of religious meeting places is good for encouraging low levels of private car use, and should be maintained.	4					

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	<b>c) considered detrimental</b>	Support (a)	1	Prefer option a) but should be applied selectively. Oxford can afford to lose a number of minor tutorial colleges and to constrain the growth of educational newcomers who are here only to use the Oxford brand; but its major libraries, places of worship, schools and universities should be protected.	7			Is a protective policy needed?	7	Option c would result in the loss of further institutions to the detriment of the area.	1
				Multi-use demands of libraries are managed effectively and carefully with all stakeholders to ensure the long-term viability of these institutions which provide an important service to the local communities they serve.	1						
C6: Provision of new learning and non-residential institution	<b>Preferred Option - a)</b> (Criteria-based policy for assessing suitability of proposals)			Policies specific to H Edu should be in Chapter 3 as the universities key in supporting the learning, knowledge and economy of the city	1	Combine with C5?	2	Support option b – do not have a policy	4	NB although no new schools proposed if there were new school land would be transferred to county. community use of school sites is decided by the trusts or government body	
				This policy should be more positive e to welcome this and there should be a policy expressing support for the knowledge economy.	1	New private institutions should be discouraged as they increase the housing crisis. Expansion must be matched by accommodation provision.	2			Option a is not necessary	1
		Support PO	10	Policy needs to contain strict criteria to assess the suitability of proposals in order to protect the integrity of Oxford as place of learning. In the past there have been instances of dubious institutions setting up in the city. Development of new private or fee-paying schools should be severely limited - the policy should encourage schools for the local community.	6	No more language schools	1				
				When schools are required to increase their capacity, first preference should require them to make use of their existing space, including taller buildings.	2	Don't make children only go to school in the 15 min zones - you will segregate them too much and cause animosity.	1				
				Planning policies should actively support the strategic plans of local health commissioners, and new health facilities to meet the needs of the population should be supported.	1						
				Build houses on school land as commercial support	1						
C7: Protecting cultural, social and visitor attractions	<b>Preferred Option - a)</b> Criteria-based policy	Support PO particularly to include live music venues and pubs	17	You can't force owners to keep loss-making enterprises going, unless the Council is going to subsidise them. This option should be mentioned in the policy.	1			Support option b – do not have a policy	3	Do not support option a	1

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	that protects existing venues										
		<b>Historic England</b> acknowledge that such venues are frequently heritage assets, and in such cases often forms part of what makes them attractive destinations.		Sounds fine but central Oxford cultural sites are already largely inaccessible from outside the ring road due to high costs and limited provision of transport and parking.	1						
				Suggested additional policies: to prevent loss/size reduction of community spaces; and ensuring users of community spaces are properly consulted when considering new development.	1						
				Highlight the racism of some of these attractions - show the full history	1						
				Protect small, local, independent shops too. These used to form a great part of Oxford's attraction, sadly now mostly gone.	1						
				Playing fields are culturally important to families and children	1						
	Para 7.10			Mentions attracting "visitors from within the city and tourists", as though these are binary alternatives. Oxford's venues and its cultural and social activities have an attraction and a role for many people from the wider county of Oxfordshire and beyond, often on a fairly frequent basis. They could attract many who do not yet use those opportunities.	1						
C8: Provision of new cultural, social and visitor attraction	<b>Preferred Option - a)</b> Criteria-based policy that assesses suitability of proposals			A distinction need in policy between PB facilities which service public and opposed to facilities which have a main function and serving public is incidental.	1	Combine with C7?	2	Support alternative option c – do not allow new cultural, social or visitor attractions	1	Alternative option b – allow only in city and district. Unsure what this is designed to do. There seems to be conflict between the 15-minute neighbourhood model and attractions in the city centre.	2
		Support PO	20	Provide a criteria-based policy to assess the suitability of proposals, which looks at accessibility, environmental and transport impacts to determine the acceptability of proposals for these uses.				Support alternative option d – do not have a policy. Too many restrictions are harmful and stifles grassroots innovation	4	Disagree with option c	1
		<b>Historic England</b> advise ensuring that that the historic environment is considered under environmental impacts.		New cultural, social and visitor attractions should be encouraged everywhere, particularly live music venues.	2					Disagree with option d	1

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				New tourist facilities should be considered separately from those which benefit residents more (though of course some may be both).	1					
				New attractions should not be developed on greenfield sites or provide additional car parking. There should be a preference for taller structures where new build or sustainable refurbishment is being contemplated.	1					
				There are potential risks of "conflict with Oxford's historic assets" as indicated in Option a. What is provided in the city centre should not undermine the general ambience of the city or the pleasure of enjoying its existing spaces and facilities.	1					
				Need for a clear definition of what is a visitor attraction and what the criteria were to be in the policy. An example is Jericho Canalside. If this is successfully developed, it will attract a lot of visitors - even though visitor attraction is not the specific objective of any element on site.	2					
C9: Pubs	Preferred Option - a) (Criteria-based policy to protect pubs)	Support PO	26	Too many pubs have been lost. They are an integral part of any community and some no longer have one. Some of these are historic buildings and the businesses in them need support. Part of the issue is high rent charges so need to ensure this is affordable so businesses survive and the risk of losing the unique characteristics of local businesses is decreased.  Should be more opportunities for these establishments to become community owned, supported by local policy.	23	Alcohol encourages antisocial behaviour, and does not benefit society. The concept of the pub is culturally important but in social terms, cafes have become the equivalent of the pubs of the past and this is to be welcomed in health terms.	3	Support option B - option A lists requirements that are too onerous	2	
				Support PO: but need to ensure evidence of marketing is sufficiently stringent, to ensure owners do not allow property to get into a state of disrepair in order to develop it for a more profitable use. Council should adopt CAMRA's model planning policy, including Public House Viability Test.	1	The council cannot protect pubs as they have to be commercially viable to survive.  If pubs are to survive, it will be by adaptation into good restaurants combined with a degree of 'cafe culture' in how they present themselves to the community.	5	Already covered by Policy Option C7	1	
				Should consider car park as part of viability assessment	1	Should be left for local communities to determine how best to support Pubs in their community.	1	Alternative option c – do not have a policy. Pubs are less important within the landscape of community facilities than they used to be and are also less suitable to community needs than they once were held to be.	5	
			1	What is most necessary is the protection of medium sized rooms for hire within the 'pub' type building but independent of the main bars in terms of space and for hire.	1	Too many pubs. Should be used for other things such as housing.	1	Alternative option c – most pubs are mediocre and shouldn't be protected. Excellent pubs don't need protection because they succeed.	1	
				Historic England support the preferred option and suggest the text also refers to [heritage] significance.						

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C10: Transport assessments, travel plans and servicing and delivery plans	Preferred Option - a) (Require transport assessments and travel plans to review transport impacts) and b) (Require transport assessments to also include servicing and delivery plans, where relevant)			Unclear what are 'significant transport implications' are. Policy approach needs to align with NPPF.		Option repeats NPPF and Validation Checklist	2	Support Option C - No policy required as TAs, TPs and servicing and delivery plans can call be validation requirements or can be conditioned on permissions.	7	Object to Option C as would not allow potential impacts on SRN to be determined resulting in safety and operational impacts.	2
		Support PO	23	Refer to the Decide and Provide approach to TAs NB significant can be low trip generation in highly sensitive area	1	Processing all of these assessments and criteria is bureaucratic. Who pays for this?	1				
				Needs to be strict restrictions on the movement and timing of deliveries by heavy lorries and delivery vehicles within the city centre.  Also needs to be monitoring and feedback for policy to be effective.	18	Proposals are wholly inadequate. Should be recognised that private vehicle transport is indispensable. Policy should ensure that private vehicles do not pollute, are small (i.e. no SUVs etc.), and that the entire city is accessible. Here, there should be no separation between vehicles and pedestrians, the latter with priority at all times and traffic reduced to walking pace along the Dutch Woonerf principles.	1				
		Support Option a	5	TAs, TPs and DSPs should be reviewed carefully by planners. Wide range of quality in these documents. Often include incomplete/ out-of-date traffic counts, over-optimistic walking times. These documents should also contain a section on key risks to active travellers which gives consideration to the safety and attractiveness of proposed routes.		Mitigation is not enough, there has to be full offset or removal.	1				

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				Should be required for all developments, although proportional for smaller schemes. Should consider how a development generally fits into the city's transport system and not just focus on mitigating negative impacts.	6	Support options A & B as this would allow the impact on the SRN to be evaluated. Expand option B to include edge of town commercial/industrial land use could limit the impact on peak travel on SRN				
		Support Option b	4	Plan needs a stronger emphasis on connectivity	2					
				Alterations to travel flows and restrictions to road use should not be imposed on local communities.  The fixation on local emissions needs to be replaced by thinking more about how Oxford as a city might be more environmentally responsible. Instead of concentrating on locally driven cars, it should be considered how much heavy industry the city relies upon.	4					
				Have an assessment which leads to a flexible, reliable and city wide transport system and not one which requires a half mile walk across town to change buses. At the moment the transport system suits the providers not the users.	1					
				Transport assessments have to be more meaningful. Not like a recent example in Old Marston which referred to a 10 minute walk to a bus stop which is (only) serviced hourly. Should be more protection for local bus routes.	2					
				Ensure the plans allow for rapid technological and behavioural change in the future, not just the current situation. E.g. deliveries to houses replacing shopping, local collection points, bicycle and scooter couriers.	1					

## Sites Allocation Policy Options

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Introduction & Infrastructure Needs	8.1	<p>OULD supports existing allocations of 2036 Plan and wishes to discuss each site to ensure most efficient use of land, reference to housing nu should be removed</p>		<p>City council must work with Integrated Care system to ensure primary care facilities are provided across the city. Water and sewerage infrastructure needs to be properly considered city wide and planned for also need to ensure that public transport is supported the serve the needs the whole of the city- need routes that get people to places of work, BMW, hospitals as suggested in the local connectivity plan.</p>		<p>Littlemore PC looks forward to working with the City Council to improve infrastructure provision for residents</p>			
				<p>Infrastructure section does not include any infrastructure projects. Suggest infrastructure projects are included in this section, especially active travel measures.</p>		<p>There will be more floods in the future and so must be invested in water treatment works. Boundary Brook could be restored to a natural river to manage an increase water absorption</p>			
	8.1 & 8.3			<p><b>Historic England</b> suggest reference is made to minerals and waste planning policy.</p>					
Introduction & Infrastructure Needs	Fig 8.1	<p>NB - refer to county reps which lists which sites they consider that should be car free.</p>		<p>Support addendum to IDP however it needs to be considered within viability assessment and within the context of the level of employment and residential development, the sites chosen and what is essential.</p>	5	<p>Before any unmet need is met from neighbouring dc the deficit of infrastructure delivery must be addressed and delivered</p>	2		
				<p>Divisions in IDP are useful but there are also likely to be Oxford-wide issues that require a joined up approach. Consider using 15 minute city zones</p>	4	<p>East Oxford, Littlemore and BBL should be considered as a whole rather than piecemeal</p>	1		
				<p>Infrastructure also needed outside of Oxford's boundary to facilitate development within Oxford. A wider and joined up approach is required. Include more crossing for cycle and pedestrian over A40</p>	2	<p>Littlemore needs more attention, an area with deprivation that needs input.</p>			
				<p><b>Natural England</b> flag that in accordance with NPPF the plan should allocate land with the least environmental or amenity value - sufficient evidence needs to be provided through SA/HRA to justify site selection. <u>They note that a number of site allocations are within close proximity to designated sites.</u> Allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. <u>Sites which would result in unavoidable impacts and/or where mitigation cannot be secured, should not be pursued.</u></p>		<p>Infrastructure plan needs complete change of economic model.</p>			

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				<p>Thames Water make various comments in relation to water supply/wastewater infrastructure - see comments against S3, R6 and R8. Also, <u>highlight that they are concerned that the water and sewerage network in this area may be unable to support the demand anticipated from the developments. We therefore would seek for as early engagement as possible with the Local Planning Authority to ensure that there is adequate water and wastewater infrastructure to serve all new developments.</u> They do not reserve network or treatment capacity for specific development sites. A consideration to the potential impact on water and wastewater infrastructure should be included when promoting a development and provision for upgrades should be made, where required</p>					
	207			<p>Consider more sites will be required to meet Oxford's unmet need from the surrounding districts. Need to keep working with surrounding districts to bring forward additional sites and supporting infrastructure.</p>	2			<p>Overall housing and employment need should be defined before pushing into surrounding districts. Existing OLP2036 allocations should be maintained and reviewed to see if they can accom. additional development</p>	2
				<p>New developments should be future proofed for future innovations and look for potential freight consolidation centres, need to consider how the grid will be decarbonised.</p>	2				
				<p>PO document does not identify which sites are new and which are already extant allocations in the 2036 Plan. No indication of quantum of development suitable on suggested sites. New sites have been added but it is not clear how these will contribute to the housing numbers etc.</p>					
	207- para 8.5			<p>I regret that in Para. 8.5. "Whilst each of the neighbouring authorities will be responsible for the delivery of these sites, the City Council retains a strong interest in seeing them developed in a sustainable manner. In infrastructure terms, this means that they should be well connected into existing networks and reflect Oxford's particular approach to transport provision, with a strong emphasis on the need for dedicated pedestrian and cycle provision in addition to an effective public transport system offering residents a realistic alternative to the private car", you show no recognition that there are many other aspects to consider when the City impacts on neighbouring authorities. It is not only the sites themselves which should be sustainable; the impact on environment, wildlife corridors, specially recognised sites, the health and well being of your own Sandhills community (and those in Barton who make use of and benefit from that area of prime countryside) should equally be listed as matters of concern.</p>					

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	Fig 8-3			<p><b>Historic England</b> flag that whilst the LP's approach to the location of unmet need housing sites within adjacent Oxfordshire local authorities will have limited weight, a number of sites have the potential to impact on designated/undesigned heritage assets, which needs to inform the consideration of and approach to these potential allocations. They note following allocations in particular: a) land east of Oxford and potential impact on the significance of St Frideswides Farmhouse (GI*) b) land south of Grenoble Road, and its potential impact on the setting of a Scheduled Monument c) land at Northfield and its potential impact on the significance of a cluster of designated heritage assets associated with Wick Farm d) land within the Oxford and Abingdon Fringe area of search and its potential impact on the significance of Marcham Conservation Area and designated heritage assets e) land west of Eynsham and its potential impact on the significance of Scheduled Monuments.</p>							
				<p><b>Historic England</b> also make two general comments about the approach to site allocations: firstly, they note within the HELAA appendices, a 'rather artificial delineation' between policy constraints and physical / environmental constraints, which should be avoided, as significant elements of what are currently listed as policy constraints are often also environmental constraints. Secondly, the current LP 2036 currently deals with heritage considerations within the supporting text of policies - whilst this may be appropriate in some cases, in others, the relevant concerns should be put into main policy text, or else risk of insufficient weight being given to the conservation and enhancement of designated heritage assets, particularly those that are highly graded. They've flagged against the relevant policy options in this consultation where they are looking for specific policy text to address the heritage considerations on a proposed development. For archaeology specifically, they would prefer to see text in policy where there is high potential for archaeological remains and/or the evidence base suggests a particular policy approach is required.</p>							
Areas of Focus	8.7-8.8			Site should be more loosely allocated for "residential" rather than specifying key worker or student accommodation.		The Aof F could be too narrow a focus on specific area and need to consider all sites if Oxford is to meet its housing requirement.					
				Existing OLP2036 housing allocations should not be removed from the plan.		Aof F should be aligned to 15/20 minute neighbourhoods, unclear as to the boundaries as it could imply whole area becomes a policy	1				
				Where sites can tolerate additional homes, this should be set out in the updated allocation		The Plan is unclear about Aof F - it cannot allocate sites beyond its boundaries. The city has not discussed taking any unmet need with SODC. There has been no attempt to properly justify exceptional circumstances for higher growth. We must discuss these issues. SODC/VWHDC	2				

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				Consented schemes should be updated accordingly.						
				<b>Environment Agency</b> flag that at present it is unclear, but appears as if a number of sites (particularly in the South and Central/West areas) are at risk of flooding. This should be explored in new SFRA and Local Plan would be unsound without this. A sequential test should be undertaken at earliest possible stage as well as exception test if necessary - this should be followed up with Level 2 SFRA where necessary. Agree with para 8.6 statement about sequential approach to site layout. Flag that Council should demonstrate that it has avoided allocating land for inappropriate development within its flood zone. Also the south and central/west areas include the route of OFAS which should be acknowledged in context of these areas.						
				<b>Environment Agency</b> agree with area of focus approach which might prove simpler in due course to work on several sites concurrently in relation to ground contamination. They flag that they have been unable to provide specific comments on sites due to lack of national grid references but that if this is provided they can provide more detailed assessment with regards to sensitive groundwater sites - without more detailed consideration of constraints and ground water protection they would find the Local Plan unsound. Also info on sites is not currently sufficient to make assessment of suitability of sites regarding how they will sustainably discharge wastewater and access water resources. Would like to see a Water Cycle Study or Water Quality Assessment to assess the impacts of the development on local STWs and have concerns about Oxford and Cassington STWs already. Any impacts of development on the bathing water should also be assessed. Would be able to help with Water Cycle Study/Water Quality Assessment. Any issues identified should be appropriately mitigated before development is approved.						
				<b>Environment Agency</b> also have comments in relation to biodiversity/ecology on sites, but cannot give specific information until they better understand detailed site boundaries and NGR information.						
<b>North Area Northern Edge of Oxford Area of Focus (AOF)</b> OUP Sports Ground HELAA #49 Jordan Hill Business Park #512 Frideswide Farm #107 Oxford North (formerly Northern Gateway) #001 Pear Tree Farm #590	A - Preferred Option - Designate AOF with its own SA policy	<b>Natural England</b> support the proposed Northern Edge AOF designation and would welcome further detail as to the key development principles to be included in policy for the area to protect Port Meadow SSSI & Oxford Meadows SAC. No comments on proposed sites.		Figures for each AOC should also include all development on the edge but outside of City boundary.	2	Strongly oppose any further development in this area, new housing would be used by commuters to London and will do very little to meet Oxford's unmet need		Support Option C	1	

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		Support inclusion of Pear Tree Farm within the North Area of Focus. Eventual allocation Policy should allow for employment and residential development		With reference to IDP for this area, a large proportion already has pp that fixes infrastructure, IDP can only seek new elements via new app's that come forward.		Increased traffic impact	3	Support Option D	5
		Support 'preferred option' approach of designating the wider area surrounding Pear Tree services as an Area of Focus and giving this area its own strategic policies. Consider that Red Barn Farm should have its own policy allocation	2	County - refer to our previous comments on site policies for 2036 Plan		This policy option set presupposes that North Oxford should be further developed, which implies further incursion into the green belt. There has been too much development in the Northern Edge already, and future development should be focused on brownfield sites and increased density in the Oxford core area.	4	Support Option E	5
		Agree with preferred option - but there should be proper, grade separated cycle infrastructure installed for any large development outside the ring road.	3	<b>Historic England</b> (on basis of combining options a and b) do not think it is appropriate to list 'Wolvercote NP' as a key principle. Needs to better articulate what is meant; for example, linked with the protection of local distinctiveness in the area and with reference to Wolvercote NP. Also, do not support the over-simplistic conclusion in the SA that the area has 'limited local character' as evidenced by the relevant Conservation Area Appraisal. Consider that Oxford North needs its own policy to articulate how proposals will enhance the Wolvercote conservation area and any designated and non-designated heritage assets that would be impacted by the development.		Bike lane needed on both sides of Woodstock Road		Focus is already Summertown. No more foci required.	
		Support Option A	7	TWO and ONV recommend that Northern Gateway is included as a specific policy in the LP2040. Failure to do this would result in no specific allocation policy to deliver those aspirations beyond the extant planning application, which only relates to part of the wider Northern Gateway allocation.		Oxford has permitted overdevelopment without adequate thought about communities or transport. Other towns in Oxfordshire should take some of this burden.		Respect the Green Belt and similar areas, and do not join Kidlington to Oxford.	
		Support Option B	7	Necessary to review each existing allocation to see if it can accommodate additional development		Developments at Northern edge have not been handled well so far e.g. no decent cycle track to Parkway Station, destruction of golf course etc.		This is too little, too late. The area is already devastated and Wolvercote will be a shrinking island overshadowed by an overpowering and polluting development. The local plan has been quite ignored in the interests of profit.	
				OUS - we are not convinced all these sites are strategic a more coherent grouping should be established sites 49, 512 and 107 relate but linked to sites in CDC as opposed to 1 and 590		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines		Improve transport especially A40 and put in a rail link to Witney.	
						What about public transport?			

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						No development outside the ring road should be allowed unless and until high-quality grade-separated active travel connectivity across the ring road towards the centre is provided.					
						Less business allocation, more housing. Green space/habitat					
						There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.					
						The only permitted development should be on brownfield sites.					
						Oh yes! There will be a tremendous impact on roads into and out of the city under pressure from additional houses. It is unlikely that people will cycle anywhere from the North since the traffic load already putting pressure on the area will discourage this.					
						We do not need more businesses to add further pressure.					
						Mosaics development should not have been permitted and should not be a precedent for further destruction of valuable green field green belt land. Destruction of natural habitat. Polluted with fumes from northern bypass.					
						Nothing should be allocated until sufficient Infrastructure is in place					
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					

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						<p>As a general position, the <b>Woodland Trust</b> objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland.</p>					
						<p>These proposals will result in a very built-up area in N. Oxford. The cumulative effect would result in urban sprawl between Oxford and Kidlington potentially from Shipton to South Abingdon. It would change the character of the area &amp; undermine policies to protect nature corridors. Some of the allocations around Yarnton &amp; Begbroke appear to be meeting the needs of the University of Oxford rather than city's need. The allocations will result in loss of Kidlington Gap, which would be further threatened by proposed Green Belt Review. Concerned about wording which considers outdoor recreation not inappropriate appears to offer potential support for new Kassam Stadium.</p>	1				

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						<p>a) rail line re-opening Witney-Oxford, and then to Carterton with exploration of options for further extension to help reduce traffic within West Oxfordshire;</p> <p>b) Electronic Road Pricing to be applied to the A40 and alternative routes servicing Oxford to create downward pressure on car movements permanently;</p> <p>c) substantial upgrades for cycle tracks including colour marking and width large enough for cargo and e-cargo bikes;</p> <p>d) look at options for bus lanes, use ERP funds for electric buses and ensure bus lanes, advance stop areas for bicycles and more pedestrian crossings in current high traffic areas are all implemented.</p>			
Oxford North (formerly Northern Gateway) (HELAA #1)				<p><b>Historic England</b> don't object to allocation, but note that the boundary appears to have (slightly) changed and that the site assessment states that 'Design sensitivity may be required for the part of site which is within the Wolvercote CA'. Feel this is too weak and is likely to have minimal impact. Mindful of the duty for special attention to be paid to the desirability of preserving or enhancing the character or appearance of that area, state that the supporting text in the OLP should refer to the need to enhance the conservation area.</p>					
	Fig 6.4			Plan in Fig 6.4 is inaccurate as indeed is Fig 1.2	1				
<b>North Area Sites Outside AOF</b>				Review each of these allocations to see if could deliver more development	1				
Summertown House HELAA #580	A - Allocate for grad. student accommodation			<p><b>Historic England</b> do not object to allocation, but look for a commitment in policy to retain the Listed Building and protect its setting. Also, note that the adopted OLP2036 has included for archaeological interest at this site; however, the site assessment does not pick this up.</p>					
Diamond Place HELAA # 18	A - Allocate for mixed use			DP has potential to deliver more by increasing height of development		No opportunity to comment on key sites, such as Diamond Place.	1		
				<p><b>Historic England</b> do not object to the allocation; however, note that the site assessment identifies high potential for archaeological interest as the site is adjacent to cropmarks of likely prehistoric or Roman date and that the site lies adjacent to some Listed Buildings, Diamond Cottages. Noting this information, they challenge the site assessment's conclusion that there are no environmental constraints associated with this site. This needs to be resolved in the final plan to acknowledge the heritage interests of this site more accurately and ensure that they are afforded suitable protection.</p>					

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Wychwood Tennis Courts HELAA # 623	A - Allocated for residential			<b>Historic England</b> do not object to the allocation of this site; however, supporting text needs to articulate clearly the need to enhance the conservation area adjacent.							
	8.1	Support reopening of CBL need to provide supporting infrastructure in terms of car and bike facilities and a third station.		Do not consider that Cowley Branch Line is a viable and deliverable project. Services likely after 2028. Bus service is more affordable. Inappropriate to use this scheme as planning the location of development without much greater certainty as to its delivery.							
<b>South Area</b> <b>Cowley Branch Line, Littlemore and The Leys AOF</b> Kassam Stadium and Ozone Leisure Complex #28a Overflow Car Park as Kassam Stadium SITE #28b Oxford Science Park #588 Oxford Business Park #587 Mini Plan Oxford #497 Sandy Lane Rec. Ground #289 Oxford Stadium #111	A - Preferred Option -	<b>Natural England</b> support the proposed Cowley Branch Line, Littlemore and the Leys AOF designation and would welcome further details as to the key development principles to be included in policy for the area. We would anticipate this may include details on the proposed protected green infrastructure network and the application of a specific UGF for this particular area given the current baseline position.		Why does this area exclude Unipart and sites 401 and 604 - should be included. Need clear site boundaries check for errors.		Too much focus on CBL which is unlikely to happen without public finances. The project was proposed by NIC before any realistic appraisal of its feasibility by NR. Whilst it could be explored it is an inappropriate bases of which to plan the location of development without much greater certainty as to its delivery	5	Support Option C	1		

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		<p>Railfuture Thames Valley strongly supports the re-opening of the Cowley branch line to passenger services, with the two new stations as proposed, and given the advance planning already undertaken by Network Rail, works should be brought forward to commence as soon as reasonably practical so that the line can open as soon as possible after the completion of the next phase of Oxford Station redevelopment which will bring into use the necessary 5th platform.</p> <p>This scheme will greatly improve social inclusion in east Oxford, including some of the most deprived parts of the city, as well as the wider catchment area for the new stations, with much better connectivity for employment, education, health, leisure and other reasons. The journey time to central Oxford will be much reduced compared to by bus and it will relieve congestion on the busy main roads in east Oxford.</p> <p>We consider the city should be open minded as to the destinations of the trains serving the Cowley line; Chiltern Railways have in the past shown interest in running the service by extending their Marylebone-Oxford trains but other options should be considered such as Milton Keynes, via EWR or Hanborough for a cross-city "metro" style service with investment in the Cotswold line &amp; Hanborough station. All these or perhaps other options should be borne in mind.</p>		Concerned that the Cowley Branch Line won't be delivered within plan timeframe. As such is it sensible to make policies that relate to it. Lots of development coming forward in the South Area of Focus seems to rely on CBL. Concerned of transport impacts if CBL not delivered within plan period.		Do not allocate any greenfield site to housing		Support Option D	1
		Support allocation of Oxford Stadium for mixed-use leisure / recreation and residential use, subject to consultation with local residents & users of leisure facilities. Welcome no mention of Greyhound use.	1	Consider that 'contextual analysis' should include and acknowledge regional, national and international attraction of R&D companies. Allied to this, a key principle should be to support the needs of businesses located there.		Both the business park and science park have available plots. Question why employment land is left undeveloped when there is a shortage of land for housing.		Support Option E	1
		<b>Savills on behalf of Cowley Investments Ltd</b> supports principle of identification of AOF and also Ox. Stadium as a specific development site. PO also supported in principle. The detailed site development guidance under 'B' must reflect the guidance in OLP2036 SP51, particularly reference to enabling residential development not impacting on operation of stadium and also opp. for resi led dev if Speedway and Greyhound racing become unviable.		<b>Historic England</b> note that something may be wrong with Figure 8-5. Sites allocated in AoF not shown in figure, and other sites inc which seem not to be part of AoF in accompanying text (see submission). Feel that for high-level principles, text needs to pick up the contribution made by the AoF's historic environment; for example, wording such as "Enhance Temple Cowley and Littlemore conservation areas and protect the area's archaeological remains and the significance of its designated and non-designated heritage assets". Support PO A in combination with B.		It is disingenuous to present this as a viable and deliverable project. The Network Rail report on the Oxford Rail Corridor implies that the only interested passenger rail operator for this line, Chiltern Railways (aka Deutsche Bahn) would consider running a passenger service to Cowley, after 2028, only if enough commuter passengers from the proposed new Cowley stations bought 'through return tickets' to London (i.e. not local commuting). The public bus service from Cowley to Oxford Station will always cost much less than using a passenger railway to carry workers into that part of Oxford, and long-distance commuting is now contra to local and national policy. This project was proposed by the National Infrastructure Commission before any realistic appraisal of its feasibility was undertaken by Network Rail.			
		Support option A	11	Should be a good bus services around the ring road. linking all these areas to the hospitals at least. Also should be affordable housing around these employment hubs to minimise travel.	1	Whilst further exploration of this scheme is desirable, it is inappropriate to use it as a basis for planning the location of development without much greater certainty as to its delivery.			

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		We support the re-opening of the Cowley branch line to passenger use. We support a north-east re-opening of the line to allow it to connect to the existing rail line near Wheatley as part of reducing traffic heading for the utterly appalling Green Road roundabout, Windmill Road-Old Road junction and the non-roundabout roundabout sloppily permitted at the Corner House at the top of Hollow Way. Please note a traffic filter on Hollow Way, which we support, will cause more traffic to move to and from the Slade and Horspath Driftway, making vehicle and traffic movements north on Hollow Way more problematic than they are already.		Agree partly with preferred option, but there needs to be stringent attention to impacts on noise for residents near the line, and who would be affected by increased rail traffic. This was not done by Network Rail in past developments in the North of Oxford, and they reneged on their noise abatement commitments (e.g. backing out of installing Silent Track, and settling on inadequate noise barriers).		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.	2				
		Given current and planned developments on the East side of Oxford, the reopening of the Cowley Branch Line would greatly enhance connectivity and in accordance with the County's transport plans, reduce vehicular traffic.	3	<b>BMW</b> support Preferred Options A and B. BMW have no objection to the Preferred Option of safeguarding land to enable the future expansion of the Cowley branch line. However, should the expansion be achieved, it would be essential that this should not in any way disadvantage the existing rail freight users, including BMW, who rely on the Cowley branch line to transport finished cars from their site to UK ports for export.		Spindleberry park is the wrong message for younger generations who do not have a say on future ecological concerns					
		Safeguard land for Cowley Branch Line proposed stations and access, improved connectivity for the area and between areas		Mini Plant Oxford (HELAA 497) could have houses built over the car park. Building houses over car parks seems to have been ignored.		Thomson Terrace Allotment, Rose Hill is a valuable community asset and should be included as a full viable green space within the Oxford plan. I understand the land is only rented by OCC but long term agreement or buy out should be pursued to assure long term use of the space. The land itself has very restricted site access due to the limiting road access to the south.					
		Putting Cowley on the GB railway map will boost east Oxford's economy and benefit the whole city. Local bus routes (such as to the hospitals, Headington and settlements in south Oxfordshire) should connect to the service with a rail/bus interchange hub.		If the council is going to build houses near to the Cowley Branch line stations, please ensure they are medium density. The sites will all have great transport infrastructure and therefore are great plots to build a large number of flats		You are inviting generic comments on site selection via these questions but appear to have already shortlisted sites. Why is comment on individual sites not being invited?					
				This should come with improvements to the ring road cycle path (which is currently fractured going through Littlemore)		Cowley branch line protection is good, as is better cycle and walking routes to the station. But it doesn't say anything about the level crossing between Spring Lane and the cycle and walking path to Kassam stadium, which will need to be upgraded to reduce car traffic to the new houses off Knights Road.					

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				Just improve the bus services by removing all the traffic filters.		Goals of increasing public access to green spaces, protecting wildlife corridors and enhancing existing tree cover don't have any concrete actions. Instead list areas covered by new housing. As a background paper states, every development will need a 10% biodiversity net gain. This is possible in the Leys, but not in the 2040 option documents. It would need, e.g. wildlife corridors crossing Grenoble Road, linking Northfield Brook to the forest area in Sandford.					
				Wildlife corridors -can you say that the residents really understand what these are and what purpose they serve?		Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					
						What wildlife corridors would you have in mind? Railway banks can be good habitats in themselves, but a wildlife corridor must lead to other areas of the same kind or it is a corridor to nowhere. Would this line be purely local? Would you put a ban on using the line for travel to other destinations such as London, and, if not, how do you avoid making the area a dormitory site for long-distance commuters? 'Improved connectivity' of this sort would have detrimental results from other perspectives.					
						Yes, any development should give due regard to the natural environment, but that is not what you are asking.					

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	B - Preferred Option - Include detailed site development policies for sites listed.	<b>JLL on behalf of Firoka Group</b> support inclusion of the <u>Ozone Leisure Complex together with the Kassam Stadium site for redevelopment</u> . Recognition of the potential for 'redevelopment of the Ozone Leisure Complex within Use Class E' is specifically supported as it is clear that the Ozone Leisure Park's location immediately adjoining the Oxford Science Park provides an excellent opportunity to provide additional office, light industrial and life sciences uses. Significant provision of Class E employment uses in this location would enable existing life sciences hub to be enlarged beyond the limitation of the Oxford Science Park and would also reduce pressure on development of green belt land in order to meet the huge need for this form of development in and around Oxford.		JLL on behalf of the Firoka Group - welcome the proposed allocation of the Kassam Stadium, Ozone Leisure Complex and the Overflow car park to deliver mixed use development incl. housing, the 'detailed site development guidance' should allow for detailed consideration of the balance of non- resi and resi development in the car park and stadium land through a masterplanning approach, with the distribution of uses also to be informed by an updated SFRA.		<b>JLL on behalf of Firoka Group</b> - Support expressed in principle for the proposed allocation of the <u>Overflow Car Park at Kassam Stadium Site</u> but <b>object</b> to this site being identified to specifically comprise a residential allocation, as this upfront requirement is not adequately justified and thus is likely to be to the detriment of proper masterplanning of both HELAA #28a and HELAA #28b to optimise mixed-use development across both sites. Concern that containing employment development to the existing confines of the Ozone Leisure Park and specifically defining HELAA #28b as a residential allocation appears arbitrary and contrary to the principles of good planning, with no clear rationale as to why employment development should not extend northwards of the Littlefield Brook and onto the overflow car park. Dwelling houses constitute a land use more vulnerable to flooding impacts according to Annex 3 of the NPPF, whereas employment uses are classed as less vulnerable. Despite a significant area of the Overflow Car Park being within FZ3 the proposed residential allocation favours development of 'more vulnerable' dwellings houses rather than 'less vulnerable' Class E use' - despite the Kassam Stadium and car park to the South being within FZ1 and not subject to any significant flood risk. The proposed allocation of the overflow car park for resi development appears to run contrary to the approach of Para 159 of the NPPF. Although a SFRA was published by the City Council in 2017..... this clearly led to the clarification that 'more vulnerable development will be expected to be directed away from FZ3b'. The OLP2040 PO Flooding and Drainage BP recognises that an update of this assessment is needed, ahead of the update being provided, there is no apparent justification for development of 'more vulnerable dwelling houses as opposed to less vulnerable class E use on the overflow car park.			
		Support Option B	8			We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children.			
						Some things are too niche to have access to them in every local are - not all sports can be played in all places etc.			
						Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines			

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						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland.</p>				
						CT PG should not be deallocated.				
	Kassam Stadium and surrounding area HELAA (#28)			<b>Historic England</b> do not object to this allocation; however, adopted OLP2036 notes archaeological interest, but no mention of archaeological interest in the site assessment making it inadequate/incomplete. New OLP needs sufficient detail on the archaeological interest and potential of this allocation. Note also potential for groundwater levels to impact on archaeological remains in this area.						
				HELAA 28 (Kassam Stadium and Ozone) could have houses built over the car park. Building houses over car parks seems to have been ignored. The Site assessment carefully leaves out the Ozone Leisure centre part including a heritage asset that has been allowed to decay.						
	Oxford Science Park. HELAA (#588)			<b>Historic England</b> flag current LP allocation guidance on archaeology. Support the continuation of suitable policy protection for archaeological remains associated with this location. Note also the potential for groundwater levels to impact on archaeological remains in this area.						

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				HELAA#588 (Oxford Science Park) would be useful to provide specific guidance for site regarding the height of buildings - pressure will continue to build upwards and a framework that will guide and manage development would be useful.							
	Oxford Business Park (HELAA #587)			<b>Historic England</b> remark that the site assessment picks up that the site has archaeological interest. Also, it is adjacent to Temple Cowley Conservation Area and a Listed Buildings GII adjoins (The Nuffield Press, East Wing and attached former school house). They flag that its environmental sensitivities do need to be accurately reflected in the emerging Plan.							
				<b>ARC</b> (Advance Research Clusters) has renamed Oxford Business Park, ARC Oxford. Requests that reference to the site in the OLP2040 are changed. Welcomes South AOF							
				HELAA#587 (Oxford Business Park) would be useful to provide specific guidance for site regarding the height of buildings - pressure will continue to build upwards and a framework that will guide and manage development would be useful.							
	Oxford Stadium (HELAA #111)			<b>Historic England</b> highlight that there is potential for heritage-led regeneration around stadium. They regard the SA's conclusions as too negative. Heritage provides opportunities too and this needs to be identified in policy terms. For this opportunity to be fully explored requires a heritage impact assessment for the site (which the Oxford Stadium CAAMP would usefully inform), supported by site-specific policy that outlines how the development could successfully deliver agreed objectives for the site.							
	Sandy Lane Recreation Ground (HELAA # 289)					HELAA 289. A proposal to build houses on half of this small recreation ground, reducing the space for sport. That is bad.					

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South Area Sites Outside AOF		Natural England will require further information on the following proposed allocations to determine the potential impacts to designated sites, the scope for mitigation and to inform appropriate policy wording. (Bertie Place 008; Redbridge Paddock 113; Court Palace Gardens 013; Land at Meadow Lane 389; Former Iffley Mead Playing Fields 104) - see detailed response for more info. Also flag the following allocations have potential impacts on the Lye Valley SSSI: 016- Cowley Marsh Depot, 516- Former Powell's Timberyard, 593- Knights Road, 095a1, 095a2, 017, 014		Safeguard areas for PT and cycle improvements as required by County					
		Support allocations	1						
Bertie Place Rec Ground #8	A - Allocate for residential			Site allocation needs updating to reflect no need for primary school capacity in this location.	2	BBOWT - we consider this site to be ecologically sensitive and in Flood zone 3a so should not be considered for development.		Option B - Do not allocate a recreation ground for development	3
				See <b>Natural England</b> comments - further info required		Object to proposals to build homes. Green space, playground & MUGA well used for recreation by residents would be lost. Current proposal would cause conflict between use of reduced recreation space & residents. Road layout could result in safety issues between vehicles, cyclists & pedestrians.	1		
Redbridge Paddock # 113	A - Allocate for residential			If the council is going to build houses on Redbridge Paddock (HELAA #113) please ensure they are medium density. The site will have great transport infrastructure and therefore are great plots to build a large number of flats (and residential moorings)		Object to proposals to develop site for housing. Former landfill site and prone to flooding likely to cause health / risk problems for future residents. Suggest alternative nature reserve use.	2	Option B - Do not allocate	2
				See <b>Natural England</b> comments - further info required				Do not allocate this site is it part of Oxford's Riverside Nature Network and important green space	2
				BBOWT - the site forms important GI function and in proximity to the Iffley Meadows SSSI and that development on this site could increase damage to it with increased dog walking and vandalism. Support the need for hydrological assessments to be carried out, a buffer zone should be required in perpetuity to protect the SSSI. The allocation site adjoining the Thames and Cherwell CTA and any potential development would need to further the aims and objectives of the CTA - oppose the allocation owing to impact on SSSI					

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Court Place Gardens #3	A - Allocate for grad student or resi or a mix of both			BBOWT concerned about the potential impacts of the dev on the nature conservation interest of the nature reserve, OCW site and GI network	1				
				<b>Historic England</b> highlight that development of this site has the potential to impact on Iffley Conservation Area, GII Court Place, GI St Mary's Church, the Rectory (GII*), the stable and garden walls of the Rectory (GII*) and other nearby listed buildings. The potential for impacts on designated heritage assets and suitable mitigation measures need to be in policy and supported by relevant supporting text.					
Land at Meadow Lane # 389	A - Allocate for residential			See <b>Natural England</b> comments - further info required		Strong objection to this allocation - poor consultation and this site should be protected as green space in CA. Development would be harmful to the allocation of principal quiet route for Active Travel, loss of valuable GI for health and wellbeing of residents and climate. Development of this site is contrary to the council's objectives if the site were to be developed it should be for AH not private market housing, there is insufficient sewerage capacity to support this allocation.		Option B - Do not allocate	37
				Children from local schools use site as an educational resource.		Oppose allocation for development. This site provides wildlife corridor, includes badgers & is rich in biodiversity.	3		
				<b>Historic England</b> state that any allocation of this site needs to ensure that its development will conserve and enhance Iffley conservation area. The site falls within a view cone, which also needs to be made explicit in the text associated with this proposed allocation. Policy should state that careful design must ensure that development proposals contribute to the character of the conservation area.		Need an ecological assessment before allocation.	3		
				Site forms part of a quiet route. Not mentioned as part of 2036 plan allocation. any development here would increase vehicular traffic and harm quiet route.		Lots of people signed petition against development at this location. Consultation for last local plan was not carried out adequately so not enough people knew. Against wishes of local community.			
						Do not support site for development.			
						Any development here would not support conservation objectives set out in Iffley Conservation Area Appraisal (2009). Should be preserving site rather than developing which would harm the conservation area.			
Northfield Hostel #39	A - Allocate for residential			<b>Historic England</b> flag that the site being of archaeological interest (some Roman potential, 90m from Roman kiln) should be acknowledged in the emerging OLP.					

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Former Iffley Meads Playing Fields # 104	A - Allocate for residential			support site for use as affordable housing but aware there are some access issues that need to be overcome		Oppose allocation for residential development. Provides a wildlife corridor & is rich in nature. Suggest use for public green space.	1	Option B - do not allocate	1	
				See <b>Natural England</b> comments - further info required						
				<b>Historic England</b> highlight that any allocation of this site needs to ensure that its development will enhance the adjacent Iffley Conservation Area.						
Unipart #120	A - Allocate for employment			This site should be considered in context of development of Northfield allocation in SODC	1			B - Do not allocate	1	
				<b>Logicor</b> strongly support the option of allocating the Unipart site for employment purposes. This would reflect the historic land use of the site and support future growth of the area as a source of employment opportunities for the local community. However, Logicor stress that development guidance for the Unipart site will require appropriate consideration of the cross-boundary allocation at Northfield in South Oxfordshire. The delivery of the Northfield allocation should not prejudice the future potential of the Unipart site as an employment location. As such, Oxford City Council must ensure that any development guidance that is attached to the Unipart site maintains compatibility between the sites. Logicor are exploring various options in improving accessibility in the site to overcome accessibility constraints relating to Transport Way. This includes potentially securing a new entrance from Oxford Road which will improve circulation around the wider employment site, as well as more direct accessibility to the strategic highway network. This, as well as the compatibility with the Northfield development to the south, should be duly recognised through the Local Plan preparation process.						
Blackbird Leys Central Area # 9	A - Allocate for mixed use			If site is developed then it needs to provide replacement community centre of the same size as the existing centre. New building needs to provide significant / innovative space with good facilities for local people.	1	Blackbird Leys redevelopment is wrong and not necessary to destroy current layout with restrictions and limit community centre as a building site ruin				

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				This development relies on funds released by housing development on Knights Road. In the initial good consultations, residents sat down to redesign the central area. Those designs included shops and a community centre at the same size as the existing community centre. But current plans will demolish the community centre on one side, then eventually build a smaller community centre on the other side (and no design work has been done for that). The catch in the site assessment is the number of times it mentions "depends on implementation". E.g. Allocation leads to a significant increase or improvement in community facilities (depending on implementation). It looks like there will be a decrease in community facilities. And "The site has the potential to increase the number of jobs or economic floorspace in the knowledge-based economy but it will depend on implementation if there is to be a gain or no change", ignores the potential of setting up a maker space or hack space in Blackbird Leys where people can learn 3D printing and other skills using shared equipment like people do around Aristotle Lane.							
				<b>Historic England</b> flag that any allocation of this site needs to ensure that development on the site takes account of the character or appearance of the Oxford Stadium Conservation Area and not to adversely affect views out from St Mary's Tower.							
Knights Road # 593	A - Allocate for residential			Could be acceptable if recreational facilities provided in Fry Hill's Park and linked and extension of nature park provided along both sides of Northfield Brook, adding to biodiversity. Cycle and footpath improvements required.	1			B - Do not allocate	1		
				See <b>Natural England</b> comments - further info required							
Cowley Marsh Depot # 16	A - Allocate for residential			Support high-density, car-free residential development. Site has good space, access to public transport, active travel links and potential for significant social housing.	1						
				See <b>Natural England</b> comments - further info required							
Between Towns Rd on corner of St Lukes Rd #95a2	A - Allocate for residential			See <b>Natural England</b> comments (and 095a1)							
Royal British Legion #604	A - Allocate for residential			Consider for primary health care not residential							
Crescent Hall #17	A - Allocate for student			<b>Historic England</b> flag that any allocation of this site needs to ensure that its development will enhance Temple Cowley conservation area.							
				See <b>Natural England</b> comments - further info required							

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Workshops, Lanham Way #98	A - Allocate for residential			<b>Historic England</b> flag that the limited site assessment in the interim HELAA report identifies the site is adjacent to the Littlemore conservation area. This proximity and the potential to impact on the setting of the conservation area needs to be mentioned in text associated with allocation of this site.					
Grandpont Car Park #106	A- Allocate for residential			Extensive studies required prior to development to ensure there is no toxic contamination from former gas works site.	1				
				<b>Historic England</b> do not object, but disagree with stage 2 conclusion that "The site is also not sensitive from either an ecological or heritage perspective." The OLP2036 includes the icon denoting archaeological interest. Also, the text associated with this allocation needs to cover the potential for impacts on views.					
Littlemore House (Former SAE Institute) #401	A - Allocate for economic use			<b>Historic England</b> highlight potential for impacts on the setting of Littlemore Hospital (GII) and for any development of the site to consider the potential design implications of this proximity. This should be carried forward and supported in the emerging OLP, if the site is allocated.					
Former Powells Timber Yard #516	A - Allocate for residential			See <b>Natural England</b> comments - further info required					
Cowley Centre Templars Square #14	A - Allocate for district centre/ mix uses, commercial, leisure and residential	<b>CBRE on behalf of Redevco</b> - providing the site allocation acknowledges the site's important contribution to meeting local needs then supports the site not being included in the AOF.		<b>Historic England</b> do not object to this allocation; however, any allocation needs to recognise the environmental sensitivity of the site, including (but not necessarily limited to): Its archaeological interest; It partly adjoins Beauchamp Lane conservation area; Potential for tall buildings to affect views out from St Mary's Tower. The site is in an elevated position in the city.					

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				<p>CBRE on behalf of Redevco request that reference to design guidance for sites in the AOF is made more clearer. Also request that current wording in 'Consideration for allocation incl. constraints and landowner intention' is changed to 'Landowner reviewing options to demolish, redevelop, optimise the efficient use of land to provide a mix of uses including retail, leisure, office, commercial, residential uses. Given the site's location in the District Centre there is potential for all residential products including specialist residential products such as build to rent, student accommodation, co-living and senior living. In light of changing retail market, repositioning of the existing retail is likely but will require justification and a strategy for repurposing that maintains the District Centre status. Three existing car parks on site are significantly underutilised / closed - the quantum of car parking provided is to be reviewed and reduced'.</p>					
				<p>See <b>Natural England</b> comments - further info required</p>					
	para 8.12			<p>You note in Para. 8.12 "The strategic site of Land North of Bayswater Brook (STRAT 13) adjoins this area and has been allocated in the South Oxfordshire Plan 2035. This site is expected to deliver affordable housing to meet Oxford's unmet need. Policy STRAT 13 recognises the need for this development to be well linked to the city in terms of both design and connectivity across the ring road." As I have noted previously the entire basis of what Oxford's unmet housing needs now are has to be established by fresh surveys in the light of considerably changed conditions. In particular it is highly questionable whether the Bayswater Field which was tacked on at a late stage into the Land North of Bayswater Brook into STRAT 13 will actually be needed. In which case that incursion into the Green Belt should be abandoned as the land is of considerable significance to the communities in Barton and Sandhills. When you speak of "the need for this development to be well linked to the city in terms of both design and connectivity across the ring road" the situation is quite different in terms of the main site North of Bayswater Brook and that of Bayswater Field. Access to the latter, both by construction traffic and subsequently by domestic traffic coupled with delivery vehicles &amp;c, would cut through Sandhills within the City boundary, dramatically changing and impacting that community with many deleterious effects.</p>					
				<p>We broadly agree the preferred policy but with certain exceptions: Land North of Bayswater Brook will have very poor connections so don't do policy based on it being connected.</p>					

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<b>East Oxford Marston Road and Old Road Area of Focus</b> Government Buildings and Harcourt House # 24 Land Surrounding St Clements Church #117 Headington Hill Hall and Clive Booth Student Village #560 Oxford Brookes University Marston Rd Campus #439 Old Road Campus # 43 Warneford Hospital #63 Churchill Hospital #12 Nuffield Orthopaedic Centre #42 Pullens Lane Residential #440	A - Preferred Option - Designate AOF .....	<b>Natural England</b> supports the Marston Old Road proposed AOF and would welcome further detail as to the key development principles to be included in the policy to protect the Lye Valley SSSI. But flag that the following proposed site 462- Park Farm - 165m from New Marston Meadows SSSI. New Marston Meadows is an area of Lowland Neutral Grassland and the proposed allocation may have potential impacts on the site, mitigation may therefore be required.		Areas of focus should not be an attempt at creating development control measures to reduce development in certain areas.		Land North of BWB will have poor connections so don't base a policy on that, dont allocate Ruskin Field as it is part of a vital stretch of open land don't allocate Park Farm - rural lung of Marston meadows, don't allocate OB Marston Road, vital POS, don't allocate Valencia Road, or Westlands Ave		Support option D	1
		BBOWT - support allocation not including Warneford Meadow which is important in relation to the Lye Valley and is part of ecological compensation for housing dev in Littlemore. Small development in the area can impact upon hydrogeology of the Lye Valley. Welcome need for a buffer and this should be provided for both SSSI and adjacent LWS buffer should be for both construction and operation of the site. Support need for BNG to be delivered on site or nearby		<b>Oxford Health NHS Foundation Trust - RE: Warneford Hospital (HELAA #63) and wider East AOF</b> - have made a response specifically about their plans at this location for a new hospital complex and globally significant brain health sciences campus. They note that they have had initial consultations with OCC planners in 2020. They would like to discuss and understand further the implications of the suggested 'Area of Focus' policy initiative. If it represents continuing support for the principles of collaborative working and excellence, they can support it. They assume that it does not suggest the need for wider coordination or studies which might delay development. Flag that within east Oxford, there are many campus sites which operate as 'mini neighbourhoods' with own character and needs - current approach in LP seems to work successfully to enable individual development. Not aware of any strategic issues that require additional management/intervention. Would be grateful if their proposals for Warneford Park could be fully taken into account as you develop the Local Plan.		Too much land given to staff parking at hospital sites. Knock-on impacts of so many staff driving to work include air quality impacts, traffic pressures etc.		Support Option E	1
		Support Option A	6	Many sites in Marston / Headington have significant issues with transport connectivity. Future developers should be asked through the planning process to provide significant investment to public & active transport.		Joined up strategy required to reduce staff parking at the hospitals is required including reductions in spaces, increased frequency of P&R buses etc.,			
				Why were parking reductions removed from previous local plan? This is contrary to CIL Regs. Do not consider that the Inspector's suggested alternative - a sustainable travel plan - is sufficient to address these concerns. Policies need to reduce staff parking.	1	Other issues that need addressing include - Marston flooding due to run-off from JR car parks; heritage impacts on Old Headington Conservation Area from Cuckoo Lane and green space at the JR being used as a helipad rather than for the benefit/ enjoyment of Headington residents.			

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				<p><b>Historic England</b> support option A in combination with B. Also welcome key principles but suggest some improvements needed - <i>see their submission for suggestions</i>. Also flag that whilst the SA correctly identifies area's many heritage assets and CAs, language used is rather general and vague when describing potential impacts from development - needs to be clearer in new LP.</p> <p>They make a number of specific comments and suggestions relating to local context of each of the allocations within the AoF (HELAA #24, #117, #560, #439, #43, #63, #12, #42, #440) - <i>see submission for full details</i> (they are not listed below).</p>		<p>In relation to Government Buildings (24), Land adj. St. Clements Church (117), Headington Hill / Clive Booth (560) and Oxford Brookes Uni Marston Rd Campus (439), in all cases the level of detail does not allow scope for public comment. Concerns over impact on green infrastructure, heritage assets &amp; risk of sewerage flooding.</p>				
				<p>The Old Road is heavily congested in rush hours and school run, acting as a parallel line of movement to the London Road/Headington crossroads axis. Investigation of who is moving on both these axes should prompt policy initiatives to reduce traffic movements, until such time as Electronic Road Pricing can act as a deterrent for some drivers. Alternative routes - eg. Horspath Driftway-the Slade - would need to have deterrent levels of ERP charging to stop big increases in vehicle movements if they were tempted to avoid using Headington or the Old Road by moving into this part of Oxford on the already disturbingly congested Horspath Driftway from the Eastern ring road.</p>		<p>Do repairs to the bridge to Shotover and get a bus route starting there.</p>	1			
				<p>No development without public transport options</p>		<p>Parking available for South Park which is empty since cycleways taken parking spaces</p>				
				<p>The options are vague. NM(S)RA is committed to improving the quality of life of residents in New Marston, alongside safeguarding / protection of heritage assets, particularly of Headington Hill and New Marston Meadows. The area of focus should reflect these local commitments and also the necessity of upgrading the neighbourhood facilities to create a functioning 15 minute walk community.</p>		<p>We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines</p>				
				<p>Any development within the area should be contingent on proper active travel provision for the area, including the Headington LTNs, provision of adequate cycle tracks or lanes along London Rd and Old Rd, and redesigns of all the main road junctions in the area that prioritise making walking and cycling safe and accessible. Three people have been killed cycling in this area in the last two years.</p>	2	<p>What about a GP surgery rather than clinical research?</p>				
				<p>Any development outside the ring-road should be contingent on provision of safe and accessible grade separated walking and cycling routes across the ring road.</p>	2	<p>Marston Road is appalling, no shops, an unused car park, the unused Government building, hopeless new bike lanes. Why don't you speak to local residents about what we need?</p>				

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				Absolutely no additional car parking should be allowed at sites within the ring road, and new buildings should replace current car parking space before any expansion of sites is permitted.		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.					
				Important to protect Lye Valley		As commented earlier. the only permitted development should be on brownfield sites.					
						Any change must be within the city boundaries and not in green belt					
						Again, this area is being developed beyond genuine need with encroachments into the Green Belt and devastating consequences for biodiversity.					
						Do not build anything on greenfield or green belt land					
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					
						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p> <p>Further information is available in the Trust's Planners' Manual for ancient woodland.</p>					

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						Surface level parking must be removed if possible., especially at Headington Hospitals Traffic issues have not been addressed. Runoff must be reduced to stop flooding from Headington Hill	2				
						ALL calcareous spring areas (Lye, Dunstan Park, Headington Hill) must be analysed and suitable protections given					
						East Oxford has the least green space and the fastest growth of population anywhere in Oxford, it is not a "more open area" - this needs addressing via policy					
						Managing parking must translate into actual policies agreed with Oxfordshire Council both to control traffic inflows and flooding downstream. The unchecked increase in employee numbers must be addressed by housing on the car parks and by displacement of positions out of Oxford where possible.					
						An area of focus will only work if defined in conjunction with Oxfordshire, as traffic is the most important environmental and health problem, as it is now the centre of Oxford by population and traffic.					
						Create a new Road access route direct to the ring road from the John Radcliffe and Churchill hospitals					
	B - Preferred Option - Include detailed site development policies for sites listed.	Support Option B	8	<b>Government Buildings and Harcourt House</b> Policy should allow the provision of employer-linked affordable housing (Policy H5) to expediate development on this under-utilised land. Policy should carry forward full schedule of uses permitted under OLP2036 SP16. Any min. housing no's should be expressed to make it clear that either student no's or C3 equiv general housing would be acceptable.							
Old Road Campus				This has expanded without any coherent master plan							

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Warneford Hospital		<p><i>(possible duplicating text in Oxford Health Foundation Trust response above in cell above..... )</i> Land at Warneford Hospital should be specifically identified as a strategic development site in comparable terms to that set out in the Local Plan 2036 (Policy SP22 and from paragraph 9.126 onwards).</p> <p>The existing listed mental health hospital is no longer fit for purpose and a new hospital needs to be constructed at Warneford in order to de-cant the existing uses and create an opportunity for a world class mental health campus.</p> <p>A joint venture has been formed between the NHS Trust, the University of Oxford and a private philanthropist in order to promote comprehensive development of a new hospital, a new research facility dedicated to mental health and a new University college. The joint venture formed between the parties has written a letter to accompany the response to this questionnaire (letter sent from Dr. Nick Broughton, Chief Executive, Oxford Health NHS Foundation Trust &amp; Dr. David Prout, pro-Vice Chancellor, Oxford University to Ms. Rachel Williams, Head of Planning Policy &amp; Place Management, 11 November 2022).</p> <p>Given the importance of the proposal, Local Plan policies need to develop to support the emerging plan and to recognise the particular suitability of the Warneford Hospital site to meet this use.</p>				Note that some of the sites proposed for development outside of the area of focus are controversial, and that the development proposed by the landowners - obviously seeking to make money out of their assets - is in some cases inappropriate for various reasons and resisted by the local residents. To be truly a community local plan, the residents' concerns for a particular idea must outweigh the fancy of landowners. Indeed there is an argument for having a citizens' list of areas and sites which ought to be protected from development.					
		<p>Considerable care should be taken not to harm the secluded character of Warneford Meadow, which is an important amenity providing quiet enjoyment of natural and peaceful open space; ensure that design and materials of future development reflect the rural character of the meadow, and avoid creating a sense of enclosure on the south eastern boundary. The link between the historic hospital buildings and the meadow should be respected with the retention of some open space connecting the two. Adequate space should be given around the boundary trees on the south western boundary with Hill Top Road in any further development in that area of the site.</p>									
Oxford Brookes Marston Road Campus						Don't allocate Oxford Brookes Marston Road. a) It is important open space for local people. b) It has a high wildlife grassland with orchids c) your other proposals at Government buildings and Harcourt House will urbanise the Marston Road sufficiently- this would be a step too far					

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East Area Sites Outside AOF						BBOWT - concerned about potential impact of development on the conservation of the area. MG4 grasslands are dependent upon hydrological flows, low nutrients and management - these must be considered as this site is developed.					
Hill View Farm #112a1	A - Allocate for residential						1	Option B - Do not allocate on grounds of traffic generation and/or greenfield site use	1		
Land West of Mill Lane#112b1	A - Allocate for residential			Development of this site will have significant transport implications if there is no junction with A40.	1		1	Option B - Do not allocate on grounds of traffic generation and/or greenfield site use	1		
				<b>Historic England</b> - Careful design is needed to ensure that development proposals contribute to the character of the nearby conservation area.							
Marston Paddock #114d	A - Allocate for residential					Don't allocate Marston Paddock- it may not now be in the Green Belt but it still functions as a green context for the village urban form of Marston, and a visual green buffer from the A40. It will also result in more people living by a noisy and polluting main road, and will cause traffic problems in Old Marston		Option B - Do not allocate on grounds of traffic generation and/or greenfield site use	1		
						Object to this allocation which is part of the green setting of Oxford and should be retained for future generations					
Barton Comm. Centre and Underhill Circus Shops #354	A - Allocate for mix of uses as part of local centre										
JR Hospital Site #57	A - Allocate for health care and complementary uses	care with heights of buildings		<b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area and to retain the Listed Building and protect its setting.							
Ruskin Field #463	A - Allocate for residential	Support for this allocation - submission includes planning assessments to support inclusion of the site also refer to Call for Sites form March 2022	1	BBOWT - rare Tufa springs and associated habitats and species are v sensitive to hydrological changes which might have implications for proposed allocations at Ruskin College Campus and Ruskin Fiend and appropriate hydrological surveys should be carried out on these sites if developed. 3 fields below Ruskin college on sloping land towards the ring road are old fields with carbon-rich with well-developed soil profiles. Area between Dustan Pk and Larkin Lanehas a number of wetland springs, likely to be carbon-rich peat areas(1.67m depth over 0.6ha - Dustan Pk, Ruskin Fields likely to have a number of wet peat accumulating areas with carbon storage. It should not be disturbed to ensure no oxidation and CO2 emissions.		Don't allocate Ruskin Field- it is part of a vital stretch of open land that it would break up and change - a major change that should be a policy on its own- and not one we would support.	1	Support option b - do not allocate.	1		

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		UWL considers that the existing policy allocations in the Local Plan 2036 (OP55 and OP56) continue to represent an appropriate approach and a sensible range of land uses to meet housing and/or student accommodation requirements in a sustainable location at and adjacent to Ruskin Campus.		<p>Land at Ruskin Fields should be allocated for housing and student accommodation and it represents a significant opportunity to add to the scarce supply of housing land in the City without giving rise to significant adverse effects. It is a genuine opportunity site which should be considered for allocation.</p> <p>UWL have commissioned evidence base studies which are submitted separately to the Planning Policy Team at the City Council at the same time as this questionnaire response (14 November 2022). Those evidence base reports relate to Heritage and Transport. They demonstrate the suitability of the site for development and the lack of any constraints which would justify foregoing an opportunity to contribute towards the urgent, pressing need for additional residential accommodation within the City. Given the scale of housing need, the alternative to taking opportunities such as this will be inevitable Green Belt release in less sustainable locations outside the City.</p> <p>Also submitted on behalf of UWL is an initial feasibility study by architects Eric Parry Architects on behalf of UWL which demonstrate the capacity for the site to deliver between 200 and 300 dwelling units at the same time as providing a significant extension to open space, of which there is an acknowledged shortage in the local area.</p>		<p><b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.</p>		Do not allocate on grounds of traffic generation and/or greenfield site use	1		
								<p>Old Headington Conservation Area Appraisal considers these fields as a positive attribute of Old Headington and sets out some positive characteristics of these fields as:</p> <ul style="list-style-type: none"> <li>- the last remnants of the green fields that once ran along the edge of the village now cut off from countryside;</li> <li>- views from public realm across the green open spaces with visual connection to SODC countryside beyond Bayswater Brook.</li> <li>- the green spaces in this character area are important views to the conservation area from outside its boundaries</li> </ul>			
								Do not allocate site - rejected through Barton AAP process and not allocated in OLP2036 (only small part of field allocated in SP56, not whole site as currently proposed). Should not be allocated in OLP2040.			
								Site previously not accepted as an allocation - Barton AAP (2013) and Sites and Housing DPD (2013). SA process for these documents also considered that site should not be allocated. OLP2036 considered that there should be "no development on Northern Fields"			

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								Consider that there would harm to conservation area if any amount of housing is delivered here. Also number of homes delivered would be "insignificant" compared to other large developments nearby therefore no need to allocate.			
								Existing policy should not be a precedent which would cause harm to the conservation area including loss of "view lines" from Stokes Place across the field.			
								Wider views would also be damaged if the whole site was allocated for development.			
								Site forms part of wider green Headington. Allocation and development of this site would damage this green setting.			
								Likely to be very high quality soil at the site, given proximity to peat deposits at nearby Larkin's Meadow.			
								Headington has a lack of publicly accessible green space.			
								Importance of Stoke Place Bridleway is considered in the city's Old Headington Conservation Area Appraisal. It is the only accessible place in the city where residents can enjoy a rural experience of great beauty. The creation of pedestrian/ cycle access from Stoke Place would destroy its character.			
								The proposed site allocation would score poorly when considered against the criteria in the conservation area appraisal (see Headington Heritage Rep for full details).			
								HELAA #463 (Ruskin Field) would ask that this is removed from the proposed development site lists. A large amount of residential development is proposed within the immediate area and it would be preferable to keep this as an area of open green space.			

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Ruskin College Campus #54	A - Allocate for educational and student accommodation	UWL supports the allocation of sites 054 and 463, both of which fall within its ownership. UWL considers that the existing policy allocations in the Local Plan 2036 (SP55 and SP56) continue to represent an appropriate approach and a sensible range of land uses to meet housing and/or student accommodation requirements in a sustainable location at and adjacent to Ruskin Campus.		policy needs to ensure the historic setting of Headington is better respected. Previous development has caused harm.		<b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area and to retain the Listed Buildings on-site and protect their setting.				
Thornhill Park #38a2	A - Allocate for residential									
Oxford Trust Wood Centre for Innovation #437	A - Allocate for employment uses if there is opportunity for expansion/intensification on the site									
Slade House #124	A - Allocate for health and/or residential development									
Manzil Resource Centre #524	A - Allocate for health and/or residential development which could be employer linked housing	Allocation should ensure sufficient consideration would be given to impact on adjoining housing. Any development should be small-scale.		<b>Historic England</b> - ...the site "Lies to the west of the Bartlemas Conservation Area but not adjoining. Crescent Road View Cone across part of site". These sensitivities need to inform the wording of what is said in the Local Plan about this allocation.						
Union Street Car Park #61	A - Allocate for residential/student development			Support: portion of car park could be developed for residential but not student accommodation with remaining spaces left to serve Cowley Rd shops and entertainment uses.	1			Site seems to be a well-used car park, particularly for people doing a weekly shop at Tescos, but also visiting the other shops along Cowley Road. There has already been considerable building in the area just around the site. The car park is adjacent to the block along Cowley Road which has recently been renovated into any number of flats. On the other side is a primary school. Not only would this development overlook the school and one of its (tarmacked over) playgrounds, the school already overlooked by the dense student housing developments to the east (where the builders yard used to be). What kind of living would be possible? What about access to green space, air, light and so forth? What about the policies advanced in this document?		
				Should only be allocated for development without parking	1					
				<b>Historic England</b> are keen to learn if any further work has been done to understand the nature and significance of any archaeological remains and the potential impact of the development on this site on the significance of those remains.						

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Park Farm #462	A - Allocate for residential			See <b>Natural England</b> comments - further info required				Don't allocate Park Farm- it is part of the rural lung of the Marston meadows, development here would break-up its open feel with a graduation along the edge to urban form.			
				<b>Historic England</b> flag that the current LP notes that consideration should be given in design to the impact on views from Headington. The site assessment notes that this allocation lies within a view cone (from north east hills), which naturally should inform the policy approach to this allocation.				It is an utterly insane suggestion to develop this site. 1. It floods. 2. Even if the bit of land where the farmhouse sits doesn't flood, if a development were put on it, it would negatively impact the surrounding lands and houses, even if so-called mitigation measures are put in place (let's call it what it is - displacement, not mitigation) and even if we were not facing increased risk of flooding and more severe flooding in the near future. 3. It would involve the creation of infrastructure (sewers and the like) which would entail the alteration of ditches and waterways which control the flooding, against the proposals in this local plan. (Moreover, the provision of sewers and so forth in this area desperately need an upgrade, not more users. Thames Water have failed to remedy this in the nearly 30 years I've lived here.) Infrastructure could only be placed along the sole access to the site: a long narrow lane, much used by the public for walking, running etc. etc. and also for getting into town. Also used for access to university sports facilities. It is not suitable for all the vehicular traffic that would be using it. Any upgrade would interfere with the ditches which assist flooding control as the fields on both sides flood. 4. The access point to the lane forms a t-junction with Edgway Road, the unadopted/unknown who owns it Ferry Road, in reality a continuation of the fourth spur, the recently upgraded and heavily used cycle path/pedestrian way to Croft Road and beyond. If it were to be turned into a road, this would be of serious detriment to all those who are travelling sustainably and would put people off from doing so, going against the promotion of sustainable travelling. 5. The site is next to and within the proposed green corridor, encompassing areas of nature which are protected.			
								Do not allocate on grounds of traffic generation and/or greenfield site use	1		
Carpenter's Yard	A - Allocate for residential							Object to allocation			
								Do not allocate on grounds of traffic generation and/or greenfield site use	1		
								Object to Option C	1		

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Valentia Road #329	A - Allocate for residential	Support Option A	1			Don't allocate Valentia Road- this area of Oxford is high on the HMO and deprivation scale. People living here at high density HMOs deserve some open space on the estate. A step too far in searching for housing land.	2			
						Oppose: it would result in the loss of another small playground.	1			
Jesus College Sports Ground #26	A - Allocate for residential	Support Option A	1	site suitable for delivery of post-graduate and fellows' accommodation in self-contained units (including family accommodation). Allocation should include reference to graduate accommodation						
				Car-free development is easier to enforce if site delivered for student accommodation.						
				Should be allocated for very minimal residential use with majority of the site being public open space	1					
				Supports allocation: sustainable location, would like to see public open space and use of sports facilities by public.	1					
				<b>Historic England</b> - look for a continuation of the mitigation measures for this site outlined in the OLP2036.						
Lincoln College Sports Ground #32	A - Allocate for residential	Support Option A	1	Supports the allocation of this site but it should be broadened to include student accommodation as well as general resi to help meet student accommodation needs and thus release market housing across the city - follow guidance in NPPF and PPG to plan for student needs.		Strongly object to the limiting of this site for student accommodation. Previous applications have been refused. It doesn't meet the proposed criteria for student accommodation and other residential options should at least be given equal weight to student accommodation.				
				Supports allocation: sustainable location, would like to see public open space and use of sports facilities by public.	1					
				Support the preferred option for residential accommodation. The college's preference for student accommodation is not required for the college's own needs (it has largely sufficient accommodation).						
				<b>Historic England</b> - look for a continuation of the mitigation measures for this site outlined in the OLP2036.						
				Should be allocated for very minimal residential use with majority of the site being public open space	1					

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Former Bartlemas Nursery School #346	A - Allocate for residential	The College would support the allocation, however the site would also be suitable for graduate student accommodation, as was proposed by the application which was refused in 2020. The reasons why we consider that it would be suitable for allocation for development as graduate accommodation are outlined within the comments which we have made in respect of Policy Option Set H9.		Support: providing a rigorous prohibition on height of development is imposed.	1	Object to option of student accommodation (as indicated in Site Assessment document), but support allocation for Residential accommodation (shown as preferred in chapter 8 of main document), subject to great weight being placed on minimising impact on the conservation area. Previous applications for student accommodation have been refused and the site doesn't meet the proposed criteria for student accommodation. Constraints should include that a proportion of the 0.24 hectare site is undevelopable as it consists (in addition to the water ditch) of an approach road (south) and, we understand, a 12" pressurised water main (west).		<p>These representations also present an opportunity to promote other sites within the Oriel College's estate in East Oxford which may be suitable for development allocation.</p> <p>Whilst the Council undertook a Call for Sites exercise during the summer of 2021, the accompanying FAQ Document to the Call for Sites identifies as follows: "We are undertaking a Call for Sites exercise for an eight-week period to ensure the Oxford Local Plan 2040 process can include a robust assessment of all known potentially available land in the city. However, that does not preclude sites being submitted after 25 August 2021. If a site is submitted after 25 August 2021, we will include these in its assessment; however they are likely to be assessed at a later stage of the plan-making process".</p> <p>The sites in particular which the College wishes to promote are: 1. Former bowling green at the junction between Cowley Road and Bartlemas Close – 0.3ha site within the boundary of the Bartlemas Conservation Area – formerly used as a bowling green and tennis court, albeit now surplus to requirements. This site is considered suitable for development of a modest and appropriate scale, potentially incorporating residential and student accommodation. Equally, it could also deliver a replacement sports facility with ancillary car-parking. 2. Land to the west of Meadow Lane, Iffley – site contiguous with HELAA Site Ref: #389 ("Land at Meadow Lane") which is identified in the Preferred Options document as a site which the Council may allocate. The College's holding amounts to 6.5ha bounded by the river to the west and Meadow Lane to the east. Part of it is within the flood zone. It currently has no use (but has previously been used for tipping). The site in question was put forward by Oriel College as part of the Call for Sites for the Oxford Local Plan 2036. The College proposed that the site would be suitable for a range of uses comprising residential (including key worker and student accommodation). 3. 49-51 Jeune Street – the site is within the Cowley Road District Centre at the very fringes of the District Shopping Frontage, adjacent to the Ultimate Picture Palace to the southeast and Oriel College's James Mellon Hall to the east and northeast. It measures around 500sqm in size. The site's authorised use is for vehicular repair and as a hand car wash. It could be used to deliver accommodation for the College.</p> <p>These sites are available and deliverable. We will complete the Council's pro forma "Call for Sites" document for these sites and will issue this to the Council under separate cover, however the College is keen that their</p>	

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								suitability for development and allocation in the emerging Local Plan should be assessed as part of the Local Plan process.		
				<b>Historic England</b> object, are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.						
				Should be available for graduate student accommodation, with landowner contributing to residential development elsewhere.						
Halliday Hill/ Westlands Drive # 602	A - Allocate for residential					Don't allocate the square at Westland's Avenue- its an integral part of the layout of the estate and has potential as part of a neighbourhood centre providing the setting for shops nearby, and having associated open space function-- outdoor cafe, play area etc.				
Rectory Road Centre #620	A - Allocate for residential			Supports allocation: providing health care services can be provided elsewhere in an accessible location, offering same facilities.	1					
<b>Central and West Area</b> <b>University areas north of the city centre Area of Focus</b> Science Area and Keble Road Triangle #62 Radcliffe Observatory Quarter #579 Banbury Road University Sites # 6 West Wellington Square #65 OUP - Cat 1 Employment Site #523	A - Preferred Option - Designate AOF .....	Support allocation as an area of focus and sites identified.	9	Creation of an area of focus is welcomed as long as it does not impede delivery of other sites outside it.		Would like to see this area allocated for more housing & less hotel, retail, leisure & employment uses. Opportunities for denser development and taller buildings in appropriate locations to contribute to skyline.		Support option C	3	

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		Improved pedestrian and cycle access is always a good thing		Historic England preferred option is A in combination with B. Welcome approach as set out in SA, however feel that the key principles would benefit from further editing to provide positive strategy for heritage - <i>see their submission for more detail</i> . They have also provided comments on the allocations included within the AoF (HELAA #62, #579, #6, #65) - there are objections to all these and suggestions for additional considerations or local context which needs to be taken into account - <i>see their submission for full details</i> (they are not listed below)		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines	2	Support option D	1		
				Good design principles are only mentioned with regard to these areas-should be across the board.		There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.		Support Option E	2		
						As commented earlier. the only permitted development should be on brownfield sites.		Alternative option 2, because as a cyclist I feel threatened, not empowered, by the current designations for cycle use. As a pedestrian, I don't want to share a pavement route with cyclists, and the same applies to me as a cyclist. And I don't want to share any space with powered vehicles, which includes e-bikes and e-scooters.			
						Motor vehicles should only be allowed to enter the city centre if unavoidable: disabled users, service and loading, emergency access, operational vehicles, etc. Development should be predicated on a car-free city centre.					
						Developments, whether residential, commercial or industrial need to be car-free (except for disabled and service/operational traffic). There is no way to provide for safe and accessible cycling, wheeling and walking in the city centre or West Oxford without drastic reductions in the existing levels of motor traffic.	2				
						Need to ensure that new developments do not exceed genuine need in order to protect biodiversity.					
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					

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						<p>Pedestrianisation of area should be priority. To include: Queen Street; most of St Giles; George Street up to Gloucester Green; Little Clarendon Street; New Inn Hall Street; High Street-St.Aldates and Magdalen Bridge with buses turning around on the Plain, and in St.Giles. This is partly contingent on moving the existing bus-coach station to the Beckett Street car park and making it a major bus-coach terminus/turnaround area. It would no longer be necessary to have as many buses starting/terminating at the rail station as a result of major upgrade of station including expansion of cycle parking, radical improvements to colour marked cycle and walking routes from the rail station, including to the Beckett Street car park. ERP charging should be used to discourage car use on the Botley Road and especially from Botley Road to the Abingdon Road to be a major nuisance queueing for the Westgate Shopping Centre low priced and badly planned car parking.</p>					
						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p>					
	B - Preferred Option - Include detailed site development policies for sites listed.	Support Option B	7	Aof F could be better designed to reflect the WE SPD	1	These areas are unsuitable for residential accommodation , needs more public space at the ROQ					
Banbury Road University Sites						Concerns over the allocation of this site and the scale of development proposed in the North Oxford CA.					

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West End and Botley Road AOF Oxpens #76 Osney Mead #585 Oxford Railway Station #75 Island Site #70 Worcester Street Car Park #81 Oxford Centre for Innovation #448 Botley Road Retail Park #607 Units 1 and 2, 135-137 Botley Road #607	A - Preferred Option - Designate AOF .....	Support WE area of focus.	8	Area should be extended to include Botley Road area west of station and Botley Road area which is facing pressure for change.		Refurbishment existing built environment for passivhaus standard new homes; not building on greenfield; car free developments throughout the area with pedestrianisation adding to colour marked walking and cycling routes; live work units in this area rather than adding to conventional employment usage of existing or new buildings. ERP to reduce use of the Botley Road by traffic, with very limited exceptions.		Support Option D	1
		Inclusion of Botley Road Retail Park in AOF is welcomed. Support for economic uses at Botley Retail Park welcomed		Key sites in the WE and Botley Road area of focus are broadly correct. Worcester St. Car Park should be specifically considered as an employment opportunity while the Island Site should be updated to refer to an "employment-led mixed use opportunity". RE: Worcester St. Car Park - intention is to redistribute residential provision to other sites in locality (not lose it altogether)		Ensure the canal terminus is included in the West End area of focus and improved as a focal point at the end of the canal.		Support Option E	1
		Yes - must be a mix of uses and well-connected.		Additional site request: South Frideswide Square Site. Request that this site is added to the list of specific development sites in the area of focus. Suggest an "employment-led mixed use allocation" with the inclusion of some residential on Becket St. (Nuffield College)		We should still be able to use the other assets and not just stick to the ones in our area. I don't just live in my 15 minute walking area. I live in Oxford. I will enjoy all of Oxford's communities and so will my children. Some things are too niche to have access to them in every local are - not all sports can be played in all places etc. Also - why should we stay segregated? Children need to meet people in other areas so that Oxford unites and integrates instead of drawing up turf/ gang lines lines			

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		<p>UBS recently acquired the headlease to 23-42A Hythe Bridge Street in Oxford (known as 'Beaver House' and its immediately adjoining buildings). The land is situated within the boundary of the West End and Botley Road Area of Focus.</p> <p>UBS strongly supports the designation of the Area of Focus and welcomes the intention for this be aligned with the principles established by the emerging West End SPD. The Local Plan identifies that the Area has some 'significant development and regeneration opportunities' and, given the pressure on local land supply and the desire to make best use of land, the area is anticipated to provide a significant quantum of new floorspace to meet various policy objectives. There is lower levels of sensitivity within the existing urban fabric than in some other locations across the City Centre and as such, the opportunity for new, denser forms of development must be realised in order to meet the various targets within the Plan.</p>		<p><b>East West Rail Company (EWR Co)</b> (responsible for delivering East West Rail project) note that their comments to the Issues consultation do not appear to have been acknowledged/addressed. Would like to see EWR's role within emerging Local Plan fully integrated with the city's planning strategy - flagging it will meet many core objectives inc climate, improving movement and access to/from housing and jobs.</p> <p>Flag that a number of improvements at Oxford station to facilitate delivery of EWR being developed in collaboration with Network Rail (see submission) that would increase network capacity and improve design/quality of facilities at the interchange at Oxford Station.</p> <p>They welcome the preferred policy options A and B for the proposed West End and Botley Road Area of Focus will be based on a number of key planning principles that carry forward the key objectives of existing policies.</p> <p>Note that whilst their specific proposals are still under development, continuing engagement between OCC and EWR will be needed as LP progresses. New Local Plan policies should facilitate the proposals once they are confirmed, and if necessary identify and safeguard any land required for EWR on the Local Plan Proposals Map.</p>		<p>There should be no further greenfield development. The development potential is zero owing to other limitations including the provision of health and social amenities, schooling and transport to areas of employment / commuting hubs.</p>			
				<p><b>Historic England</b> preference is for PO A in combination with B. They express concern that the text of the SA does not present an accurate picture of the AoF's sensitivities. Number of assets is much less important than their significance, also incorrect to say that there are a few heritage assets - there may be few within allocated sites but not within the AoF. Also feel contextual analysis in the West End/Botley POs fails to mention historic environment - no mention of CAs or scheduled monuments. Support ref to Careful consideration of heights of buildings, being mindful of views into and out of the historic core, and the landscape setting of Oxford. Suggest adding "Enhance the character or appearance of the conservation areas" to the key principles. Also they make a number of comments/suggestions for local specific considerations for the allocations within the AoF (HELAA #586, #75, #70, #81), including objection to Worcester Street car park wording - <a href="#">see submission for full details</a> (not copied below)</p>		<p>There should never be any development leading to a diminution of flood plain.</p>			
				<p>The 'Key Principles' refers to the Area contributing to the knowledge economy but doesn't refer to the target to establish an Innovation District (as per the West End SPD). That objective should be specifically picked up as part of the Preferred Option.</p>		<p>As commented earlier. the only permitted development should be on brownfield sites.</p>			

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						Reduce car parking to make more efficient use of land is a very limited perspective on the need to reduce car parking. Developments, residential or commercial or industrial, need to be car-free (with disabled and service/operational motor traffic only). There is no way to provide for safe and accessible walking and cycling along and across Botley without drastic reductions in motor traffic.					
						Likewise need to ensure that new developments do not exceed genuine need in order to protect biodiversity.					
						We would be concerned if the approach adopted in the Local Plan policy was to include some or all of the design guidance recently endorsed in the Botley Road Retail Park Development Brief (Technical Advice Note), October 2022. We made a number of comments on the Development Brief itself and sought to contribute positively to its drafting with officers. Whilst we understand that this now provides guidance as a start point for development discussions, if this were to be further embedded in policy, it would have a fundamental impact on the shared ambitions for the delivery of high quality and comprehensive regeneration of Botley Road Retail Park. In this regard, we would make the following comments.					
						The whole of the west side of Oxford needs careful reconsideration with re designation of much of the Botley Road to allow more sustainable development rather than retail sheds that are there. A policy that if they fall out of use after a certain period of say a year the area could be designated for housing or research.					
						Any options must protect and not build on existing greenspace, its ecology, biodiversity and flood attenuation, carbon storage and well-being benefits					

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						<p>As a general position, the Woodland Trust objects to any areas of ancient woodland being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.</p>			
						<p>In line with the aims of the traffic filter proposals it is important to significantly reduce the amount of car parking across these areas and thereby require active / sustainable travel and not frustrate the wider transport plans alongside any intensification proposals.</p>			
	B - Preferred Option - Include detailed site development policies for sites listed.	Support	2	<p>The Council's Preferred Option (b) proposes detailed site development guidance for the listed sites, which we have no objection to in principle. However, we would strongly urge the council to carefully consider the approach to such policy to ensure that such development guidance does not impact negatively on the ability to bring forward sustainable development. We have worked successfully in a number of city centre regeneration locations where a more 'criteria based' policy approach has been taken that enable the Council and development sector to work collaboratively to secure the best outcomes.</p>	1				

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Osney Mead		Whilst flood risk will be an issue, it should be recognised that the frontages onto the river and meadows of the Osney Mead site are more suited to residential (perhaps with commercial on the ground floor) than to larger institutional R&D type uses. The core of the site is more suited to such uses.		The aspiration for intensification of the use of the Osney Mead area is supported, but it needs to be balanced with the reservation of specific sites for community uses / access and facilities.							
Botley Road Retail Park		<p>"1. We welcome the fact that the Botley Road retail area is being recognised as a part of the Area of Change. It provides an important opportunity to regenerate a brownfield site for the benefit of the economic future of the city in a sustainable location close to Oxford Train Station and on a key arterial route into the city.</p> <p>2. We are in broad support of preferred option (a) to align the redevelopment of Botley Road Retail Park with the draft West End and Osney Mead SPD principles. These principles aim to revitalise and regenerate the city, providing opportunity to build on its key strengths in research and development. Botley Road Retail Park is unsuitable for housing and given its close proximity to the West End it can perform a complementary role in developing the wider innovation ecosystem in Oxford. It also presents significant opportunity to mirror the West End's aspirations to deliver local improvements including:</p> <ul style="list-style-type: none"> <li>• Provision of a legible, permeable and direct active travel network</li> <li>• Urban greening</li> <li>• Integration of blue and green infrastructure</li> <li>• Venues to activate public spaces e.g. cafes and mobile eateries</li> <li>• Enhancement of local biodiversity</li> <li>• High quality public realm</li> <li>• An 'inclusive economy'</li> </ul> <p>5. In terms of the vision for Botley Road Retail Park, we agree with the Council's assessment that the retail park presents a major opportunity to meet unmet demand for commercial research and development space and help Oxford become a stronger global city. We also agree with the aim of enabling a more inclusive economy and moving towards a zero carbon economy.</p>		Botley Road Retail Park: support plan for less car-centric development. Developers should be encouraged to explore with EA potential for expanding floorspace to allot shorter buildings rear to residential streets.		Botley Road retail park soon likely to become non-viable with growth of online shopping and closure of Botley Road, large area of brownfield land soon available for residential development. Close to city centre. Green space behind. Perfect for high density affordable housing.					
		Allocate Botley Road Retail Park for residential/mixed developments. With changes in shopping and a drive to net zero the Local Plan needs to deliver housing on transport axis on land on outdated retail economic model.		3. The Council's Preferred Option (b) proposes detailed site development guidance for the listed sites, which we have no objection to in principle. However, we would strongly urge the council to carefully consider the approach to such policy to ensure that such development guidance does not impact negatively on the ability to bring forward sustainable development. We have worked successfully in a number of city centre regeneration locations where a more 'criteria based' policy approach has been taken that enable the Council and development sector to		The approach outlined is too broad for the Botley Road retail park area. Again it is essential to reduce the level of car parking in that area as part of any redevelopments to ensure that does not frustrate wider transport aspirations and impact on the Botley AQMA - which should be a key test of any assessment. The case for changing this area to "economic uses" undefined has not been demonstrated. The aim should be firstly to ensure that the Botley Road retail park changes over time to support the needs primarily of the community on the western end of the city including the 9,000					

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				<p>work collaboratively to secure the best outcomes.</p> <p>4. We would be concerned if the approach adopted in the Local Plan policy was to include some or all of the design guidance recently endorsed in the Botley Road Retail Park Development Brief (Technical Advice Note), October 2022. We made a number of comments on the Development Brief itself and sought to contribute positively to its drafting with officers. Whilst we understand that this now provides guidance as a start point for development discussions, if this were to be further embedded in policy, it would have a fundamental impact on the shared ambitions for the delivery of high quality and comprehensive regeneration of Botley Road Retail Park. In this regard, we would make the following comments.</p> <p>6. Our concern however, is that the design guidance and parameters set out within the Development Brief do not necessarily facilitate best use of land and secure redevelopment opportunities within the retail park that add to a unique sense of place, contrary to national planning policy and the stated vision and objectives. This is due to the rigid way in which the parameters are set out in the Development Brief and the implied constraints on development area – both of which act to reduce the viability and commercial potential for redevelopment schemes. We are starting to see the impacts of this in the marketing of units for ‘permitted development conversions’ rather than redevelopment opportunities. If the Development Brief is carried forward in its current state into the new Local Plan 2040, it is highly likely that the full benefits of regeneration to this area will not be met.</p> <p>7. The guidance at paragraph 8.7 of the Development Brief divides the site into three areas and proposals maximum heights to inform further rigorous testing and analysis at application stage. There is no formal townscape or viewpoint analysis underpinning the Development Brief and whilst visual analysis has been carried out using Vu.City, it does have significant limitations. It is evident in discussions we have had with the Environment Agency that site specific flood assessments are required to understand the true extent of site potential and impacts on development layout, height and deliverability.</p> <p>8. As set out above, we suggest that any policy avoids a prescriptive approach with a more criteria-based response that allows for design, height and heritage issues to be dealt with on a site-by-site basis. By setting some clear criteria and requiring effective assessment in accordance with the Development Brief and High Buildings TAN, the best use of the land will more likely be achieved in line with local and national planning policy. Were a more prescriptive approach to be adopted in the Local Plan it will mean that the policy objectives will not be achieved as development will not be brought forward and the</p>		<p>population Botley Communities just outside the city boundary that look to that area for its retail needs as well. This area in comparison with the rest of the City is severely under-supplied in terms of community facilities (halls, swimming, health and fitness) and additional employment uses in that area will exacerbate that issue. The focus needs to be away from a car park frontage to the main road and into a more pedestrian focussed access frontage. It is essential that the City Council recognises the need to consult actively with the population of the Botley Communities (North Hinksey, Dean Court and Cumnor) over the proposals for this area.</p>				

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				<p>opportunity to regenerate this area to the benefit of the city will be lost as the parameters imposed will potentially incentivise Permitted Development conversions on a piecemeal basis.</p> <p>9. We would suggest that landscape improvements can be achieved in a number of ways not just through green fingers and pocket parks and needs to be carefully balanced against the urban context of the site and the need to make efficient use of limited land. The green fingers indicated in Figure 9 of the Development Brief are significant in breadth and would not necessarily make best use of land. Several pocket parks are also located within the opportunities diagram and whilst we support the notion of achieving improved public realm, the suggested areas shown take up large swathes of land and would make more sense in a residential area or out of town business or science park. It would make more sense in our view if the guidance were to identify areas where there is opportunity to improve public realm that could also tie in with staff amenity areas and existing green infrastructure.</p> <p>10. The stated key objectives of the Development Brief in relation to prioritisation of pedestrians, cyclists and public transport, reduction in car parking and provision of EV charging points are understood. However, a reduction in access points from Botley Road proposed to improve traffic flow could, in some cases, have a negative impact by directing more traffic along residential routes. It would also negatively impact on the permeability of the site and limit emergency access routes.</p> <p>11. We agree with the Council's assessment that the Retail Park represents a highly sustainable location within Oxford with good potential for public transport, cycling and walking. Clearly, the current level of car parking is not appropriate and does not reflect this and we recognise the Council's ambition to reduce car parking as a priority. However, again, the success of the vision for the area means that this needs to be balanced with the commercial realities and requirements of potential occupiers.</p>					
				<p>The guidance at paragraph 8.7 of the Development Brief divides the site into three areas and proposals maximum heights to inform further rigorous testing and analysis at application stage. There is no formal townscape or viewpoint analysis underpinning the Development Brief and whilst visual analysis has been carried out using Vu.City, it does have significant limitations. It is evident in discussions we have had with the Environment Agency that site specific flood assessments are required to understand the true extent of site potential and impacts on development layout, height and deliverability.</p>					

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Central and West Area Proposed Development Sites outside AOF											
Canalside Land #11	A. Allocate for Mix of Uses			Canalside SPD could be updated to reflect public space requirements and canal crossing work commissioned by Jericho Wharf Trust		Canalside Land should be a strategic site.					
				Use the Area of Focus policies proposed in OLP2040 to safeguard adequacy of non-housing requirement or the Canalside site. The "University areas north of city centre" area of focus would need to be extended to include this site.		Should include student accommodation as existing policy.					
				Include bespoke requirements in allocation policy for minimum public open space which would be verified through the Design Review process. Also specify the location of the canal crossing, size of boatyard etc. Concerned if these are left to developer's viability tests then they won't be delivered.							
				Challenge to deliver all benefits successfully.							
				Need to ensure that the requirement to provide a new community centre is included in the policy.							
				Any public space needs to be of a high quality and a vibrant and attractive social space for the whole community.							
				The consultation document excludes Jericho Canalside (HELAA 11) from the Areas of Focus, yet the site occupies a strategic location and potential connection between the University areas north of the city centre, the city centre and the West End and Botley Road. The site is the last significant mixed use and housing site in Jericho, as well as adjoining major heritage assets. The importance of these and other features are recognised in the current SPD and the Council policies it contains, yet reference to the SPD is absent in the consultation document. The site should be taken into the Areas of Focus with support for detailed development guidance. Failing this the Canalside SPD should be updated to ensure that there is a robust planning policy framework. Simply allocating the site for a 'mix of uses' in the Local Plan is inappropriate and undermines adopted Council planning policies.							
				<b>Historic England</b> note that LP2036 flags this as a sensitive location for the historic environment and, to a degree, that this is picked up in the site assessment. This needs to be carried forward in the emerging OLP. It would be helpful to refer explicitly to Christ Church Meadow as a GI RPG.							

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Faculty of Music #21	A. Allocate for residential and educational uses			Support allocation of site for residential however other suitable uses should also be considered for allocation (e.g., PBSA, life sciences, commercial)		<b>Historic Environment</b> object, flag that any allocation here needs to take account of the historic environment - but that the current site assessment is incomplete/weak - stating that 'There will be some [listed buildings] close to the site' is inadequate. They flag a range of listed heritage assets in the area (see submission for list) and that it is within Central (University and City) Conservation Area with high potential for archaeological remains linked with the Civil War defences. Flag that they are looking for policy to state that careful design must ensure that development proposals contribute to the character of the conservation area and protect the setting of the adjacent Registered Park and Gardens, the setting of nearby listed buildings and the Civil War defences.					
				Support continued allocation of this site for extant mix of uses.							
Manor Place #31	A. Allocate for residential					Remove this from the list as a very sensitive site due to proximity to Holywell Cemetery and being within the Central Conservation Area.					
						Not allocate Manor Place- it is too sensitive a site for development, including proximity to the King's Mill and St Cross Cemetery, and Magdalen Park.					
Oriel College Land at King Edward Street and High Street #44	A. Allocate for mix of uses	Oriel College would support the continuation of this site-specific allocation in the forthcoming development plan.		Policy should ensure that the ground floor level of development is retained for retail use.		<b>Historic England</b> object, any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the site lies within an area where there is potential for important archaeological remains and is within the Central (University and City) Conservation Area. Also, the site contains a listed plaque and forms the setting to several of listed buildings fronting onto Oriel Street. Are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.					
Sites adjacent to the east of Osney Bridge to the north and south of Botley Road #613	A. Allocate for a mix of uses	support proposed allocation		<b>Historic England</b> flag that any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the Hotel is currently on the OHAR, the site adjoins the conservation area and lies within the city centre archaeological area. It states that: 'Any development would need to take into account the various heritage constraints'.				Not allocate the Osney site with the Riverside Hotel. Major redevelopment would lose the characteristic architecture and urban form and grouping of Victorian buildings.			
Site to the south of Cripsey Place #614	A. Allocate for residential			<b>Historic England</b> flag that any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the site lies within an area where there is potential for important archaeological remains and is adjacent to Osney Island Conservation Area and a building on the OHAR.							
				We welcome the allocation of Cripsey Place- but care will be needed to secure improved design and build quality, and integration with adjoining areas, protecting the historic rail bridge.							

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Osney Warehouse and St Thomas School #616	A. Mixed-use development	support proposed allocation	2			<b>Historic England</b> object, flagging that any allocation in this location needs to take account of the historic environment. As acknowledged in the site assessment, the site lies within an area where there is potential for important archaeological remains and is partly within the Central (University & City) Conservation Area. Looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.		Not allocate the Osney warehouse and St.Thomas School. Oxford needs the availability of such sites for its current uses-community based action and SMEs			
St Stephen's House, 17 Norham Gardens #609	A. Allocate for residential (student accommodation) and academic use only.					<b>Historic England</b> object, the site assessment acknowledges that the site lies within the North Oxford Victorian Suburb Conservation Area and is adjacent to a GII Listed Building (No.19 Norham Gardens). The archaeological potential would seem to be unknown. The proximity to University Parks (GII) RPG needs also to be acknowledged in the text supporting this allocation, so that any future development does not adversely impact on the setting of the RPG. Are looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.					
1-3 Cambridge Terrace #611	A. Allocate for mixed use	support proposed allocation				<b>Historic England</b> object, flag that interim HELAA report notes this site is in a sensitive location – adjacent to Listed Buildings (Campion Hall and Clarks House), within Central (University & City) Conservation Area and in an area where archaeological remains are likely to be encountered, which any allocation in this location needs to take into account. Looking for the policy to state that careful design must ensure that development proposals contribute to the character of the conservation area.					
Digital infrastructure general comments		Difficult to get 4g connection, broadband coverage is patchy, cable subscription is costly	3	Council needs policy on digital exclusion, set of bold ideas to tackle this issue							
		Digital infrastructure should be guaranteed in all new developments		Risk that any policy on digital infrastructure could be outdated quickly.							
		All mobile companies should ensure 5g outdoor coverage over all of Oxford if they need permits for equipment in city		Concern about carbon impacts of having more communications equipment provision going against net zero aims.							
				Digital infrastructure must be improved across the whole city if it is to be truly inclusive.							
				5G connectivity health effects unknown in long term, should make permissions caveated (to be removed in future if needed) until full results understood		Concern and opposition to 5G/smart cities due to unknown health effects, increased surveillance					

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Policy DS1: Digital Infrastructure	A. Rely on national policy/ future DM policies. No local policy. Include digital connectivity requirements in design checklist (PO)	Support preferred option - no need for a policy.	10	Support PO: but consider planning officers should encourage developers in areas of poor broadband connectivity to improve service.		Doubt expressed over connectivity still being a problem – is it not automatic to get broadband nowadays?		Option B	9		
				Consider Oxford-Cam Arc deeply flawed – would prefer option without connection to this.	2			Option C	12		
				Concern about poor siting/design of communication infrastructure, policies should allow for option to hold applications to account.				Option C - Support - particularly important to support research capacity in oxford in future if it is to expand.	1		
				Support having a policy than just relying on national policy given the importance of connectivity in a post covid world (e.g. internet speed demand exacerbated by work at home). Many Oxford sites are small scale so may not be covered by national policy.	1			Supports either option B or C - flags that relying on market provision alone cannot meet city's needs	2		
				Need a policy to help deliver appropriate digital infrastructure to meet needs of all occupants (including working/ learning from home). Needs to be a policy in place for expectations of broadband connectivity that are required from new developments.							
				Support promotion of decentralised power systems through on-site renewable energy generation. Lack of secured covered cycle provision everywhere but especially City centre. LP should encourage covered cycle parking in public spaces. Greater cross-referencing of LTCP & COTP in LP to ensure future transport policy is embedded in document. Travel hierarchy needs reference including car-sharing, & motorbikes.							
Other comments				Provision should be made for on-road induction charging at all bus stops and all buses electric.	1						
	Section 8.22			Investing in/supporting EVs is important for those who must rely on cars (e.g. those who cannot walk)		Concern also about lack of EV policies/incentives; need to do more to support transition to EVs					
Electric vehicles	Section 8.24					Need to balance out the environmental impact of promoting EV car usage which are not carbon neutral from a production/maintenance perspective		We recommend the City should seriously consider, as an alternative to electric buses for the longer term, the introduction of light trams on the busiest core routes, using the technology being developed for Coventry (battery powered, light vehicles with no overhead wires and reduced construction costs due to less utility work required). Trams can achieve higher modal shift from cars than buses and reduce particulates emissions thus improving air quality in the city.			

# 1. Sustainability Appraisal

Section/option set heading	Para or option number	Comments made in support of the preferred option/aspects of the preferred option	No.	Suggestions for changes to the Preferred option/general comments relating to the preferred option	No.	Comments in disagreement with the preferred options	No.	Comments in support of an alternative or rejected option	No.
Sustainability appraisal		Sustainability topic is key/ sustainability measures must be a high priority	2			SA does not appropriately consider the climate emergency/ecological emergency and the impacts of continually growing population. Economic growth does not seem to fully consider potential growth in remote working, nor does LP encourage it enough. SA does not address climate adaptation (as a distinct need from mitigation) enough; they highlight work from EA including 8 point plan which the Oxford work needs to dove tail with; also their own adaptation work which has previously been submitted to council.			
				County note we were consulted on screening and this SA takes this forward		Need to change POs to make Plan sustainable.	2		
				Concern that findings/data is not current or reflective of immediate issues		Concern about errors with site descriptions in SA, unclear on weight given to it at this stage. Feels there should be a separate consultation on the SA and its scoring before any further progress on LP.			
				A lot of work is borrowed from the last LP review with updating - particularly in relation to Site Appraisals.		SA brings into question the sustainability of the preferred options and indicates need for significant change.			
						Greenfield S2b is preferable as there is almost no greenspace left in the Headington area with a rising population which has not been accounted for or calculated			
SA obj 4						Overconcentration on home rather than accommodation, Oxford has an unusual population mix consisting of key workers and students, most of whom will want rooms/small flats not large homes. Also overconcentration on providing space inefficient family homes which impacts ability to deliver medium/high density accommodation.			
SA obj 7, 9, 10, 11, 12						Disagreement with analysis/scoring of S2b in objs 7, 9, 10, 11, 12. Feels S2b should score better than other, e.g. adequate blue/green leisure - S2b is clearly better for leisure. Losing greenspace brings more population in (increasing demand) and reduces greenspace so increases demand and reduces supply. Heritage assets include greenfield sites in OHCA's so again S2b scores better. Under obj 12, an unhealthy, overcrowded and undesirable city will not support economic growth.			

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SA obj 7 Biodiversity		<b>Natural England</b> suggest the use of the BNG metric 3.1 and EBNT at this stage of plan making in order to establish a baseline position and inform the SA evidence base. Also, have not reviewed plans listed in SA but suggest that the following types of plans relating to the natural environment should be considered where applicable to plan area: GI strategies, Biodiversity plans, Rights of Way Improvement Plans, River Basin Management Plans, Relevant landscape plans and strategies.							
HRA		<b>Natural England</b> supports the approach that Oxford City Council are taking in regards to the Habitat Regulations Assessment as detailed in the background paper submitted with this consultation stage. They look forward to providing further advice on the assessment once it becomes available.	1	The Lye Valley is wholly absent from reference in HRA which is one of the most unique habitats in the UK.		AQ impacts resulting from increased traffic on A34 as a result of traffic filters and LTNs must be factored into HRA			
		OCC welcomes HRA and agree Oxford Meadows SAC to be included.	1						
HIA		Support and welcome	1			Not enough on air quality PM2.5			
				Must be data driven					
				Health impact around airport is not addressed					
				Concern about air pollution from yard and agricultural waste burning					
				Sewerage flooding should be factored into the HIA process					
				Concerns about air quality (including PM2.5)	3				
				Green and recreational space is very important					
				Health impacts of more cycling/walking leading to more accidents					
				Particular health/life expectancy inequalities, or lack of provision of facilities across areas of city (lower in Littlemore for example)	2				
				HIA should not be used to justify bus gates/15 min city plan					
Housing need paper BGP				Put jobs where people live outside of Oxford		The BGP reports that 144 AH delivered pe year, is this a success?	2		

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				Providing family homes is laudable, but the space used for a detached house with a car and garden could house 30-40 key workers. Predominantly, key Workers with lower incomes require affordable, decent housing.		Housing need paper wrongly treats Oxford in isolation from wider economic market of Oxfordshire. Does not reflect the recession or recent impacts of Brexit and therefore overstates growth needs. Nature and climate emergency needs to be taken into account in that paper too, net zero retro-fitting will necessitate materials and skilled labour that will have to come from supply for housebuilding creating a constraint on new homes.			
Flooding BGP		A new flood assessment is needed		Agree that more than just fluvial flood risk needs to be taken into account, flags that building in flood zone 3a or 3b is not acceptable, particularly in light of climate change, also will be more expensive, impacting viability and delivery on other objectives.					
Climate risk assessment				Misses both the serious danger of flash flooding due climate change, and Oxford's Flood History. Urgent actions needed to restrict any further development on the flood plain (e.g. impose Article 4 directions to suspend PDRs to restrict paving over gardens increasing run off).		Doubt expressed over points made in climate change background paper discussion inc reality of warmer summers and evidence of climate change actually impacting Oxford.			
Natural Resources		Leave any sites which may have an impact upon the Lye Valley out of the Plan until study completed	2	Although the Lye Valley Survey is welcome, further public involvement and consultation is required to produce a strategy and regulations (e.g. Article 4 suspension of permitted development rights) – disappointing so little is available after Warren Crescent and Dynham Place developments					
GI BGP		Any loss of GI should be avoided							
Inclusive economy BP				MINI is an established large local employer, and would welcome the opportunity to contribute to the inclusive Economy Strategy referenced in this paper					
				There is a tension between support for consolidation centres and preference for employment land for 'higher order' employment uses. Unmet need for warehouse/logistics that will require engagement with neighbours.					
Net zero BP				BMW would be keen to understand what standards would be set by policy to mandate net zero unregulated energy.					
				More research needed – green renewables are not all positive – EVs not the answer, hydrogen is being pursued in Europe.					
Urban design and heritage BP				Conservation Areas are Heritage Assets not just buildings inside them, yet are not even mentioned, although they are the single biggest contributor to wellbeing.					

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Site assessment #104 Iffley Mead Playing Fields		SA Objective 3 and 7 need review. Information appears inaccurate							
site assessment #389 Land at Meadow Lane		Site needs a proper biodiversity survey.							
site assessment 463 Ruskin Fields		SA Objective 3 - question "unprotected open space" classification. Site is greenfield, and part of the OHCA.	2						
site assessment 463 Ruskin Fields		SA Objective 4 - previous assessments (OLP2036 and previous inquiries) have shown that the site is not suitable or viable for development. (Friends of OH Rep for details)	2						
site assessment 463 Ruskin Fields		SA Objective 5 - misleading to say that site is adjacent to Barton (one of most deprived areas in Oxford). Site is adjacent to Barton Park and on the other site is Old Headington & Foxwell Drive. Barton Park is less deprived than Barton itself. This needs to be reflected in the assessment.	2						
		SA Objective 7 - site currently forms part of uninterrupted green corridor, which has wildlife benefits and has potential to create a green walking/ cycling route. OPT recognise the importance of protecting this corridor. This corridor/ potential green route would be interrupted by development.	2						
site assessment 463 Ruskin Fields		SA Objective 10 - incorrect reference to conservation area. Should read - Old Headington Conservation Area. Given this mistake, we question other aspects of the appraisal. Listed buildings nearby include Ruskin Hall, Stoke House and the garden wall.	2						
site assessment 463 Ruskin Fields		Vehicular access - we question the statement "there is currently no vehicular access to the site" as vehicular access could be created from Foxwell Drive. OLP2036 set out that any vehicular access would need to be through the college.	2						

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Site assessment Bertie Park		<p>Site assessment for Bertie Park is misleading. Should remove site B from the local plan as this site can neither be used for construction or for the location of a new recreation ground, perhaps only a nature trail though no established local need. Ultimately, Site A should be considered on its own merits, and also removed from the local plan. Flags that the 2 sites have completely different characteristics, which leads to confusion and inaccuracies, gives a number of reasons summarised as follows:</p> <p>Site B is greenfield site in flood zone 3; not suitable for any sort of construction; site B is unprotected green space whereas, site A is public open space. Regarding provision of essential services and facilities, assessment doesn't mention that there will be destruction of an outdoor amenity space used by people from area. Also, amenities to replace Bertie Park are too small, would only be used by residents of new development. If not possible for Site B to be converted into public open space, there will therefore be a decrease in the provision of public open space. If site A was assessed independently, the impact on the provision of public open space would be immediately apparent.</p> <p>Also, Hinksey stream borders both sites A and B. This means that housing cannot be built within 10m of the stream; there is a steep bank down to the stream which developers appear to be unaware of as they have shown this as part of an area for free play on site A.</p>							

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Appendix 6 – Performance of Preferred Options Social Media Campaigns

**Council Newsletter**

Date	Newsletter title	Link	Total clicks	Unique clicks
07/10/2022	<a href="#">Record your views on Oxford 2040</a> 🗣️📄	<a href="https://consultation.oxford.gov.uk/">https://consultation.oxford.gov.uk/</a>	129	106
14/10/2022	<a href="#">Think a private rented property should be up to standard? So do we!</a> 🏠📄✖️	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	20	15
21/10/2022	<a href="#">A sneak peak at exciting developments to come</a> 🏡👁️	<a href="https://consultation.oxford.gov.uk/">https://consultation.oxford.gov.uk/</a>	25	18
28/10/2022	<a href="#">Using wine, oil, corn and salt to bless a house... no this isn't a House of the Dragon reference</a> 🍷🏰	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	9	8
03/11/2022	<a href="#">Oxford remains a diverse and youthful city</a> 🌍	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	13	12
11/11/2022	<a href="#">Working to retrofit council homes, we wish it was as easy as EPC</a> 🏠📄	<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-preferred-options-consultat/</a>	35	29

**Facebook Ads**

Ad name	Results (link clicks)	Reach	Impressions	Page engagement	Post reactions	Post comments	Post saves	Post shares	Link clicks
<b>Overview video</b>	790	17639	32007	8899	51	16	5	8	790
<b>15 minute city</b>	1006	11864	33897	4240	47	34	3	5	1006
<b>Climate emergency</b>	1217	7191	27448	3264	10	11			1217
<b>Inequalities</b>	1528	4821	31296	3050	2	2			1528

**Facebook Organic Posts**

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p>"the Covid pandemic and lockdowns really reminded us how important local neighbourhoods and local communities are"</p> <p>The Local Plan 2040 looks at the idea of a 15 minute city in which daily needs are within a 15 minute walk of your home.</p> <p>This provides the opportunity to build</p>	Video	5	211		24	63	817	39	26	10	75	727	240	405

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p><b>strong local communities that enable residents to thrive.</b></p> <p>Do you agree with this idea? Have your say on #Oxford2040  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>														
<p><b>Record your views on Oxford's future 🗨️.</b></p> <p>#Oxford2040 is a planning document required by law, it will be used to inform all future planning applications, by setting out how and where new homes, jobs and community facilities will be delivered to make Oxford a better place to live, work and visit.</p> <p>Shape the #Oxford of 2040 (and beyond!) here:  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Photo	1	5			0	71	1	1	0	2	62	6	0
<p><b>EDIT: University Parks Parkrun has been cancelled, but the team will be available at Cuttleslowe Park Parkrun instead. Timings remain the same.</b></p> <p>Got questions about #Oxford2040? Talk to the team!</p> <p>You can find them:</p> <ul style="list-style-type: none"> <li>◆ Monday 24 October - Ferry Leisure Centre - 12 - 2pm</li> <li>◆ Tuesday 25 October - Oxford City Football Club, Marsh Lane - 6:15 - 7:30pm</li> <li>◆ Friday 28 October - Gloucester Green Market - 12 - 2pm</li> <li>◆ Saturday 29 October - Cuttleslowe Park Parkrun - 8:30 - 10:30am</li> <li>◆ Sunday 30 October - Florence Park Parkrun - 8:30 - 10:30am</li> <li>◆ Wednesday 2 November - Sainsbury's</li> </ul>	Photo	1	22	4		0	1907	1	5	5	11	1900	27	0

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p><b>Heyford Hill - 11am - 1pm</b></p> <p>◆ Thursday 3 November - Further Education College (EMBS) - 12 - 12:45pm</p> <p>◆ Friday 4 November - Templars Square Shopping Centre - 11am - 1pm</p> <p>More info and consultation:  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>														
<p><b>Oxford has diverse communities and a strong identity but there are wide inequalities across the city, exposed and exacerbated further by the recent pandemic.</b></p> <p>Identified by you in a consultation last summer, some of the inequalities include access to housing and employment opportunities and in health and wellbeing. #Oxford2040 aims to reduce these inequalities and create opportunities for all.</p> <p>We want your views on how this can happen to make Oxford a fairer city in 2040? Have your say on #Oxford2040 ↓  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Video	1	10			8	463	0	2	0	2	463	11	120
<p><b>Under two weeks to record your views on #Oxford2040!</b></p> <p>Play a part in making Oxford's future better for everyone, share your views on the Local Plan before November 14.</p> <p>Head over to →  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>	Photo	1	1			0	159	0	4	2	6	144	2	0
<p><b>Got questions about #Oxford2040? Talk to the team!</b></p> <p>You can find them:</p>	Photo	2	3			0	107	0	4	0	4	93	5	0

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<p>◆ Tuesday 8 November - Oxfordshire County Library, Westgate - 12 - 2pm</p> <p>◆ More locations to be confirmed</p> <p>More info and consultation:  <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a></p>														
<p>Don't miss your chance to shape the future of Oxford! The consultation on #Oxford2040 closes November 14 📅.</p> <p>Head to the "Consultations" link in bio to record your views 🗣️</p> <p>#LocalPlan #OxfordCityCouncil  #planningcommunity  #communitiesupportingcommunities  #climateemergency #climatechange</p>	Video		19		5	0	530	10	8	1	19	515	24	226
<p>Last summer, we asked you to give your views in an 'Issues' consultation for the Local Plan 2040.</p> <p>The views you shared have helped us to create a first draft which we are now sharing with you to record your views on before a more detailed draft is produced.</p> <p>The consultation is split into three key threads:</p> <ul style="list-style-type: none"> <li>◆ 15-minute neighbourhoods (where everything residents need to live well is within a 15 minute walk of home)</li> <li>◆ Climate change (accelerating the move to net zero buildings and ensuring the City's resilience against impacts of climate change)</li> <li>◆ Reducing inequalities (narrowing the gap in housing, health and employment inequalities across the city by creating real opportunities for everyone)</li> </ul> <p>You can find out more and record your</p>	Photo	1	32			0	183	4	8	2	14	160	33	0

Description	Post type	Link clicks	Other clicks	Photo views	Clicks to play	60-second video views	Impressions	Comments	Likes	Shares	Engagements	People reached	Total clicks	3-second video views
<a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">views here ↓</a> <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a>  <b>#Oxford2040</b>														
<b>Got questions about #Oxford2040? Talk to the team!</b>  <b>You can find them:</b>  <b>Monday 10 October - St Mary's and St Nicholas Church - 10:30am - 12pm</b> <b>Wednesday 12 October - Blackbird Leys Community Centre 2 - 4pm</b> <b>Tuesday 18 October - Rose Hill Community Centre - 2 - 4pm</b> <b>Thursday 20 October - Tesco Superstore Blackbird Leys - 11am - 1pm</b>  <b>More info and consultation:</b> <a href="https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/">https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/</a>	Photo		1			0	193	0	2	3	5	175	1	0

### Instagram Posts

Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
<b>The Oxford Local Plan 2040 is a planning document that shapes the city for the good of its people, that's why we need you to record your views!</b>	49	IG video	3091	2963	0	4	1536	103	11	13

Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
Have your say on the city's future, head to the 'Consultation' link in bio #Oxford2040										
<p>Would you like to have everything you needed within a 15-minute walk of you 🏡🚶?</p> <p>Last year we collected your views on what #Oxford's future issues could be. You told us that local neighbourhoods, communities and access to local amenities were really important. That has helped us to shape the 15-minute city idea and we'd like to know if it meets your needs.</p> <p>Record your views on the latest stage of the Oxford Local Plan 2040 by heading to the "Consultations" 🗨️ in bio.</p> <p>#Oxford2040</p>	13	IG video	3836	3504	6	4	2028	175	1	19
<p>Record your views on Oxford's future 🗨️.</p> <p>#Oxford2040 is a planning document required by law, it will be used to inform all future planning applications, by setting out how and where new homes, jobs and community facilities will be delivered to make Oxford a better place to live, work and visit.</p> <p>Shape the #Oxford2040 (and beyond!) by heading to the "Consultations" link in bio 🗨️</p> <p>#LocalPlan #OxfordCityCouncil #planningcommunity #communitiesupportingcommunities #climateemergency #climatechange</p>	0	IG image	421	402	0	0	0	3	0	0

Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
<p>It may be grey and rainy today in #oxford, so we thought we'd share a video from a sunnier time.</p> <p>#radcliffesquare is an iconic part of Oxford's city centre and history. We're working on #Oxford2040, a local plan for the city's future.</p> <p>To shape the draft plan, we collected your views on what Oxford's future issues could be. You told us that the climate emergency and transitioning to net zero was important, however, there was concern about how that could happen in a city with so many historical buildings. The two things can seem at odds, but #Oxford2040 looks to address both issues.</p> <p>Have your say on the Local Plan by heading to the "Consultations"  in bio</p>	4	IG video	4917	4626	12	6	2573	218	8	16
<p>Have your say in the Oxford Local Plan to help shape the city of tomorrow  .</p> <p>#oxford2040 is a planning document that will help to shape new developments in the city and make it a better place for you to live, work or visit!</p> <p>Head to the "Consultations"  in bio for more information.</p> <p> @oxfordyouthambition</p> <p>#oxford #oxfordcity #youthambition #planning</p>	35	IG video	2273	1972	2	0	1293	45	2	4
<p>Under two weeks to record your views on #Oxford2040!</p> <p>Play a part in making Oxford's future better for everyone, share your views on the Local Plan before November 14.</p> <p>Head to the "Consultations" link in bio </p>	0	IG image	362	333	0	0	0	2	0	0

Description	Duration (secs)	Post type	Impressions	Reach	Shares	Follows	3s views	Likes	Comments	Saves
<p>Don't miss your chance to shape the future of Oxford! The consultation on #Oxford2040 closes November 14 📅.</p> <p>Head to the "Consultations" link in bio to record your views 🗣️</p> <p>#LocalPlan #OxfordCityCouncil #planningcommunity #communitiesupportingcommunities #climateemergency #climatechange</p>	49	IG video	1634	1562	0	0	845	58	9	6
<p>Only four days left to have your say about #Oxford2040 🗣️🗣️.</p> <p>Head to the "consultations" 🗣️ in bio for more info!</p> <p>#oxford #oxfordcitycouncil #consultation #haveyoursay</p>	35	IG video	866	822	0	0	438	18	0	1
<p>Last summer, we asked you to give your views in an 'Issues' consultation for the Local Plan 2040.</p> <p>The views you shared have helped us to create a first draft which we are now sharing with you to record your views on before a more detailed draft is produced.</p> <p>The consultation is split into three key threads:</p> <ul style="list-style-type: none"> <li>◆ 15-minute neighbourhoods (where everything residents need to live well is within a 15 minute walk of home)</li> <li>◆ Climate change (accelerating the move to net zero buildings and ensuring the City's resilience against impacts of climate change)</li> <li>◆ Reducing inequalities (narrowing the gap in housing, health and employment inequalities across the city by creating real opportunities for everyone)</li> </ul> <p>You can find out more and record your views on #Oxford2040 by heading to the "Consultations" link in bio 🗣️</p> <p>#Oxford #OxfordCityCouncil #NetZeroCity #ClimateEmergency #inequalities #healthandwellbeing #communities #communitiesupportingcommunities</p>	0	IG image	635	571	0	0	0	9	0	0

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## Twitter Posts

Tweet text	impressions	engagements	retweets	replies	likes	user profile clicks	url clicks	hashtag clicks	detail expands	dial phone	media views	media engagements
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>You can find them:</p> <p>Wednesday 2 November - Sainsbury's Heyford Hill - 11am - 1pm</p> <p>Thursday 3 November - Further Education College (EMBS) - 12 - 12:45pm</p> <p>Friday 4 November - Templars Square Shopping Centre - 11am - 1pm <a href="https://t.co/3jEmATeGpR">https://t.co/3jEmATeGpR</a></p>	720	4	3	0	0	0	0	0	0	0	1	1
<p>The Oxford Local Plan 2040 is a planning document that shapes the city for the good of its people, that's why we need you to record your views about tackling the #ClimateEmergency!</p> <p>Have your say on the city's future, today <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a></p> <p>#Oxford2040 <a href="https://t.co/nnLzrBlvMi">https://t.co/nnLzrBlvMi</a></p>	780	34	2	2	4	0	3	2	11	0	243	10
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>24 Oct - Ferry Leisure Centre - 12-2pm</p> <p>25 Oct - Oxford City Football Club - 6:15-7:30pm</p> <p>28 Oct - Gloucester Green Market - 12-2pm</p> <p>29 Oct - Uni Parks Parkrun - 8:30-10:30am</p> <p>30 Oct - Florence Park Parkrun - 8:30-10:30am</p> <p><a href="https://t.co/ufkCM86Yqa">https://t.co/ufkCM86Yqa</a></p>	1195	10	3	0	5	0	0	0	1	0	1	1
<p>Record your views on Oxford's future ↪.</p> <p>#Oxford2040 is required by law and will be used to inform all future planning applications to make Oxford a better place to live, work and visit.</p> <p>Shape the #Oxford of 2040 here <a href="https://t.co/ShHTuf1SMe">https://t.co/ShHTuf1SMe</a> <a href="https://t.co/HHV0iHeCVW">https://t.co/HHV0iHeCVW</a></p>	619	9	1	2	2	0	2	0	1	0	1	1

Tweet text	impressions	engagements	retweets	replies	likes	user profile clicks	url clicks	hashtag clicks	detail expands	dial phone	media views	media engagements
<p>#Oxford2040 looks at the idea of a 15 minute city in which daily needs are within a 15 minute walk of your home.</p> <p>This provides the opportunity to build strong local communities.</p> <p>Do you agree with this? Have your say, today:  <a href="https://t.co/ShHTuf1SMe">https://t.co/ShHTuf1SMe</a> <a href="https://t.co/7lg5KKspfv">https://t.co/7lg5KKspfv</a></p>	17567	2135	55	109	33	134	141	3	922	0	5814	736
<p>The Oxford Local Plan 2040 is a planning document that shapes the city for the good of its people, that's why we need you to record your views!</p> <p>Have your say on the city's future, today  <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a></p> <p>#Oxford2040 <a href="https://t.co/isj4dhXlp1">https://t.co/isj4dhXlp1</a></p>	563	22	1	1	2	8	1	0	5	0	193	4
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>10 October - St Mary's and St Nicholas Church - 10:30am-12pm  12 October - Blackbird Leys Community Centre 2-4pm  18 October - Rose Hill Community Centre - 2-4pm  20 October - Tesco Superstore Blackbird Leys - 11am-1pm <a href="https://t.co/USHDNY9xm2">https://t.co/USHDNY9xm2</a></p>	902	10	0	3	1	0	0	0	3	0	5	3
<p>Record your views on #Oxford2040 Local Plan and help to shape the city for future generations</p> <p><a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a> <a href="https://t.co/XqsJb47I2m">https://t.co/XqsJb47I2m</a></p>	455	5	0	0	1	0	4	0	0	0	0	0
<p>Only a few days left to have your say on the Oxford Local Plan! Help shape the city of tomorrow</p> <p>#oxford2040 is a planning document that will help to shape new developments in the city and make it a better place for you to live, work or visit!</p> <p><a href="https://t.co/aXmPyG3Gpz">https://t.co/aXmPyG3Gpz</a> <a href="https://t.co/DkVmOavTwc">https://t.co/DkVmOavTwc</a></p>	780	26	1	1	3	0	9	0	1	0	245	11

Tweet text	impressions	engagements	retweets	replies	likes	user profile clicks	url clicks	hashtag clicks	detail expands	dial phone	media views	media engagements
<p>Got questions about #Oxford2040? Talk to the team!</p> <p>You can find them:</p> <p>Tuesday 8 November - Oxfordshire County Library, Westgate - 12 - 2pm More locations to be confirmed</p> <p>More info and consultation: <a href="https://t.co/ShHTuf1SMe">https://t.co/ShHTuf1SMe</a> <a href="https://t.co/pTEwef5e8z">https://t.co/pTEwef5e8z</a></p>	911	24	0	1	5	2	6	2	5	0	3	3
<p>Under two weeks to record your views on #Oxford2040!</p> <p>Play a part in making Oxford's future better for everyone, share your views on the Local Plan before November 14.</p> <p>Head over to <a href="https://t.co/ShHTueKhUG">https://t.co/ShHTueKhUG</a> <a href="https://t.co/ltliuremMN">https://t.co/ltliuremMN</a></p>	498	6	0	1	1	0	2	0	2	0	0	0