Agenda

Cabinet

This meeting will be held on:

Date: **Wednesday 8 July 2026**

Time: **6.00 pm**

Place: **Long Room - Oxford Town Hall**

For further information please contact:

Dr Brenda McCollum, Committee and Member Services Officer, Committee Services Officer

01865 252784 DemocraticServices@oxford.gov.uk

Members of the public can attend to observe this meeting and.

- may submit a question about any item for decision at the meeting in accordance with the Cabinet's rules
- may record all or part of the meeting in accordance with the Council's protocol

Details of how City Councillors and members of the public may engage with this meeting are set out later in the agenda. Information about recording is set out later in the agenda and on the website

Please contact the Committee Services Officer to submit a question; to discuss recording the meeting; or with any other queries.

Cabinet Membership

Councillors: Membership 10: Quorum 3: No substitutes are permitted.

Leader/ Chair

Cabinet Members

Councillor Susan Brown	Leader, and Cabinet Member for Partnership Working, Inclusive Economic Growth and Culture
Councillor Ed Turner	Deputy Leader (Statutory), and Cabinet Member for Finance and Asset Management
Councillor Anna Railton	Deputy Leader, and Cabinet Member for Planning and Zero Carbon Oxford
Councillor Lubna Arshad	Cabinet Member for a Safer Oxford
Councillor Nigel Chapman	Cabinet Member for Citizen Focused Services and Council Companieses
Councillor Linda Smith	Cabinet Member for Housing and Communities
Councillor Mark Lygo	Cabinet Member for a Healthy, Fairer Oxford
Councillor Mike Rowley	Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness

Apologies received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting.

Agenda

Items to be considered at this meeting in open session (part 1) and in confidential session (part 2).

Future items to be discussed by the Cabinet can be found on the Forward Plan which is available on the Council's website

		Pages
1	**Apologies for Absence**	
2	**Declarations of Interest**	
3	**Minutes of the previous meeting** **Recommendation:** That Cabinet resolves to **approve** the minutes of the meeting held on 17 June 2026 as a true and accurate record.	15 - 18
4	**Addresses by members of the public** Public addresses relating to matters of business for this agenda, up to five minutes is available for each public address. **The request to speak accompanied by the full text of the address must be received by the Director of Law, Governance and Strategy by 5.00 pm on Thursday the 2nd of July.**	
5	**Councillor addresses on any item for decision on the Cabinet agenda** Councillor addresses relating to matters of business for this agenda, up to five minutes is available for each address. **The request should be received by the Director of Law, Governance and Strategy by 5.00 pm on Thursday the 2nd of July.**	
6	**Councillor addresses on Neighbourhood Issues**	
7	**Items raised by Cabinet Members**	

Decisions come into effect after the latest of the expiry of the post-meeting councillor call in period; reconsideration of a called-in decision; or Council's agreement of recommendations.

8 Reports from the Scrutiny Committee

The Scrutiny Committee will meet on the 30th of June 2026. The Committee and its Working Group will consider the following reports:

- Annual Review of the Council of Sanctuary Framework
- Private Sector Housing Enforcement Policy
- HRA policies

Scrutiny's discussions and recommendations on the reports will be circulated as a supplement to the agenda.

9 Thames Valley Strategic Authority Proposal: Update and Implications for Oxford City

19 - 24

The Transition Director submitted a report to invite Cabinet to note Oxfordshire County Council's veto of the systemwide Expression of Interest to Government, which would have enabled the creation of a Thames Valley Strategic Authority with enhanced powers and funding for the region. Cabinet is further requested to reaffirm its commitment to working collaboratively with Thames Valley partners and Government to reassess devolution in light of the 'minded to' decision on Local Government Reorganisation, with the clear aim of advancing a renewed proposal that includes Swindon and remains open to Buckinghamshire.

Cabinet is recommended to:

1. Note Oxfordshire County Council's decision to veto the Thames Valley Foundation Strategic Authority proposal;
2. Agree that the Council Leader and Council officers to work with counterparts in other Thames Valley councils to review the position following the Government's decision on Local Government in Oxfordshire and West Berkshire;
3. Note that officers will work with counterparts in the other 12 councils to further develop the Expression of Interest proposal against any updated policy position around devolution set out by the new Prime Minister;
4. Agree the commitment to continue to support Swindon's involvement as a willing partner in a Thames Valley Strategic Authority – and keep the door open for Buckinghamshire's inclusion too, if they change their position.

10 Local Development Scheme 2026-2031

25 - 40

The Director of Planning and Regulation submitted a report to request that Cabinet approve the Local Development Scheme 2026-2031, which sets out the work programme for the Oxford Local Plan 2045.

Cabinet is recommended to:

1. **Approve** the Local Development Scheme 2026-2031;
2. **Authorise** the Director of Planning and Regulation Services to make any necessary minor corrections not materially affecting the document prior to publication.

11 Oxford Local Plan 2045 Next Steps

41 - 3366

The Director of Planning and Regulation submitted a report to request that Cabinet recommend that Council approve the Proposed Submission Draft Oxford Local Plan 2045 for submission to the Secretary of State for formal examination.

Cabinet is recommended to:

1. **Recommend** Council to authorise submission of the Oxford Local Plan 2045 to the Secretary of State for examination, including the minor amendments made according to recommendation 3;
2. **Recommend** Council to approve all the supporting statutory documentation including the Sustainability Appraisal, Habitats Regulation Assessment, Infrastructure Development Plan (IDP), Policies Map, Regulation 18 Consultation Statement, Regulation 19 Consultation Statement and Equalities Impact Assessment (Appendices 2-7 & 9); 18 October 2019 .
3. **Recommend** Council to authorise the Director of Planning and Regulation, after consultation with the Lead Cabinet Member, to make any necessary minor editorial corrections to the Submission Draft Oxford Local Plan 2045, IDP, Sustainability Appraisal and Habitats Regulation Assessment, Policies Map, and to agree the supporting evidence base prior to submission;
4. **Recommend** Council to authorise the Director of Planning and Regulation, after consultation with the Lead Cabinet Member, to invite the examining inspector(s) to recommend any modifications considered to be necessary in accordance with section 20(7C) of the Planning and Compulsory Purchase Act

2004.

12 Local Authority Housing Fund Round 4

3367 - 3388

The Director of Housing submitted a report to seek the required budget provision and the necessary project approval and delegations to enable the Council to proceed with entering into the national Local Authority Housing Fund Round 4.

Cabinet is recommended to:

1. **Approve** receipt of the Local Authority Housing Fund Round 4 (LAHF R4) funding of £1,719,354 to deliver 4 temporary accommodation units and 4 units for resettled Afghan families
2. **Recommend** to Council, to approve the allocation of £808,000 of the LAHF R4 grant funding in substitution of approved HRA borrowing for the delivery of the temporary accommodation element of LAHF R4.
3. **Recommend** to Council, to approve the allocation of £898,500 of the LAHF R4 grant funding to a new General Fund capital budget for the payment of a capital grant of 898,500 to a Registered Provider to deliver the 'resettlement' element of LAHF R4.
4. **Delegate** authority to the Director of Housing in consultation with; Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness, the Group Finance Director and the Director of Law Governance and Strategy, to select a Registered Provider delivery partner and enter into a grant agreement with them to part fund the purchase of 4 units for resettled Afghan families.

13 Annual Review of the Council of Sanctuary Framework 2025-2028

3389 - 3464

The Director of Housing submitted a report to provide an update to Cabinet on the progress made in Year 1 of the Council of Sanctuary Framework 2025-28 and to seek approval for the implementation of the Year 2 Action Plan.

Cabinet is recommended to:

1. **Note** the progress made in Year 1 to implement the Council of Sanctuary Framework and Action Plan and the emerging risks

and challenges for delivery over the next year and beyond

2. **Approve** the adoption of the new Framework Action Plan for Year 2 (26-27); and
3. **Delegate** authority to the Director of Housing, in consultation with the Cabinet Member for Housing and Communities, to update the Action Plan when required to respond to emerging risks and challenges.

14 HRA Policies

3465 - 3574

The Director of Housing submitted a report to request that Cabinet recommend that Council approve the following policies: complaints, lifting equipment and lifting operations, voids.

Cabinet is recommended to:

1. **Recommend** full Council to approve the draft Complaints Policy
2. **Recommend** full Council to approve the draft Lifting Equipment and Lifting Operations Policy
3. **Recommend** full Council to approve the draft Voids Policy

15 Private Sector Housing Enforcement Policy

3575 - 3610

The Director of Planning and Regulation submitted a report to Cabinet to request approval of the Private Sector Housing Enforcement Policy for adoption.

Cabinet is recommended to:

1. **Approve** the Private Sector Housing Enforcement Policy (at Appendix 1) for adoption.
2. **Delegate authority** to the Director of Planning and Regulation, in consultation with the Director of Law and Governance and the Portfolio Holder, to approve future updates to the policy where such changes are consistent with the overall policy approach and reflect changes to legislation or relevant case law.

16 Park and Ride Charges

3611 - 3618

The Director of Regeneration, Economy and Sustainability submitted a report to request that Cabinet introduce temporary discounted combined ticket charge funded by Oxfordshire County Council.

Cabinet is recommended to:

1. **Approve** amending the fees and charges schedule as it relates to the Park and Ride 16 hour combined bus and parking tickets as set out in Appendix 1 to be implemented as soon after this decision as practicable and to run until 31 March 2027.

17 Thames Valley Spatial Development Strategy (SDS)

3619 - 3640

The Director Planning & Regulation submitted a report to Cabinet to note the development of, and governance arrangements for, a Thames Valley SDS.

Cabinet is recommended to:

1. **Note** the governance and development of the Thames Valley Spatial Development Strategy
2. **Agree** to officer and member involvement in the early programme stages as outlined in this report, in particular with regards to the governance model and assisting in the development of the Thames Valley SDS.

18 Development and Governance Decision to Direct Award OCC's Water Supply and Wastewater Contract

3641 - 3708

The Director of Regeneration, Economy and Sustainability submitted a report to Cabinet to request that Cabinet Delegate authority to the Deputy Chief Executive - Place to Direct Award the Council's Water Supply and Wastewater Contract to Anglian Water Business (National) Limited t/a Wave Utilities on a 2+1+1 contract term, subject to final contract price; and delegate authority to the Deputy Chief Executive - Place to make non-substantive changes to the framework should they become necessary.

Cabinet is recommended to:

1. **Approve** Delegate authority to the Deputy Chief Executive - Place to Direct Award the Council's Water Supply and Wastewater Contract to Anglian Water Business (National) Limited t/a Wave Utilities on a 2+1+1 contract term, subject to final contract price; and delegate authority to the Deputy Chief Executive - Place to make non-substantive changes to the framework should they become necessary.

19 **Procurement of a high-support service for accommodation for single homeless individuals** 3709 - 3738

The Director of Housing submitted a report to Cabinet to request approval of the commencement of a procurement exercise for accommodation with high support in Oxford from 1st April 2027.

Cabinet is recommended to:

1. **Give** project approval for the commencement of a procurement of an accommodation support service for individuals with multiple and complex support needs who are experiencing homelessness;
2. **Delegate** to the Director of Housing (following conclusion of the procurement) in consultation with the Group Finance Director, Director of Law Strategy and Governance and the Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness), the authority to award a contract within the relevant budget.

20 **Appointments to Outside Bodies** 3739 - 3760

The Director of Law, Governance and Strategy (Monitoring Officer) submitted a report to Cabinet to request that Cabinet agree appointments to Outside Bodies for the 2026/2027 Council Year.

Cabinet is recommended to:

1. **Approve** appointments to charities, trusts, community associations and other organisations as set out in Appendices 1A – 1D; and note the appointments to partnerships as detailed in Appendix 1E;
2. **Note** the guidance for appointees in Appendix 2; and
3. **Delegate** authority to the Director of Law, Governance and

Strategy, in consultation with the Leader of the Council, and where appropriate with other group leaders, to make any changes to appointments to Outside Bodies as required during the council year 2026/2027.

21 Dates of future meetings

Meetings are scheduled for the following dates:

- 19 August 2026
- 16 September 2026
- 21 October 2026
- 18 November 2026

All meetings start at 6.00 pm.

Matters Exempt from Publication

If Cabinet wishes to exclude the press and the public from the meeting during consideration of any of the items on the exempt from publication part of the agenda, it will be necessary for Cabinet to pass a resolution in accordance with the provisions of Paragraph 4(2)(b) of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012 on the grounds that their presence could involve the likely disclosure of exempt information as described in specific paragraphs of Schedule 12A of the Local Government Act 1972.

Cabinet may maintain the exemption if and so long as, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Information for those attending

Recording and reporting on meetings held in public

Members of public and press can record, or report in other ways, the parts of the meeting open to the public. You are not required to indicate in advance but it helps if you notify the Committee Services Officer prior to the meeting so that they can inform the Chair and direct you to the best place to record.

The Council asks those recording the meeting:

- To follow the protocol which can be found on the Council's website
- Not to disturb or disrupt the meeting
- Not to edit the recording in a way that could lead to misinterpretation of the proceedings. This includes not editing an image or views expressed in a way that may ridicule or show a lack of respect towards those being recorded.
- To avoid recording members of the public present, even inadvertently, unless they are addressing the meeting.

Please be aware that you may be recorded during your speech and any follow-up. If you are attending please be aware that recording may take place and that you may be inadvertently included in these.

The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

Councillors declaring interests

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

Members' Code – Other Registrable Interests

Where a matter arises at a meeting which directly relates to the financial interest or wellbeing** of one of your Other Registerable Interests*** then you must declare an

interest. You must not participate in discussion or voting on the item and you must withdraw from the meeting whilst the matter is discussed.

Members' Code – Non Registrable Interests

Where a matter arises at a meeting which ***directly relates*** to your financial interest or wellbeing (and does not fall under disclosable pecuniary interests), or the financial interest or wellbeing of a relative or close associate, you must declare the interest.

Where a matter arises at a meeting which affects your own financial interest or wellbeing, a financial interest or wellbeing of a relative or close associate or a financial interest or wellbeing of a body included under Other Registrable Interests, then you must declare the interest.

You must not take part in any discussion or vote on the matter and must not remain in the room, if you answer in the affirmative to this test:

> "Where a matter affects the financial interest or well-being:
>
> a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
>
> b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest You may speak on the matter only if members of the public are also allowed to speak at the meeting."

Otherwise, you may stay in the room, take part in the discussion and vote.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

** Wellbeing can be described as a condition of contentedness, healthiness and happiness; anything that could be said to affect a person's quality of life, either positively or negatively, is likely to affect their wellbeing.

*** Other Registrable Interests: a) any unpaid directorships b) any Body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority c) any Body (i) exercising functions of a public nature (ii) directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management.

How Oxford City Councillors and members of the public can engage at Cabinet

Addresses and questions by members of the public (15 minutes in total)

Members of the public can submit questions in writing about any item for decision at the meeting. Questions, stating the relevant agenda item, must be received by the Head of Law and Governance by 9.30am two working days before the meeting (eg for a Tuesday meeting, the deadline would be 9.30am on the Friday before). Questions can be submitted either by letter or by email (to cabinet@oxford.gov.uk).

Answers to the questions will be provided in writing at the meeting; supplementary questions will not be allowed. If it is not possible to provide an answer at the meeting it will be included in the minutes that are published on the Council's website within 2 working days of the meeting.

The Chair has discretion in exceptional circumstances to agree that a submitted question or related statement (dealing with matters that appear on the agenda) can be asked verbally at the meeting. In these cases, the question and/or address is limited to 3 minutes, and will be answered verbally by the Chair or another Cabinet member or an officer of the Council. The text of any proposed address must be submitted within the same timescale as questions.

For this agenda item the Chair's decision is final.

Councillors speaking at meetings

Oxford City councillors may, when the chair agrees, address the Cabinet on an item for decision on the agenda (other than on the minutes). The member seeking to make an address must notify the Head of Law and Governance by 9.30am at least one working day before the meeting, stating the relevant agenda items. An address may last for no more than three minutes. If an address is made, the Cabinet member who has political responsibility for the item for decision may respond or the Cabinet will have regard to the points raised in reaching its decision.

Councillors speaking on Neighbourhood issues (10 minutes in total)

Any City Councillor can raise local issues on behalf of communities directly with the Cabinet. The member seeking to make an address must notify the Head of Law and Governance by 9.30am at least one working day before the meeting, giving outline details of the issue. Priority will be given to those members who have not already addressed the Cabinet within the year and in the order received. Issues can only be raised once unless otherwise agreed by the Cabinet. The Cabinet's responsibility will be to hear the issue and respond at the meeting, if possible, or arrange a written response within 10 working days.

Items raised by Cabinet members

Such items must be submitted within the same timescale as questions and will be for discussion only and not for a Cabinet decision. Any item which requires a decision of the Cabinet will be the subject of a report to a future meeting of the Cabinet.

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Minutes of a meeting of the Cabinet on Wednesday 17 June 2026

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OXFORD CITY COUNCIL

Committee members present:

Councillor Brown
Councillor Railton
Councillor Linda Smith
Councillor Rowley
Councillor Turner
Councillor Arshad
Councillor Lygo

Officers present for all or part of the meeting:

Caroline Green, Chief Executive

Tom Hook, Deputy Chief Executive - Citizen and City Services

Alistair Rush, Group Director Finance

Emma Jackman, Director of Law, Governance, and Strategy

Jonathan Malton, Committee and Member Services Manager

Dr Brenda McCollum, Committee and Member Services

Paula Redway, Culture and Community Development Manager

Annette Osborne, Strategic Procurement Manager

Apologies:

Councillor Chapman sent apologies.

1. Declarations of Interest

None.

2. Minutes of the previous meeting

Cabinet resolved to approve the minutes of the meeting held on 15 April 2026 as a true and accurate record.

3. Addresses by members of the public

None received.

4. Councillor addresses on any item for decision on the Cabinet agenda

None.

5. Councillor addresses on Neighbourhood Issues

None received.

6. Items raised by Cabinet Members

None.

7. Reports from the Scrutiny Committee

Scrutiny Committee met on the 9th of June to consider the following report.

- Establishment of Scrutiny Standing Working Groups and Review Group

Jonathan Malton, Committee and Member Services Manager, presented the report. He outlined the creation of the Scrutiny Working Groups and Scrutiny's gratitude for Officers' work over the previous year.

8. Delegation to purchase fleet vehicles 2026/2027

The Interim Group Finance Director submitted a report to Cabinet to request that Cabinet delegate authority to the Interim Group Finance Director for the 2026/27 financial year to award any fleet contracts valued in excess of £750k following a compliant procurement process.

Annette Osborne, Strategic Procurement Manager, presented the report. She noted that this was a similar report to the one which Cabinet had approved in the previous year. She outlined the recommendations of the report and the procurements they believe will be undertaken in the coming year.

Councillor Linda Smith asked what opportunities there were in the procurement process to buy British vehicles to support British manufacturing and the British economy.

The Strategic Procurement Manager said that procurements for fleet were mainly call off contracts from a range of frameworks. She said that supplier selection was dependant on suppliers listed on a framework. She said that the Council had specific requirements for vehicles which limited where they could procure them from. She said that where possible they would try to build this in, but this would not always be possible.

Cabinet resolved to:

Delegate authority, to the Interim Group Finance Director for the duration of the 2026/27 financial year to award contracts with values over the Key Decision threshold for the purchase of fleet vehicles.

9. Grant Allocations to Community & Voluntary Organisations 2024/25

The Director of Communities and Citizens' Services submitted a report to highlight to Cabinet the positive impact of Oxford Community Impact Fund 2024-25.

Councillor Linda Smith presented the report. She said that the report outlined how they had used the Community Impact Fund in 2024/2025. She said that this represented a big investment into communities each year and that the report outlines how they were distributed in the year under consideration. Councillor Smith noted the grant contributions from the fund to groups which have particularly positive impacts for people across the city.

Councillor Smith described how they had simplified the grant application process in 24/25 and how they had focused the grant awards to address inequality in the city. However, she said that they had not let up on their approach to monitoring organisations to ensure that they use grants in an impactful way. She thanked the Officers for their work in this area and the positive impact possible through their community grant programs.

Councillor Brown said that it was great to see the positive difference being made by such a range of organisations across the city with this funding.

Councillor Arshad asked how many new groups applied for funding each year. Paula Redway, Culture and Community Development Manager, said that they had a campaign to encourage new groups to come forward. She said that in the previous round over 20% of applicants were newcomers to the program.

Councillor Brown thanked the team for their work to make the process simpler and their integration of support for applicants.

Cabinet resolved to:

1. **Note** the social value and economic impact of the fund – see appendices 1-4

10. Dates of future meetings

Cabinet noted the dates of future meetings.

The meeting started at 18:00 and ended at 18:12.

Chair …….. **Date: Wednesday 8 July 2026**

When decisions take effect:
Cabinet: after the call-in and review period has expired
Planning Committees: after the call-in and review period has expired and the formal decision notice is issued
All other committees: immediately.
Details are in the Council's Constitution.

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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	**8 July 2026**
Report of:	Mish Tullar – Transition Director
Title of Report:	Thames Valley Strategic Authority Proposal: Update and Implications for Oxford City.

	Summary and recommendations
Decision being taken:	Cabinet is invited to note Oxfordshire County Council's veto of the systemwide Expression of Interest to Government, which would have enabled the creation of a Thames Valley Strategic Authority with enhanced powers and funding for the region. Cabinet is further requested to reaffirm its commitment to working collaboratively with Thames Valley partners and Government to reassess devolution in light of the 'minded to' decision on Local Government Reorganisation, with the clear aim of advancing a renewed proposal that includes Swindon and remains open to Buckinghamshire.
Key decision:	No
Cabinet Member:	Councillor Susan Brown, Leader of the Council, Cabinet Member for Partnership Working, Inclusive Economic Growth and Culture
Corporate Priority:	The Council Strategy 2024 to 2028.
Policy Framework:	The Government's English Devolution White Paper.

Recommendation(s): That Cabinet resolves to:

1. **Note** Oxfordshire County Council's decision to veto the Thames Valley Foundation Strategic Authority proposal;
2. **Agree** that the Council Leader and Council officers to work with counterparts in other Thames Valley councils to review the position following the Government's decision on Local Government in Oxfordshire and West Berkshire;
3. **Note** that officers will work with counterparts in the other 12 councils to further develop the Expression of Interest proposal against any updated policy position around devolution set out by the new Prime Minister;

4. **Agree** the commitment to continue to support Swindon's involvement as a willing partner in a Thames Valley Strategic Authority – and keep the door open for Buckinghamshire's inclusion too, if they change their position.

Information Exempt From Publication	
State in here what information is to be exempt from publication – where it is, attach it as an appendix and name the appendix as you describe It here	• None

Appendix No.	Appendix Title	Exempt from Publication
None		

Introduction and background

1. Councils across Berkshire, Oxfordshire and Swindon including Oxford City Council have been working together for over 18 months to develop a strong Expression of Interest proposal to Government for a new Strategic Authority for the Thames Valley region.
2. This work has been supported by businesses, public service organisations and local leaders across the Thames Valley, who recognise the opportunity to better coordinate growth, investment and delivery of strategic services across a shared economic area.
3. A Foundation Strategic Authority could bring significant benefits, including devolved powers over transport and adult skills, improved coordination of infrastructure and housing, and increased access to significant government funding.
4. With a potential economy growth opportunity worth approximately £97bn in gross value added, the Thames Valley is a region of national significance, behind only London and Greater Manchester.
5. Significant work has progressed over the past 18 months, involving officers and leaders of 13 councils, coordinated by a senior officer employed by Oxfordshire County Council, to develop and refine a strong proposal and engage with Government to maximise the potential opportunity. In December 2025 Government amended its policy to require that a Foundation Strategic Authority must first be established, and can demonstrate it is functioning effectively, before transition to a Mayoral Strategic Authority with a directly elected mayor – which unlocks greater powers and enhanced level of Government funding.

6. On 24th March 2026 an Expression of Interest letter was submitted to Govt on behalf of Oxfordshire and Berkshire, confirming a wish to develop a formal devolution proposal for a Foundation Strategic Authority. It was signed by the leaders of Oxfordshire County Council and Slough Borough Council.
7. On Tuesday 16th June 2026 Thames Valley council leaders received a letter from the Devolution Minister encouraging the submission of the Expression of Interest that would see the creation of a Foundation Strategic Authority, as a stepping stone towards establishing a Mayoral Strategic Authority .
8. The very next day, at a meeting of councils held in Reading on Wednesday 17th June 2026, held to finalise the joint submission to Government, the Leader of Oxfordshire County Council ("the County Council") vetoed the devolution proposal.

Implications of the Oxfordshire County Councils decision

9. The County Council's decision to veto the proposal:
    a. Considerably reduces the likelihood of establishing a Thames Valley Mayor in the near term. An elected Mayor could provide a single, clear regional voice to government, help secure inward investment, and support decision-making on strategic growth; capable of rising above local politics to make the difficult decisions needed to deliver on the area's growth potential.
    b. Brings 18 months of constructive partnership working to a halt and removes for now, an opportunity to secure additional investment and greater local decision-making for Oxford and the wider region.
10. For Oxford, this impact is significant. A Foundation Strategic Authority would have enabled the city to:
    a. Bring decision-making that currently sits with government closer to residents and businesses
    b. Access new government funding and investment
    c. Strengthen delivery of housing, transport, energy and water infrastructure and jobs in a coordinated way
    d. Improve the integration of public services across the region.

Recommendations

One of the key requirements Government set for Local Government Reorganisation (LGR) is that proposals must demonstrate how they support and integrate with existing or planned devolution arrangements. There remains strong support for the creation of a Strategic Authority among the majority of Thames Valley councils, therefore it is recommended that the Council Leader and officers work with counterparts to review the position once the Government has announced its decision on LGR for Oxfordshire and West Berkshire.

The prospect of a new Prime Minister could see a review of Government devolution policy and potentially a strengthening of its commitment to bring forward those areas of the country that don't yet have strategic authorities. Officers will monitor any Government announcements on devolution over the coming months and work with

colleagues to in the other Thames Valley councils to further develop the Expression of Interest proposal against any updated policy position.

In discussions on devolution to date Oxford City Council has stated its clear support for Swindon's inclusion in any Thames Valley strategic authority. Cabinet is asked to reaffirm the commitment to continue to support Swindon's involvement as a willing partner in a Thames Valley Strategic Authority – and keep the door open for Buckinghamshire's inclusion too, if they change their position.

Alternative Options Considered

11. No alternative options have been developed to date. Councils across Berkshire, Oxfordshire and Swindon, including Oxford City Council, have been focused on this proposal over the past 18 months and devolution has been assessed to bring many benefits to Oxford and other parts of the Thames Valley region that are not otherwise available.

12. The County Council's veto at the final stage of agreeing the devolution Expression of Interest was unexpected. Its decision was made without consultation with Oxford City Council or other district councils in Oxfordshire or across the wider Thames Valley. It followed recent positive engagement with Government and broad support from councils across the region, including within Oxfordshire itself.

Implications of Local Government Reorganisation

13. The County Council's veto has no immediate statutory implications for Local Government Reorganisation, although Government has been clear that one of its criteria for assessing LGR proposals is that they must demonstrate how they support and integrate with existing or planned devolution arrangements.203

14. The County Council's decision is likely to delay and potentially reshape progress to devolution.

Other implications

15. While the County Council's veto does not prevent future progress, it introduces delay, uncertainty, and strategic risk.

Financial implications

Oxford City Council has contributed a total £20,300 to date to support Thames Valley systemwide work needed to progress a Devolution proposal. There are no other direct financial implications arising from this report.

Without a strategic authority in place, Oxford and other areas of the Thames Valley are likely to continue to miss out on significant levels of Government funding now being channelled through such bodies.

Legal issues

16. Whilst there are no direct legal issues arising from this report directly, without agreement of the constituent Councils at this stage the establishment of a Strategic Authority and devolution are not possible.

Level of risk

17. There are no direct risks arising from this report.

18. Without the structure of the Foundation Strategic Authority, there is a risk that Oxford, and the wider Thames Valley may miss future funding opportunities, as national funding is increasingly directed through such bodies.

Equalities impact

19. There are no direct equalities impacts arising from this report

Carbon and Environmental Considerations

20. This report is not seeking key decisions. There are no direct carbon and environmental considerations arising from this report.

Conclusion

21. Oxford City Council does not consider the County Council's veto to be final.

22. Local Government Reorganisation is expected to lead to new local governance arrangements within the next two years, which may provide future opportunities to progress devolution.

23. The Council remains committed to working with regional partners and local stakeholders to secure the best possible outcomes for Oxford, including continuing to advocate for greater devolution, investment, and the powers needed to deliver sustainable growth and tackle inequalities.

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Background Papers:
4 None

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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	**8th July 2026**
Report of:	**Director Planning and Regulation**
Title of Report:	**Approval of Local Development Scheme 2026-2031**

	Summary and recommendations
Decision being taken:	To approve the Local Development Scheme 2026-2031, which sets out the work programme for the Oxford Local Plan 2045.
Key decision:	Yes
Cabinet Member:	Councillor Anna Railton, Cabinet Member for Planning and Zero Carbon Oxford
Corporate Priority:	Strong, fair economy Good, affordable housing Thriving communities Zero carbon Oxford A well-run council
Policy Framework:	The Local Plan is a statutory requirement, and the LDS sets out the timetable for its production. The scope of the policies is wide and encompasses all of the Council's corporate priorities

Recommendation(s): That Cabinet:

1. **Approve** the Local Development Scheme 2026-2031;
2. **Authorise** the Director of Planning and Regulation Services to make any necessary minor corrections not materially affecting the document prior to publication.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Local Development Scheme 2026-2031	No

Appendix 2	Risk Assessment	No

Introduction and background

1. The Oxford Local Development Scheme (LDS, Appendix 1) is a project plan that sets out timescales for the preparation and revision of documents forming part of Oxford City Council's Development Plan, and other planning policy documents. The Local Plan is the name for the document that contains the majority of the Council's statutory planning policies. The focus of the work programme set out in the LDS 2026-2031 is the Oxford Local Plan 2045.
2. The LDS provides details on what the Development Plan documents will contain and the geographical area they will cover. The LDS is an important tool to enable local communities and interested parties to keep track of the progress of Development Plan documents and to ensure that they are aware of when opportunities for involvement are likely to arise. It is a statutory requirement that all local planning authorities prepare and maintain a LDS. The LDS 2026-2031 will come into effect from the date of approval and will supersede the existing version of the LDS 2025-2030. The Oxford Local Plan 2045 will be prepared to that timetable as far as is practicable. Any changes to the LDS timetable prior to submission of the document to the Secretary of State may need a further decision of Cabinet.
3. The currently approved and published version of the LDS 2025-2030 needs updating to delay the target date for submission of the plan to the Secretary of State for examination. Subsequent stages are dependent on the Planning Inspectorate, so are only indicative estimates, but a delay has also been assumed for all subsequent stages. The reason for the delay to submission is that an injunction has been granted preventing submission whilst the High Court deals with a Judicial Review request made by a claimant. This will not be resolved by the June date as shown currently for submission in the LDS.

Local Development Scheme for the Oxford Local Plan 2045

4. The proposed timeline in the updated LDS has the effect of delaying submission of the Local Plan from June 2026 to a target date of July 2026, with the subsequent milestones also adjusted, although these can only be indicative as once the Plan has been submitted the City Council will hand control of the programme to the Planning Inspectorate. The LDS unusually shows a target date for submission, with other potential dates as well, and also it shows two alternative timeline scenarios. Officers deem this necessary and appropriate in order to deal with the uncertainty around the timelines for a court hearing on the submission injunction/JR. This approach will enable officers to respond promptly to decisions of the court and submit the Plan in a timely manner. The second scenario, as a backstop position, involves a potential second Regulation 19 consultation. If Cabinet approves the return of the Plan to Council to make a

fresh decision to submit, there is a risk that Council would wish to make a substantial change to the Plan that affects the overall strategy. This would require a repeat of the Regulation 19 exercise. Including this alternative scenario prevents the need for a further report to amend the LDS again in such circumstances.

5. Officers consider that there will be no negative effects for other parties through the flexible approach in the LDS. The City Council will continue to liaise closely with the Planning Inspectorate to facilitate submission as soon as possible.
6. In setting the timeline for the Oxford Local Plan 2045 it is important to consider that the Oxford Local Plan 2036 remains the extant plan for planning decisions. This is important, because within 5 years from adoption a plan is considered in-date (assuming other conditions are met), but after that it must be weighed against national policies such as the standard method for assessing housing need. The Local Plan 2036 was adopted in June 2020 which is now over 5 years ago. It is therefore important that there will be minimal time from the date five years after adoption of the Oxford Local Plan 2036 to adoption of the new Local Plan 2045.
7. Another key consideration in setting the timeline is that only plans submitted before 31st December 2026 can be examined under the Planning Act 2004. After that date, submitted plans must have followed the wholly new local plan process as enabled by the Levelling Up and Regeneration Act 2023, the secondary legislation enacted in March 2026, most notably the Town and Country Planning (Local Planning) (England) Regulations 2026, and anticipated new national planning policy and guidance.
8. The Oxford Local Plan 2045 will replace the Oxford Local Plan 2036. This document, as well as any neighbourhood plans, will form the statutory Development Plan for Oxford. Following the Council meeting to approve the pre-submission draft of the OLP2045, on 26th January 2026, that draft can be used as material consideration for development management decisions; its weight will be limited initially but increases as it proceeds towards adoption.
9. The Oxford Local Plan 2016-2036 has sufficient flexibility to deal with a twenty-year period and the policies within it place Oxford in a strong position to manage growth and change effectively over this period. The Oxford Local Plan 2036 will remain a relevant and appropriate plan to guide development in the city until such time as it is replaced.

Alternative Options Considered

10. The only alternative option would be not to update the LDS, but it is clearly expected of the Council to keep LDSs up to date with the anticipated work programme for plan making.

Implications of Local Government Reorganisation

11. There are no implications for Local Government Reorganisation from this report, as it is simply an update to the work programme for plan-making.

Financial implications

12. There are limited financial implications from this report, which sets a revised timetable reflecting a delayed submission of the plan. The revised submission date changes very little in terms of the resource needed to progress the local plan. The implication is a subsequent delay to latter stages of plan preparation, which stretches the end of the plan production period during which Planning Policy team and legal resource is required, although it also delays deployment of the same resources to a new plan and this can be accommodated within existing budgets.

Legal issues

13. The preparation and publication of the Local Development Scheme is a statutory requirement under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended). The Council is required to monitor compliance with the timescales for document production and their revision set out in the LDS and to make this information publicly available. Compliance with the LDS is monitored and published through the Council's Authority Monitoring Report.

Level of risk

14. A risk assessment has been undertaken (Appendix 2). All risks have been mitigated to an acceptable level.

Equalities impact

15. There are no equalities impacts arising from this report. An Equalities Impact Assessment is not necessary for this report as it merely proposes a timetable for producing a local plan. The Council will continue to monitor equalities impact as the revised local plan is developed.

Carbon and Environmental Considerations

16. The LDS is merely a timetable and work programme, so it does not itself have any environmental impacts.

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Background Papers: None

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OXFORD CITY COUNCIL

Oxford City Council

Local Development Scheme
2026 - 2031

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1) Introduction

1.1. The Planning and Compulsory Purchase Act 2004 introduced the requirement for councils to prepare and maintain a Local Development Scheme (LDS). The LDS specifies which local development documents are to be development plan documents and sets out the work programme for the preparation of documents to be included in the Development Plan. This document supersedes the 2025-2030 Oxford LDS from December 2025.

What is the Local Development Scheme?

1.2. This LDS is a five-year project plan for preparing documents and provides the starting point for the local community, businesses, developers and other interested parties to find out what the City Council's current planning policies are for the area. It includes 'milestones' to inform the public about opportunities to get involved with the plan making process and to let them know the likely dates for involvement. The LDS is published on the City Council's website at www.oxford.gov.uk/lds.

2) Oxford's Development Plan

2.1. Oxford's Development Plan contains a range of documents to guide development within Oxford. Applications for planning permission are to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Council-produced documents within the statutory Development Plan are subject to community and stakeholder involvement, and an independent examination by an Inspector to ensure that the necessary legal requirements for the preparation of the document have been met and the document is 'sound'. All these documents are subject to the European Strategic Environment Assessment Directive and will incorporate a sustainability appraisal to ensure that they accord with the principles of sustainable development. They must be consistent with the National Planning Policy Framework (NPPF).

2.2. Supplementary Planning Documents (SPDs) provide further details and guidance to supplement policies. SPDs are adopted by the City Council following public consultation, and are not part of the statutory Development Plan.

Documents in Oxford's Development Plan

2.3. Currently, the statutory Development Plan consists of:

- Oxford Local Plan 2016-2036 (June 2020)
- Barton Area Action Plan (December 2012)
- Northern Gateway Area Action Plan (July 2015)
- Headington Neighbourhood Plan (July 2017)
- Summertown and St Margaret's Neighbourhood Plan (April 2019)
- Wolvercote Neighbourhood Plan (June 2021)

Oxford Local Plan 2036

2.4. The Oxford Local Plan 2016-2036 was adopted in 2020 and superseded the following documents:

- Saved policies of the Oxford Local Plan 2001-2016 (November 2006)
- Oxford Core Strategy (March 2011)
- Sites and Housing Plan (February 2013)

2.5. The Adopted Policies Map (2020) illustrates graphically the policies and proposals of the adopted Local Plan. The Policies Map (2020) reflects the policies of the Oxford Local Plan 2036.

Neighbourhood Plans

2.6. The Localism Act introduced new rights and powers to enable communities to get directly involved in planning for their areas. Neighbourhood planning allows communities to come together through a parish council or formal neighbourhood forum and produce a neighbourhood plan. Neighbourhoods can decide what they want to cover in their neighbourhood plan. They may allocate land for development, or influence the type and design of development that comes forward. Neighbourhood plans must however be in general conformity with the strategic planning policies already adopted by the City Council. They should not promote less development than set out in the Local Plan and/or undermine its strategic policies. They are also subject to an independent examination and need to be approved by a majority vote in a local referendum.

2.7. Once plans are adopted they will become part of the Development Plan. To date, Oxford City Council has formally designated five neighbourhood areas where plans are being led by neighbourhood forums. Three Neighbourhood Plans, Headington, Wolvercote and Summertown and St Margaret's, are made. Two more are being prepared: Blackbird Leys and Littlemore

Other Documents

2.8. In addition to the Oxford Development Plan there are several other important planning documents:

- Statement of Community Involvement in Planning (June 2021)
- Annual Monitoring Report
- Community Infrastructure Levy (CIL) Charging Schedule (July 2025)
- West End SPD

Statement of Community Involvement in Planning (SCI)

2.9. The Statement of Community Involvement in Planning sets out how the Council will involve the community in the planning process, including Local Plans and Development Management. It sets out the activities that the Council will undertake to reach stakeholders and the public during the various stages of preparation of Local Plan documents. The most recent SCI was adopted at Cabinet on 16th June 2021. It can be viewed at www.oxford.gov.uk/sci.

Annual Authority Monitoring Report

2.10. Each year the City Council produces an Authority Monitoring Report, which is approved at the City Cabinet in the autumn. The Authority Monitoring Report has the following main functions:

- to measure progress made in respect of the planning documents being prepared;
- to review the effectiveness of the adopted planning policies;
- to monitor the extent to which policies and targets in adopted documents are being achieved against a range of indicators.

2.11. The most recent Authority Monitoring Reports produced by the City Council can be viewed on the City Council's website at www.oxford.gov.uk/amr.

CIL Charging Schedule

2.12. The Community Infrastructure Levy (CIL) was introduced by the Planning Act 2008 as a tool for local authorities to help deliver infrastructure to support the development of their area, based on the principle that most development has some impact on infrastructure and should contribute to the cost of providing or improving infrastructure. Oxford City Council is the charging authority for the Community Infrastructure Levy in Oxford, meaning it sets and collects the levy, coordinates the spending of the funds and reports on this spending annually.

2.13. Oxford City Council commenced charging CIL on 21st October 2013. The Charging Schedule sets out the tariff per M^2 of various development types. A partial review of the CIL Charging Schedule, focused on employment floorspace, was adopted on 14th July 2025.

West End and Osney Mead Supplementary Planning Document (SPD)

2.14. This document sets a framework for future developments in the West End and Osney Mead area of Oxford. It is intended to help ensure the area can achieve its regenerative potential by a cohesive understanding of public realm enhancements and infrastructure needed and design considerations, to manage sites coming forward over time.

3) Work Programme for 2026-2031

3.1. During the period covered by this LDS, the City Council will commence / continue work on the following documents:

Development plan documents

- Oxford Local Plan 2025-2045
- Neighbourhood Plans

Other documents

- Annual Authority Monitoring Report

Development Plan documents

Local Plan 2025-2045

3.2. Government guidance expects that all Plans are reviewed every 5 years. That is to say that the Plan must have been reviewed by the date 5 years after adoption in order for there to be an up-to-date plan. The Local Plan 2016-2036 was adopted on 8th June 2020 and contains policies based on relatively recent evidence. The Oxford Local Plan 2045 will replace the Oxford Local Plan 2036. This document, as well as any neighbourhood plans, will form the statutory Development Plan. Following the council meeting to approve the submission draft Oxford Local Plan 2045 on 26th January 2026, that draft can now be used as a material consideration for development management decisions on planning applications; its weight will be limited initially, but increases as it proceeds towards adoption.

3.3. Given that a Local Plan takes considerable time to produce, a review was started a relatively short time after the adoption of the Local Plan 2036. Work began on the Oxford Local Plan 2040 in 2020. The timetable for this document was set with the intention that it would be adopted by June 2025, five years after the adoption of the Oxford Local Plan 2036. The Oxford Local Plan 2040 was submitted for examination in March 2024, with a recommendation after an initial set of hearings that it be withdrawn.

3.4. The withdrawal of the Oxford Local Plan 2040 meant that that plan in the form it was previously agreed no longer existed. It had to be reviewed, and that review means it is, in legal terms, a different document that must therefore follow all statutory processes. That meant that the statutory consultations (Regulation 18 and Regulation 19) were repeated, most recently the Regulation 19 consultation which took place 30th January to 13th March 2026. The next step for progression of the Oxford Local Plan 2045 is for it to be submitted to the Secretary of State in order that it can be independently examined by the Planning Inspectorate.

3.5. Only plans submitted by December 2026 can be examined under the Planning Act 2004. The Oxford LDS 2025-2030 anticipated submission of the Oxford Local Plan 2045 to happen in June 2026. From the end of the Regulation 19 consultation on 13th March 2026, preparation for submission has been underway. However, this intended submission in June has been prevented by a High Court order not to

submit the plan prior to the determination of a judicial review claim or further order of the Court.

3.6. Predicting the exact timing of submission is difficult because it is dependent on several factors, including the timing of a potential Court hearing and/or the possibility of returning to Council for another decision on submission. Any return to Council has potential to result in a need for a second Regulation 19 consultation. Therefore, the timetable in Appendix 1 sets out two possible scenarios. It sets the target submission date as the earliest possible time, which would be in August. However, the timetable also recognises that submission, whilst it will happen as early as possible, could take place at any time up to the end of the year.

Neighbourhood Plans

3.7. Two neighbourhood plan areas have been defined but do not yet have a made neighbourhood plan, which are Littlemore, and Blackbird Leys. Work on these will take place during this LDS period. Littlemore is just awaiting a Council decision to make the plan.

Other documents

Annual Authority Monitoring Report

3.8. Each year the City Council produces an Authority Monitoring Report. This will be taken for Cabinet approval in December 2026 for publication in December 2026. The Authority Monitoring report published in December 2026 will be reporting on the monitoring year 2025/26.

Appendix 1: Gantt chart of the LDS work programme 2026-2031

	2026												2027												2028	2029
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	
Local Plan 2025-2045 scenario 1																										
Local Plan 2025-2045 scenario 2																										
Annual Monitoring Report																										

Start	
Publish	
Completed Regulation 19 proposed Submission consultation	
Potential second Regulation 19 Submission Consultation	
Submission target date	
Potential later submission dates	
Potential second Regulation 19 consultation	
Inspector's Report*	
Adopt*	

*These are estimates- once the plan is submitted, the timetable is in the hands of the Planning Inspectorate.

Risk Register

(Local Development Scheme)

As at: (09.06.26)

									Gross		Current			Target						
Ref	Title	Risk Description	Opp / Threat	Cause	Consequence	Risk Treatment	Date Raised	Owner	P	I	P	I	Score	P	I	Comments	Control / Mitigation Description	Date Due	Action Status	% Progress	Action Owner
	Unexpected delays	There is potential for unanticipated delays in next steps.	Threat	number, or combination, of factors (for example, external agencies or consultants maybe unable to fit in with timescales, issues may be more complex to understand/resolve than anticipated, or there may be a lack of resources available to complete the	LDS timescales for next steps are not met		09/06/26	Director of Planning and Regulation	3	3	2	2	4	2	2	Compliance with LDS timescales will be reported in the AMR.	Maintain awareness of potential causes of delay- maintain continuous contact with consultants and managers to check necessary resources are in place and work is being produced to detailed work programmes.	Ongoing throughout the lifetime of the LDS as required			
	Changes to the planning system at the national level	arrangement deadlines means that changes to national legislation, policy and guidance may alter the process that needs to be followed in producing new documents, or may mean that the focus or approach of documents needs to be altered.	Threat	Failure to meet transitional arrangments meaning changes to national legislation, policy and guidance by central Government kick in.	The LDS may need to be amended if additional documents need to be reviewed in order to maintain compliance with national policy.		09/06/26	Director of Planning and Regulation	4	4	4	3	2	4	2	Compliance with LDS timescales will be reported in the AMR.	Maintain awareness of causes of delay affecting whether transitional arrangements apply and impact of changes at the national level as they arise so that appropriate responses can be planned in advance in order to minimise negative impacts	Ongoing throughout the lifetime of the LDS as required.			
													0							
													0							

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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	**8th July 2026**
Report of:	**Director of Planning and Regulation**
Title of Report:	**Proposed Submission Draft Oxford Local Plan 2045**

Summary and recommendations	
Decision being taken:	Cabinet is requested to recommend that Council approve the Proposed Submission Draft Oxford Local Plan 2045 for submission to the Secretary of State for formal examination.
Key decision:	Yes
Cabinet Member:	Councillor Anna Railton, Cabinet Member for Planning and Zero Carbon Oxford
Corporate Priority:	Support thriving communities, Enable an inclusive economy; Pursue zero carbon Oxford; Deliver more affordable housing
Policy Framework:	The Local Plan is a statutory requirement. The scope of the policies is wide and encompasses all of the Council's corporate priorities

Recommendation(s): That Cabinet:

1. **Recommend Council to authorise** submission of the Oxford Local Plan 2045 to the Secretary of State for examination, including the minor amendments made according to recommendation 3;
2. **Recommend Council to approve** all the supporting statutory documentation including the Sustainability Appraisal, Habitats Regulation Assessment, Infrastructure Development Plan (IDP), Policies Map, Regulation 18 Consultation Statement, Regulation 19 Consultation Statement and Equalities Impact Assessment (Appendices 2-7 & 9);

3. **Recommend Council to authorise** the Director of Planning and Regulation, after consultation with the Lead Cabinet Member, to make any necessary minor editorial corrections to the Submission Draft Oxford Local Plan 2045, IDP, Sustainability Appraisal and Habitats Regulation Assessment, Policies Map, and to agree the supporting evidence base prior to submission;
4. **Recommend Council to authorise** the Director of Planning and Regulation, after consultation with the Lead Cabinet Member, to invite the examining inspector(s) to recommend any modifications considered to be necessary in accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Proposed Submission Draft Local Plan 2045	No
Appendix 2	Sustainability Appraisal	No
Appendix 3	Habitat Regulations Assessment	No
Appendix 4	Infrastructure Development Plan	No
Appendix 5	Policies Map	No
Appendix 6	Regulation 18 Consultation Statement	No
Appendix 7	Regulation 19 Consultation Statement	No
Appendix 8	Risk Assessment	No
Appendix 9	Equalities Impact Assessment	No

Introduction

1. The purpose of this report is to seek approval for the Proposed Submission Draft Oxford Local Plan 2045 (Appendix 1) for submission. Following Council approval in January, this document was published on 30th January 2026 and made available for public comment until 13th March 2026, in line with the requirements set out in Regulation 19 of the Town and County Planning (Local Planning) (England) Regulation 2012.
2. A Regulation 19 Consultation Statement summarises the responses that were received during this period (Appendix 7, to be taken into account). All comments in full, together with the Consultation Statement, will be submitted alongside the Local Plan and its evidence base to the Secretary of State for examination. An Inspector from the Planning Inspectorate will be appointed to carry out an independent examination including hearings in public to assess whether the Plan is sound.

Background

3. Production of a local plan is a statutory requirement of the City Council as a planning authority. The Local Plan is important because it sets the planning framework for the city, with statutory policies that will inform decisions on all planning applications in the city. The Plan sets out how the city should look and feel, guiding development to the right locations, ensuring it meets the needs of the city and its communities, and making sure new development is well designed to make best use of resources, including by making efficient use of land.
4. The Oxford Local Plan 2036 was adopted in June 2020 and so became 5 years old in 2025, this means the policies are no longer automatically considered up to date. The NPPF states that where local plan policies are more than 5 years old, housing land supply should be measured against the standard method calculation of housing need. As was reported in the Annual Monitoring Report in December, this means that Oxford no longer has the required 5-year housing land supply and the "tilted balance" applies. This means that the starting point when assessing developments is that they should be supported unless the policies of the NPPF protect assets of particular importance, or where specific adverse impacts clearly and significantly outweigh the benefits.
5. In the absence of up-to-date policies in a local plan, planning decisions must be made in accordance with the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF). This limits the ability of the local planning authority to apply its locally relevant policies when making decisions. It is therefore important that the Draft Local Plan progresses quickly towards adoption, which is best achieved by having a 'sound' plan that meets the Government's tests. The Planning Inspectorate will assess the Plan against these tests and make the final call on whether these tests are met or the policies need amendment.
6. The policies in the Proposed Submission Draft Oxford Local Plan 2045 have been informed and are supported by an extensive evidence base, including a whole-plan viability assessment. The proposed policies have been prepared carefully to meet the Government's tests of soundness set out in paragraph 36 of the NPPF, which are that it is positively prepared, justified, effective and consistent with national policy. Alternative options for all policy approaches have been considered, but the proposed policies are considered to be those that best meet the aims of the plan's strategy overall and the tests of soundness. More detailed explanation of the key features and policies of the Plan are provided in Background Paper 1.
7. It is important to note that the Oxford Local Plan 2045, having been developed under the provisions of the Planning Act 2004, must be submitted before 31 December 2026. This date is confirmed in the National Planning Policy Framework (NPPF) Consultation dated 24 September 2024. After that date, submitted plans must have followed the wholly new local plan process as enabled by the Levelling Up and Regeneration Act 2023, the secondary legislation enacted in March 2026, most notably the Town and Country Planning (Local Planning) (England) Regulations 2026, and anticipated new national planning policy and guidance. It will not be possible therefore to submit this Plan

after December 2026, missing this date would require work to begin on a wholly new plan under the new provisions of the Levelling Up and Regeneration Act and associated regulations.

Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulation Assessment

8. It is a legislative requirement (The Planning and Compulsory Purchase Act 2004) that the Council undertake Sustainability Appraisal during the preparation of its Local Plan. The purpose of Sustainability Appraisal is to help promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve environmental, economic and social objectives. The Sustainability Appraisal process incorporates Strategic Environmental Assessment, which is required by separate legislative requirements (The Environmental Assessment of Plans and Programmes Regulations 2004) in order to ensure that potential environmental effects are given full consideration alongside social and economic issues during the preparation of a draft plan.
9. A Sustainability Appraisal, incorporating Strategic Environmental Assessment, (Appendix 2, to be taken into account) has been carried out alongside the development of the Local Plan 2045. A non-technical summary is included in the Sustainability Appraisal. This iterative work built upon an interim SA report published as part of the earlier Regulation 18 (Preferred Options) consultation and has informed the development of the Local Plan and its policies.
10. A Habitats Regulation Assessment (HRA, Appendix 3, to be taken into account) appropriate assessment (as required by the Conservation of Habitats and Species Regulations 2017 (as amended)) has also been carried out to assess any potential negative impacts of development on the Oxford Meadows Special Area of Conservation (SAC), and suggested mitigations are included in relevant site allocation policies.
11. The Sustainability Appraisal and HRA were published alongside the Proposed Submission Draft Local Plan in January and were also available for consultation. Responses received with regard to the Regulation 19 SA and HRA are also reported in Appendix 7.

Consultation and engagement

12. Engagement has already provided an important input in forming and shaping the Proposed Submission Local Plan. Engagement and consultation on the Oxford Local Plan 2045 has been consistent with the Statement of Community Involvement in Planning and appropriate to the stage. Public engagement has involved: the early engagement survey 17th March-28th April 2025, the Regulation 18 preferred options consultation that took place from 28th June- 8th August 2025, following Cabinet approval on 18th June 2025, and the Regulation 19 proposed submission draft consultation took place from 30th January-13th March 2026, following full Council approval on 26th January 2026. Alongside the evidence base and Government policy, engagement at the early non-statutory stage and at Regulation 18 has been important in informing policy direction,

together with professional judgement. A summary of the Regulation 18 consultation responses and how they informed the draft submission plan is appended for consideration (Appendix 6: Regulation 18 Consultation Statement).

13. The Regulation 19 publication is not a consultation in the standard sense. Instead, the aim of the recent Regulation 19 (Proposed Submission Draft) consultation stage is to ask for views on whether the Plan meets the tests of soundness set out in paragraph 36 of the NPPF, with the aim of allowing interested parties the opportunity to make representations on the draft plan and subsequently participate in the independent examination. Comments received at this stage are sent to the Secretary of State on submission of the Plan for consideration by the Inspector as part of the examination.

Legal challenge

14. A legal challenge was made to the decision taken by Council in January to both approve the Proposed Submission Draft Local Plan for consultation and thereafter to submit it (subject to any main modifications as agreed) for examination. This claim was made on the basis that Council ought to have considered both the Regulation 18 and Regulation 19 Consultation Statements when deciding to submit the Plan. An injunction was issued preventing submission of the plan until that challenge was resolved. Officers consider the challenge is defensible. However, given the Court's workload and likely date of a hearing, there is a high possibility that awaiting the Court date and outcome could lead to the Plan never being able to be submitted by the deadline of the end of the year, meaning that all work on it thus far would be wasted. Rather than take this risk, officers consider that the Council should make a fresh decision on whether or not to submit the Local Plan, taking into account the representations made at both the preferred options (Regulation 18) and pre-submission (Regulation 19 stages). This will ensure that the procedural issues raised by the claimant in the High Court challenge are addressed through a fresh decision to submit the plan. In those circumstances, there would be no basis for the injunction to be maintained.

15. This report seeks a fresh decision of Council to approve the Local Plan for submission. Once submitted, the objections made at Regulation 19 will be considered in full by the Planning Inspector who will ensure a public hearing of all the outstanding issues in detail. This process is designed to test, challenge and, if necessary to ensure soundness, refine the policies as drafted. Once the Inspector's report has been received there will be a further opportunity for Council to consider its findings and decide whether to adopt the Plan.

Limitations on ability to make modifications

16. At this stage, following the Regulation 19 publication and submission of views on soundness, there is very limited scope to make changes to the Plan in response. The City Council should only submit a Plan that it considers to be sound which, by definition, is one which does not need any significant modification. The City Council can request that the Planning Inspector considers proposed modifications to the Plan during the Examination process in line with

recommendation 4. These will only be taken forward by the Planning Inspector if they are considered necessary to overcome soundness issues.

17. In this context, a proposed change to the Plan which is considered significant in terms of the overall strategy and objectives of the Plan and which would require consultation and sustainability appraisal should not be made after publication of a proposed submission plan under Regulation 19. Where a significant change is required for soundness reasons after publication of a proposed submission plan, a further period of consultation on both the modification and any necessary sustainability appraisal would be required before the plan could be submitted.

18. During the examination the Inspector may themselves identify modifications to the plan which they consider are necessary for soundness. This can include, for example, modifications to the wording of policies or removing a site from the local plan before adoption. At the end of the hearings, all the modifications that the Inspector considers are required to make the Plan sound will be consulted on together with a sustainability appraisal report addressing the proposed modification. When any are taken forward in the Inspector's report as recommended modifications, they will become part of the Plan which is brought to Cabinet and Council for adoption.

Next steps

19. Subject to Council approval the Local Plan will be submitted (together with a large evidence base and all the comments made through the consultation period) to the Secretary State through the Planning Inspectorate. Officers have been liaising with the Planning Inspectorate to facilitate an examination as soon as possible after submission.

20. Following the examination, the Inspector's report will be published which will recommend either that the Plan is sound, or that it can be made sound with some modification, or that it is unsound and cannot be adopted. Any modifications which the Inspector proposes (in line with recommendation 4 of this report) will be subject to further consultation. When there is a sound Plan which can be adopted a report will come back to Council for that decision.

Implications of Local Government Reorganisation

21. Adopting a new Local Plan ahead of LGR will mean that the successor authority will have an up-to-date Local Plan for the Oxford area from day one which can be used to make planning decisions, offering continuity of service. This will allow the new authority the time and space that will be required to embark on the development of a new Local Plan, which will in time replace it.

Financial implications

22. Production of a Local Plan is a significant and multi-year financial commitment. In particular the costs associated with examination are notable. Work on the Oxford Local Plan 2045 has been structured to be able to progress whilst minimising financial implications. The budget of the Planning Service is drafted and has been approved with this service pressure in mind. The work required has been assessed as capable of being resourced by existing Planning Policy

staff and existing Planning Policy budgets and reserves. This situation will be kept under review as the Local Plan progresses through the last stages of production.

23. It should be noted that in the event that the Oxford Local Plan 2045 is not submitted by the end of the year deadline, and as such work would need to start from the beginning on a wholly new plan, this would entail significant additional costs that are not budgeted for. In addition to the staff costs involved, considerable resource is required to secure the consultant advice and background studies necessary to support a Local Plan. It would be likely that all the studies supporting the Local Plan 2045 would need to be replaced by new commissions with a considerable cost to the City Council.

Legal issues

24. As outlined in this report, officers consider that the correct processes were followed leading to Council's resolution to submit the plan in January and that the legal challenge is defendable. Nevertheless, due to delays obtaining a Court hearing date which could prejudice the ability to submit the plan before end of December 2026, a fresh resolution from Council is sought, with the benefit of the consultation reports appended to the report, in order to address the one ground of legal challenge.

Level of risk

25. A risk assessment has been undertaken (Appendix 8). All risks have been mitigated to an acceptable level.

Equalities impact

26. The Equalities Impact Assessment is attached as Appendix 9. A number of the policies contained in the Submission Draft Oxford Local Plan 2045 will help address inequalities within the city if adopted.

Carbon and Environmental Considerations

27. The council is committed to addressing the effects of, and reducing our contribution towards, climate change. In 2019, the council declared a climate emergency and has committed to a series of actions. The Submission Draft Oxford Local Plan 2045 has sustainability, climate change and climate adaptation and mitigation as core themes running throughout the plan. The document seeks to reflect this across all the chapters, whether it is through design policies, parking policies, flooding, drainage or how to ensure the most efficient use of land. The Plan is supported by a Sustainability Appraisal and Habitat Regulations Assessment.

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Background Paper:

1. Details of the Submission Draft Oxford Local Plan 2045

Background Paper: Details of the Submission Draft Oxford Local Plan 2045

1. The Submission Draft Oxford Local Plan 2045 offers a range of policies with supporting text. These range from strategic policies to more detailed policies to be used in development management decisions. The Plan is comprehensive and will replace the Local Plan 2036. Any adopted Neighbourhood Plans will be the only other documents containing statutory policies after the Northern Gateway AAP expires in 2026. The sections below briefly summarise the key points from each chapter of the Plan.

Vision and Strategy

2. The first step in any local plan is to understand needs and the next step is to try to meet these needs, within the bounds of key objectives for the plan. Of primary importance is that the plan seeks to alleviate the housing crisis whilst aiming to achieve sustainable development. A Sustainability Appraisal is attached as Appendix 2 and a Habitat Regulations Assessment (HRA) as Appendix 3.
3. The Vision for Oxford in 2045 is that it will be a healthy and inclusive city, with strong communities that benefit from equal opportunities, not only in terms of access to housing and jobs, but to social and leisure opportunities, to healthcare and to the natural environment. Oxford will continue to be a city with a strong cultural identity, that respects our heritage, whilst maximising opportunities to look forwards, to innovate, learn and enable businesses to prosper. The city will be supported to continue to make advancements in the life sciences and low carbon sectors. The protection of the environment is central, ensuring the city maintains its biodiversity, is well connected in terms of blue and green infrastructure and is resilient to climate change. We will utilise resources prudently, while mitigating impacts upon the natural environment. The city will be net zero carbon by 2040, while our communities, buildings and infrastructure will be more resilient to the impacts of climate change or other emergencies.
4. The vision and strategy chapter contains a suite of policies that set out key features of the strategy. These include locational policies that support easily accessible facilities, and a plan-wide viability policy that sets out when viability evidence must be submitted and a cascade for relaxing the policy approaches considered as having the most impact on viability, if robustly justified and supported by strong evidence. This approach will ensure that we bring forward as much development, specifically housing, as possible in the plan period.

A healthy, inclusive city to live in

5. Chapter 2 is concerned with the delivery of housing. There is an urgent need for new homes in Oxford, but a limited and constrained supply of land available for development in the city. The very high need for new housing means that general market prices for renting and buying are prohibitive for many. The challenges the workforce may face in finding accommodation mean that employers struggle to find and retain staff.
6. The NPPF requires that the overall housing need is understood and puts forward the Standard Method as the only method by which this need should be

calculated. The Standard Method for Oxford calculates the need as 1,087 dwellings per annum. There is not sufficient capacity within Oxford for new housing to meet this need. Policy H1 sets instead a housing requirement, which is based on the assessed capacity. Every effort has been made to find capacity, but the Plan does result in unmet need. A formal request for help with unmet need has been sent to the neighbouring authorities in Oxfordshire, and all have agreed to help meet this need, noting that provisions in existing plans already go a long way, if not the whole way, towards helping to meet this unmet need arising from Oxford.

7. In addition to the overall housing need, various individual housing needs must be considered, and local plans are expected to attempt to meet these needs. The need for affordable housing is particularly significant in the city and amounts to 692 units per annum, and of this 446 per annum need is for those who cannot afford to either buy or rent. Social rented housing meets the needs of those most excluded from the housing market. Regardless of how high the need is, any policy requirement set for affordable housing must be viable and therefore deliverable. The intention of Policy H2 is to maximise the amount of social rented homes that can be provided and to set the affordable housing contributions at a level that can generally be afforded, which is 40% of housing schemes over 10 units. The requirement is set at a level that should ensure the majority of developments are viable, which will limit the amount of viability evidence that will need to be assessed at the planning application stage. The policy requires 80% of affordable homes to be social rented. There will be schemes that have specific features that mean this level of affordable housing cannot be afforded, so when justified, Policy S2 sets out a cascade approach. In addition, Policy H3 sets out when contributions towards affordable housing will be sought, including from purpose-built student accommodation, certain types of elderly persons accommodation and certain employment-generating uses.

8. Policy H4 seeks to provide employer-linked housing which recognises the challenges that employers face in both recruiting and retaining staff in Oxford given the shortage of housing and its affordability. This acute staffing issue impacts on the operation and provision of key services such as schools and hospitals. Employer-linked housing involves the development of housing by specified key employers in the city, on their own specified sites, to provide a means of delivering affordable housing for their own staff. For example, the NHS provide staff accommodation within the hospital sites.

9. The large number of students resident in Oxford has an impact on the availability of general market housing. Policy H8 aims to ensure new student accommodation is built only in suitable locations and is limited to those on courses of a year or more who are receiving the greatest and longest-term educational benefit. It prioritises students of the two universities to assist with the economic aims of the Plan in supporting the universities. Policy H9 ensures that where new academic and teaching facilities are proposed that support additional students, that these students' accommodation needs can be met. In the case of the universities this will be measured by the set threshold of students living outside of university accommodation such as student halls.

A prosperous city with a globally important role in learning, knowledge and innovation

10. Chapter 3 is concerned with Oxford's economy. The Submission Draft Oxford Local Plan 2045 sets out policies that seek to identify and plan for the employment needs of the city over the plan period whilst recognising the balance of other land uses, particularly housing. Existing employment uses will be supported through the intensification, modernisation and regeneration of existing employment sites, including university and hospital sites (Policy E1). The strategy is that employment needs over the plan period can be met on existing sites. Key employment sites outside of the city centre and district centres are protected for their importance to the economy. Within the city centre and district centres, full flexibility is allowed for, with no protection of sites (although new employment uses could be located here, recognising that Use Class E includes many commercial uses and new employment uses could take place as a lawful use). Other policies are intended to help ensure benefits of the successful economy are widely felt, such as the requirement for Community Employment and Procurement Plans (E3) and the Affordable Workspace policy (E4).

A green, biodiversity city that is resilient to climate change

11. Chapter 4 is concerned with protecting and enhancing green and blue infrastructure, delivering net gains in biodiversity and building in resilience to flooding and promoting sustainable drainage and resilient construction methods. Ensuring people have access to a network of green and blue infrastructure, such as green spaces, is important in Oxford, and these networks need to be protected, as well as new green and blue infrastructure provided in new development where opportunities arise.

12. The policy approach in the Local Plan recognises the multi-functional benefits of our GI network and seeks to ensure that we protect (Policy G1) a range of spaces and features for the benefit of the city now and into the future, where possible enhancing these (Policy G2) and providing new features to strengthen that network. Policy G3 requires use of the Urban Greening Factor tool to encourage greening on new developments. The policies set out the requirements that seek to ensure applicants identify/assess and protect existing habitat value and add biodiversity and green features. Policy G4 sets out how the 10% biodiversity net gain (BNG) required through the Environment Act 2021 should be delivered. In addition to BNG, new development offers the opportunity to support additional biodiversity in the local area through sensitive and well thought out design that incorporates wildlife friendly measures that can support nature, such as bird and bat boxes, insect homes and wildflower meadows (Policy G5).

13. The way we design and build has a key role to play in both mitigating and adapting to the impacts of climate change. Other policies in this chapter are concerned with climate resilient design, including by managing flood risk (Policy G7).

A city that utilises its resources with care, protects the air, water and soil and aims for net zero carbon

14. Chapter 5 includes policies that seek to ensure that new development comes forward in a way that does not further exacerbate climate change. If development is to be truly sustainable, then the city's natural resources must be appropriately stewarded to protect the natural environment, also ensuring public health is not negatively impacted by poor air and water quality.

15. Draft policies support the City Council's target of being a net zero carbon city by 2040. Policy R1 provides requirements for the carbon efficiency of buildings once they are in operation and throughout their lifetime. Policy R2 focuses on emissions associated with the lifetime of the development, including the construction process (embodied carbon), and Policy R3 is concerned with the importance of retrofitting existing buildings in the city, and also says that carbon efficiency benefits which a scheme may bring are a public benefit that may be weighed against heritage impacts. Policies R4-R8 are concerned with environmental quality, including of air, water and soil, and with environmental health impacts of development.

A cultural city that respects its heritage and fosters design of the highest quality

16. Chapter 6 is concerned with policies that respect the city's heritage and foster high quality design. Delivering high quality urban design is about more than just how a building or street looks. It is also about ensuring development functions positively for the people who live and work there, including taking account of the need to adapt to climate change, and that development is attractive and easy to move around, particularly for pedestrians and cyclists.

17. Policy HD1 then sets out the principles of high-quality design, which need to show that it is responsive to its context, creates or enhances local distinctiveness & ensure that the amenity of the natural environment is protected. Policy HD2 is concerned with ensuring new developments make efficient use of land. The policy includes criteria to ensure that a proposal makes the best use of its site capacity. New development should respect and respond to the city's heritage and archaeology.

18. Policy HD3 sets out the criteria for assessing the impacts of new developments on designated heritage assets and the importance of ensuring that they are protected and enhanced and that applications affecting them are informed by heritage assessments to weigh the impacts of proposals on both the significance of the asset and their settings. Policy HD4 deals with non-designated heritage assets and Policy HD5 with archaeology.

19. The city's historic views into and across the city are encapsulated in the view cones, and design should fully consider and respect these key views. Policy HD6 then goes on to consider specifically design in relation to views & building heights.

20. Additional policies focus on the well-being of new and surrounding occupants, including the need for a Health Impact Assessment for larger developments.

These ensure that proposals meet privacy, daylight and sunlight requirements, as well as internal and external space standards.

A liveable city with strong communities and opportunities for all

21. Accessibility to valued facilities, services and cultural opportunities is important for making strong local communities that enable people to thrive. Oxford is generally well serviced by local centres, so the focus of this chapter of the plan is on policies (Policies C1 and C2) that protect them and focus new similar developments to those locations, which are already accessible, allowing linked trips and supporting continued success of those centres.

22. The policy approach is to minimise the need to travel and prioritise sustainable modes of transport (Policies C6 and C7). The approach towards motor vehicle parking is to continue to seek a downward pressure on public, residential and non-residential parking across the city (also Policy C8). Urban spaces should be created for people to move around safely, rather than designed to prioritise cars, as these are safer, healthier, more attractive and enjoyable environments to live in.

Development sites and infrastructure

23. In order to guide the right type and level of development to the optimal location, whilst fully considering the city's constraints, the Plan contains site allocation policies and Areas of Focus policies. The latter are defined areas across the city anticipated to experience more change as a result of new development (in some cases including development across the city boundary) during the Plan period. Every effort has been made to identify as many sites for allocation as possible, so as to reduce the level of unmet housing need. This work has also involved a detailed search within the Green Belt. The revised NPPF makes it clear that, when there are unmet needs within a planning authority area, the planning authority is required to look to the Green Belt to meet those needs (paragraph 146). Several "calls for sites" have been held asking landowners and developers to nominate potential sites. These streams of work and follow up investigations through the development of the Strategic Housing Land Availability Assessment (SHLAA) have combined to result in the proposed allocation of 53 sites, the vast majority for housing development, including some sites newly identified in this Plan.

24. New development across the city results in additional infrastructure needs. This could range from the requirement for additional capacity at a city school, the introduction of a new cycle or pedestrian route or a contribution to a community or health facility. An Infrastructure Delivery Plan (IDP), which details the key infrastructure needs within the city has been produced with the engagement of utility and health providers and the county council, and is attached as Appendix 4. The following tables summarise the development sites which have been investigated through the SHLAA process and are proposed to be taken forward as policy allocations in Chapter 8, and which are shown on the Policies Map (Appendix 5). Table one identifies those with a current allocation in the Oxford Local Plan 2036. Table two identifies those newly identified sites. Table three

lists sites which have been considered through the SHLAA, but which are not included in Chapter 8 for specific reasons, which are set out.

Table 1: Sites with allocation policies in Chapter 8 that are currently allocated in the Oxford Local Plan 2036:

SHLAA ref	Site allocation name	Minimum housing number anticipated (or stated if no residential expected)
587	ARC Oxford	employment
006b	Banbury Road University Sites - Parcel B	54
008a	Bertie Place Recreation Ground	25
11	Canalside Land, Jericho	0 in allocation as, in the event of an alternative application, housing numbers will be heavily dependent on the proposed arrangement of uses on site (including boatyard/ community centre/ public open space) in conjunction with flood mitigation measures.
12	Churchill Hospital	0 in allocation as hospital use primary need
16	Cowley Marsh Depot	83
17	Crescent Hall	75
018	Diamond Place and Ewert House	135
21	Faculty of Music	23
104	Former Iffley Mead Playing Field	84
24	Government Buildings and Harcourt House	68
70	Island Site	59
26, 234	Jesus College Sports Ground	40
27	John Radcliffe Hospital	0 in allocation as hospital use primary need
028a	Kassam Stadium	290
389	Land at Meadow Lane	allocation does not state number as characteristics of site means this must be led by detailed proposals that respond to heritage and biodiversity sensitivities.
117	Land surrounding St Clement's Church	50
32	Lincoln College Sports Ground	24
31	Manor Place	43
574	Manzil Way Resource Centre	0 in allocation as medical use primary need
114e	Marston Paddock extension	20
497	MINI Plant Oxford	employment

42	Nuffield Orthopaedic Centre (NOC)	0 in allocation as medical use primary need
586	Osney Mead	247
028b	Overflow carpark at Kassam Stadium site	100
439	Oxford Brookes Marston Road Campus	42
001a1	Oxford North remaining phases	161
075 (a & b)	Oxford Railway Station and Becket Street Car Park	52
588	Oxford Science Park	employment
049	Oxford University Press Sports Ground, Jordan Hill	90
76	Oxpens	450
001e	Pear Tree Farm	111
001c	Red Barn Farm	employment
113	Redbridge Paddock	200
54	Ruskin Campus	30
289	Sandy Lane Recreation Ground	300
124	Slade House	0 in allocation as medical use primary need
14	Templars Square	500
38a2	Thornhill Park (phase 2)	402
61	Union Street Car Park	15
120	Unipart House	employment
63	Warneford Hospital	0 in site allocation policy as hospital the principal use of the site.
65	West Wellington Square	13
81	Worcester Street Car Park and Public House	Part of the Nuffield sites allocation (with Island Site and South of Frideswide Square) that has a minimum housing requirement of 59)

Table 2: Sites with allocation policies in Chapter 8 that are not currently allocated in the Oxford Local Plan 2036. (N.B. some of these sites have been previously allocated or were being considered in the Oxford Local Plan 2040, but they do not have a current site allocation policy relating to them):

SHLAA number	**Site name**	**Minimum housing number anticipated**	**Description**
516	474 Cowley Road	14	Former Powells Timber Yard
613, 614, 615	Botley Road sites around Cripley Road including River Hotel and Westgate Hotel	20	A mix of uses exist and some reprovision expected, but some conversion and intensification will result in more residential

204	East Oxford Bowls Club	10	Disused and vacant site was a bowling green
20b2	Elsfield Hall, Elsfield Way	27	Wider site including car park previously allocated and previous car park now includes housing. Building currently in use as offices and gym
664	Jowett Walk (South)	14	College accommodation to be intensified including additional student accommodation
624	Land south of Frideswide Square		Part of the Nuffield sites allocation that also includes the Island Site and Worcester Street Car Park, but only the other two parts were included in the OLP2036 (all three were included in the OLP2040). 59 units minimum across the three parts of the site
33	Littlemore Mental Health Centre, Sandford Road	0	No minimum number in policy, but 81 assumed in the SHLAA against all Oxford Health Trust sites. Redevelopment and intensification expected on this site, including staff/student accommodation
028c	Ozone Leisure Park & Minchery Farmhouse	employment	No residential expected and in lawful use for other uses
428	Rectory Centre	21	Anticipated to come forward as part of the Oxford Health Trust's rationalisation of its sites
463	Ruskin Field	28	Ruskin Field does have an allocation policy in the OLP2036, but the red line allocation for the policy has shifted to the northern part of the site
616	St Thomas School and Osney Warehouse	10	Redevelopment of small brownfield site with heritage interest

Table 3: Sites that have been considered (i.e. they passed the first stage of filtering), but that are not proposed to have a site allocation policy:

SHLAA number	**Site name**	**Reason site has not been taken forward for an allocation**
440	1 Pullens Lane	Site includes house with significant garden, which was initially considered large enough for 10 dwellings (the allocation threshold), but more detailed assessment suggests the very significant amount of green infrastructure, particularly trees, on the site might make that difficult to achieve. Site could come forward as windfall
660	2 Harberton Mead	Detailed assessment suggests the site does not have capacity for 10 dwellings (the allocation threshold). Could still come forward as windfall
173	Bayards Hill Primary School Part Playing Fields	At the current time there is not enough information to suggest it can come forward without unacceptable loss of playing pitch.

657	Clarendon centre	Work commenced on approved scheme
467	Edge of Playing Fields, Oxford Academy	At the current time there is not enough information to suggest it can come forward without unacceptable loss of playing pitch.
658	Land off Harolde Close	Further investigation of ecology and general developability suggests it does not have capacity for 10 dwellings.
43	Old Road Campus	Put forward by the University as intention to intensify further, but limited intensification within same use on this site does not require an allocation policy
665	Oriel College Sports Ground and adjoining land (comprising 263 and 639)	Very sensitive site for heritage - important as green space to the character of Bartlemas Conservation Area, and the setting of the Bartlemas Farmhouse and chapel. Also, not apparent that sports use could be provided within the site, alongside development.
111	Oxford Stadium (Greyhound stadium)	Site put forward for housing by landowner, and considered. However, current community uses mean it could not also support housing, so allocation would require the loss of those uses.
579	ROQ Site	Site is part of an area of focus and does not need a specific site allocation policy
62	University of Oxford Science Area & Keble Road Triangle	Site is part of an area of focus and does not need a specific site allocation policy
Multiple	Green Belt sites, particularly in Marston Gap	The Green Belt was considered again, as required by the NPPF. Large amounts of Green Belt within Oxford are not developable because they are functional flood plain and/or strongly protected for their biodiversity value (SSSIs). Other sites were looked at, but many were ruled out because development of them would be contrary to the strategy of the plan (Core Green Infrastructure areas, e.g. University Parks). Of the remaining areas, landowner interest was then gauged. This was minimal, but there was interest in two sites to the east of the current development sites on the western edge of Old Marston, another site which was the Extension of the Marston Paddock Development (put forward for allocation), and another site which was the playing field of Hertford College. The sites in the Marston Gap have been ruled out on transport grounds, based on detailed comments from the Highways Authority. There is no likely prospect of suitable access, and the sites are isolated and would be car-dependent. The Hertford College Playing Field is in sports use. The College suggested the site for housing, but also said they ideally want to retain the sites in sports use, and they do not have alternative plans in train for reprovision of the pitches. Therefore, it seems premature at this point to allocate it as a housing site, as it is not clear how that would come forward.

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Oxford Local Plan 2045

Submission Draft (Regulation 19)

January 2026

Version Control

V1

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CHAPTER ONE

INTRODUCTION AND STRATEGY

WHERE WE ARE

Oxford is an attractive place to live, work, study and visit, and is home to a diverse range of communities. Its environment is characterised by a wealth of built heritage that reflects many centuries of settlement, interspersed with high quality green and blue spaces that harbour a variety of ecologically important habitats.

The city has a broad, multi-faceted and active economy, with one of the highest concentrations of knowledge intensive businesses in the UK. This is enhanced by its historic role as a world-renowned seat of learning, with two universities and a strong research and innovation sector.

However, this attractiveness and success brings challenges for our people, the lives they lead and jobs they have, their communities and the environment. High demand for land results in high land values; congestion on the city's roads makes movement difficult and exacerbates poor air quality in certain areas; and the supporting infrastructure needs to keep pace with a changing and growing city. These challenges are intensified by national and international pressures such as rising build costs for new development, a chronic undersupply of housing, climate change and energy insecurity.

The role of this Local Plan is to carefully manage and guide new development so that it seeks to address the challenges we face and build upon the positive aspects of the city that make it so special. The Local Plan contains positive planning policies to ensure the optimum outcomes for the city's residents, environment, businesses, education and health institutions.

This Local Plan for the period 2025-2045 supersedes the Local Plan 2036 and the other relevant parts of the development plan including the Northern Gateway Area Action Plan. The vision for Oxford in 2045 seeks to address the strengths and challenges identified above.

In 2045 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare.

Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper.

The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

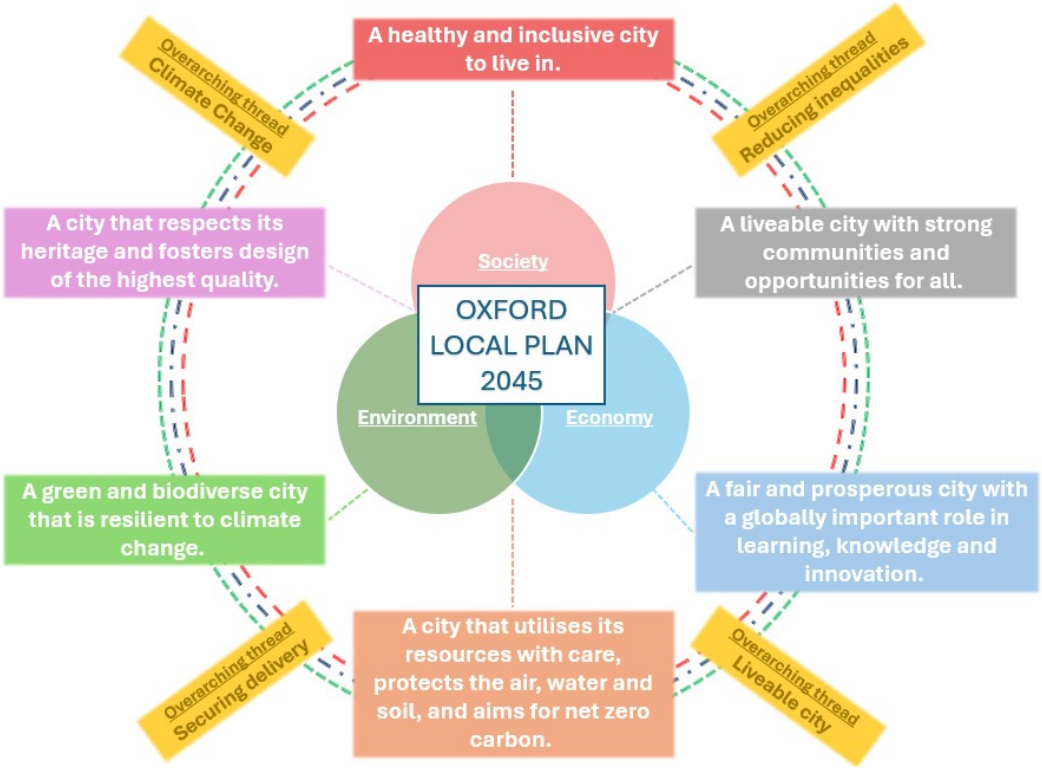
The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. Resources will be utilised prudently whilst mitigating our impacts on the soil, water, and air.

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.

OBJECTIVES AND STRATEGY

The vision for the city in 2045 is divided into key six themes which are illustrated in Figure 1.1. These are based on society, economy and environment as the three pillars of sustainability, and three themes which fall at the intersections of those pillars. Taken together, the six themes represent what we consider to be a sustainable future for Oxford. The themes are supported by a number of underlying objectives; in practice there will often be overlaps with some objectives being of relevance to more than one theme.

Figure 1.1: The six themes underpinning our vision for Oxford in 2045 – adapted from the three pillars of sustainability (society, economy and the environment)



Local Plan 2045 theme	Underlying Local Plan 2045 objectives ***The Oxford Local Plan 2045 will...***
A healthy and inclusive city to live in.	• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
A green and biodiverse city that is resilient to climate change.	• Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and

	apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
A liveable city with strong communities and opportunities for all.	• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. • Value diversity whilst fostering greater inclusivity within our communities. • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.
A city that respects its heritage and fosters design of the highest quality.	• Ensure well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage. • Curate a built environment that supports and enables people to be physically and mentally healthy.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	• Ensure Oxford is ready for a net zero carbon future. • Ensure our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • Ensure the city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.

OVERARCHING THREADS

In response to the complexities of planning in such a challenging but dynamic city and alongside a need to urgently respond to inequality and climate change, there are four particularly important threads which are wound throughout the Local Plan and supported by multiple policies across the different chapters. These relate to key issues and challenges facing the city which require a multi-faceted response and that are relevant to all six themes underpinning the vision and all of the objectives. As such, all the proposed policies will help to address these key issues.

The first overarching thread is that of **reducing inequalities** in the city. The Local Plan chapter 2 puts forward a range of requirements aimed at supporting access to affordable

housing, as well as a good mix of housing, in order to help address housing inequality. Equally, chapter 3 sets out policies which seek to support the economy, including addressing unequal access to employment and training through options for policies requiring employment and skills plans as well as provision of affordable workspaces. Polices that are proposed for protecting, enhancing and providing new green infrastructure in chapter 4 are intended to help preserve access to and improve the natural environment across the city and there are other policies located in the document which also respond to this overarching thread.

The second thread is that of **addressing climate change.** In terms of reducing our emissions, the proposed policies of chapter 5 most directly address this issue covering topics such as net zero development, embodied carbon and supporting retrofitting of existing buildings, however, policies elsewhere in the Local Plan also address good urban design, parking, and bike storage which can enable people to live lower carbon lifestyles. Equally, a diverse range of policies can support adaptation and resilience to the expected impacts of climate change, from resilient design and construction, to flooding, green infrastructure and most of these sit within chapter 4, though other policies such as urban design and health impact assessment will also contribute.

The third overarching thread which runs throughout the document is that of **enabling a liveable city** and ensuring that communities are well supported and well served by having access to the basis of their daily needs within an easy walking distance of their homes. The Local Plan's proposed strategic policies discussed later in this chapter include a spatial strategy which sets out where types of development ought to be focused in the city and helps support this theme. Within subsequent chapters, there are policies which are put forward to focus on more specific aspects of provision that we want to see in our neighbourhoods to help ensure the right balance of needs are met. These include policies on the protection of a network of green spaces across the city (chapter 4), as well as policies which address the provision of community facilities (chapter 7).

The fourth overarching thread is **securing delivery.** The strategy and policies of this Local Plan will only reduce inequality, address climate change and enable a liveable city if they are implemented and delivered upon. The City Council is clear in Policy S1 that applications which accord with the Local Plan will be approved without delay. To help facilitate the speedy progress of proposals through the planning process the City Council has set out in the policies clear expectations and requirements. Where policies require supporting evidence, this is to ensure that planning officers have all relevant information from the outset to enable speedy decision making. The City Council wants this plan to be being delivered quickly and to secure the real change envisaged in the vision.

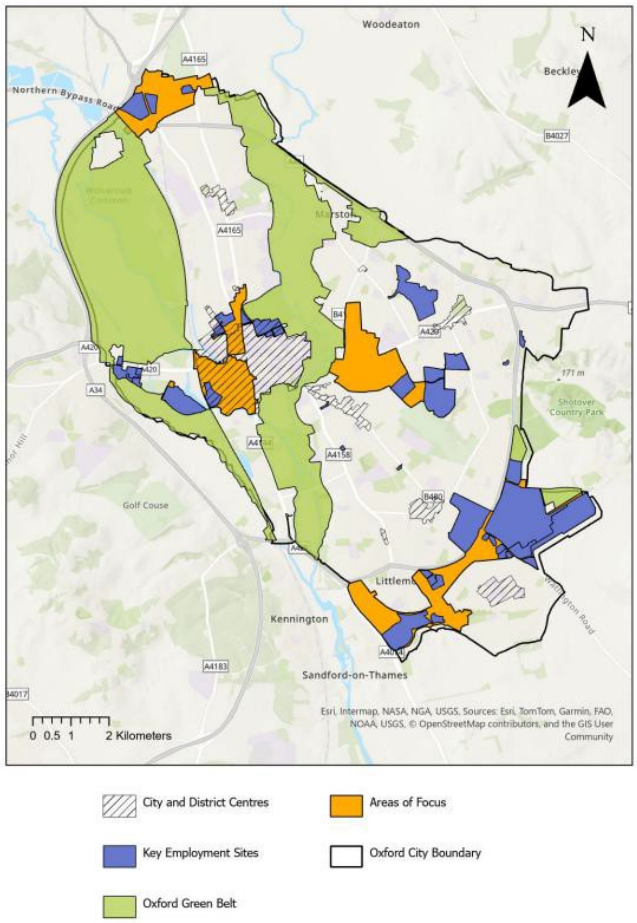
SPATIAL STRATEGY AND PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Policy Context

- The aim of the plan is to understand and try to meet the city's needs, without having detrimental effects on economic, social and environmental sustainability objectives.
- The Plan sets a housing requirement, in Policy H1, that seeks to meet housing needs as far as possible using a capacity-based approach.
- The Local Plan's policies focus on delivering sustainable growth for Oxford, compliant with the presumption in favour of sustainable development in the National Planning Policy Framework (NPPF) that meets the objectives, including by delivering affordable housing, supporting an inclusive economy, ensuring the protection of our green and blue networks and natural resources and supporting the city in moving towards being net zero carbon by 2040.
- The spatial strategy focuses on supporting Oxford's strengths in research and development, particularly related to health and education.
- The spatial strategy responds to climate change and the need to address and attempt to reduce it, including by carefully locating development so that facilities can be reached by sustainable travel.
- The spatial strategy is designed to ensure development responds appropriately to the context of the site, including heritage, green space, flooding and amenity.

Policy Implementation

- Applications that accord with the Local Plan will be approved without delay.
- The Key Diagram below shows the spatial strategy. The district centres and the city centre are transport hubs and service centres, where mixed-use, high-density developments are expected. The Key Employment Sites are where intensification of employment use is to be concentrated. Policies in Chapter 8 of the Plan set out requirements for the areas of focus. Oxford has significant green spaces, in particular the green corridors along the two major rivers, which broadly coincide with the area of Green Belt within the city. Areas of Focus have specific policies in Chapter 8.



POLICY S1: SPATIAL STRATEGY AND PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Planning permission will be granted where development proposals accord with the policies of the Plan taken as a whole.

The City Council, through its policies and decisions, will positively pursue sustainable development and achieve sustainable growth in the delivery of homes, jobs and services to create a network of healthy, well-connected, high-quality areas where people want to live, play, learn and work in line with the vision and objectives of the Local Plan. To help achieve this it will aim to ensure development is located to:

a) Ensure the continued strength and vibrancy of district and local centres so they continue to attract people and support a range of facilities that meet people's immediate needs conveniently within their local area;

b) Whilst ensuring active frontages are retained, allow flexibility of uses within the city centre and district centres so that they can respond quickly to changing needs and economic circumstances and to ensure a wide mix of uses including housing is encouraged;
c) Ensure new development is focused on areas with opportunities for sustainable travel links;
d) Ensure activities that attract large numbers of people are centrally located in the city centre and district centres first, so they are easy to reach by walking, cycling and public transport;
e) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere;
f) Ensure new uses are in locations where they will not harm the amenity of existing neighbouring uses;
g) Direct new development away from locations where it would have a negative impact on important blue and green infrastructure networks, public open space, and result in loss of flood plain, also ensuring efficient use of land, helping to maximise opportunities on brownfield sites first.; and
h) Take account of local historic context and respond appropriately to heritage significance.

When determining development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the *National Planning Policy Framework* (NPPF). The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city.

All new proposals for development must conform with the principles of securing sustainable development, which ensures that the city is ready for a net zero carbon future, natural resources and raw materials are used prudently and considerately, the air quality of the city is improved, and human health is safeguarded.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, considering whether:

i) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
j) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

HIGH QUALITY DESIGN

Policy context

- Good design is a fundamental part of achieving many of the aims of the Plan. It is not just about creating aesthetically pleasing buildings, but also about placemaking, strengthening the connection between people and the places they share, promoting a sense of identity and people's health and well-being.
- The wider fundamental considerations include the need to make efficient use of limited land in the city, local character and history, the transition to net zero development, the delivery of improved energy efficiency, adaptability and resiliency to a changing climate, creation of spaces for nature and wildlife and nature, and providing multifunctional spaces that support the wellbeing of people.
- Oxford's heritage is a unique and irreplaceable resource, which has a fundamental role in shaping the city's character and cultural offer. Within this context, high quality, well designed new developments will likely become the heritage assets of the future. Good design can also help new development to sit more appropriately on challenging sites or in certain locations which are more sensitive to change.
- Some parts of the city will experience change in accordance with the policies of the development plan at a pace that may be rapid. Development proposals in these areas will require added design consideration so that their impacts are managed to avoid harms and maximise the benefits that new development can bring about.

Policy Implementation

- All development proposals will be expected to have been derived from a comprehensive approach to design from the outset and will be expected to

demonstrate this through supporting material including a Design and Access Statement, Planning Statement or other means to address the checklist provided in Appendix 1.1.

- Policies elsewhere in the Plan also set requirements which help to secure high quality design, and to conserve and enhance historic assets, and character.
- Specific locations such as Areas of Focus, site allocations and city and district centres have associated design guidance as part of their respective policies.
- In addition, the City Council is committed to preparing, reviewing and adopting (as appropriate) development briefs, local design codes or guidance when a need arises, and will support neighbourhood planning groups who wish to produce design guidance for their areas.

POLICY S2: HIGH QUALITY DESIGN

A holistic, considered approach to design will help ensure that design proposals meet a wide range of policies of the Local Plan, and is an important element of ensuring efficient use of land is made. The design checklist set out in Appendix 1.1 should be used to inform design and ensure that a comprehensive approach is taken from the outset, which includes consideration of:

- Context,
- Built form,
- Movement,
- Public spaces,
- Identity and character,
- Nature and green infrastructure,
- Resources,
- Homes and buildings,
- Lifespan.

For Areas of Focus, the City Centre and District Centres, and other areas with more detailed guidance, proposals should refer to and align with the design principles set out in the Local Plan or in supporting documents such as SPDs and development briefs. The City Council will be proactive in producing additional local design codes or guidance when a need arises with the involvement of the local community, landowners and other stakeholders, and will support neighbourhood planning groups who wish to produce design guidance for their areas.

In recognition of the significance of Oxford's heritage, and as part of its positive approach to the historic environment, consideration is given by the Plan to ensuring the continued conservation and enjoyment of the historic environment, as part of good design achieved by bespoke policies (HD1-HD6), and individual site allocation and area of focus policies in Chapter 8. Opportunities for heritage-led regeneration are supported, and the Plan strategy supports the conservation and appreciation of key characteristics of the city's townscape and urban landscape.

INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENTS

Policy context

- The success of new development and the response of local communities in which it is located is often linked to the provision of infrastructure to ensure that increased demand and pressures (e.g., on local roads, services and facilities) are addressed.
- Infrastructure needs to be funded and delivered in a timely manner. Developer contributions and the delivery of infrastructure will be sought through the most appropriate mechanism available, using the Community Infrastructure Levy (CIL) and planning obligations (e.g., Section 106 (S106) or S278 agreements)
- The Community Infrastructure Levy is a tariff in the form of a standard charge on development. This applies on the basis that almost all development has some impact on infrastructure, so should contribute to the cost of providing or improving infrastructure.
- Planning obligations are used to make new development acceptable in planning terms; legal obligations that must meet specific statutory tests; and are enforceable and run with the land.

Policy implementation

- The Infrastructure Delivery Plan (IDP) forms part of the evidence base for the Local Plan. The IDP is a 'live' document, that is regularly updated and includes:
    - An assessment of the city's current infrastructure and identified requirements;
    - Evidence of a funding gap between committed and required infrastructure;
    - An Infrastructure Delivery Schedule that highlights infrastructure projects needed to support the city's planned development needs to 2045.

- A range of public and private bodies are responsible for delivering infrastructure and facilities to support development and the wider population, for example education, health, emergency services, transport, utilities and environmental provision. The City Council has worked with these providers in developing this plan, however, additional early engagement with the relevant body or provider should be undertaken when those elements form a part of the proposal or would have a particular impact on them.
- Delivering certain infrastructure projects has the potential to deliver transformational improvements, and to collectively increase the accessibility to a wider workforce across the city and the wider Oxford to Cambridge Growth Corridor area as well as bringing significant localised benefits. The Infrastructure Delivery Plan identifies key transformational projects, such as:
    - Oxford Railway Station (incorporating public realm, capacity and interchange improvements and will enable the delivery of East-West Rail).
    - Re-opening of the Cowley Branch Line to passenger trains (and the delivery of new stations to service key employment sites in the south of the city such as Oxford Science Park and ARC Oxford.
- It is likely significant funding will be required to deliver these transformational opportunities. As such, certain sites within the Cowley Branch Line Area of Focus (Policy CBLAOF) will be expected to help contribute to their delivery.

POLICY S3: INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT

The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. The projects required to support the Local Plan strategy are identified within the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be reviewed to ensure infrastructure information remains up to date and is monitored effectively.

Developers will be expected to engage early with the Council and infrastructure service providers to discuss their requirements. Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the city, opportunities should be taken to maximise infrastructure provision on suitable sites.

Development proposals, including those allocated in this Local Plan that give rise to a need for infrastructure improvements, will be expected to mitigate their impact, both individually and cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development. The standards of infrastructure delivery will be expected to comply with other policies set out within this Plan.

Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development. Infrastructure identified within the Infrastructure Delivery Plan or through negotiations on individual planning applications will be delivered either through on-site provision or off-site contributions and secured by S106, S278 or other appropriate agreements and the Community Infrastructure Levy (CIL) or its successor as well as other identified sources of funding as set out in the Infrastructure Delivery Plan.

Development proposals which rely on the delivery of critical infrastructure projects to support the development, will only be permitted prior to completion of that project or where appropriate, a phase of that project which has been identified as necessary in the IDP, where the council is content that the infrastructure or phase of that infrastructure will be in place within a reasonable timetable from the date of permission.

Proposals to enhance the city's rail and bus network will be supported. In particular, proposals for improvements to Oxford Railway Station that increase network capacity and support the Cowley Branch Line (CBL) will be supported. Oxford Railway Station should be transformed to facilitate integrated transport with enhanced entrances, additional secure cycle storage, cycle racks, new bus interchange facilities and new priority public areas.

Enhancements to public transport accessibility in the south-east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the Cowley Branch Line to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL. Outside the 1,500m buffer area, financial contributions from new

trip-generating development would be sought on a case-by-case basis. These will be tested in accordance with Paragraph 58 (or updated equivalent) of the NPPF.

PLAN VIABILITY

Policy Context

- The NPPF (paragraph 35) requires that policies for contributions should not undermine the deliverability of the Plan.
- Planning Practice Guidance sets out that 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.
- As such, the Plan needs to deliver development that is viable, and a Local Plan viability assessment has informed the level of contributions sought in policies.

Policy Implementation

- Where a site faces exceptional costs that could not have been anticipated in the whole plan viability assessment (for example, land contamination which requires remediation), the policy sets out the basis for negotiations relating to viability, the council's priorities for contributions, and the expectations for evidence required to demonstrate viability.
- The viability assessment for the Plan identifies the policies which are likely to have the greatest potential impacts upon site viability include the parking Policy C8, net zero buildings in operation Policy R1, and the affordable housing contributions Policies H2 to H5). The policies identified as being most impactful on viability will not apply in all cases.
- Where the combined impact of policies in the Plan results in a site being unable to deliver a viable development because of a site-specific circumstance, development should proceed in a way that ensures maximum compliance with planning policies. The policy guides the process of making amendments to proposals to ensure viability in a way that the intention of the policies is met as far as possible (the "cascade").
- The policy prioritises delivering affordable housing in this stepped cascade approach. So whilst negotiations will be on a case-by-case basis, the retention of affordable housing delivery will be prioritised over other policy considerations.
- The City Council will work with applicants to understand where the largest costs savings can be made in terms of items that may trigger non-compliance with policy

(such as energy offsetting or parking) and will weigh up the planning (and public interest) merits of doing so but will actively engage with developers before any negotiation is undertaken.

POLICY S4: PLAN VIABILITY

The policies in the Plan have been viability tested and planning applications that fully comply with them will generally be assumed to be viable.

The City Council will always expect developers to have considered the financial implications of affordable housing policy requirements, and local market indicators, when purchasing the land for development.

If the combined impact of the policies in the Plan do result in a site being unable to deliver a viable development, and if an applicant can demonstrate particular circumstances that justify the need for a viability assessment, negotiations will take place on an 'open book' basis, informed by robust evidence in the form of an independent viability appraisal carried out by independent assessors appointed by the City Council in agreement with the applicant.

If the applicant can demonstrate through an open book approach, the development to be unviable, the relevant cascade approach below should be worked through with the City Council until development is viable as follows:

Housing viability cascade

Step 1) Where it is clearly demonstrated that any offsetting against the targets in Policy R1 Net Zero Buildings in Operation cannot be fully achieved, payments towards energy offsetting should be reduced incrementally until viability is achieved. The development itself must remain free of fossil fuel use to ensure that it is net zero carbon ready and does not conflict with Net Zero Carbon targets for the city and nationally.

Step 2) If the development remains unviable after step 1, and the low car requirement in the parking policy impacts upon site viability, then this must be clearly set out in the planning application, including setting out the site-specific circumstances that lead to it being unviable. In the first instance, allocating spaces to units should be considered. If the development is still not viable, increasing the number of spaces incrementally, up to the maximum parking standards, which will be no more than one space per unit for residential schemes.

Step 3) If on relevant sites (of 10 or more units), following the adjustments in steps 1 and 2 to achieve viability, it can be robustly proven that meeting the affordable housing policy requirements will make a site unviable, then the following further steps should be followed:

Firstly, reduce the number of affordable housing units provided by reducing the intermediate housing element only, whilst retaining the social rent element in full; **Secondly**, if the development is still not viable, continue to reduce the amount of social rent incrementally until viable.

Contributions from employment-generating uses viability cascade

If on relevant sites (of 1000sqm or more net gain) for employment-generating uses it can be robustly proven that the combined policy requirements will make a site unviable, developers and the City Council will work through a cascade approach that prioritises contributions to affordable housing in the following order until a scheme is made viable.

Step 1), where it is clearly demonstrated that any offsetting against the targets in Policy R1 Net Zero Buildings in Operation cannot be fully achieved, payments towards energy offsetting should be reduced incrementally until viability is achieved. The development itself must remain free of fossil fuel use to ensure that it is net zero carbon ready and does not conflict with Net Zero Carbon targets for the city and nationally.

Step 2), affordable housing contributions - If the development remains unviable after step 1, payments towards affordable housing should be reduced incrementally until viability is achieved.

Contributions from mixed use sites

For mixed use sites, the viability cascade should be applied on the employment-generating uses in the first instance, ahead of the affordable housing cascade, in order to prioritise the delivery of onsite affordable housing.

CHAPTER TWO

A HEALTHY INCLUSIVE CITY TO LIVE IN

INTRODUCTION

It is important we try to provide for all types of household needs and circumstances, including families, single people, the elderly and those with special needs. Good quality, affordable housing is an important element of enabling people's stability and security. Good and sufficient housing can improve our social, environmental and economic wellbeing. It helps to create stronger communities that can attract investment and skilled workers.

This chapter sets out policies for the following topics:

- Housing need and requirement and delivering affordable homes
- Creating mixed and balanced communities

HOUSING NEED AND REQUIREMENT AND DELIVERING AFFORDABLE HOMES

Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and demand continues to outstrip supply. This exacerbates inequalities by leading to high property prices and a limited supply of affordable housing. This means that many lower paid essential workers cannot afford to live in the city and employers experience high staff turnover and vacancy rates which can affect their operation. This is particularly apparent in the city's schools, hospitals, care homes, public transport services, the building industry and the universities. Therefore, the supply of available and affordable housing for all is a priority for people, the economy and the services on which we all rely, including healthcare and education.

HOUSING NEED AND REQUIREMENT

Policy Context

- The *National Planning Policy Framework (NPPF)* sets out the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed.

- Delivery of housing is a priority for the City Council, and the Local Plan's strategy is to maximise housing delivery while balancing protection of other important assets such as biodiversity, open space and functional floodplain.
- The minimum housing need figure for Oxford has been calculated by using the Government's Standard Method as set out in National Planning Policy and guidance. The housing need in Oxford is for 1,087 new dwellings per annum. However, this need is greater than the capacity of the city to deliver it. The assessment of capacity (set out in the Strategic Housing Land Availability Assessment 2026) is 9,267 homes over the plan period, or 463 dwellings per annum.
- The Local Plan must set out a total housing requirement for the plan period to 2045, setting out the number of houses that are required to be delivered each year. Local Plans should seek to meet identified needs, and in establishing a housing requirement figure should show the extent to which their identified housing need can be met over the plan period.

Policy Implementation

- Every effort has been made to maximise the identified capacity in the city through the Strategic Housing Land Availability Assessment (SHLAA) and a Green Belt assessment.
- A range of policies that prioritise residential development over other uses, design policies including Policy HD8 on efficient use of land and Policy H6 on Employer-Linked Housing work together to maximise delivery of housing.
- However, the calculated housing need is greater than the capacity identified. Therefore, the housing requirement is less than the housing need, and results in a level of unmet need in Oxford.
- The Council is continuing to work with adjoining authorities to deliver sites in adjoining districts to help meet Oxford's housing needs to address the unmet housing need.

POLICY H1: HOUSING REQUIREMENT

Provision will be made for at least 9,267 new homes to be built in Oxford over the plan period 2025-2045 (average of 463 per annum).

Measures in the Local Plan to promote housing delivery include:

a) Making site allocations for residential uses in this Plan (see Chapter 8: Site allocations);
b) Promoting the efficient use and development of land/sites; and
c) Prioritising housing across the city and by allowing an element of housing on all employment sites if suitable.

DELIVERING AFFORDABLE HOMES

Policy Context

- Oxford is one of the least affordable places in the country, resulting from a combination of high housing demand, high land values, reducing land availability, and a shortage of homes. Housing is so expensive, in absolute terms and compared to average salaries, that many people are priced out of the market.
- "Affordable" homes models (for ownership or discounted market rent) are often not affordable in the Oxford context and are out of reach for many households. This means that in Oxford, social rent is the only option for many people who are not able to access market housing, or even other tenures of affordable housing,

- Securing new affordable housing as part of larger developments is a significant way that more affordable homes can be provided in Oxford.
- The NPPF also sets out 'Golden Rules' for Green Belt development relating to affordable housing provision requirements, including that, to reflect that they are likely to be cheaper to develop, a higher level of affordable housing than elsewhere should be sought if viable.

Policy Implementation

- The policy seeks to deliver housing that is genuinely affordable in Oxford to help ensure that Oxford is a sustainable and inclusive city, with mixed and balanced communities.
- Social rent is the priority tenure of affordable housing, with a lesser proportion provided as intermediate forms of affordable housing.
- Viability testing indicates the levels of contributions set out in the policy are viable for the majority of development typologies likely to come forward during the Plan period in Oxford. However, where there are exceptional circumstances that mean viability is a challenge then Policy S4 sets out a cascade of adjustments that proposals should work through until the site becomes viable.

POLICY H2 DELIVERING AFFORDABLE HOMES

Planning permission will only be granted for residential development if affordable homes are provided in accordance with the following criteria:

On self-contained residential developments (including Use Classes C3 and C4 but excluding self-contained student accommodation, older persons accommodation and employer-linked housing) where sites* have a capacity for 10 or more homes (gross), a minimum of 40% of units on the site should be provided as homes that are truly affordable in the context of the Oxford housing market. On sites in the Green Belt or released from the Green Belt, this should be a minimum of 50%. The following criteria apply in all cases:

a) At least 80% of the affordable units on the site should be provided as onsite social rented dwellings. The remaining element of the affordable housing may be provided as intermediate forms of housing onsite provided that they are affordable in the Oxford market;
b) The affordable homes must be provided as part of the same development (i.e. on site) to ensure a balanced community;
c) Where affordable housing is provided onsite it should incorporate a mix of unit sizes (see Policy H7 on mix of dwelling sizes).

Where the gross number of dwellings (including conversions and changes of use) proposed falls below the thresholds set out above, the Council will consider whether the site reasonably has capacity to provide 10 or more dwellings that would trigger a requirement to contribute towards affordable housing. This is to ensure that developers may not circumvent the policy requirement by artificially subdividing sites or through an inefficient use of land.

*site area includes everything within the red line boundary of the planning application, which may include existing properties which are being materially altered.

AFFORDABLE HOUSING CONTRIBUTIONS FROM OTHER DEVELOPMENTS

Policy Context

- Securing contributions towards affordable housing from new student accommodation, older persons accommodation and employment-generating uses can help contribute towards the supply of affordable homes in Oxford, which is important because many sites proposed for those uses could equally be suitable for homes, from which a percentage of affordable housing would have been sought under Policy H2.
- This requirement also helps to ensure that the provision of affordable homes is not disadvantaged in the market in comparison with these other uses.
- Direct provision of new student accommodation with affordable bedspaces targeted at students considered to be in need of low-cost rent does not negate the requirement for contributions. This is because discounted student accommodation bedspaces are, by their nature, provided for students who do not live in the city full time, and it does not contribute to meeting the city's affordable housing need.
- Employment-generating uses can impact on affordable housing needs by encouraging workers in housing need to move to Oxford to take up new jobs generated by the proposed use of the new development. As such this policy seeks financial contributions towards affordable housing provision.

Policy Implementation

- Financial contributions are required on a comparable basis so that the development of sites for residential is not disadvantaged in the market or viability terms.

- Financial contributions are more likely to be appropriate than on site provision as many qualifying schemes are likely to be designed in a way which would be challenging for registered landlords to manage the affordable housing units or are unlikely to be appropriate because of the different housing needs and lifestyles. Management agreements and other restrictions (e.g. low car parking) may also be imposed related to those uses, which are also not necessarily appropriate to general housing in all locations.
- For new student accommodation, the policy does not apply to development within university campus sites or redevelopment of existing purpose-built student accommodation that is currently and will continue to be owned and/or managed by the universities.

POLICY H3: AFFORDABLE HOUSING CONTRIBUTIONS FROM OTHER DEVELOPMENT TYPES

The City Council will seek financial contributions towards the delivery of affordable housing from proposals for new purpose-built student accommodation, new older people's accommodation and new employment-generating uses.

The contribution will be required only from the number of units creating a net gain or the additional floorspace that is new to employment-generating use. For mixed-use developments a pro-rata approach will be used to determine whether a contribution is required, and how much this should be. The usual affordable housing contributions policies will apply to any residential elements of mixed-use developments. The contribution will be calculated using the formulas in Appendix 2.1.

On proposals for new purpose-built student accommodation

a) A financial contribution will be sought towards the delivery of affordable housing from proposals for new student accommodation of 24 or more student units (or 10 or more self-contained student units). Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate.
b) Contributions towards affordable housing provision from new student accommodation will not be sought where:
    - The proposal is within an existing or proposed university or college campus site, as defined in the glossary; or
    - The proposal is for redevelopment of an existing purpose-built student accommodation site which at the date of adoption of the Plan is owned by a university, and which will continue to be owned by a university to

meet the accommodation needs of its students after the redevelopment.

On proposals for new self-contained older persons accommodation

c) A financial contribution will be sought towards the delivery of affordable housing from proposals for new self-contained older persons accommodation of 10 or more self-contained units. Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate.

On proposals below the thresholds for contributions

d) Where the number of dwellings or units proposed falls below the relevant thresholds to require affordable housing contributions set out in A or C , the Council will consider whether or not the site reasonably has capacity to provide the number of dwellings that would trigger a requirement to make a contribution towards affordable housing. This is to ensure that developers may not circumvent the policy requirement by artificially subdividing sites or an inefficient use of land. This policy will apply to all types of development including conversions and changes of use.

On proposals for new employment-generating uses

e) A financial contribution will be sought towards the delivery of affordable housing from proposals for major employment-generating uses (defined in Glossary), or flexible E-Class uses which could be used for employment-generating use, delivering a net gain in floorspace of 1000sqm GIA or more.

f) Where description of development is listed as flexible class E, it will be assumed that all of it is employment-generating (unless specified otherwise in the planning application). This is to avoid proposals circumventing the policy and providing appropriate contributions towards affordable housing.

EMPLOYER-LINKED AFFORDABLE HOUSING

Policy Context

- Employers in Oxford, including critical services such as the NHS, are facing significant challenges in recruiting and retaining staff because of the shortage of homes that are affordable to local people working in Oxford on average Oxford salaries. People can be discouraged from taking jobs in Oxford if they cannot afford to live close enough to their place of work.
- Many jobs in Oxford still require people to attend their workplaces because they are jobs that are not possible to do remotely, such as in frontline healthcare,

teaching in schools and universities, as well as those working in manufacturing and R&D labs, cleaning and servicing. Many of these workers may find themselves living away from the city, with expensive and time-consuming commutes, or living in shared accommodation in Oxford that is too small for their needs. People with no option but to rent a room in a house-share can be prevented from moving on with their lives with a partner or family.

- Employer-linked housing is a bespoke approach that was introduced in Oxford in the LP2036. It involves housing being developed on specified sites, by specified key employers, to provide a means of delivering affordable housing for their own staff. This allows those employers to help to address their own recruitment and retention issues by providing housing on their own land.
- For most of the specified sites, employer-linked housing will only be one element of use on the site, for example operational hospital uses will be retained on the hospital sites.

Policy Implementation

- The policy provides an alternative means of delivering affordable housing, to supplement the affordable homes delivered via Policy H2.
- Employer-linked affordable housing provides 100% affordable housing.
- The policy is designed to enable delivery of on-site affordable housing on sites that would not be suitable for delivering housing to the usual requirements of Policy H2. It is not intended as an alternative to H2, it is a supplementary approach to be used only in specific circumstances.
- The policy is restricted to specified sites and specified employers, which have been chosen for their suitability, availability and potential capacity to cater to the housing needs of essential workers, and also to avoid the policy being used to circumvent normal affordable housing contribution policies or the provision of social rented housing.
- The tenure mix and size of dwellings on employer-linked sites needs to respond to the needs and circumstances of the employees, there is not a one size fits all approach.
- Additional criteria in the policy collectively ensure that the benefits truly outweigh the compromises.
- In the event that market housing is also provided on the site then Policy H2 is engaged on the market housing element. The employer-linked affordable housing could then contribute to the requirement for the intermediate element within Policy H2 but could not be relied on to meet the social rent tenure requirement within Policy H2.
- In the event that over time the employer no longer has a need for the employer linked housing, the legal agreement will also ensure that 40% of the units are

transferred to a registered provider or the City Council as affordable housing, with a tenure split that reflects affordable housing Policy H2, and not sold on the open market.

POLICY H4: EMPLOYER-LINKED AFFORDABLE HOUSING

Planning permission will be granted on the following sites for employer-linked affordable housing for rent.

The sites identified as appropriate for employer-linked affordable housing are:

- Campus sites of the colleges of the University of Oxford and of Oxford Brookes University. These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employer-linked housing
- Slade House
- Manzil Way Resource Centre
- Littlemore Mental Health Centre
- Warneford Hospital
- West Wellington Square
- Osney Mead
- John Radcliffe Hospital
- Churchill Hospital
- Nuffield Orthopaedic Hospital

Where this policy is applied, the standard affordable housing requirements of Policy H2 will not apply, except to any market housing element on the site or under those circumstances identified under criterion f)iii).

An affordable housing approach will need to be agreed with the Council setting out how the proposed affordable homes will be developed and managed by the employers (or by development partners on their behalf) to meet the housing needs of their employees.

All of the following criteria must be demonstrated as part of the planning application and will be secured through the relevant planning permission:

a) The employer has an agreed affordable housing approach in place setting out access criteria and eligibility, rent policy and rent levels, approved by the City Council and with an appropriate review mechanism in place; and

b) 100% of the housing should be available to be occupied by those employees who meet the requirements of the affordable housing approach agreed with the City Council and be available in perpetuity; and
c) The occupation of the housing will be limited to households where at least one member works for the employer linked to the site (for the duration of their employment). This also applies to social care workers who work for but are not employed directly by Oxfordshire County Council and to some NHS staff who are not directly employed by the NHS; and
d) An occupancy register should be kept and made available for inspection by the City Council at any time; and
e) Planning applications must be accompanied by a detailed explanation and justification of the approach proposed and the mechanisms for securing the requirements of this policy; and
f) A legal agreement will be required to secure the benefits of this policy. In addition, the legal agreement will be used to:
    i) agree the allocations policy;
    ii) agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months;
    iii) agree that if the employer decides they no longer have a need for the housing, then the affordable housing requirements detailed under Policy H2 will be applied.

CREATING MIXED AND BALANCED COMMUNITIES

Local planning authorities are required to plan for the needs of groups with specific housing requirements. These include but are not limited to, those who require affordable housing, families with children, older people, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. There is also a need to plan for sufficient student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on a campus. Helping to meet specialist housing needs is important to creating mixed and balanced communities.

MIX OF DWELLING SIZES (NUMBER OF BEDROOMS)

Policy context

- The NPPF sets the expectation that within the overall aim of meeting an area's identified housing need, an appropriate mix of housing types for the local

community should be sought. This policy contributes towards this by shaping the mix of dwellings sizes (number of bedrooms).

- To inform the % requirements in Policy H7, evidence from the Specialist Housing Needs evidence (2025, Iceni) was combined with factors from the affordable housing register including mix of unit sizes, need to downsize and the existing housing stock.
- Some sites and locations will be more suitable for different types of dwelling.
- The plan should aim to meet the full variety of needs over the plan period, which includes the need for family housing, with sufficient flexibility to respond to changing needs over time.

Policy implementation

- The % requirements have been proposed as a range to allow for flexibility, in response to constraining elements such as site size or layout.
- The % mix set out in Policy H7 should be understood as relevant only to the affordable housing element of a site, not the market element. However, the overall mix should still be explained and justified. The relevant evidence base that may inform the appropriate mix includes the Specialist Housing Needs evidence (2025, Iceni), consideration of the housing register, demographics, household sizes and trends over time. Also relevant is the nature of the site, local context and the need to make efficient use of land.

POLICY H5: MIX OF DWELLING SIZES (NUMBER OF BEDROOMS)

Planning permission will be granted for residential development where it is demonstrated that it will deliver an appropriate mix of dwelling sizes that responds to the site context, including local needs, and that it results in mixed and balanced communities. Evidence to support the proposed mix should be proportionate to the application and may include evidence from the Specialist Housing Needs Evidence, market demand and design considerations. Evidence should also demonstrate regard to the housing register and current requirements if the below mix for affordable housing does not apply.

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):

Mix of dwelling sizes for affordable housing (for rent and for ownership):

Size of dwelling	% of the affordable housing element
1 bedroom homes (all 2 person unless by agreement based on specific need)	20-35%
2 bedroom homes	30-45%
3 bedroom homes	25- 35%
4+bedroom homes	5-15%

For affordable rented forms of homes for those 65 and over, the mix should be 35-50% 1 bed and the remainder 2-bed+.

For affordable ownership forms of homes with 10 or more units of affordable home ownership types (excluding employer-linked housing):

Size of dwelling	% of the affordable housing element
1 bedroom homes (all 2 person unless by agreement based on specific need.	20-30%
2 bedroom homes	45-55%
3+ bedroom homes	20- 30%
4+bedroom homes	5-15%

LOSS OF DWELLINGS

Policy context

- Oxford cannot meet its full housing need, and as such it is important to ensure that the existing stock of homes is protected.
- However, it is also the case that the lack of available land and sites in Oxford can constrain development of other facilities needed to support the local community, which sometimes are best delivered by conversion of an existing house.

Policy implementation

- The policy generally resists any net loss of dwellings, including for short-term lets.
- The policy allows some flexibility in particular circumstances, in order to allow facilities important to the local community to come forward. Where this does

happen, the policy requires that the conversion is done is such a way that the unit could be converted back to a dwelling in the future.

- The policy also ensures that the proposed use is compatible with neighbouring uses and does not give rise to unacceptable impacts on the local area.

POLICY H6: DEVELOPMENT INVOLVING LOSS OF DWELLINGS

Planning permission will not be granted for any development that results in the net loss of one or more self-contained dwellings on a site (this includes all HMO that are suitable for occupation by a single household), except in one of the following circumstances:

a) Where essential modernisation is proposed to make living accommodation acceptable, and it can be shown that loss of a unit is essential for operational reasons or to secure space standards; or
b) A change of use of a C3 dwelling or dwellings to a non-self-contained C2 extra care, specialist or supported housing, sheltered accommodation or care home is proposed; or
c) A change of use of a dwelling to form a primary care facility, dentist, children's nursery or local community hall or meeting place (Use Class F.2) (defined as a building or parts of a building, or space that is open and accessible to the local community, providing services or activities that the local community wants and needs).

In such cases, the following criteria should all be satisfied:

d) It must be demonstrated that the layout of the unit retains capacity to be turned back into a residential unit in future; and
e) The scale and nature of the proposed use is compatible with neighbouring uses and with the surrounding area and is not likely to give rise to unacceptable impacts and effects from noise, nuisance, traffic, or on-street parking.

HOUSES IN MULTIPLE OCCUPATION (HMO)

Policy Context

- The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, an appropriate mix of housing types for the local community should be sought. This policy contributes towards this by shaping the approach for the supply of HMO.

- HMO offer the only available and affordable solution for many people as renting individually or buying a property in Oxford is too expensive.
- It's important to monitor and control the supply of this type of home as high concentrations of HMO can result in changes to the character of the local area.

Policy Implementation

- A percentage threshold has been included to ensure there is not an overconcentration of HMO in certain streets/ areas of the city
- The policy includes a requirement for HMO applications to comply with good practice guidance on HMO amenities and facilities
- The policy does not allow new purpose- built HMO as this type of accommodation reduces potential for delivering housing that meets greater needs (e.g. social rented housing).

POLICY H7: HOUSES IN MULTIPLE OCCUPATION

Planning permission for conversions to or new HMO, will only be granted where:

a) The proportion of buildings that are used in full or part as a licensed/ pending licensed HMO, within 100 metres of street length either side of the application site's principal elevation, does not exceed 20%; and
b) The development complies with the City Council's good practice guidance on HMO amenities and facilities, or any equivalent replacement document.

For the purposes of this policy, street length is measured as:

i) 100m either side of the mid-point of the principal elevation of the proposed development, including principal elevations that wrap around corners or that are broken by a road or footpath; and
ii) 100m either side directly opposite the mid-point of the principal elevation of the proposed development, including principal elevations that wrap around corners or that are broken by a road or footpath; and
iii) All buildings opposite the principal elevations described above.

Appendix 2.2 illustrates how this will be applied.

Applications for changes from C4 HMO to a Sui Generis HMO must be compliant with point b) above.

New purpose-built HMO will not be permitted.

LOCATION OF NEW STUDENT ACCOMMODATION

Policy Context

- It is important to acknowledge, support and build on the vital economic and educational role of the universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing.
- The Planning Practice Guidance (PPG) recognises that encouraging more dedicated student accommodation may provide low-cost housing that takes the pressure off the private rented sector and increases the overall housing stock.
- The City Council accepts that some additional student accommodation should continue to be provided to meet the accommodation needs of both universities. However, aiming to accommodate all students in purpose-built student accommodation is not a sensible approach for a number of reasons:
    - Purpose-built student accommodation will not be suitable for the whole student body.
    - It could use up sites better suited to general housing.
    - It could lead to a dominance of student accommodation resulting in less availability, loss of opportunities to bring forward affordable housing and result in a high proportion of transient occupants in the area that would undermine the desire to deliver mixed and balanced communities.
    - Not all types of students have the same accommodation needs or impacts on the community, for example post-graduate researchers and those on vocational courses tend to be working alongside their course and student halls may not be suited.
    - Some students may already live in or near the city at home, and they do not need accommodation.
- Delivering student accommodation in only the most suitable locations can help to ensure that quieter residential streets are not subject to unacceptable changes in character or increased activity.
- Student accommodation is generally not used for every week of the year, giving opportunities for efficient use of student accommodation outside of semester or term-time, if well managed.

Policy Implementation

- Occupation of new student accommodation is limited to full-time students enrolled on courses of one academic year or more.

- The policy allows for slightly more flexibility towards location of post-graduate accommodation than graduate accommodation, reflecting its slightly different impacts.
- The policy ensures that existing student accommodation sites are not lost to other uses and that any loss, must be provided for by at least an equivalent amount of new student accommodation.
- The policy does not restrict use of the accommodation outside semester or term-time by allowing it to be used by short-stay visitors.
- Larger schemes are required to include indoor communal amenity space for students to gather and socialise, which should minimise impacts outside the accommodation.
- The policy allows only operational and disabled parking for new student accommodation.

POLICY H8: LOCATION OF NEW STUDENT ACCOMMODATION

Planning permission will only be granted for student accommodation in the following locations:

- On or adjacent to an existing* university or college campus or academic site, or hospital and research site, and only if the use during university terms or semesters is to accommodate students being taught or conducting research at that site; or
- In the city centre or a district centre; or
- On a site which is allocated in the development plan to potentially include student accommodation.

In addition, if purpose-built postgraduate accommodation already exists at a particular location, subject to meeting criteria a) to e) below, new purpose-built postgraduate accommodation will be granted planning permission adjacent to existing postgraduate accommodation.

Planning permission will only be granted for student accommodation if:

a) Student accommodation will be restricted in occupation to full-time students enrolled in courses of one academic year or more, subject to the provisions of criterion e below; and
b) For developments of 25 or more bedrooms, the design includes indoor communal amenity space for students to gather and socialise; and

c) A management regime has been agreed with the City Council that will be implemented on first occupation of the development (to be secured by a planning obligation); and
d) The development complies with parking standards that allow only operational and disabled parking, and the developer undertakes and provides a mechanism to prevent residents from parking their cars anywhere on the site, (unless a disabled vehicle is required), which the developer shall thereafter monitor and enforce; and
e) A management strategy is agreed if it is intended there will be occupants other than students meeting the definition set in criterion a) outside of term times; and
f) It provides affordable housing contributions where required in compliance with Policy H3.

Planning permission will not be granted for development that would lead to the loss of student accommodation linked to an educational institution unless new, alternative student accommodation is available for occupancy, within a reasonable and acceptable timeframe, by students of the same institution. New accommodation should be equivalent in amount, mix and affordability to the rooms being lost.

*An existing university or college campus or academic site is one that exists at the time the Plan is adopted

LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

Policy Context

- Higher education institutions offer courses for students of 18+, many of whom move to live in the city and therefore generate additional accommodation needs.
- In order to balance competing demands on land in Oxford, there is a need to ensure that the expansion of numbers of students at higher education institutions does not occur without consideration of how they will be accommodated. Minimising the number of students who are reliant on living

outside of university-provided accommodation so that housing can be retained for market and affordable housing is a priority for this Plan.

- Not all students have the same needs, for example those on vocational courses with work placements away from Oxford (e.g. student teachers, nurses) would not require accommodation for that period, and postgraduates may have different needs to undergraduates.
- The threshold levels for each institution have been reconsidered and have been based on the latest forecasting needs for each university, whilst ensuring they are still effective. They are to be re-considered from the academic year starting in 2033 as forecasting student numbers becomes less reliable over time.

Policy Implementation

- The threshold is limited to the number of full-time taught course students living in Oxford requiring accommodation.
- Not all expansion of these institutions will create additional accommodation capacity for students, and if institutions can demonstrate that their proposals for academic or administrative accommodation will not generate an associated increase in capacity for student residences then the policy does not apply. Where that increased capacity for students is generated, it should be demonstrated that the additional students may be accommodated through provision of additional university-provided student accommodation.
- From 2033, it will be considered whether the thresholds are still achievable, and if not, information will be needed to explain the current situation and the impacts of a proposal to inform decisions at the planning application stage. The annual Authority Monitoring Report will be used to identify the current numbers and set a threshold above this, reflecting any anticipated short-term changes, for the year ahead.

POLICY H9: LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

Planning permission will only be granted for new, redeveloped or refurbished academic, research or administrative facilities for higher education institutions where it can be demonstrated that either:

a) The new facilities would not generate or facilitate any increase in student numbers; or

b) There is a plan in place for managing the accommodation needs of the additional students, either because the institution has sufficient existing accommodation, or because sufficient accommodation has been identified as being available. For Oxford Brookes University and the University of Oxford this criterion will be measured and can be demonstrated through application of the threshold of the number of qualifying students living outside of relevant student accommodation, as follows.

University of Oxford

Planning permission will only be granted for new/redeveloped or refurbished academic or administrative facilities (that generates or facilitates an increase in student numbers) for the University of Oxford, where the number of full-time taught course students living in Oxford requiring accommodation, does not exceed the level of university owned or managed accommodation by more than the following thresholds at the time of the application:

- Until the academic year starting in 2033: 3,100
- Academic year starting 2033 onwards to be negotiated based on consideration of the situation at the time.

Oxford Brookes University

Planning permission will only be granted for new/redeveloped or refurbished academic or administrative facilities (that generates or facilitates an increase in student numbers) for Oxford Brookes University, where it can be demonstrated that the number of full-time taught course students living in Oxford requiring accommodation, does not exceed the level of university owned or managed accommodation or known purpose-built student accommodation by more than the following thresholds at the time of the application:

- Until the academic year starting in 2033: 5,750
- Academic year starting 2033 onwards to be negotiated based on consideration the situation at the time.

The reference to full time, taught course students requiring accommodation excludes those students who were resident in Oxford before applying to study at the university and who continue to live at their pre-application home address while studying. Appendix 2.3 provides more detail on how compliance with the thresholds will be calculated.

HOMES FOR TRAVELLING COMMUNITIES

Policy Context

- The Council has worked collaboratively with neighbouring authorities on the Oxfordshire Gypsy and Traveller, Travelling Showpeople and Boat dwellers Accommodation Assessment. This includes taking into account waiting lists and whether there are members of the travelling community living in bricks and mortar. It does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford. This Plan therefore does not make any specific site allocations for new sites in Oxford but provides criteria to assess any proposals for new sites that may come forward during the Plan period.

Policy Implementation

- The criteria-based policy provides a framework for assessing planning applications for these types of specialist housing should they be submitted.
- Gypsies and Travellers and Travelling Showpeople are defined as two separate groups with different criteria applicable to each. The relevant criteria should be applied, depending on which group the application is for.

POLICY H10: HOMES FOR TRAVELLING COMMUNITIES

Proposals for permanent or transit residential pitches or yards for Gypsy, Traveller, or Travelling Showpeople in Oxford will only be granted planning permission where all of the following criteria are met:

a) The applicant or updated City Council evidence base has adequately demonstrated a clear need for the pitch/yard in the city, and the number, type, and tenure of pitches/yards proposed, which cannot be met by a lawful existing or available allocated site; and
b) The pitch/yard is accessible to facilities and services including local shops, healthcare, education and employment by walking, cycling and public transport; and
c) The pitch/yard has safe and convenient vehicular, pedestrian and cycle access, including adequate access for emergency services and the other types of vehicles that could reasonably be expected to use or access the pitch/yard; and
d) Proposals make adequate access to or provision for essential on-site facilities that meet best practice for modern Traveller pitch/ yard

requirements, including, play areas, and provision for servicing including water supply, electricity and recycling and waste management (and for Travelling Showpeople space for the storage and maintenance of equipment appropriate to their business activities): and

e) The pitch/yard will provide an acceptable living environment and the health and safety of the pitch/yard's potential residents should not be put at risk. Factors to take into account include: flood risk (pitch/yard should not be located in Flood Zone 3a or 3b), site contamination, air quality, and noise; and

f) The pitch/yard is located, and can be managed, so as not to have unacceptable adverse impact on the amenity of nearby residents or other existing uses, or the appearance or character of the surrounding area. Appropriate boundary treatment and landscaping should be capable of being provided.

HOMES FOR BOAT DWELLERS

Policy Context

- Residential boats and their dwellers on both permanent and temporary visitor moorings contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable.
- There are also boat-dwellers whose transitory nature generates a significant demand for temporary moorings, including those who identify as Bargee Travellers, as well as those who continuously cruise.
- The City Council has worked collaboratively with neighbouring authorities on the assessment of need for accommodation for boat dwellers. The analysis of houseboat need suggests that there is additional need for residential moorings across waterways in Oxfordshire, the majority of need arising from Oxford, which has a need with a range of 20-50 additional moorings.
- There is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.
- The City Council welcomes opportunities for the establishment of new moorings and will produce further planning guidance for those seeking to deliver new moorings in the city.

Policy Implementation

- The criteria-based policy provides a framework for assessing planning applications for this type of specialist housing if sites do come forward.

POLICY H11: HOMES FOR BOAT DWELLERS

Planning permission will only be granted for new residential moorings on Oxford's waterways where all of the following criteria are met:

a) Proposals do not impede navigation, navigational safety, or operational requirements of the waterway including use of footpaths;
b) Proposals will maintain or enhance the amenity, visual character, water quality, historic and ecological value of the waterway or nearby land;
c) Proposals are close to existing services and amenities including potable water, electricity (including consideration of demand and need for EV boat charging) and waste disposal;
d) Proposals are served by adequate pedestrian/cycling access and public transport facilities and services including shops, healthcare, education and employment, and vehicular access for emergency vehicles; and
e) Proposals have investigated impacts of flood risk and addressed provision for safe access/egress and/or evacuation plans where appropriate.

OLDER PERSONS AND SUPPORTED ACCOMMODATION

Policy context

- Nationally, the population is aging, and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8% in the South East, 2024, ONS), the population of those 65+ in Oxford is expected to grow by around 35.9%-38.7% by 2045 (representing 7,336-7,905 additional people in this age range).
- The NPPF lists older people (including those who require retirement housing, housing with care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met.
- The Oxfordshire County Council Specialist Housing Need Assessment 2024, and the Oxford Updated Specialist Housing Needs Evidence (Iceni, 2025) that expands on it, give a recent picture of the need for supported housing in Oxford.
- For market accommodation, it is expected that the market will respond by bringing forward specialist housing types.
- To be viable, specialist housing developments need to be of a reasonably large size, so that there are enough rooms to justify the on-site staff and facilities.

Because of the lack of large sites in Oxford, there are limited opportunities to allocate parts of sites specifically for this use.

- People in this housing type may have limited mobility and it is important that they are in accessible locations so residents do not become isolated.

Policy implementation

- Provision of new extra-care and elderly persons' accommodation is generally supported by the policy approach.
- The criteria are intended to ensure that supported accommodation is well designed, with good access to local facilities, and that it is well integrated into a mixed community.

POLICY H12: OLDER PERSONS AND OTHER SPECIALIST ACCOMMODATION

Planning permission for accommodation for older people and supported and specialist care will only be granted where it:

a) Is located with good access to local facilities and services including public transport, shops and healthcare facilities; and
b) Is located close to or as part of a mixed community and will contribute positively to the creation and/or maintenance of mixed and balanced communities; and
c) Is appropriate for the neighbourhood in terms of form, scale and design; and
d) Includes internal rooms, gardens and amenity space of appropriate size and quality for residents
e) Provides affordable housing contributions where required in compliance with Policy H3.

Planning permission will not be granted for the loss of existing specialist care accommodation unless it can be demonstrated that provision is to be replaced or that there is a not a need for the facility.

SELF BUILD AND CUSTOM HOUSEBUILDING

Policy Context

- As required under section 1 of the Self Build and Custom Housebuilding Act 2015, the City Council is required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of that Act to have regard to this and to give enough suitable development permissions to meet the

identified demand. Self and custom-build properties could provide market or affordable housing.

- Proposals for community-led housing will be supported because of the benefits they are expected to bring in terms of community cohesion, permanent affordability and sustainable development.
- Community-led housing can be delivered through several approaches including community land trusts, co-housing and co-operatives and can involve homes that are market sale, shared ownership, market or affordable rent, rent to buy, or a combination of all. There are several organised groups with ambitions for providing community-led housing in Oxford.

Policy Implementation

- A percentage threshold has been included to help deliver a supply of sites for self-build and custom housebuilding
- The threshold only applies to sites of 100 or more homes in order to avoid potential adverse impacts on the design/layout of the site
- A time limit is specified so that if the plots don't sell they can still be brought forward with the rest of the site (and would need to comply with normal policies about affordable housing).
- This policy doesn't apply to certain types of development because delivery of self-build within these kinds of development is not likely to be feasible.

POLICY H13 SELF-BUILD AND CUSTOM HOUSEBUILDING

Proposals for self-build and custom-build housing will be supported as a way of enabling people to meet their own housing needs.

On residential sites of 100 homes or more, 5% of the site area developed for residential use should be made available as self-build/custom-build plots. Plots will be part of the market housing element of the scheme, unless they are conditioned to be brought forward as housing that meets the affordable housing definition.

Plots should have services (water, foul drainage and electricity supply) to the boundary and access to the public highway. Plots should also have surface water drainage, telecommunications services, and access to a fuel or energy source in line with policy R1.

A legal agreement will be used to ensure that if the self-build plots have not sold after six months of marketing, then dwellings should be built and brought forward

in the normal way, in accordance with other policies regarding affordable housing and housing mix.

The following development types are excluded from this requirement: Employer-linked affordable housing; student accommodation; other C2 or Sui Generis types of accommodation; and residential development in conversions or on brownfield sites where only flatted development is provided.

Community-led housing

Proposals for community-led housing will be supported because of the benefits they are expected to bring in terms of community cohesion, permanent affordability and sustainable development.

Community-led housing will not necessarily meet the requirements for self-build or custom build but has potential to if the community-led housing group have the primary input into the final design and layout.

BOARDING SCHOOL ACCOMMODATION

Policy Context:

- There are many boarding schools in Oxford with children aged 18 and under. Most of these schools are campus-based, so that the children live in accommodation on the teaching campus.
- Because these types of developments are for children, they are not counted in calculations of housing need, or in monitoring of housing completions, but they do sometimes seek similar types of sites to residential developments.
- If boarding accommodation comes forward outside of the main school site, this could have a variety of negative implications such as:
    - Preventing the site for coming forward for alternative residential uses for which there is a greater need
    - It could lead to children being accommodated in a location removed from the school, with a potential drop in supervision and their safety, and with an increased need to travel to reach lessons
    - Potential negative impact on the amenity of surrounding residents, for example, if the new accommodation is a conversion of a property not designed for the purpose

Policy Implementation:

- The policy is aimed to minimise the conflicts and potential negative impacts and ensuring a good living environment for the children
- Proposals will only be accepted on campus or adjacent, to avoid competing with residential sites that help meet the wider housing need

POLICY H14: BOARDING SCHOOL ACCOMMODATION

Proposals for new or extended boarding school accommodation for children ages 18 and under will only be accepted where it is on or immediately adjacent to a main teaching campus of the school the children will attend, and it is in accordance with the other policies of the Development Plan.

CHAPTER THREE

A FAIR AND PROSPEROUS CITY WITH A GLOBALLY IMPORTANT ROLE IN LEARNING, KNOWLEDGE AND INNOVATION

INTRODUCTION

Oxford is a city with a global reputation and. has many major economic assets. These include two leading universities, and cutting-edge research in key areas including biotech, data science, quantum technology and robotics. The city is home to an increasingly diverse array of enterprises that are driving economic growth and prosperity for all. The city also has an impressive tourism economy.

Oxford's economy is shaped by the presence of its two successful universities. The city is a major centre for teaching hospitals and is home to several acute and specialist medical research organisations. Oxford is an attractive location for a range of companies and can foster home-grown spin out businesses because of the existing research capabilities, the ready supply of graduates and the clustering effect of organisations with close ties in a number of related areas. Work that is happening in Oxford is helping to find solutions to global problems such as health and climate change. Oxford's economy makes a vital contribution to the regional and national economy.

Oxford is the most sustainable location for employment in the county. It is often 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.

This chapter sets out the following topics:

- Employment strategy
- Community employment and procurement plans
- Affordable workspace
- Hotel and short stay accommodation

EMPLOYMENT STRATEGY

Policy context

- Oxford's overall employment floorspace need for the plan period is 412,460sqm.
- This is distributed between each of the employment generating uses as follows:
    - Office – 21,370sqm
    - R&D – 345,004sqm
    - Industrial – 0sqm
    - Storage/ Distribution – 46,086sqm

- Oxford has seen strong demand for employment floorspace in key sectors including Research and Development (R&D). There is a strong development pipeline of R&D floorspace being delivered at locations across the city (including Oxford North, Oxford Science Park, ARC Oxford, within the West End of the city centre and at Botley Road).
- The delivery of the employment strategy creates the conditions:
    - For Oxford to meet all identified employment needs arising within the city to 2045;
    - To facilitate the delivery of much needed homes for people on a range of different incomes by:
        - supporting the complete loss of poorly performing employment sites to housing; and
        - allowing an element of housing to come forward on Key Employment Sites, subject to certain criteria being met;
    - To support improvements to the accessibility of services and facilities; and
    - To enable the delivery of infrastructure improvements.

Policy implementation

- The city's employment strategy:
    - Seeks to modernise and intensify existing employment sites so that the identified employment floorspace need can be met without using additional sites;
    - Enables appropriate redevelopment opportunities to be delivered within the city and district centres;

- While the employment strategy does not require additional sites to meet employment land needs, the intensification of Oxford's existing employment sites is still likely to

draw additional workers into the city. However, by focusing and concentrating new employment floorspace towards known employment sites, this can support the delivery of identified infrastructure schemes contained within the Infrastructure Delivery Plan, including public transport and active travel schemes.

- Oxford's employment sites fall into two categories:
    - Key Employment Sites; and
    - Existing employment sites not designated as Key Employment Sites.

    - *Key Employment sites:*
        - Include nationally and regionally important employment sites that make a significant contribution to the knowledge economy, are significant employers or provide important local services;
        - Have been identified as performing well and having long-term potential for continued employment uses, when assessed against a set of identified criteria and;

        - When located outside the city and district centres are at least 0.25ha;
        - When located within the city and district centres are very large sites (2ha or more).

    - *Existing employment sites not designated as Key Employment Sites:*
        - Are often smaller sites;
        - Can be less-well located;
        - Do not perform such an important economic function or are unlikely to be able to in the future.

POLICY E1: EMPLOYMENT STRATEGY

All new development on employment sites needs to show that it is making the best and most efficient use of land and premises, positively promotes sustainable development and does not cause unacceptable environmental impacts.

New employment generating uses:
Planning permission will be granted for the intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre.

Outside of these locations:

a) Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), can only be regenerated with employment generating uses if better and more intensive use is made of the site through the redevelopment, up-grading or re-use of existing under-used buildings, and
b) Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow the sequential approach for new town centre uses as set out in Policy C1.

Planning permission will not be granted for proposals for employment generating uses outside the following locations:

c) Key Employment Sites;
d) the city and district centres;
e) existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class).

Key Employment Sites are listed in Appendix 3.1 and are shown on the policies map. All other employment sites are existing employment sites not designated as Key Employment Sites.

Loss of employment floorspace and the use of employment sites to support housing delivery

Planning permission will not be granted for development that results in a net loss of employment floorspace on Key Employment Sites unless it can be fully justified where:

f) The employment use can be maintained; and
g) The number of jobs in employment generating uses is retained.

Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).

Proposals involving housing at Key Employment Sites and on existing employment sites not designated as Key Employment Sites will be assessed by a balanced judgement which will take into account the following objectives:

h) Meet as much housing need as possible in sustainable locations;
i) Avoid the loss of, or significant harm to, the continued operation or integrity of successful and/ or locally useful, business and employment sites;
j) Create a pleasant residential environment that provides an acceptable level of amenity for future occupiers;
k) Create a sense of place that is well-connected by safe walking and cycling routes to shops, schools, open spaces, and community facilities and that is well-served by public transport;
l) Secure environmental improvements
m) Avoid locating residential uses in close proximity to existing businesses that may create noise, smells or other potential disturbances as part of the day-to-day operations.

WAREHOUSING STORAGE AND DISTRIBUTION USES

Policy context

- New large scale B8 uses are usually low-density and do not generally make for an intensive land-use. In Oxford's context with numerous competing pressures for land, these uses are not likely to make the most efficient use of any land.
- A range of factors dissuade large-scale B8 uses from locating in Oxford including: a lack of proximity to key junctions on the strategic road network; lack of available sites; and competition from higher rental markets such as R&D.
- However, small-scale warehousing, storage and distribution uses can be useful in supporting local employers in sectors such as manufacturing; and are often essential in supporting other key employers within the city to maintain their supply chain.

Policy implementation

- New B8 Uses can only come forward on Key Employment sites in support of the main employment use or as part of a wider agreed masterplan on sites specifically allocated for that purpose.

- Development proposals involving the loss of B8 uses at Key Employment Sites will need to demonstrate that the B8 use is not needed to support existing businesses/ employment generating uses operating at that site.
- Proposals involving the loss of B8 floorspace at existing employment sites not designated as Key Employment sites should be assessed in accordance with Policy E1.
- Freight consolidation centres are a specific type of B8 development where goods are grouped together for distribution so that fewer delivery journeys are required by road. This can have a beneficial impact on air pollution, congestion and noise across Oxford. The Council will work with partners to promote the use of freight consolidation centres where possible.

POLICY E2: WAREHOUSING, STORAGE AND DISTRIBUTION USES

Planning permission will only be granted for new or expanded warehousing, storage and distribution uses if it is within an existing Key Employment Site. Development proposals for B8 uses at Key Employment Sites should demonstrate how they will:

a) Enable the continued operation of employment generating uses at that site; and/ or
b) Be brought forward as part of a wider agreed masterplan on sites specifically allocated for B8; and
c) Be delivered in a way that does not result in an adverse impact on residential amenity resulting from an increase in vehicle movements, noise, or dust or smells etc.

Development proposals involving the loss of B8 floorspace (on any Key Employment Site) will need to demonstrate how they comply the loss of floorspace criteria set out in Policy E1.

In addition, planning permission will be granted for the loss of B8 uses (on any Key Employment Site) where it can be demonstrated that:

d) The B8 use is not required to support the continued operation of any Key Employment Site.

COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS

Policy context

- Oxford has a tight labour market with different sectors competing for jobs. Many people in Oxford are highly qualified, as reflected in the number of science and knowledge-based jobs in the city.
- This positive situation masks some of the challenges faced in Oxford; parts of the city contain large numbers of people with few to no qualifications, or who are working but on low earnings. There is an opportunity to support local people to access training, education and apprenticeships.
- Providing training opportunities locally can help support the local workforce to acquire appropriate skills and deliver access to a greater range of job opportunities for local people.
- Skills and training for the local workforce is important to support businesses to drive economic growth, productivity and services and deliver wider economic benefits, social value and well-being for all its citizens.

Policy implementation

- Community Employment and Procurement Plans have an important role to play in securing opportunities that arise from new development, both in the construction and operational phases of development.
- A Technical Advice Note (TAN) that expands on various aspects of the policy (including advice on how to prepare a CEPP, successful implementation and monitoring) will be produced to support delivery of the policy.
- The City Council is committed to working in partnership with businesses and key partners, such as Enterprise Oxfordshire, Oxford Strategic Partnership, to promote an 'inclusive economy'.

POLICY E3: COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS
Planning permission will only be granted for proposals of 50 or more dwellings (or the number of rooms in student/ communal accommodation that equate to this when the relevant ratio is applied) or 5,000sqm (GIA) or more non-residential floorspace where they are supported by a Community Employment and Procurement Plan (CEPP). The CEPP must identify the opportunities that will be provided by the development to

support the inclusive economy, demonstrate the social value of the proposals and set out how they will be promoted and delivered. CEPPs will be expected to demonstrate consideration of all the following measures:

a) Securing construction jobs for local residents;
b) Providing construction apprenticeships and/or training opportunities for local residents;
c) Linking with local schools and colleges;
d) Securing jobs in the operational/ end-user phase for local residents;
e) Procuring a proportion of on-going supply chain needs locally;
f) Paying all employees (other than apprentices, although this is encouraged where possible) the Oxford Living Wage;
g) Only using contractors who commit to paying the Oxford Living Wage
h) Procuring a proportion of construction materials locally; and
i) Delivery of affordable workspaces.

The City Council will usually use a legal agreement to secure these commitments in accordance with a site-specific CEPP.

Smaller developments (proposals for major development below the threshold for a CEPP) will be expected to provide a written statement in support of their planning application to show what job opportunities, and/or skills and training prospects can be delivered during the construction and or end-user phase of the development.

AFFORDABLE WORKSPACES

Policy context

- Due to the recent strength of the R&D market and associated rents, many SMEs and Social Enterprises are being priced out of the city or have experienced difficulties finding suitable affordable workspace.
- This has a detrimental impact on economic diversity, innovation opportunities and productivity the foundation of a robust economy.

- Providing affordable workspace would:
    - Enable a broader range of 'foundational' businesses to remain in, or locate to the city;
    - Bring more diversity to the city's employment offer; and

- Support employment opportunities that would be otherwise unavailable;
- Help local people start-up new businesses;
- Support social and cultural enterprises; and
- Promote social value

- Supporting the delivery of affordable workspaces at key locations across the city aligns with the vision for an 'inclusive economy', set out in the Oxford Economic Strategy, and the aims and objectives of the Oxfordshire Strategic Economic Plan, that relate to 'productivity and the foundational economy'.

Policy implementation

- The policy:
  - identifies specific sites where the delivery of affordable workspace is anticipated; and
  - requires qualifying development proposals to produce an affordable workspace strategy

- Affordable workspaces should be delivered on-site and should be designed and fitted out to meet the needs of the sector for the future SME or Social Enterprise occupier (See glossary definition for more details).
- A Technical Advice Note (TAN) that expands on various aspects of the policy will be produced (including advice on how to prepare an affordable workspace strategy, implementation of the policy and monitoring) to support the delivery of the policy.

POLICY E4: AFFORDABLE WORKSPACES

Development proposals delivering a net gain of 5,000 sqm GIA or more employment generating uses (or flexible E-Class uses which could be used for employment generating uses) on the following sites are expected to produce an affordable workspace strategy:

a) ARC Oxford
b) Oxford Science Park
c) Oxpens
d) Osney Mead
e) Nuffield Sites
f) Kassam Stadium and Ozone Leisure Park
g) Unipart
h) Oxford North

i) Red Barn Farm
j) Botley Road Retail Park

Details of the size, marketing, servicing, management and how the space provided will meet end-user requirements, should be set out in an Affordable Workspace Strategy (AWS). The AWS should explain how the proposed provision helps to overcome market failures that would otherwise prevent beneficial workspace typologies (as identified in the glossary definition) from coming forward.

The City Council will usually use a legal agreement to secure these commitments in accordance with a site-specific AWS.

Affordable workspace that is brought forward in accordance with an agreed site-wide masterplan is encouraged.

HOTELS AND SHORT STAY ACCOMMODATION

Policy context

- According to Experience Oxfordshire's Economic Impact Report 2024 there were more than 6.4million visitors to Oxford, which generated a total spend of more than £715mn. Tourism is a significant sector of Oxford's economy accounting for 13% of jobs in the city.
- Tourists and visitors to the city help support a wide range of facilities and attractions, such as theatres, cinemas and museums. However, more than 84% of visitors to Oxford spend less than 24 hours in the city, and these account for only 44% of the total visitor spend.
- Visitors to Oxford who stay overnight contribute significantly more to the visitor economy than those visiting for the day. The City Council therefore seeks to support the visitor economy by encouraging longer stays and higher spend in the city.
- Oxford has a good range of short stay accommodation.
- Accommodating significant numbers of day visits to Oxford can be challenging, particularly in the historic city core, where a dense network of streets and alleys exists dating back to Saxon and medieval times.

Policy implementation

- 'Tourism and hotel development' are 'main town centre uses' (Glossary, NPPF, Dec 2024) and as such, their future growth is subject to a 'sequential approach' that directs new development towards the city and district centres.
- One of the key priorities for the City Council is delivering new homes. As such, proposals for new (including changes of use), expanded and/ or refurbished existing hotel and short stay accommodation should not result in the loss of residential dwellings.
- The Hotel and Short Stay Accommodation Study (2023) recognises that smaller existing tourism and short stay accommodation can be more prone to financial difficulties. As such, it includes a recommendation that smaller hotel and short stay accommodation (less than 10 bedrooms) should be allowed to change use to residential without the need to produce evidence to demonstrate non-viability.

POLICY E5: HOTEL AND SHORT STAY ACCOMMODATION

Planning permission will only be granted for new hotel and short stay accommodation (including changes of use) in the following locations:

a) In the city centre;
b) In district centres;
c) On sites allocated for that purpose; and
d) On Oxford's main arterial roads where there is frequent and direct public transport to the city centre.

Planning permission will only be granted for new hotel and short stay accommodation (including changes of use) or for the expansion and/ or refurbishment of existing accommodation where it meets the following criteria:

e) It is acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements; and
f) It does not result in the net loss of a residential dwelling(s) as set out in Policy H6; and
g) It will not result in an unacceptable level of noise and/or disturbance to nearby residents.

Planning permission will only be granted for the change of use from hotel and short stay accommodation when any of the following criteria are met:

h) The existing property has less than 10 bedrooms and is proposed to be changed to residential use.

i) Where an existing property has 10 or more bedrooms, and is located within the city centre, a district centre, or on a main arterial road, and it has been demonstrated through the submission of robust evidence that it is no longer viable in that use;

j) A property is unsuitable for the use, as demonstrated by being contrary to the location requirements or any of criteria a-c above.

CHAPTER FOUR

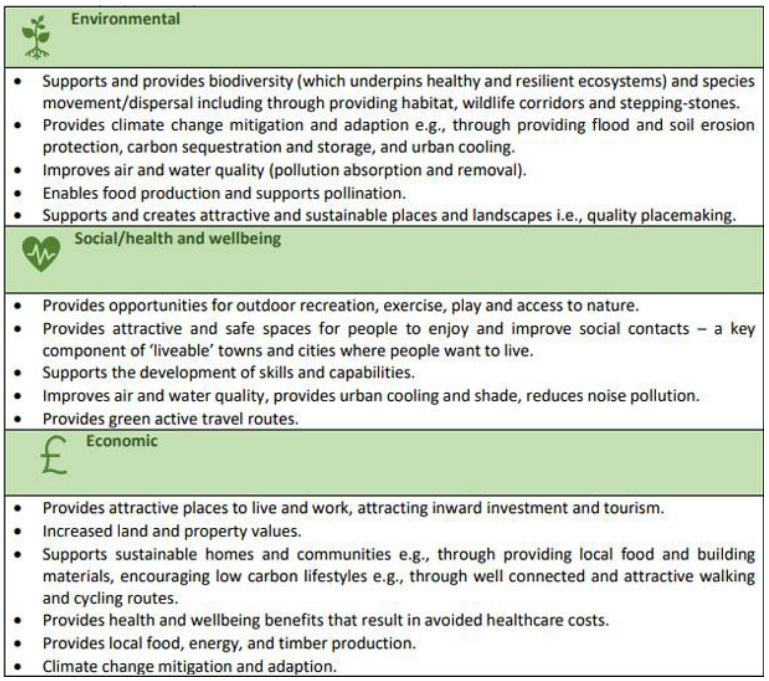
A GREEN BIODIVERSE CITY THAT IS RESILIENT TO CLIMATE CHANGE

INTRODUCTION

This chapter seeks to ensure that new development is adapted to climate change and does not impede Oxford's future resilience to climate change threats. The first part of the chapter sets out policies for protecting and enhancing a network of green and blue spaces across our city for the multitude of benefits they provide. The second part provides for biodiversity, protected species and habitats. The third part includes policies addressing flood risk and managing drainage, as well as mitigating various risks from the changing climate through climate-resilient design, such as that of overheating.

GREEN AND BLUE INFRASTRUCTURE NETWORK

A key feature that contributes to the special character of Oxford is its close relationship with the natural environment that encircles and permeates the city. These include: green spaces (from parks to flood plains and sites of nature conservation), some 248,000 trees and blue infrastructure (the rivers Thames and Cherwell, the Oxford Canal and smaller waterways between them). Collectively these green and blue features are referred to as the green infrastructure network. This green infrastructure network performs a vital role in supporting the health and wellbeing of our residents and the wider environment. They are particularly important for the ‘multi-functional’ role many of them provide (Table 4.1).



Environmental

- Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones.
- Provides climate change mitigation and adaption e.g., through providing flood and soil erosion protection, carbon sequestration and storage, and urban cooling.
- Improves air and water quality (pollution absorption and removal).
- Enables food production and supports pollination.
- Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking.

Social/health and wellbeing

- Provides opportunities for outdoor recreation, exercise, play and access to nature.
- Provides attractive and safe spaces for people to enjoy and improve social contacts – a key component of 'liveable' towns and cities where people want to live.
- Supports the development of skills and capabilities.
- Improves air and water quality, provides urban cooling and shade, reduces noise pollution.
- Provides green active travel routes.

Economic

- Provides attractive places to live and work, attracting inward investment and tourism.
- Increased land and property values.
- Supports sustainable homes and communities e.g., through providing local food and building materials, encouraging low carbon lifestyles e.g., through well connected and attractive walking and cycling routes.
- Provides health and wellbeing benefits that result in avoided healthcare costs.
- Provides local food, energy, and timber production.
- Climate change mitigation and adaption.

Table 4.1: The various benefits that green infrastructure can provide to an area

PROTECTION OF THE GREEN INFRASTRUCTURE NETWORK

Policy context

- Oxford's constrained nature means there are competing pressures for land which can put open spaces and other green features under threat. Oxford currently has not got a surplus of sports pitches or allotments. Losses of green space can fragment the network and harm the wider functioning it provides, for example to climate change mitigation, biodiversity, and wellbeing. For all these reasons, no green space identified as part of the Green Infrastructure Network is considered surplus, and their loss without reprovision is not permitted.
- Whilst some of the benefits or functions spaces in the network provide can, if needed, be replaced and/or reprovided to other areas, some are intrinsic to the location and are important to retain in situ, such as providing flood storage; supporting rare habitat and species; or retaining important heritage and history.
- The connections between the features in the network is also of great importance, acting as movement corridors for both people and nature. Blue infrastructure like the rivers and their embankments being particularly valuable in this role.
- Many private spaces also play an important role in the GI network e.g. sports pitches, private gardens and non-domestic spaces. These can provide valuable opportunities for recreation, private amenity and socialising, host a range of green and blue features, as well as making an important contribution to the fabric of the urban realm.

- The city centre has a deficit of high-quality, accessible playgrounds and the City Council will welcome applications that seek to resolve or contribute to the resolving of this deficit.
- The network is also enhanced by a number of individual features that support the GI network and provide localised benefits to amenity and biodiversity, such as trees and hedgerows, ponds, smaller streams, green roofs and walls, wild patches of vegetation, private gardens and other spaces.
- Of particular value are ancient woodland, ancient/veteran trees and important hedgerows (as defined by the Hedgerow Regulations 1997), which are assigned a high level of protection through national policy. A small proportion of trees benefit from Tree Preservation Orders (TPOs), or protection through conservation areas, but this is not the only determiner of quality/importance and others may be of a similar or higher quality with varied contributions to the area (e.g. supporting amenity, biodiversity, or as setting of heritage assets).

Policy implementation

- The following hierarchy of green spaces is used in the policy:
    - Core spaces – designated at highest level in hierarchy due to their fundamental role in supporting the city-wide network for reasons such as providing wildlife habitat and corridor functions, flood storage, intensity of use and strength of heritage or other local value. These benefits are typically intrinsic to their location, which means they are not easily reprovided elsewhere without compromising their character and/or function.
    - Supporting spaces – designated for their important role in enhancing the network and its overall function. Their loss will be resisted; however, there is more opportunity for reprovision. It is unlikely that any of these spaces could be found to be surplus, although it is accepted that there could be changes over time.
    - All other green spaces – these spaces also support the overall network, and often help to enhance the more urban areas of the city by breaking up the built environment with pockets of natural amenity, but are typically smaller and more fragmented, playing a reduced multi-functional role as a result.
- It should be noted that some types of spaces benefit from additional protections such as the designations for ecological sites (**Policy G6**) and Registered Parks and Gardens (**Policy HD3**). Applications proposed within Green Belt would be determined in accordance with national policy.
- Reprovision of green infrastructure that is harmed or lost to development is an important element of the policy, and the City Council will seek for this to be to

the same standard or higher, ideally onsite. This reprovision can be delivered quantitatively (like-for-like replacement) or qualitatively (enhancements that improve the functionality and quality of other areas - demonstrated via the Urban Greening Factor or similar methodology (**Policy G3**). Any features delivered as part of reprovision or as mitigation for losses should also be designed in accordance with the principles set out in **Policy G2.**

- There may also be additional considerations that would apply to applications that affect certain types of spaces in the supporting GI network, including how these might need to be 'reprovided'. These relate to the particular primary function a space is providing and will be of relevance when determining whether a site is 'surplus to requirements', but also in identifying the qualities and sensitivities essential to the function that would need to be addressed.
- Any strategy for a site where trees are present should consider their value in regard to the wide variety of benefits they can bring, making use of best practice criteria such as the BS.5837:2012 standards or future equivalent. Where losses are proposed, these will need to be justified, including demonstrating that options for retention have been explored, before resorting to mitigation.

POLICY G1: PROTECTION OF GREEN INFRASTRUCTURE

Green Infrastructure (GI) Network

The City Council will seek to protect the GI network for the many and varied benefits it offers. The GI network is made up of a number of green spaces. The hierarchy of GI spaces and the policy approach for each level of the hierarchy is as follows:

G1A: Core spaces

Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as part of the Core GI Network. *These spaces are designated G1A on the policies map*.

G1B: Supporting spaces

Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. *These spaces are designated G1B on the policies map.*

G1C: All other green spaces

Planning permission will only be granted for proposals which affect all other green spaces where any impacts are mitigated by ensuring sufficient reprovision, 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.

Additional details to be submitted with proposals affecting G1B Supporting spaces

Proposals impacting the following types of open space will need to be accompanied by additional evidence that demonstrates consideration of the following:

a) Outdoor sports including pitches:
    i. The types of sports that the space provides for currently, whether this can be accommodated elsewhere without creating deficits in provision against demand, or whether alternative sports might better suit the local community; and
    ii. With reference, where relevant, to the City Council's latest Playing Pitch Strategy, as well as engagement with Sports England and the City Council's Active Communities team.
b) Parks, accessible greenspace and amenity greenspaces:
    i. The role of the space in supporting people to socialize, take part in informal recreation (particularly where facilities like children/youth play and outdoor gym equipment are present), or as an escape from the urban environment; and
    ii. With reference, where relevant, to an up-to-date green infrastructure/open space study, with particular attention to local need arising from existing deficits of these types of spaces or deprivation in the area.

Residential Garden Land

Planning permission will be granted for new dwellings on residential garden land provided that:

c) The proposal responds to the character and appearance of the area, taking into account the views from streets, footpaths and the wider residential and public environment; and
d) The plot to be developed is of an appropriate size and shape to accommodate the proposal, taking into account the scale, layout and spacing of existing and surrounding buildings, and the minimum requirements for living conditions set out in Policies HD11, HD12 and HD13; and
e) Requirements are met for biodiversity as set out in Policy G4, greening factor as set out in Policy G3 as well as requirements for protection of existing green infrastructure features, as set out below.

Existing green infrastructure features

Planning permission will not be granted for development resulting in the loss or

deterioration of ancient woodland or ancient or veteran trees and important hedgerows except in wholly exceptional circumstances or there is a suitable compensation strategy in place.

f) Planning permission will not be granted for development resulting in the loss or deterioration of other trees, unless it can be demonstrated that preservation of the trees is not feasible, by provision of evidence:
    i. Of testing of practical alternative site layouts that might preserve the tree(s) where possible; and
    ii. That loss or other impacts to any tree(s) on the site has been minimised where possible, and guided by BS.5837:2012 recommendations or its future equivalent;
g) Where tree retention is not feasible, any loss of tree canopy cover should be compensated by the planting of new trees to provide additional tree cover (with consideration to the predicted future tree canopy on the site at 30 years following development) to achieve a minimum of no net-loss of tree canopy cover; and
h) Where loss of trees cannot be compensated by tree planting, then alternative forms of green infrastructure should be incorporated that will mitigate the loss of trees, using the Urban Greening Factor (Policy G3) to demonstrate no reduction in GI score as a minimum.

Planning permission will not be granted for development that results in the loss of other green infrastructure features such as hedges or ponds where this would have a significant adverse impact upon public amenity or ecological interest. If it is demonstrated that their retention is not feasible, then their loss must be mitigated in accordance with other relevant policies, in particular Policy G3.

ENHANCEMENT AND PROVISION OF NEW GREEN AND BLUE FEATURES

Policy context

- Providing for high-quality green and blue infrastructure features on new development should be fundamental to the design process. New development can provide greening both through enhancing existing green/blue features on a site, as well as providing entirely new features and spaces and it is important to explore both avenues to maximise opportunities onsite. On more constrained

sites with limited opportunities for extensive new greening it is important that green infrastructure is planned carefully to deliver maximum benefit.

- It is important that public open space is of an adequate size to be usable in a variety of ways, so it is maintainable and does not seem like left over space. Therefore, only larger sites are required to provide new public open space as part of the development.
- Developing sensitively in proximity to the blue corridors can improve our connections with these areas and promote enhanced benefits for wildlife. Inappropriate development can have negative impacts like polluting the water environment and destroying freshwater habitats, as well as exacerbating flood risk.

Policy implementation

- New and enhanced green infrastructure needs to be thought about as early as possible in the conceptual and design stages alongside other elements of the development. It is important that design choices are guided by an understanding of local context and opportunities on the site as well as in the surrounding area (see Box4.1).
- The policy sets out requirements for incorporating ecological buffer zones along watercourses and seeks to facilitate opportunities to re-naturalise spaces near watercourses. This could mean thinking about ways to reinstate embankments by removing artificial materials and 'rewilding them' which can create new spaces for nature and for people as well as other benefits like helping to mitigate flood risk.
- Larger developments are expected to include a proportion of the site as public open space with a mix of uses tailored to the needs of occupants and the local area, for example, a nature area, seating, a playground and kick-about area, or areas left aside for community food growing.
- It is important that the ongoing maintenance and management of green features is considered when they are designed into a scheme, for example, appropriate watering and pruning regimes. Suitable arrangements will depend on the types of features proposed and the particular context of the application, and there may also be ways to encourage community stewardship as part of this.
- Whilst this policy sets out general requirements for new green infrastructure, applicants may have to consider other more site-specific requirements for greening that may be outlined in specific site allocations, as well as what is needed to meet the Urban Greening Factor targets (**Policy G3**).

Box 4.1: Using local context to help inform design of green infrastructure onsite.

Wider considerations informed by local context and the opportunities onsite and in the surrounding area should inform choices about new greening as part of a development. In practice these considerations could include:

Tailoring types of open space to meet identified needs or deficiencies – by providing space for food growing where residents might not have access to private gardens of allotments in the local area, or incorporating play features for younger people including children and teenagers to help enhance the number of facilities that can be reached in walking distance.

Strengthening linkages between areas to enhance network connectivity – by incorporating linear features like lines of trees/hedges, creating new pockets of green space that can form 'stepping stones' between larger spaces, or taking opportunities to open up and enhance access to rivers and streams including their banks. Improving linkages across the network can be particularly beneficial for supporting biodiversity helping species to move across the city (particularly where these improve connectivity between ecological sites), but also in supporting active and sustainable transport for people.

Buffering sites from potential sources of disturbance – where the site is in proximity to busy roads that could cause noise or air pollution issues, green infrastructure such as trees and wild meadows has been used as a buffering feature to improve amenity for residents and reduce their exposure to ill effects. Green features can also help buffer sensitive habitat such as ecological sites or watercourses from disturbance that could be caused by the development itself.

Improving climate resilience and 'greening the grey' – taking opportunities on particularly urbanised sites, lacking green features and with an abundance of artificial surface cover to unseal surfaces and expose soils/natural vegetation where possible, as well as increasing canopy cover and incorporating features like green walls/roofs on buildings. These measures can help to slow and store surface water run off during heavy rainfall, as well as help cool urban realm and generally promote more climate resilient open spaces.

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

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. Where the site includes existing green and blue features, proposals should seek to enhance these, prioritising opportunities to improve linkages between features in order to strengthen connections with the wider green infrastructure network including beyond the boundaries of the site. Features should be highlighted clearly within the Design and Access Statement where required and/or on landscape/elevation plans, which should also include details of how the following requirements have been met where relevant.

In demonstrating that green infrastructure considerations have played a fundamental part of the design process, the selection of green and blue features, or enhancement of any existing features, should be tailored to the specific context of the site and surrounding area. The proposal should set out clearly how these features have been designed to secure multi-functional benefits which contribute to the following, where relevant:

a) Public access;

b) Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities, particularly children and

teenagers;

c) Making space for nature and enhancing biodiversity;
d) Where there is an opportunity to strengthen links between green spaces, particularly ecological sites, creating linkages with surrounding green infrastructure (e.g. by including lines of trees/hedges to support linkages);
e) Addressing climate change (including carbon sequestration; reducing flood risk; providing sustainable drainage; reducing overheating and promoting urban cooling);
f) Enhancing appearance and character/sense of place;
g) Conserving and, where possible, enhancing the historic environment;
h) Connectivity of walking and cycling routes, including potentially new public rights of way;
i) Opportunities for edible planting or community food growing;
j) Providing natural buffer features to mitigate impacts of air pollution or noise.

Opportunities to enhance blue corridors

For proposals on sites incorporating or located adjacent to watercourses, opportunities should be sought through careful design and landscaping to re-naturalise the water courses where possible, including restoration of the bankside and instream habitats. An ecological buffer zone of at least 10 metres with should be retained, or if it is not already in place it should be reinstated where possible.

New public open space

In situations where the proposal relates to replacement provision that is mitigating losses elsewhere, this will need to be demonstrated to be equally or more accessible for people of all ages and abilities by walking, cycling and public transport to local users of the existing site where relevant.

For residential sites of 1.5 hectares and above, new public open space should be provided that is equivalent to 10% of the overall site area. For mixed-use sites, the area of residential use should be used for that calculation.

Where new open space is provided, the type of provision should be tailored to address existing needs or deficiencies in access locally. For example, by providing space for food growing where residents might not have access to allotments in the local area or incorporating play features for younger people.

Maintenance/management arrangements
Appropriate maintenance/management plans should be organised as part of the design/construction process. Applicants will be required to replace any failed features for the first five years post-completion, unless agreed otherwise with the City Council, and this will be secured through planning condition. Where appropriate, applicants will be expected to enter into a legal agreement to ensure that any new public space is properly maintained, by means of a financial contribution to the City Council.

PROVISION OF NEW GREEN AND BLUE FEATURES – URBAN GREENING FACTOR

Policy context

- Overuse of artificial, impermeable surfacing materials like concrete, artificial lawns and tarmac can have a range of negative impacts for the environment and the people that go on to use these spaces. It seals away soils, leaves limited space for wildlife, increases surface run off (which can lead to flooding and pollution of watercourses), and exacerbates the ill effects of hot weather.
- Incorporating natural, green surface cover and other features on sites can secure multiple benefits for the development and the wider area (see Table 4.1), as well as helping to tackle many of the issues outlined above. It's therefore important that every new development in the city seeks to make use of natural surface cover wherever possible.
- The Urban Greening Factor (UGF) assessment helps quantify and deliver onsite greening as part of new development through use of weighted scores for different types of surface cover alongside set targets, with a particular focus on the naturalness of surface cover.

Policy implementation

- The policy sets out the minimum conditions for urban greening that major development will need to meet. This may involve raising the standard of green surface cover to meet the minimum targets set out, or ensuring no net loss in score (where the site is above the target already). Proposals for development on wholly greenfield sites are subject to higher requirements reflecting their greener starting point.
- Where no net loss in baseline score is technically infeasible for wholly greenfield sites, applicants will need to justify this, such as through evidencing testing of

different site layouts and will be expected to show how they have sought to minimise any reduction in baseline score. The highest quality features onsite should be retained in line with the requirements of **Policy G1.**

- The assessment process requires applicants to assess and quantify green infrastructure on their site prior to developing the area to establish a baseline for the site. This process is then repeated to assess the green infrastructure coverage which is proposed in the design of the new development to be provided post-development.
- Applicants have flexibility in how they meet the minimum conditions in the policy and these could be achieved through a mix of retaining or enhancing existing features, as well as providing new features.
- The UGF assigns weighted scores to different types of surface cover based upon the variety of environmental benefits that they offer (Figure 4.1). Higher quality types of provision benefit from a higher score. This means that understanding where these higher quality features are on the site and seeking to retain these, or providing more of them, will make achieving the minimum conditions easier.
- There is a shared objective with **Policy G4** on biodiversity net gain; however, the UGF assesses green surface cover more broadly and sets targets in order to secure a wider variety of benefits. Onsite habitat creation supporting BNG delivery will help to meet the UGF greening standards, and certain types of greening to meet the UGF requirements may also be able to support BNG requirements.
- The full UGF scoring matrix is set out in Appendix 4.1. Additional guidance on utilising the UGF is set out in the Technical Advice Note for Green Infrastructure and Biodiversity which should be referred to where appropriate.

POLICY G3: PROVISION OF NEW GREEN AND BLUE FEATURES – URBAN GREENING FACTOR

An appropriate proportion of natural green surface cover – which may be comprised of both existing and newly installed features – will need to be demonstrated on certain proposals (as set out below) and evidenced via submission of a completed Urban Greening Factor (UGF) assessment.

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:

a) 0.3 for residential or predominantly residential schemes
b) 0.2 for predominantly non-residential schemes

Major development on wholly greenfield sites: proposals should demonstrate that there would be no reduction in baseline score, unless this can be demonstrated to be technically infeasible, and achieve a minimum score of:

c) 0.4 for residential or predominantly residential schemes
d) 0.3 for predominantly non-residential schemes

All other forms of development (such as minor development) are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF assessment, though this is not mandatory.

Along with the submitted UGF assessment, all greening features proposed for the development and used in the calculation of the UGF score should be clearly demonstrated on associated landscaping/elevation plans in the application.

The adopted calculation formulae and the factors for various surface cover types are outlined in Appendix 4.1.

BIODIVERSITY AND THE ECOLOGICAL NETWORK

Oxford benefits from a concentration of rare and valuable habitats that are important refuges for a variety of flora and fauna, such as lowland hay meadows, calcareous grassland, alkaline spring fen (among other types of wetland) as well as pockets of woodland. Their ongoing protection is particularly important because many species and habitats across the country continue to experience significant losses due to a range of pressures including from changing land use, pollution and climate change. The city is also home to a variety of wildlife, including various protected species like hedgehogs, water voles, slow worms and swifts. The policies in this section have a more specific focus on supporting biodiversity whilst mitigating our impacts on existing species and habitats.

DELIVERING MANDATORY NET GAINS IN BIODIVERSITY

Policy context

- Under the Environment Act 2021, all new planning applications must deliver Biodiversity Net Gain (BNG) of 10% through strategic habitat retention, creation and enhancement as calculated using the DEFRA Statutory Biodiversity Metric. There are a few exemptions to this requirement, including householder applications and the de minimis rule.
- Where proposals have demonstrated that the full 10% BNG cannot be delivered onsite, the Statutory Biodiversity Metric allows for the remaining BNG requirements to be delivered offsite, or as a last resort, by purchasing statutory biodiversity credits. Where offsite solutions are pursued, and the further away these are delivered, the local benefits for nature recovery and people's experience of nature are generally reduced.
- The Oxfordshire Local Nature Recovery Strategy (LNRS) identifies strategic opportunities for nature recovery across the county, including areas that, with specific habitat delivery and enhancement, are expected to deliver the greatest benefits for biodiversity.

Policy implementation

- The 10% BNG target should be considered as the minimum, but the policy strongly encourages applicants to explore options for delivery of net gain that exceeds this wherever possible.
- The policy sets out that in the first instance biodiversity net gain should be delivered onsite. Where that is not feasible, it is important that offsite delivery is as close to the impacted site as possible and the policy sets out a hierarchy to guide offsite delivery.
- Where the LNRS identifies opportunities for specific habitat interventions on a development site, aligning habitat delivery and management with these will make it easier for proposals to meet, and even exceed, the required BNG target. This is due to the boost in biodiversity value applied within the Statutory Biodiversity Metric calculations for proposed habitat delivery which matches the LNRS. In practice, this means:
    - Locating habitat delivery (creation and enhancement) within the areas identified by the LNRS Map; and
    - Proposing habitat interventions which align with the LNRS specifications.
- There are strict requirements in the Statutory Biodiversity Gain guidance and metric governing the ways that losses of habitat can be mitigated which need to be considered. For example, requirements that habitats of certain distinctiveness or condition cannot be replaced with those of lower distinctiveness or condition.

POLICY G4: DELIVERING MANDATORY NET GAINS IN BIODIVERSITY

Planning permission will only be granted for development where it delivers a minimum of 10% biodiversity net gain, as measured by the latest version of the Statutory Biodiversity Metric, unless exempted by national legislation or guidance. This must be achieved in all modules of the Biodiversity Metric relevant to that development (e.g. habitat, hedgerow, and river units). Delivery that exceeds 10% net gain is strongly encouraged wherever possible.

A completed Statutory Biodiversity Metric spreadsheet must be submitted in support of planning applications. All metrics must be completed in line with the requirements set out in the relevant Statutory User Guide, Technical Supplement, Legislation, and best practice principles.

Applications are expected to prioritise the delivery of net gain onsite.

Where this is not feasible, delivery of off-site biodiversity enhancements will be expected to demonstrate accordance with the following hierarchy of preference:

a) Land that is adjacent to the development site;
b) Land in Oxford identified for its ecological potential within the Local Nature Recovery Strategy;
c) Elsewhere within the Oxford boundary;
d) Elsewhere within the Local Nature Recovery Strategy areas in wider Oxfordshire.

Where offsite measures are proposed, these should focus on delivering high-quality priority habitats. Any offsetting proposed in alternative locations will be considered on a case-by-case basis.

Where it is robustly justified that the above cannot be achieved, purchase of biodiversity units from habitat banks elsewhere or statutory credits may be accepted as a last resort.

Opportunities to deliver measures which align with those identified in the LNRS as part of any net gain provision should be prioritised, particularly where a proposal is located in an area identified in the LNRS, unless site constraints would make this unfeasible.

All onsite and offsite measures must be delivered through a biodiversity management and monitoring plan which must cover a period of at least 30 years in line with the national legislation requirements.

DELIVERING ONSITE ECOLOGICAL ENHANCEMENTS

Policy context

- The Biodiversity Net Gain requirements of the Environment Act focus specifically on habitat delivery, which is one important way of supporting biodiversity, but it does not address all the needs of the various species local to the city. It is equally important that we design measures into new development that go beyond pure habitat delivery in order to support flora and fauna through a range of other design measures.
- New development can also incorporate features which support different species in the city, such as by providing resources like food and shelter within the urban environment. Indeed, some species like swifts and bats rely on the urban environment as part of their lifecycle.
- Incorporating these ecological enhancements will be particularly important on sites where the development is exempt from mandatory biodiversity net gain, or where meeting biodiversity net gain requirements are not feasible onsite and these need to be provided offsite, to ensure that spaces are still created for nature on sites across the city.

Policy implementation

- The policy requires a certain number of ecological enhancements which scale up with the size of application. The enhancements which can be chosen from have been identified because they would be particularly well-suited to the local context of the city and the types of species prevalent in the area.
- The number of enhancements should be selected from each of three ‘pots’, as set out in Figure 4.2.

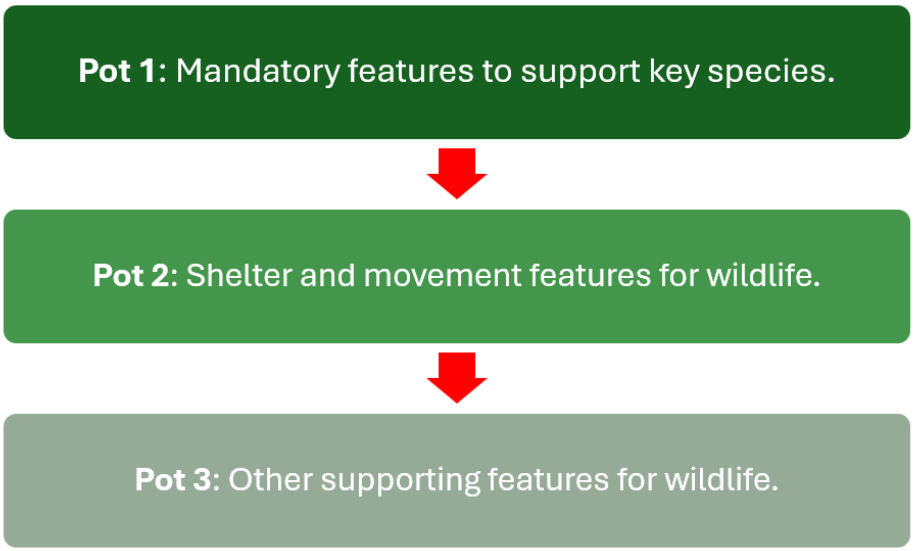


Figure 4.2: The three pots of ecological enhancements that should be selected from.

- The list of enhancements that can be selected from is set out in Appendix 4.2, any subsequent versions will be published within the Green Infrastructure and Biodiversity Technical Advice Note.

POLICY G5: DELIVERING ONSITE ECOLOGICAL ENHANCEMENTS

Development proposals should seek to incorporate ecological enhancements into landscaping or building facades/roof spaces which are tailored to the priority habitats and protected species present within the site and surrounding area. Opportunities to create, expand, enhance or link ecological networks are particularly encouraged.

All new development must deliver a minimum number of ecological enhancements selected from the City Council's Ecological Points List to achieve the required point total. The number of points required is as follows:

a) **Householder application** – all mandatory features from pot 1 (where applicable);
b) **Minor development application** – all mandatory features from pot 1 (where applicable); PLUS 1 feature from pot 2; PLUS 1 feature from pot 3;
c) **Major development application** – all mandatory features from pot 1 (where applicable); PLUS 2 features from pot 2; PLUS 2 features from pot 3.

Seeking advice from a suitably qualified ecologist on the ecological enhancements selected is encouraged. The chosen measure(s) will need to be

clearly highlighted on landscape and elevation plans and/or within the design and accessstatement.

In addition, all new tree and soft landscaping must incorporate an element of native planting, and where non-native planting is proposed this should comprise species beneficial to UK pollinators and/or chosen to be well-adapted to future changes in climate. Proposals incorporating invasive plant species will be refused.

All maintenance and management requirements of the proposed enhancements must be specified within planning applications and secured via planning conditions.

PROTECTING OXFORD'S BIODIVERSITY INCLUDING THE ECOLOGICAL NETWORK

Policy context

- Oxford has a range of habitats and ecological sites, many benefit from levels of designation including:
    - International designations – the Oxford Meadows Special Area of Conservation (SAC), part of which is within Oxford's boundary and that contains certain habitats and species recognised for their importance across Europe,
    - National designations – these include the 12 Sites of Special Scientific Interest (SSSIs), eight of which were notified for their nature conservation interest and the others primarily for geological interest.
    - Local designations – including Local Wildlife Sites (LWS); Local Nature Reserves (LNR) and Oxford City Wildlife Sites (OCWS) which have been designated for their county or city-wide importance.
- Outside of the designated sites there are also many areas that support habitats and species of principal importance (this is a wider selection of priority habitats and species listed under S41 of the Natural Environmental and Rural Communities Act, 2006, some of which are protected under other legislation and some not).
- A number of sites in the city are particularly reliant upon specific hydrological conditions, which means that they are potentially vulnerable to changes in hydrology that could arise from development. For example:

    - Oxford Meadows SAC is potentially sensitive to changes in recharge, flows and quality of groundwater stemming from development on the North Oxford gravel terrace.
    - New Marston Meadows, Iffley Meadows, and Lye Valley SSSIs are sensitive to changes in flows and quantities and quality of surface and/or groundwater within their catchment areas.
- A Habitat Regulations Assessment (HRA) has been produced to support the Local Plan 2045. This assesses the level of development proposed through the plan both 'alone' and 'in-combination' with other relevant plans and projects against the relevant conservation objectives for the Oxford Meadows SAC. The HRA includes a Stage 1 Screening, and a Stage 2 Appropriate Assessment which proposes mitigation measures to ensure there are no likely significant effects, either alone or in-combination, on the integrity of Oxford Meadows SAC.

Policy implementation

- It is vital that existing biodiversity and features of ecological interest which could be impacted by a development are well understood and that impacts are avoided and/or mitigated. This includes features being directly impacted on a site as well as those which could be adversely affected by adjacent development. Where there is a reasonable likelihood of harm or loss to protected species or natural/semi-natural habitats, targeted ecological surveys must be undertaken prior to the determination of any planning application. The extent and scale of survey effort must be informed by the context of the site and appropriate ecological expertise.
- The mitigation hierarchy needs to be followed. This requires applicants to seek to avoid any potential impacts in the first instance through careful design/ construction choice before tailoring the proposal to mitigate impacts. Only once the first two steps in the hierarchy have been exhausted should compensation measures be considered.
- This policy supplements the protections assigned to the designated ecological sites through their 'core' designation under **Policy G1** by setting out additional considerations tailored to the particular ecological importance for which they have been designated. These considerations will often apply to a wider area, taking into account impacts from development such as pollution or changes to the environment which could ultimately bring about adverse effects to the designated sites themselves. Applicants are strongly encouraged to work with ecology experts to determine relevant considerations.
- New development immediately adjacent to Oxford's SSSIs, will be expected to incorporate appropriate buffers that protect these sensitive areas during the construction and operational phases and ultimately deliver additional

supporting habitat. The design of these buffers will need to be guided by the ecological context of the sites.

- The policy outlines particular considerations around impacts on surface and/or groundwater in relation to Oxford Meadows SAC, the Lye Valley and New Marston Meadows SSSI's. Proposals may need to consider impacts on water quality, as well as disruptions to the flows and quantities of water to these sites. The City Council has published additional guidance in relation to the Lye Valley that applicants should refer to where applicable.
- More advice is set out in the Green Infrastructure and Biodiversity Technical Advice Note, whilst Oxfordshire County Council has also provided biodiversity guidance to assist applicants.

POLICY G6: PROTECTING OXFORD'S BIODIVERSITY INCLUDING THE ECOLOGICAL NETWORK

Development proposals should seek to conserve and enhance biodiversity including safeguarding the key sites of Oxford's ecological network.

Proposals with a reasonable likelihood of adversely impacting natural and/or semi-natural habitats, or protected species, on or immediately adjacent to the site, will only be permitted where they have been informed by targeted ecological surveys, completed prior to determination of the planning application, unless explicitly agreed with the City Council, and any impacts identified have been satisfactorily addressed in the design of the development in accordance with the mitigation hierarchy.

Internationally and nationally designated sites and irreplaceable habitats

When determining planning applications potentially causing significant harm to biodiversity, then the approach set out in Paragraphs 193-195 of the NPPF (or the equivalent in any update) will be applied.

To ensure no likely significant effects on the Oxford Meadows SAC, proposals identified in an area identified as having potential hydrological connectivity with the Oxford Meadows SAC that:

a) May negatively affect groundwater recharge and/or water quality must demonstrate that likely significant effects have been avoided, or mitigated where relevant through use of appropriate measures including incorporation of SuDS.
b) May negatively affect groundwater flow (subterranean development) must include a hydrogeological investigation, which must demonstrate that likely significant effects have been avoided, or mitigated where relevant.

Within the ground and/or surface water catchment areas for the Lye Valley, Iffley Meadows and New Marston Meadows SSSI's, development which could have negative hydrological impacts in relation to surface and/or groundwater will need to demonstrate that these have been avoided, or mitigated where relevant, through use of appropriate measures such as infiltration methods (where geological conditions allow) and careful design of below ground works.

Development proposed on land immediately adjacent to any SSSI must be designed with a buffer to that site that both helps to prevent adverse effects during the construction and operational phases of the development and delivers habitat supporting the interest features of that site.

Locally designated sites

Development that would have an adverse effect on a Local Nature Reserve (LNR), Local Wildlife Site (LWS) or Oxford City Wildlife Site (OCWS) will only be permitted where:

c) There is an exceptional need for the new development that outweighs any adverse effect from loss of habitat or harm to any feature of interest for which the site was selected, and this need cannot be met by development on an alternative site with less biodiversity interest; and
d) Satisfactory mitigation and compensation onsite or sufficiently local to preserve the feature of interest can be delivered and has been agreed with the City Council.

The same level of protection will be afforded to proposed LWS and proposed OCWS as to designated ones (prior to the conclusion of the selection process).

Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest features for which the site was selected.

Other features of interest

Development should seek to retain and enhance habitats and species of principal importance for biodiversity wherever possible.

Determining adverse effects

In determining the potential for adverse effects on ecology from a development, including where this relates to designated sites, applicants will need to demonstrate that they have considered information from various sources where relevant, including the site context and surrounding area; expert ecological advice, applicable City Council Technical Advice Notes, as well as a review of relevant

existing information where available, such as Natural England's Impact Risk Zones (IRZs). A range of potential impacts will need to be considered and will depend on the context of the application and proximity to any protected site(s), particularly, but not limited to:

- Loss of protected land;
- Recreational impacts;
- Impacts on air quality;
- Impacts on water quality;
- Impacts from artificial lighting;
- Changes to the hydrological regime (particularly surface and/or groundwater).

CLIMATE RESILIENT DESIGN

Oxford is already at risk from climate change and this will increase in future. In particular:

- A significant amount of the city lies within areas of higher flood risk from various sources. Climate change is likely to bring wetter winters, and more intense rainfall events that could exacerbate flood risk from various sources like rivers, surface water and the sewers with impacts for people's health as well as economic costs through damage to properties and businesses.
- People and the wider environment are also at risk from overheating and heat stress, particularly for those living in poorer quality accommodation or located in areas that are heavily urbanised due to artificial surface cover locking in heat and exacerbating the urban heat island effect. Climate change is expected to bring about hotter, drier summers and more heat wave events which will increase these risks but also have impacts for the water resources we rely on and that support many habitats and species.
- The risks from climate change are not equal for everyone. The impacts are often exacerbated for those communities who are more economically deprived, or vulnerable due to other characteristics such as age, living with health issues or living in poorer quality accommodation.

The way we design and construct the built environment has a key role to play in reducing the risks of climate change for people and the environment, enabling us to better withstand the impacts when hazards arise and to recover more quickly. Many resilience building measures, also referred to as climate change adaptations, have additional benefits for health and wellbeing and should be considered simply as good design.

FLOOD RISK AND FLOOD RISK ASSESSMENTS (FRAS)

Policy context

- National policy on planning for and mitigating flood risk is already very strong, but there is a need to consider this in the local context of Oxford. Much of the new development comes forward on previously developed land and a significant amount of the city lies within areas of higher flood risk according to EA mapping (updated March 2025) and the City Council's latest Strategic Flood Risk Assessment (November 2025). In this context a bespoke approach to Flood Zone 3b is included in the policy, whilst ensuring that the flood risk vulnerability classification will not be increased on any site.
- The sequential approach means development should first be on areas of lowest flood risk from all sources and only located in areas of higher risk if it can be shown, through the sequential test, that sites are not available in areas of lower flood risk. In those circumstances, the exceptions test applies, proposals must be able to demonstrate that wider sustainability benefits to the community that outweigh the flood risk would result, and they should be safe for its lifetime, without increasing flood risk elsewhere (and reducing it where possible).
- Where development is in an area of flood risk it is important it is safe. To help achieve this, finished floor level should be above the 'design floor level' which is the maximum estimated water level during a flood event, including with a climate change allowance.
- Work to deliver the Oxford Flood Alleviation Scheme, led by the Environment Agency, is likely to commence within the plan period. This will reduce flood risk from the River Thames to existing businesses, residential properties, major roads and the railway in the Botley Road and Abingdon Road areas, however, it will not remove risk entirely.
- Open watercourses provide a multitude of benefits and culverting them would reduce their biodiversity value as well as lead to a loss of natural flood management features.

Policy implementation

- A first step in a methodical approach to addressing flood risk is to assess the potential for flood hazards from all relevant sources , as well as any impacts the development could have on flood risk offsite.
- The second step is to design development in a way which seeks to avoid highest risks, e.g. locating the most vulnerable uses in areas of lowest risk.

- Thirdly, once avoidance has been fully explored, mitigation measures will be required, these could include:
    - flood resistance measures (dry-proofing) e.g. barriers or raised floor levels to keep water out at times of flood;
    - flood resilience measures (wet-proofing) - using materials that can quickly dry out, helping buildings to be habitable again quickly;
    - Sustainable Drainage Systems (SuDS) to reduce surface water run off by slowing and storing water (see **Policy G8**); and
    - flood compensation measures e.g. creating new flood storage to mitigate any loss of storage through development.
- Finally, there is likely to be an element of residual risk e.g. flood defences can fail or be overrun by exceptional flood events. Managing this remaining risk could involve providing the emergency services with appropriate access/egress routes during flooding as set out in the Environment Agency's best practice guidance (https://www.gov.uk/guidance/flood-risk-assessment-standing-advice), providing occupants access to early warning systems and safe evacuation plans.
- Extensions are a common form of development, and whilst these may have limited flood risk implications in isolation, their frequency of occurrence does have potential for cumulative impacts resulting in increased flood risk as flood storage areas are lost to development. However, it is acknowledged that the limited scope of some extensions can make achieving the full requirements challenging – thus the policy sets out a pragmatic approach to the requirements supporting such applications.

POLICY G7: FLOOD RISK AND FLOOD RISK ASSESSMENTS (FRAS)

Planning permission will only be granted where proposals have considered the potential for flooding from all sources including the impacts of climate change for the expected lifetime of the development, as well as the potential for them increasing flood risk elsewhere, the safety of users of the development, and where they have appropriately addressed any flood risks identified.

Planning applications for development (including minor householder extensions and changes of use to houses in multiple occupation (HMO)) must be accompanied by a Site-Specific Flood Risk Assessment (FRA) when proposed in the following locations:

a) Within Flood Zones 2 or 3;
b) Within Flood Zone 1 with a site area of 1 hectare or more;
c) Within 'Flood Zones plus Climate Change';
d) Within Flood Zone 1 and the most recent flood map for planning shows it

is at risk of flooding from surface water;

e) Within Flood Zone 1 where the LPA's strategic flood risk assessment (SFRA) shows it will be at increased risk of flooding during its lifetime;
f) On sites that increases the vulnerability classification and may be subject to sources of flooding other than rivers or sea.

The FRA must be undertaken in accordance with up-to-date flood data, national and local guidance on flooding and must assess and mitigate flooding from all sources including the impacts of climate change now and in the future.

Planning permission will only be granted in areas of higher flood risk (depending on the vulnerability of the development and as set out in the NPPF) where a sequential approach has been taken to locating the development and where the Sequential Test and the Exception Test (where necessary according to national policy and supporting guidance) have been passed, and the FRA demonstrates that for the lifetime of the development and including the impacts of climate change:

g) The proposed development will not increase flood risk offsite; and
h) Future occupants will be safe during times of flood; and
i) Safe access and egress in the event of a flood can be provided; and
j) Details of the necessary mitigation measures to be implemented have been provided; and
k) The proposed development will not impact on delivery of future flood relief measures, and where possible will reduce flood risk.

For minor extensions (including householder development) proposed within Flood Zone 2 and 3a, or at risk from other sources of flooding, it is acknowledged it may be challenging to meet all the requirements above.

Proposals will be expected to minimise risk to occupants and the surrounding area by following the below hierarchy of principles in order of preference, demonstrating robust justification where the top levels in the hierarchy cannot be met:

l) Full requirements of an FRA (as above) ;
m) Finished floor levels above design flood level with compensation;
n) Finished floor levels above design flood level ;
o) Finished floor levels at existing level, with water exclusion up to at least 300mm above the design flood level;
p) Finished floor levels at existing level with a water resilient strategy up to at least 300mm above the design flood level (unless the development

cannot be made safe).

Planning permission will not be granted for development in Flood zone 3b (including minor household development) except where it is for water-compatible uses or essential infrastructure; or where it is on previously developed land and includes a high standard of mitigation designed to demonstrably decrease flood risk on and off-site compared with the current situation. All the following criteria must also be met:

q) It will not lead to a net increase in the built footprint of the existing building within Flood Zone 3b and where possible will lead to a decrease; and
r) It will utilise a sequential approach to move development to lower risk areas within the site; and
s) It will not lead to a reduction in flood storage (using flood compensation measures) and where possible will increase flood storage; and
t) It will not lead to an increased risk of flooding elsewhere; and
u) It will not put the development or any future occupants at risk, including in relation to ensuring safe access/egress to an area wholly outside the flood event; and
v) It will not result in an increase in flood risk vulnerability classification or an increase in the number of dwellings.

Proposals for basement accommodation within flood zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation. Where proposals for construction of new basements are at risk of other sources of flooding (i.e. groundwater, surface water, or sewer flooding), it must be demonstrated that flood risk can be managed safely.

For any proposal including subterranean (such as basements or piling), it must be demonstrated through a hydrogeological assessment that the development will not cause adverse effects on groundwater (i.e. by not blocking groundwater flow).

Applications that propose culverting of open watercourses will not be permitted. De-culverting of existing culverts is encouraged wherever possible.

SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

Policy context

- Sustainable Drainage Systems (SuDS) use techniques and features which are designed to manage the flow of rainwater in a way that mimics the natural landscape. They are increasingly important in the context of climate change, building the resilience of our urban areas to flooding during times of intense and heavy rainfall events.
- SuDs can also provide a multitude of additional benefits, including providing open space for recreation, habitats to support wildlife and adaptation to other climate hazards such as overheating.

Policy implementation

- SuDS need to be considered as early as possible in the conceptual and design stages and may include water conservation (e.g. rainwater collection and storage) as well as surface water drainage (e.g. soakaways, porous surfaces, swales, streams and balancing ponds).
- SuDS should be designed in a way that incorporates reuse, infiltration, retention or conveyance methods which utilise natural, green and blue infrastructure including soft landscaping, green roofs and ponds.
- Unnatural, artificial components such as piped systems or underground attenuation tanks will rarely be considered an acceptable approach.
- The context of the site and any previous site uses should inform choice of SuDS, for example infiltration will be discouraged where there is site contamination.
- In order to ensure that the drainage scheme functions effectively as designed in perpetuity, a SuDS maintenance plan will be required to be submitted alongside any planning application including SuDS. This should demonstrate how the SuDS will be managed and remain effective for the lifetime of the development.

POLICY G8: SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

All development proposals will be required where feasible to manage surface water through Sustainable Drainage Systems (SuDS). Details of the SuDS must be submitted as part of a drainage strategy or FRA where required as part of a planning application submission, and must be submitted prior to determination unless agreed otherwise by the LPA.

SuDS should be designed in a way that incorporates reuse, infiltration, retention or conveyance methods which utilise natural, green and blue infrastructure rather than unnatural, artificial components. Below ground features such as pipe systems or underground attenuation tanks will not be permitted, unless exceptional site conditions justify an alternative approach which has been agreed with the City Council. Multi-functionality of SuDS should be maximised in

their design, such as where they are incorporated into public open space.

Where a site has potential for contamination, SuDS that rely on infiltration will be discouraged and other suitable methods should be adopted to protect the water environment unless it can be demonstrated that there will be no pathway of contamination. Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable.

Surface water runoff should be managed to greenfield run-off rates as close to its source as possible, in line with the following drainage hierarchy:

a) Store rainwater for later use; then:
b) Discharge into the ground (infiltration); then:
c) Discharge to a surface water body; then:
d) Discharge to a surface water sewer, highway drain or other drainage system; and finally:
e) Discharge to a combined sewer (only in exceptional circumstances).

For minor developments, SuDS should be designed in accordance with the City Council's latest SuDS design standards, or any equivalent replacement document. For major developments, SuDS should be designed in accordance with the national standards for sustainable drainage systems (or any national or county-level standards that supersede them). Details of the SuDS must be submitted as part of a drainage strategy or FRA where required as part of a planning application submission, and must be submitted prior to determination unless agreed otherwise by the LPA.

A SuDS maintenance plan should 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, maintenance responsibilities for all relevant parties, how frequently they will occur and for how long and will be secured by condition.

RESILIENT DESIGN AND CONSTRUCTION

Policy context

- New development must be designed for the expected future climate as well as today's. Planning for the future climate will help avoid 'maladaptation', whereby inefficient design results in inappropriate development for future climate and the increased risks for occupants.

- Resilience measures can be designed into a development from the start—helping to reduce the impacts of hazards like heat waves and flooding when they occur, but also supporting swifter recovery afterwards. They can be varied, involving simple design solutions like raising plug sockets so that they are less likely to get inundated during a flood, or incorporating overhangs on windows to reduce solar gain during the height of summer whilst allowing light in fully during winter.
- Green infrastructure can help slow down and store surface water during heavy rainfall, reducing risks of surface water flooding. Vegetation can also have a cooling effect by introducing shade to buildings and people and reducing solar gain, as well as through processes like evapotranspiration.
- The requirements in this policy can also support applicants in ensuring that their development aligns with some of the separate requirements of Building Regulations. For example, Part O, which addresses overheating, requires more stringent consideration of factors that influence a building's thermal performance such as the design/ layout of windows. Considering these issues at the design stage and as part of the planning process can help reduce the potential for conflicts with the standards required by Building Control.

Policy implementation

- The design and access statement should clearly set out how the requirements within the policy's checklist have been addressed (or identify where these are not relevant). Where a design and access statement is not required, the proposal should clearly set out in one place how the requirements have been met in another part of the application (e.g. in the planning statement).
- 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.
- In providing evidence of compliance with this policy, reference can be made to supporting documentation for other policies where relevant (e.g. FRAs for Policy G7, urban greening factor for Policy G3), rather than duplicating it. However, the proposal will need to explicitly identify how a proposed measure put forward in response to the checklist adapts or builds resilience to the existing and future climate change risks.

POLICY G9: RESILIENT DESIGN AND CONSTRUCTION

Planning permission will be granted where proposals have been designed with regard to most up-to-date climate change projections, suitably addressing the key risks from changing climate on occupants; the development; and any

supporting infrastructure for its lifetime.

All proposals, excluding householder applications, unless this is required as part of other policies in the Local Plan, will be expected to demonstrate (which could be as part of the Design and Access Statement) that the following resilience requirements are incorporated into the design:

a) Relevant future climate scenarios have informed approaches to mitigating the risk of overheating, flooding (from all relevant sources), and storm extremes for the lifetime of the proposed development.;
b) A cooling strategy to address risks of overheating This should consider both internal and external environments, with temperature management and shading of outdoor spaces, and which and promotes passive cooling and energy efficient measures of buildings in the first instance (in line with requirements of Policy R1);
c) Measures to manage water run-off and, where the site is at risk of flooding now or in future, measures to reduce flood risk, such as flood resistance measures (e.g. dry-proofing to keep water out) and resilience measures (e.g. wet-proofing to allow continued function during, or quick recovery after flooding);
d) Measures to ensure water is used prudently and that water is conserved, including that dwellings meet the water consumption limits (in line with requirements of Policy R5);
e) Supporting infrastructure which is designed to function in extreme weather conditions.

CHAPTER FIVE

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

INTRODUCTION

This chapter addresses additional elements of environmental protection. The first part of the chapter sets out policies which seek to ensure new development does not further exacerbate climate change through additional carbon dioxide emissions – sometimes referred to as climate change mitigation. The second part then deals with protection of various natural resources and ensuring that the development process mitigates its impact on the wider environment.

AIMING FOR NET ZERO CARBON EMISSIONS

The first three policies of this chapter address different dimensions of carbon reduction in the design process, which are important for mitigating our impacts on climate change. The Climate Change Act requires that the UK achieves net zero carbon emissions by the year 2050 and Oxford has set itself a local target of being a net zero carbon by 2040. Oxford's 2040 Net Zero Action Plan identifies that the built environment is the main source of emissions in the city (primarily the reliance on fossil fuels for heating of buildings), followed by transport.

NET ZERO CARBON BUILDINGS IN OPERATION

Policy context

- The principles of the energy hierarchy will help with ensuring that buildings are net zero carbon in operation and as energy efficient as possible. The hierarchy, as set out in Figure 5.1, prioritises energy saving measures in the first instance, then ensuring that any energy demanding systems utilised in the building are as efficient as possible, and

finally, meeting energy needs through renewable sources (a key element of being net zero carbon in operation).

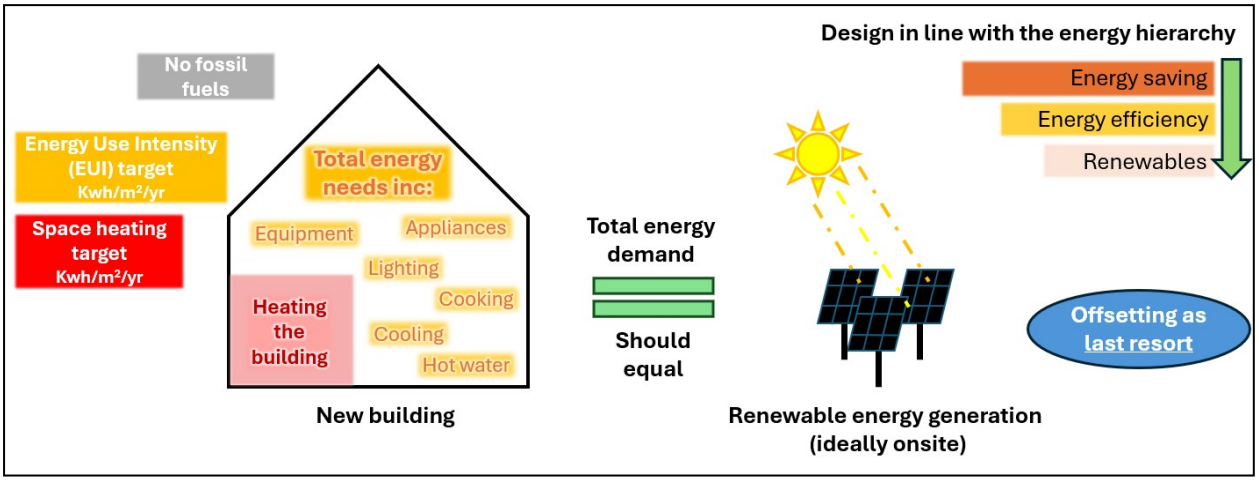


Figure 5.1: A net zero carbon building in operation will match energy needs through sufficient renewable energy generation.

- The energy saving step in the hierarchy favours a fabric-first approach, i.e. maximising the performance of the physical components that make up the 'fabric' of a building (e.g. by being well insulated). This has additional benefits further down the hierarchy, such as by reducing energy demand for heating/cooling and, in turn, the renewable energy generation needed to support the building's operation.
- The development of local renewable energy projects will be especially welcomed where they are community owned or owned by non-profit making organisations.
- Net zero carbon and energy efficient buildings have additional benefits for the city and its residents, including reducing energy bills costs (helping with resilience to fuel poverty), supporting health and wellbeing of occupants, and reducing strains on the energy grid which is under increasing pressure as we transition away from fossil fuels.

Policy implementation

- Each building is likely to require a different mix of design solutions for energy efficiency. Some land uses and development typologies will inevitably struggle to achieve net zero carbon in operation through onsite solutions alone.
- The policy sets out performance standards for space heating, and overall energy use, which should not be exceeded. The targets are expressed as an Energy Use Intensity (EUI) figure, which is calculated by combining energy demands from all sources, then dividing by the gross internal floor area (m2). Total energy demand should be matched

through new renewable energy generation, ideally onsite, although these could be installed elsewhere in the city where sites are available.

- All energy calculations will need to be undertaken using an approved methodology. At the current time, the most appropriate methodology is considered to be the CIBSE TM54 methodology and the Energy and Carbon Technical Advice Note (TAN) expands on this with additional guidance. Use of an alternative methodology should be agreed with the City Council in advance.
- Certain non-residential uses with exceptionally high operational energy demands, including R&D/labs/hospitals can seek a higher Energy Use Intensity performance target. This will need to be justified through the Energy and Carbon Statement, including by setting out the measures that have been taken to reduce energy demand as much as possible, and the application will need to ensure compliance with all other elements of the policy.
- The policy is not prescriptive in terms of technology choices. For renewable energy generation, Oxford's constrained setting means that often solar mounted PV arrays will be particularly well suited. For heating, air source heat pumps can be effective, equally connecting into communal or district heating systems can also provide sustainable solutions, particularly where this harnesses waste heat. Combining renewables technologies with battery storage systems can further support efficiency.
- There may be circumstances where certain requirements may not be technically feasible onsite. As a last resort, an element of offsetting can help deliver on the aims of the policy. Before offsetting will be accepted, the applicant must robustly justify that the earlier steps in the energy hierarchy have been exhausted and onsite/offsite energy generation is not possible to meet the development's EUI figure. Only then, will payment be accepted into the City Council's offsetting fund to mitigate remaining energy use via retrofitting of buildings elsewhere in the city.
- Specific provisions are made in the policy for householder and change of use applications.
- A worked example of the key requirements for Policy R1 is set out in Appendix 5.1 and useful resources to refer to are set out in Appendix 5.2.

POLICY R1: NET ZERO BUILDINGS IN OPERATION

All new buildings should be net zero carbon in operation. This must be demonstrated through submission of an Energy and Carbon Statement that details how all the criteria below have been met:

a) Developments have been designed in accordance with the energy hierarchy. Applications should demonstrate how design has methodically followed the

steps in the hierarchy, firstly through reducing energy use; using energy efficiently; and then, meeting all energy needs through renewables sources, ideally generated onsite, or else offsetting as a last resort.

b) 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 (unless demonstrated to be technically unfeasible):
   i. Residential: 45 kwh/m^2/yr
   ii. Non-residential: 70 kwh/m^2/yr
   iii. For non-residential uses with exceptionally high energy demands, including R&D/labs/hospitals, a higher EUI target will be accepted where it can be robustly justified, including the measures taken to limit this.

c) Space heating demand is no more than 20 kwh/m^2/yr. Emerging best practice suggests 15kwh/m^2/yr will be achievable in many instances and achieving this tighter limit is encouraged.

d) No fossil fuels are being directly utilised in the operation of the development (i.e. no gas used for heating and cooking).

e) All energy needs (matching the development's total EUI figure) will be met through onsite renewable energy generating technologies in the first instance, accompanied by energy storage where possible. Where the total energy need cannot be met through onsite renewables, applicants should seek to maximise available capacity onsite, before seeking to meet the remaining energy balance through installation of sufficient additional renewable generation at a location offsite. In these circumstances, it will need to be demonstrated in the Energy and Carbon Statement that offsite provision has been fully secured and will be in operation upon completion of the development.
   As a last resort, where the above steps have been fully explored and net zero carbon still cannot be fully delivered, offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location. The City Council will accept payment into its offsetting fund to fully offset this remaining energy demand, and this will be secured through an appropriate legal agreement/S106.

f) All new development must include information that specifies the approach to metering that will be adopted as well as proposed monitoring of the performance of the development to be undertaken post-completion (to ensure performance is in line with design specifications).

Householder applications are only expected to demonstrate accordance with criteria a). Proposals for conversions, 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 a) and d), unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply. Extensions are expected to comply with criteria a), b) and c) unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply.

The development of low carbon energy centres and heat networks of varying scales will be supported where these can offer more sustainable heating choices and are in keeping with other policies in the Local Plan. Where development comes forward in areas with access to a heat network, now or in the future, connection into the network should be considered as part of the design process, particularly if this offers more sustainable means of heating/powering the building.

The City Council will expect that, having worked through requirements a) to f), Energy and Carbon Statements demonstrate compliance with the above criteria; however, a case for anything short of full compliance will be expected to be clearly justified as follows:

g) Full details of where a criterion cannot be met will be provided and justified within the Energy and Carbon Statement with explanation of the reasonable attempts to meet it provided; and
h) Clarification that all other criteria are met or exceeded; and
i) The proposal is overall net zero carbon in operation (meaning no reliance on fossil fuels and including use of offsetting only as a last resort).

EMBODIED CARBON IN CONSTRUCTION

Policy context

- Embodied carbon includes both the upfront carbon dioxide emitted during the construction process, as well as carbon dioxide emitted throughout the various life stages of a building (Figure 5.2).
- Carbon dioxide can be emitted as a consequence of various design choices and construction practices, but it can also be locked away at greater levels than the amounts released during the manufacturing process for certain materials. Exemplary

design may actually be able to demonstrate a negative carbon balance (i.e. offsetting more carbon dioxide than the development is producing).

- Following the principles of this policy will also be beneficial in aligning with the concept of the circular economy, such as reducing waste and promoting re-use of materials wherever possible, helping conserve and use resources prudently.

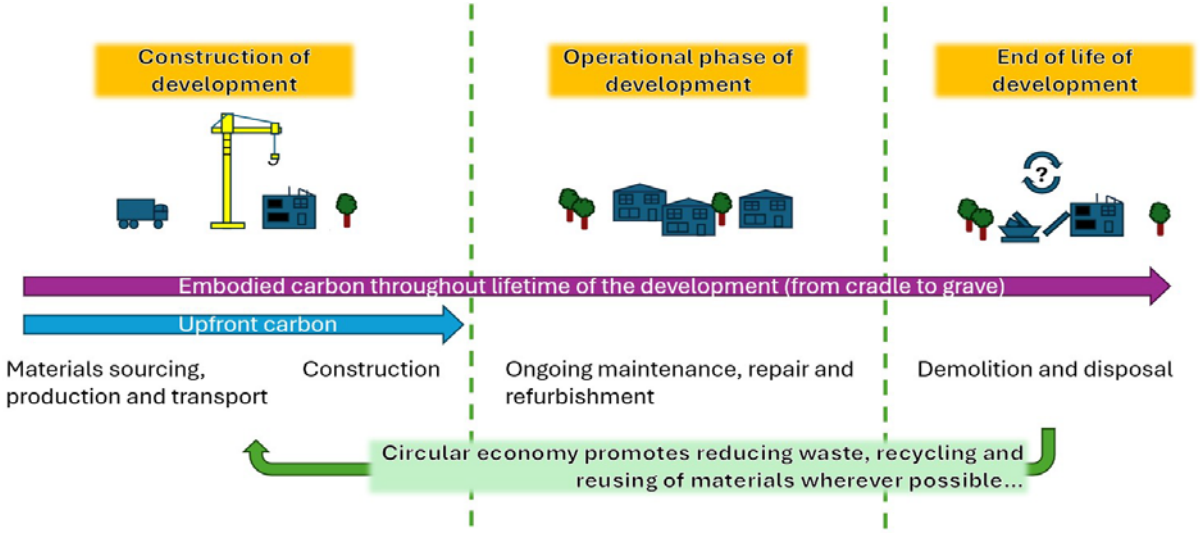


Figure 5.2: Embodied carbon at each phase of a development's lifecycle.

Policy implementation

- The focus of this policy is predominantly on the 'upfront' carbon emissions associated with construction.
- All applications will need to demonstrate how the proposed design and construction has responded to the principles in criteria a-e. This should include a sufficient level of detail that is proportionate to the size and scale of the development, including a rationale for where design choices divert from any of the principles.
- Whilst the policy does not mandate retention of existing buildings, criterion a seeks to ensure that applicants demonstrate that they have considered whether it is feasible for retention and re-use of buildings on a site, before resorting to demolition. Replacing buildings may be justified where for example:
    - a building is no longer fit for its intended purpose or the needs of users;
    - age/construction of the building means it is inefficient in terms of energy use;
    - a new building will be of more benefit to achieving wider place-making.
- Larger developments will need to be accompanied by Whole Life Cycle Carbon Assessment (WLCCA). Other types of application that fall below the policy threshold for WLCCA can submit an assessment where this would support their approaches in responding to criteria a-e of the policy, although this is not mandatory. Applicants

should pay particular attention to upfront carbon values associated with the construction phase. It is acknowledged carbon associated with latter stages of the building's life will be subject to increasing uncertainty.

- Where reductions in embodied carbon achieved through the design process need to be demonstrated, these could be framed around the high-level principles in criteria a-e.
- The Energy and Carbon Technical Advice Note will set out best practice embodied carbon targets that should be strived for, as well as more general advice on interpreting each of the principles set out in the policy, and undertaking the WLCCA process where relevant.

POLICY R2: EMBODIED CARBON IN CONSTRUCTION

All developments are expected to demonstrate consideration of embodied carbon for the lifetime of the development, particularly the upfront carbon in the construction process, and take actions to limit this as much as possible through careful design choices. Planning permission will be granted for proposals that demonstrate through their Energy and Carbon Statement that the following principles are embedded proportionately in design choices:

a) Re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition.
b) Waste generation has been minimised and re-use and recycling of materials has been maximised in the construction process, including using any demolition materials.
c) The selection of construction materials has been informed by the carbon footprint associated with their sourcing and production (carbon footprint sought to be reduced wherever possible); use of materials that sequester more carbon than is produced in making them is prioritised where opportunities arise.
d) The ways that materials are transported to site and processed during construction have been chosen to minimise the associated carbon emissions wherever possible.
e) Design choices would allow buildings to be easily maintained, adapted and repurposed at the end of use/life.

Proposals for large scale new-build development (developments of 100 or more dwellings, or 10,000m^2 or more non-residential floorspace) will also need to be accompanied by details within their Energy and Carbon Statement that provide the following:

f) A measurement of total embodied carbon associated with the development (including upfront carbon associated with selection of materials). A recognised methodology should be followed to determine these quantities including submission of Whole Life Cycle Carbon Assessment. The City Council's recognised methodologies are set out in the Energy and Carbon Technical Advice Note.
g) Details of actions taken to reduce this embodied carbon as much as possible, particularly the upfront carbon associated with the construction stages, and the specific quantitative reductions that have been secured through design process.

Where any future updates to Building Regulations (or other national policy) make embodied carbon requirements at a national level, the Energy and Carbon Statement should instead demonstrate how embodied carbon is being addressed in the context of that national legislation.

RETRO-FITTING EXISTING BUILDINGS, INCLUDING HERITAGE ASSETS

Policy context

- There is a significant retro-fit challenge facing the city if we are to reach net zero targets, reduce exposure to fuel poverty, and improve energy security. Various interventions will be needed including installation of technologies such as heat pumps, electric vehicle charging and micro-renewables.
- Retrofitting traditional and historic buildings can be carried out sensitively and successfully, whilst preserving historic character, and the City Council will support this wherever possible where interventions have clearly been designed with appropriate consideration of these additional factors:
    - Such buildings were typically constructed to rely upon natural processes such as passive ventilation and free movement of moisture to help to keep internal temperatures stable and avoid build up of damp and mould. Retro-fit interventions that might be suitable for modern buildings can be inappropriate or 'maladaptive' for these assets resulting in harm not only for the structure but also for the health of occupants inside.
    - Designated heritage assets are afforded statutory protection through the Listed Building and Conservation Area Act and also have great weight automatically assigned through the National Planning Policy Framework to preserving their significance.

Policy implementation

- On most buildings within the city, applications which propose retrofitting measures designed to secure demonstrable energy efficiency and/or climate adaptation improvements will be approved, unless other policy/material considerations would make them unacceptable.
- For traditional buildings, including heritage assets however, this presumption in favour does not automatically apply, although the City Council also supports retro-fit projects that deliver these demonstrable benefits. Instead, additional considerations need to be factored into the design process and demonstrated through the application.

- The Council will seek to ensure that applications have been informed by a whole building approach. This means that any special qualities or characteristics for which a heritage asset might have been designated must be taken into account. The way the building has been constructed and how it currently performs also need to be fully understood, in liaison with relevant professionals where necessary.
- Measures that seek to deliver carbon reduction through energy efficiency or provide adaptation to changing climate will be considered as a public benefit, however, this will not automatically override any harm to a designated asset. The City Council will need to consider the level of harm to the significance of the asset and make a determination as to whether or not this is outweighed by that public benefit where harm does occur, in line with national policy and other relevant policies of the Local Plan.

POLICY R3: RETRO-FITTING EXISTING BUILDINGS

The City Council will support retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate. The expectation is that the interventions are selected in accordance with the steps of the energy hierarchy (reduce energy use, use energy efficiently, source energy renewably) as set out in Policy R1.

A whole building approach should be taken to the retrofitting of traditional buildings, including heritage assets, whereby applications will need to demonstrate how the following principles have been embedded in the design rationale:

a) Choices on interventions have been informed by a whole building approach which includes methodical assessment of the building's heritage significance, its current performance in terms of energy efficiency and climate risk, its use (now and in future), its context, and the selection of suitable materials;
b) Any harm to the heritage significance of the asset has been minimised and mitigated as much as possible through careful design choices and in line with requirements of policies HD1-HD6;
c) Professional advice has been sought from historic environment and energy/climate experts to inform proposals where necessary/appropriate;
d) All required consents have been secured, or are in the process of being secured, such as Listed Building Consent or consent for works affecting TPOs.

Measures that seek to deliver carbon reduction through energy efficiency or provide adaptation to changing climate will be considered as a public benefit in the balance against harm, although this will not automatically override any harm to an asset.

NATURAL RESOURCES

There are a wide range of natural resources which need to be considered in the development process. Natural resources such as the soil, air, and water are all

important to health and wellbeing but also to the sustainable functioning of the wider natural environment that makes Oxford so special.

AIR QUALITY ASSESSMENTS AND STANDARDS

Policy context

- Air pollution is an ongoing health challenge which arises from a variety of sources. No amount of air pollution is safe, with pollutants such as Nitrogen Dioxide (NO_2) and particulate matter (PM2.5 and PM10) contributing to a wide variety of health impacts including respiratory and cardiovascular disease. Whilst the impacts of air pollution can affect anyone, they are particularly harmful for some more sensitive groups including children, the elderly, and those with pre-existing health conditions.
- The whole of the city has been declared an Air Quality Management Area (AQMA) for NO2 and the City Council has an Air Quality Action Plan (AQAP) which sets out a range of measures that will be required to improve air quality across Oxford including a more rigorous standard for Nitrogen Dioxide (NO2) compared with national legal limits.
- The role of this policy is to ensure that any negative impacts on air quality from new development (either during construction or once in operation) are mitigated. It also seeks to ensure that exposure to poor air quality is minimised or reduced through careful design.

Policy implementation

- All proposals need to consider their potential impacts upon air quality, as well as the impacts from existing air quality on the users of the development from the outset to avoid the need for future site mitigation. This should consider all potential air pollutants including Nitrogen Dioxide (NO_2) and particulate matter, and may necessitate various design choices to respond to and mitigate potential air quality impacts in the locally.
- Site layout should be designed in such a way as to protect human exposure to high pollution, which could involve setting the development back from key sources of pollutants; placing habitable rooms away from, and avoiding installation of balconies near to, highest pollution areas; as well as use of buffering measures like planting.
- Particular care and attention should be paid to more sensitive uses where these are present or proposed, meaning those expected to host more sensitive receptors such as schools, nurseries, care homes and healthcare settings, which need to be located away from areas of poor air quality.
- The conclusions of any Air Quality Assessment (AQA) - which should accompany all major applications - must demonstrate that the proposed development does not

conflict with or undermine any of the objectives of any of the city's current or future Air Quality Action Plans or Air Quality Strategies.

- Further guidance on meeting the requirements of the policy is set out in the City Council's Air Quality Planning Application Guidance Note, as well as the air quality webpage and the most up to date Institute of Air Quality Management (IAQM) guidelines which applicants are expected to follow.

POLICY R4: AIR QUALITY ASSESSMENTS AND STANDARDS

Planning permission will only be granted where the impact of new development on air quality is mitigated, and where exposure to air pollution is minimised or reduced, as far as is reasonably practicable as per the criteria set out in this policy.

The design and layout of new development (during construction and in operation) needs to consider the potential impacts upon air quality for current and new occupants. Sensitive uses such as schools, nurseries, care homes and healthcare settings, should be located away from areas of poor air quality as far as reasonably practical through careful site layout designed to protect human exposure to high pollution levels.

Air Quality Assessments (AQA) will be required for all major developments. Planning permission will only be granted for major developments where the AQA meets the following criteria:

a) It provides an assessment of the impacts of all the sources of air pollution generated during the development's operational and construction phases, including but not limited to transport, heating, dust generated from demolition/construction/earthworks activities; and
b) It has considered the cumulative impacts from other sources of air pollution in the local area where relevant; and
c) It clearly identifies any potential negative air quality impacts, including where these would compromise achievement of the local annual mean air quality target for Nitrogen Dioxide (NO_2), as set out in the city's Air Quality Action Plan (AQAP); and
d) It sets out appropriate site-specific mitigation measures to address negative impacts identified, following the principle of redesign – mitigate – offset.

Planning applications that involve significant demolition, construction or earthworks will also be required to submit a dust assessment as part of the AQA, to assess the potential impacts and health risks of dust emissions from those activities. Any appropriate site-specific dust mitigation measures will be secured as part of the Construction Management Plan (CMP) as required by Policy C6.

All applications are expected to follow the guidance set out in the latest City Council Air Quality Planning Application Guidance Note.

WATER RESOURCES AND QUALITY

Policy context

- The Thames River Basin Management Plan describes the current state and pressures affecting the waterbodies in the city, as well as the measures needed to achieve the requirements of the Water Framework Directive (transposed into the Water Environment Regulations). The City Council is committed to ensuring that new development will not lead to the deterioration of our water environment or impact on the ability to meet the objectives set out for our waterbodies.
- The Environment Agency has identified Oxford to be in a "serious water stressed" area, meaning that household demand for water is a high proportion of the effective rainfall which is available to meet that demand either now or in the future. There are ongoing pressures from climate change, bringing about more periods of hot weather and droughts, and rising demand from a growing population.
- Water quality issues are ongoing in the city, with the majority of watercourses either classified as moderate or poor in ecological status and ongoing quality concerns particularly for Northfield Brook and the River Thames. These issues arise for various reasons including pollution from a range of sources like agriculture, sewage discharge and surface run-off.
- Wastewater infrastructure in the city faces ongoing challenges as the city develops. Upgrades to the Wastewater Treatment Works which services Oxford are underway to address current capacity problems and meet future treatment needs, and the City Council is committed to continuing to engage with the EA and Thames Water to ensure future growth is appropriately planned for and delivered.

Policy implementation

- Applications must be accompanied by sufficient information to demonstrate that the potential for impacts on the water environment (both on water resources and water quality), have been considered and addressed.
- The policy requires that applicants set out how they will limit water use as much as possible and that new residential development as a minimum aligns with the tighter Building Regulations target for water consumption. The requirement will be subject to a planning condition to ensure that the water efficiency standards are met. Applications should also explore other ways to support water conservation, including:
    - grey water recycling (reuse of wastewater from showers, baths and washbasins);
    - rainwater harvesting (collection and storage of rainfall for reuse);
    - landscaping features which are drought tolerant and do not require regular watering during dry periods.

    - smart metering and intelligent building systems to help occupants monitor and manage water use.
- Proposals should also demonstrate consideration and mitigation of impacts on water quality such as accidental release of sediment/pollutants into waterways or drainage networks, infiltration of pollutants into groundwater. See also **Policy R8**.
- The risk of water quality impacts will be particularly relevant where proposals are located in close proximity to waterbodies, or close to ecological sites which are particularly sensitive to surface water and groundwater changes. See also **Policy G6.**
- New development may necessitate local network upgrades to facilitate water supply or wastewater infrastructure and the delivery of upgrades can take time. Developers are encouraged to engage with the Statutory Water Undertaker (Thames Water) at the earliest opportunity to establish the requirements for water supply and sewage/wastewater treatment network infrastructure both on and off site and ensure that these are planned for in due course. See also **Policy S3**.

POLICY R5: WATER RESOURCES AND QUALITY

Planning permission will only be granted for new development that utilises water supplies prudently and protects water quality. Proposals for new development, excluding householder applications, extensions, conversions and change of use (unless these would result in creation of a new dwelling) should include a water awareness statement to demonstrate how the following policy requirements have been met.

A) Water Supply/Efficiency

All new dwellings (including conversions, reversions, and change of use) should achieve an estimated water consumption of no more than 110 litres per person per day using the 'Fittings Approach' as set out in Building Regulations part G2 (proposals are encouraged to go further than this).

All non-residential development should demonstrate what measures have been incorporated to reduce water use.

All applications should demonstrate what other measures have been incorporated into the design to conserve water use including rain/grey water harvesting/reuse.

B) Water Quality and Wastewater

Proposals should demonstrate that development will not have an adverse impact on the quality of controlled water bodies and groundwater, such as by:

- managing run-off and infiltration through utilising SUDs (in line with the requirements of Policy G8);
- putting measures in place to manage and contain sediment/pollutants particularly where in proximity to open watercourses and designated bathing waters.

C) Foul and surface water drainage

Developers should separate foul and surface water sewers on all new development. Where opportunities are present during works on existing development, applicants are encouraged to separate existing combined foul and surface water sewer arrangements.

No surface water from new development will be discharged to the public foul or combined sewer system: a Foul and Surface Water Drainage Strategy must be provided for all new build residential development of 100 dwellings or more; non-residential development of 7,200m2 or more; or student accommodation of 250 study bedrooms or more, to demonstrate how foul water and surface water drainage will be managed to reduce run off and improve water quality in line with national policy.

SOIL QUALITY

Policy context

- There are multifunctional benefits of soils for the wider environment, they can store surface water, preserve water quality, support biodiversity and food production and store carbon. The natural accumulation of soil can be a slow process so soils should be considered to be a finite, non-renewable resource which needs to be protected and managed sustainably.
- Some types of soil, such as peat, have particularly valuable benefits, they are even better at locking up carbon and can act as archaeological reserves. They also take much longer to accumulate and as such are much more difficult to replace.
- Peat deposits have previously been identified at Dunstan Park, around the Churchill Hospital and Lye Valley, as well as along Littlemore Brook in the south of the city, although there could be additional deposits nearby.
- The development process can impact upon and deteriorate the quality of soils in various ways, such as through removal, compaction, sealing over with artificial surfaces and pollution.

Policy implementation

- The policy will apply to a variety of proposals where impacts on soils could arise, particularly those that involve undeveloped areas of land and greenfield sites.
- Measures to consider will vary based on the context of the site and proposal, but could include:
    - tailoring construction processes to avoid loss, erosion, or compacting of soils;
    - ensuring beneficial soil reuse and sustainable soil management;
    - minimising risks from release of contaminants (see also **Policy R8**);

    - locating development away from the highest quality soils;
    - minimising artificial surface cover that would lock away the soils.
- To allow the City Council to make an informed decision as to the impact of the development, proposals for major development on undeveloped land upon, or within 200m of, an identified peat reserve in the city will need to submit an assessment that details soil conditions and any existing peat reserve affected by the scheme alongside the application.
- Where there is potential for harm or loss of peat, proposals could seek to avoid impacts through careful design choices informed by the assessment, such as through development being located away from peat reserves where the site allows. Reliance on mitigation through offsetting the impact of lost peat alone, such as by providing carbon storage elsewhere, is unlikely to make a development acceptable as it is very difficult to achieve the same benefit for many years.

POLICY R6: SOIL QUALITY

Planning applications 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. The Design and Access Statement and associated landscape plans should include details identifying where relevant:

a) How impact on soils during the construction process has been minimised through avoiding: soil loss, compaction, pollution and reduction in the quality of soil; and
b) How development has been located in a way that avoids highest quality soils on sites where possible; and
c) How beneficial soil reuse and sustainable soil management has been implemented where possible; and
d) How artificial surface cover that seals off soils has been minimised.

Planning permission will not be granted for proposals that would remove or dewater 10m³ or more of peat.

Proposals for new major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the City Council to determine any potential impacts on reserves. The assessment should include details of the following:

I) The estimated carbon footprint of the peat impacted by development;
II) Its palaeo-archaeological interest;
III) Its function in the surrounding habitats;
IV) Its hydrological condition and stability.

LAND CONTAMINATION

Policy context

- Oxford's extensive history of development means that there are areas of the city which are likely to be affected by poor soil quality and the presence of contaminants that could be harmful for human health, for example closed landfill sites and former industrial sites.
- However, the development process can be an important mechanism for bringing land back into beneficial use through sustainable remediation processes maximising efficient use of land.
- The NPPF sets out that after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

Policy implementation

- In instances where land contamination could be an issue of relevance, a report documenting the investigations that have been carried out into the nature, extent and possible impacts arising from the contamination will need to be provided. It should detail any mitigation measures necessary to respond to what has been found.
- In assessing whether land contamination is an issue that needs to be taken into account, the City Council will have regard to a range of information sources including its database of potentially contaminated sites, information provided by developers and third parties, and the advice from the City Council's Land Quality officer.
- Ultimately, where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. Where applicable, site investigations should be carried out in line with Land Contamination Risk Management (LCRM) guidance, taking a staged risk-based approach.

POLICY R7: LAND CONTAMINATION

Planning applications where proposals could be affected by contamination or where contamination may present a risk to the surrounding environment, must be accompanied by a report which:

a) Details the Desktop Study and Preliminary Risk Assessment (PRA); and
b) Details the investigations (including, where relevant, site investigation data and results, conceptual site model, risk assessment, and remedial options) that have been carried out to assess the nature and extent of contamination and the possible impacts it may have on the development and its future users, biodiversity, the built environment, land and controlled waters; and
c) Sets out detailed remediation measures to allow the development to go ahead safely and without adverse effect, including, as appropriate:
    I) removing the contamination;
    II) treating the contamination;

III) protecting and/or separating the development from the effects of the contamination;
IV) validation of any mitigation and remedial measures.

Where site investigation and remediation measures are needed, these will be required as a condition of any planning permission.

AMENITY IMPACTS OF DEVELOPMENT

Policy context

- New development can create environmental impacts, particularly during the construction phase, as well as once in operation. Potential amenity and environmental health impacts need to be fully assessed during the planning application process to ensure that any potential nuisance resulting from the development can be properly mitigated to protect the amenity of residents, employees and the wider environment.
- The amenity of occupiers of new developments can also be impacted by the operation of existing uses nearby including uses like social venues, industrial processes, roads and rail where not appropriately considered in the design process. The applicant seeking to introduce a new land use is responsible for managing the impact of that change (the Agent of Change Principle).
- There may be other amenity impacts arising from existing uses nearby, such as sources of odour (e.g. in proximity to wastewater treatment works) or artificial lighting, which may need to be assessed to inform the design of new development to preserve the amenity of new occupiers without imposing restrictions on existing uses.

Policy implementation

- The policy sets out a number of factors which should be considered where they could have a direct impact on amenity and health, though as every development is different, some will be of more relevance and others may not be applicable.
- The management of noise (either arising from the new development or from existing uses nearby) should be an integral part of development proposals. In cases where noise sensitive development is proposed near to an existing noise generating use (e.g. a music venue or pub) the City Council will consider whether the introduction of the sensitive use might threaten the continued operation of the existing premises, which might mean the development is inappropriate in that location.
- 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. The policy sets out requirements for consultation with the Statutory Undertaker

(Thames Water) and technical assessment of odour impacts which will need to show that these can be avoided or mitigated.

- There are links with other policies in the Local Plan including transport impacts (**Policy C6**); air quality (**Policy R4**) and land quality (**Policy R7**).
- Measures to mitigate the impacts of noise and vibration associated with demolition and construction will be secured by legal agreement or condition through construction management plans which form part of the transport assessment.

POLICY R8: AMENITY IMPACTS OF DEVELOPMENT

Planning permission will only be granted for development that:

a) Ensures that the amenity of communities, occupiers, neighbours and the natural environment is protected; and
b) Does not have unacceptable transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
c) Provides mitigation measures where necessary.

The factors the City Council will consider in determining compliance with the above elements of this policy will also include where relevant:

d) Visual privacy, outlook;
e) Sunlight, daylight, overshadowing and mitigating glare from solar panels and windows where applicable;
f) Artificial lighting levels;
g) Transport impacts;
h) Impacts of the construction phase including the assessment of these impacts within the Construction Management Plan (CMP) (refer to Policy C6);
i) Odour, fumes and dust;
j) Microclimate e.g. wind, overheating
k) Contaminated land;
l) Impact upon waste and wastewater infrastructure;
m) Noise and vibration; and
n) Preserving surrounding water quality.

Planning permission will not be granted for development sensitive to noise in locations which experience high levels of noise, unless it can be demonstrated through a noise assessment, that appropriate attenuation measures will be provided to ensure an acceptable level of amenity for end users and to prevent harm to the continued operation of existing uses.

Proposals within 800m of a sewage treatment works or 20m of a sewage pumping station should be informed by liaison with the Statutory Undertaker (Thames Water). Planning permission will not be granted for sensitive development close to the Sewage Treatment Works, unless it is accompanied by a technical assessment, prepared in consultation with Thames Water, that shows there will be no adverse amenity impact on future occupiers of the proposed development or that sufficient mitigations can be incorporated to ensure that any potential for adverse impact will be avoided.

CHAPTER SIX

A CITY THAT RESPECTS ITS HERITAGE & FOSTERS DESIGN OF THE HIGHEST QUALITY

INTRODUCTION

Oxford is a world-renowned historic city, highly recognisable by its iconic skyline and its architecture, with a rich and diverse built heritage comprised from layers of history both visible and buried that are a product of more than a thousand years of settlement. Oxford is also a dynamic city that must adapt and change, and high-quality design is key to managing this change positively, for the continued success of the city. The policies in this chapter address the city's heritage assets and historic environment as well as the need for high-quality design in new development. There are, of course, many overlaps between these topics and successful new design and the conservation and enhancement of the heritage of Oxford cannot easily be separated.

This chapter sets out the following topics:

- High quality design
- Efficient use of land
- Heritage assets
- Amenity
- Space standards

HIGH QUALITY DESIGN

The value and benefits of good design and improvements it offers to quality of life are so significant that it is not a nice extra, it is essential. A successfully designed scheme will be a positive addition to its surroundings. It should be informed and inspired by the unique characteristics of the site and its setting, and these considerations should go beyond the red line of the application site to adopt a true placemaking approach. It may blend in or stand out, but it should not detract from existing significant positive characteristics in the area, and it may add interest and variety.

A well-designed scheme will meet the needs of all users and will stand the test of time. It gives flexibility to meet the needs of a wide range of people and takes account of how needs may change over time. It is important that new buildings create places that are of an adequate size and layout, with sunlight and daylight so that they provide a high quality, well-functioning

environment for occupiers. The impact on the amenity of occupiers of existing buildings must also be considered.

PRINCIPLES OF HIGH-QUALITY DESIGN

Policy context

- Oxford has a rich legacy of buildings, from iconic architectural set pieces in the historic core to smaller domestic, locally distinctive buildings within the many villages that now form part of the city and areas of planned city expansion.
- Contemporary and modern architectural styles have been added to the city over many years, adding to this richness and quality.
- There is therefore a wealth of inspiration in terms of building form and character and great opportunity for creative, high quality, complementary character to enhance the existing built form.
- Design should have a clear rationale, informed and inspired by the unique characteristics of the site and its wider setting, including an understanding of character.

Policy implementation

- The policy will require that new development proposals in Oxford have been developed through a rigorous design process that will ensure the highest possible level of quality
- The Appendix 1.1 sets out the principles against which schemes will be assessed. The emphasis of the assessment will be on a design process that is clearly explained and justified, and a demonstration that the proposed development is one that works well for its intended uses and is responsive to the immediate and wider context.
- Early discussion between applicants, the local planning authority and local community about the design of emerging schemes is encouraged as it will help clarify expectations and allow the opportunity for creative ideas and problem solving to add value.
- The Council has a Design Review Panel that can give advice so that designs can be reviewed and improved at the informative stage. It is encouraged that all major development proposals are assessed by the Panel as part of the pre-application and then application process. In assessing applications, the Council will have regard to the outcome from these processes, including any recommendations made by Design Review Panel.
- In combination with the policy requirements, applicants are encouraged to refer to other resources to inform their design approaches. These can include the following:
    - The *National Model Design Guide* sets out and illustrates the government's priorities for well-designed places.
    - Building for a Healthy Life (BHL) is the latest edition of one of the most widely used design guides in England relating to healthy placemaking.

POLICY HD1: PRINCIPLES OF HIGH-QUALITY DESIGN

Planning permission will only be granted for development of high-quality design that is responsive to its context, creates or enhances local distinctiveness, and ensures that the amenity of the natural environment is protected. Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 1.1.

All developments - other than changes of use without external alterations or householder applications - will be expected to be supported by a constraints and opportunities plan with supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement, Planning Statement or other demonstration of compliance with other plan policies that may be relevant), which should address the relevant checklist points set out in Appendix 1.1.

MAKING EFFICIENT USE OF LAND

Policy context

- Oxford is a compact city with a growing population and strong economic growth.
- It has tightly drawn boundaries and within those boundaries are flood plains, areas important for nature conservation and a sensitive historic environment, meaning that growth opportunities are constrained.
- The competing needs and pressure for land in Oxford and the limited availability of land means that it is vital that efficient use is made of land that does come forward for development.
- There are already densely developed urban areas, but there is also potential to substantially increase this density.

Policy implementation

- The policy requires all development makes efficient use of land.
- Transport hubs in the city and district centres, where development is infill and more likely to be flats and have very little need for parking should achieve very high densities.
- Careful design that responds to context is important at high densities to preserve and enhance valued features. Whilst the context of each site will be different, such features could include:
    - The potential for valuable archaeological remains to be present on the site which should be safeguarded through careful positioning of foundations
    - Whether there are sensitive views through the site which building heights should be tailored to avoid interrupting;
    - Whether there are deficiencies in particular types of green space which the proposal could help to address through provision on site
    - Whether there are opportunities to orient layout/rooftops to maximise solar gain on photovoltaics solar panels for renewable energy generation
- The city and district centres are defined on the Policies Map. Gateway locations are outside of these areas, but will be busy locations on significant roads and at the edges of suburban areas, rather than in the middle of them. All other areas are suburban, but some suburban areas are conservation areas that represent medieval villages now integrated in the city but still with a rural character, and that may sometimes need reflecting in lower density development.

POLICY HD2: MAKING EFFICIENT USE OF LAND

Planning permission will only be granted where development proposals make efficient use of land and maximise capacity. It is expected that sites across the city will generally be capable of accommodating development at an increased scale and density to their surroundings.

Proposals should demonstrate that the built form:

a) Maximises density; and
b) Is appropriate for the use proposed; and
c) Is informed by an understanding of the impacts on the significance of designated and non-designated heritage assets, including their setting and the potential for archaeological remains; and
d) Protects and enhances green infrastructure features in accordance with Policies G; and
e) Considers the opportunities for net zero carbon design, including energy efficiency measures, maximising renewable energy generation, reducing carbon dioxide emitted through construction process, and preserving carbon sinks; and
f) Considers presence of flood risk and, where relevant, locating more vulnerable uses in locations with reduced flood risk, less vulnerable uses in areas of higher risk.

It is expected that very high-density development (for residential development this will indicatively be taken as over 100dph) can be achieved in the highly accessible locations of the district centres, and in the city centre, where feasible in the context of the impacts on heritage. High density development (indicatively to be taken as over 80dph) will be expected at gateway sites (in mixed use areas on the edges of city on the main road network), and high suburban densities (indicatively to be taken as over 60dph) will be expected in most other locations.

HERITAGE ASSETS

Oxford's long history of settlement has resulted in a great density of heritage assets which, together and individually, contribute to the city's special character and unique sense of place. The city has many nationally designated assets (Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Monuments) but also non-designated assets of local importance, including a wealth of archaeological remains. Managing change in a way that respects and draws from Oxford's heritage and landscape is vital for the city's continued success, and new development needs to respect and respond to this context, whilst taking opportunities to celebrate this history.

Successful design in Oxford means understanding this heritage and managing change that meets future needs (such as providing new homes, greening our streets and reaching net zero carbon) whilst seeking to prevent harm to the special significance of these heritage assets so that they can continue to be understood, valued and enjoyed for years to come. In all cases, significance must be understood, and the level of any harm on this significance must be weighed against public benefits, which could be wide ranging and will vary in magnitude but include delivery of needed homes and facilities and environmental improvements such as energy efficiency.

Conservation areas

Oxford has eighteen conservation areas which are listed in Appendix 6.1 and defined on the Policies Map. These areas are designated heritage assets which are 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance' according to the Planning (Listed Buildings and Conservation Areas) Act 1990. Conservation areas include a diverse range of qualities reflecting the story of Oxford, from the medieval walled city to surrounding agricultural settlements, the open green space found in the Headington Hill Conservation Area to the meadows of the river valleys such as Wolvercote and Godstow. However, they all have the common element of containing features that link us to our past.

Listed buildings

Oxford has a very high concentration of historic buildings, including those of great rarity, group value and high aesthetic value, and with associations to people and events of history that allows a visible understanding of the past and contributes to the city's unique character and distinctiveness. Many of these buildings are nationally designated, or 'listed', and are graded I, II* and II, (though there is no legal difference in their protection):

- Grade I buildings are those of exceptional interest
- Grade II* are particularly important buildings of more than special interest
- Grade II are of special interest, warranting every effort to preserve them

Registered parks and gardens

As well as forming an important part of the green infrastructure network, many parks and gardens in Oxford are an important part of appreciating and understanding the city's heritage. Fifteen parks and gardens in the city are nationally designated heritage assets known as registered parks and gardens and these include: five registered as Grade I, one registered as Grade II*, and nine registered as Grade II. They represent a dense network of assets, that covers a significant proportion of the city, many helping to frame the Oxford's relationship with the River Cherwell. The majority of the Registered Parks and Gardens are related to colleges, conveying in rich detail the integrated way in which the colleges have been designed and developed. They have a pivotal role in shaping how the city's institutions and the boundaries between the public and private realms are experienced. Some (such as Oxford Botanic Garden) have a particularly important educational role linked with botany, genetics and related research. In addition to the colleges, Oxford's Registered Parks and Gardens include High Wall in Pullens Lane, Park Town and St Sepulchre's Cemetery.

Scheduled Monuments

Scheduled Monuments are another type of nationally designated asset. A heritage asset is only made a Scheduled Monument if it is of national importance and also if that is the best means of its protection. They may nor may not be visible above ground. There are 9 Scheduled

Monuments in Oxford, which are varied in age and type. They are the remains of Osney Abbey and Rewley Abbey, Oxford Castle and the City Walls, Seacourt Medieval Settlement, Old Abingdon Road Culverts, Grandpont Causeway, Port Meadow, and the Swing Bridge near Oxford Station.

DESIGNATED HERITAGE ASSETS

Policy context

- Heritage assets are not locked in time and changes can be carried out as long as this is thoughtfully done and in a manner that preserves the notable features of the heritage asset that contribute to its significance and the reason it is protected. For example, historic buildings need to be repaired and adapted to meet the changing needs of occupants, or to respond to the climate emergency.
- The setting of a heritage asset can be integral to understanding and appreciating heritage significance, and understanding the setting is also essential in determining potential harm and how to minimise it.
- Conservation area appraisals describe the distinctive character, appearance, and historic interest of conservation areas, whilst associated management plans help to articulate appropriate responses to local issues and pressures. These are published on the City Council's website.
- When a building is listed, all of the building itself, anything fixed to it, and also most buildings and structures in its grounds (the curtilage) are part of the listing. The inside as well as the outside of a building is listed, though not all features necessarily contribute to its significance.

Policy implementation

- Proposals will need to consider the potential for direct impact upon the significance of a heritage asset, and/or its setting and where there is potential for impact on a designated heritage asset the application should be accompanied by a heritage statement. The policy sets out expectations for what this should cover, and Historic England have produced guidance on what should be included in a heritage statement and how they should be structured (Statements of Heritage Significance: Analysing Significance in Heritage Assets).
- Where proposals seek energy efficiency upgrades to a listed building to mitigate the impacts of climate change, Policy R3 should be read in conjunction with this policy to help ensure that such projects do not result in maladaptations that can impair the buiding's performance and lead to unnecessary capital and carbon costs.
- The registered parks and gardens all have associated listed buildings and form a significant part of the setting of those listed buildings, so the impact of any proposals on associated heritage assets will also be a key consideration, as will the potential for impacts on archaeological remains if below-ground works are proposed (see policy HD6). Due to their contribution in the wider setting of these assets, the criteria in paragraph 214 of the NPPF

referred to in Policy HD3, about viable uses, grant-funding and bringing the site back into use, are unlikely to apply.

- The registered parks and gardens designation requires local authorities to consult Historic England on development affecting Grade I and II* Registered Parks. It also requires local authorities to consult the Garden History Society on works to all grades of parks and gardens.
- Pre-application engagement with Historic England is strongly encouraged for all proposals that are likely to affect the significance of a Scheduled Monument. Historic England can advise on the need for Scheduled Monument Consent (SMC) in addition to planning permission.
- Any work, internal or external, that will affect the special interest of a listed building is likely to require Listed Building Consent, an additional consent to planning permission.

POLICY HD3: DESIGNATED HERITAGE ASSETS

Planning permission will be granted for development that respects and draws inspiration from Oxford's designated heritage assets, responding positively to their significance, character and distinctiveness and enhancing it where possible.

Applications affecting a designated heritage asset directly or by affecting its setting will be considered in line with the approach set out in the NPPF (*National Planning Policy Framework*) paragraphs 207-221 (or updated equivalent), whereby the level of harm will be assessed and weighed against the public benefits of the proposal, and the relevant tests in the NPPF applied in that context.

The understanding of harm will be based on an understanding of context, including a description of the designated heritage asset and its significance, and an assessment of the impact of the proposed development on its significance. In cases where a proposal could result in less than substantial harm, this will need to be clearly and convincingly justified within the heritage statement. Substantial harm to or loss of significance of a designated heritage asset should be exceptional in the case of Grade II assets and wholly exceptional in all other cases, and planning permission or listed building consent will only be granted if the requirements of paragraph 214 (or the equivalent in any update) of the NPPF can be demonstrated as set out in a heritage statement.

A heritage statement must include information sufficient to demonstrate:

a) An understanding of the significance of the heritage asset, including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic, and environmental benefits they may bring; and
b) That the development of the proposal and its design process have been informed by an understanding of the significance of the heritage asset including its setting and that harm to its significance has been avoided or where it's not possible, any harm has been minimised through thoughtful design; and
c) That, in cases where development would result in harm to the significance of a heritage asset, the level of harm has been properly and accurately assessed, that alternative designs to respond to heritage constraints and/or opportunities have been explored, and that measures are incorporated into the proposal that mitigate or reduce the harm where appropriate.

Specific considerations for listed buildings

Proposals relating to a listed building should take into account its rarity, group value and how it illustrates the past and helps our understanding of it, including how it reveals its historic, architectural, archaeological and/or artistic interest.

Specific considerations for registered parks and gardens

Proposals for change within a Registered Park and Garden should take into account:

d) The scope for a landscape-led approach;
e) Opportunities to reveal significance and/or enhance its appreciation;
f) The relationship between the development site and the River Cherwell and/or other water features, as appropriate;
g) Impacts on any key views, having agreed those key views with the City Council;
h) How the treatment of boundaries may impact on significance;
i) Archaeological impacts if below-ground works are proposed.

Specific considerations for conservation areas

Certain features may be characteristic and add to the significance of a particular conservation area, and planning applications should set out how these have been responded to sensitively to create contextually responsive proposals. These features will be set out in conservation area appraisals and management plans, and may include, but are not limited to:

j) The urban grain such as specific settlement patterns, plot types and groupings of buildings and their relationship to each other and the wider area;
k) Proportions, such as height and massing, may be characteristic and may be harmed by developments that do not relate well to these;
l) Views, including focal points at the end of a view, glimpsed views of spaces beyond and between;
m) Trees and other landscape features, including backdrops to views;
n) Boundary treatments, which may include railings, walls and hedges; and/or
o) Architectural details such as the palette of materials, windows and doors, proportions, and rhythms.

Conservation areas are listed in Appendix 6.1 and defined on the Policies Map.

NON-DESIGNATED HERITAGE ASSETS

Policy context

- The term ‘heritage asset’ describes valued components of the historic environment such as buildings, monuments, sites, places, areas or landscapes that have been positively identified as having a degree of significance meriting consideration in planning decisions.
- Some heritage assets are not nationally designated in the same way that the assets are as discussed in HD3). Policy HD4 addresses the various other assets that have a local relevance that do not merit a national-level designation, but which are still important to consider in determining planning applications (and in developing proposals).

- There are many non-designated assets identified in the Oxford Heritage Asset Register, though the register is not an exhaustive list. Non-designated heritage assets may also be identified through the conservation area appraisal, neighbourhood planning, or the planning application process.

Policy implementation

- Once identified, however it is identified, it is important that a non-designated heritage asset is carefully considered in proposals, including how its significance may inform and be incorporated into proposals.
- If the loss of significance of any asset is justified by the public benefits outweighing the level of harm or the loss, the significance must still be recorded.

POLICY HD4: NON-DESIGNATED HERITAGE ASSETS

A non-designated building or group of buildings, monument or site, place or landscape will be considered a local heritage asset if it has local interest, value, and significance. These assets may be identified in a number of ways such as through the Oxford Heritage Assets Register, conservation area appraisals, or the planning application process.

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 (including its setting) and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development.

In determining whether planning permission should be granted for a development proposal that affects a local heritage asset, consideration will be given to the significance of the asset, the extent of impact on its significance, as well as the scale of any harm or loss to the asset.

Recording should take place to advance understanding of the significance of any assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and that is publicly accessible. The ability to provide publicly accessible recording will not be a factor in deciding whether such loss should be permitted.

Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the requirements of Policy HD4.

ARCHAEOLOGY

Policy context

- Oxford has a rich archaeological heritage, from prehistoric times to the modern day, and encompasses a wide variety of asset types. Some of these are formally designated heritage assets such as Scheduled Monuments, however many assets of comparable

significance are not currently designated and warrant appropriate protection through the planning system. Notable assets include:

  - prehistoric domestic, ritual, and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city.
  - middle-late Saxon urban remains, arising from Oxford's emergence as a major cloth trading town in the Norman period.
  - Numerous assets associated with Oxford's development as an international centre for academic study including the remains of multiple religious institutions, academic halls and endowed colleges.
  - Other assets of note include the town defences, the distinctive remains associated with the medieval Jewish Community and the Royalist Civil War defences.

- It is important that archaeological remains are preserved in situ wherever possible and, because these assets can't be renewed, it is essential they are managed carefully and treated with respect.
- New development has the potential to harm or destroy these assets where their presence is not appropriately investigated, and impacts are not carefully mitigated. The potential impacts of cumulative harm or loss are significant and should also be considered.
- Owing to the richness of archaeological remains in Oxford, especially in the historic core, there is a danger that allowing the recording of deposits rather than preservation in situ for several individual developments will lead to significant degradation of the archaeological record. In those cases, further work to ensure adequate contextual assessment and mitigation may be required, that takes into account cumulative impacts.

Policy implementation

- The medieval core of the city (the City Centre Archaeological Area defined on the Policies Map) has an exceptionally high concentration of archaeological remains, as do some allocated sites and other known locations, so the policy requires that any significant breaking of the ground in these locations will require an archaeological assessment within the heritage statement.
- Development within the City Centre Archaeological Area has a high potential to harm the heritage value of the sites, if not carried out sensitively. There are many things to consider as part of the design of developments at these sites, so a comprehensive approach is essential that ensures archaeology, and cumulative impacts on archaeological remains, is an integral part of considerations of how to develop a site.
- An archaeological assessment may also be required outside of these areas where it is suspected there are archaeological remains.
- There are known concentrations of past human activity in many parts of Oxford, and early discussion with the City Council to ascertain whether an archaeological assessment is required is strongly advised.

POLICY HD5: ARCHAEOLOGY

Within the City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present (including upstanding remains), applications should be accompanied by a heritage statement. A heritage statement should include and be informed by a description of impacted archaeological deposits or features (including where relevant their setting) that should as a minimum be informed by relevant information from the Oxford Historic Environment Record.

The heritage statement or, if appropriate, archaeological desk-based assessment should contain:

a) An explanation of how early assessment has informed the design of the proposal, and how this seeks to preserve deposits and features in situ, avoiding adverse effects from poor siting of foundations, drainage features and hard landscaping; and
b) An assessment of the impact of the proposed development on the significance of the deposits or features, using a proportionate level of detail that is sufficient to understand the potential impact of the proposal on that significance.

If appropriate, a full archaeological desk-based assessment may be required and potentially field evaluation. This should be undertaken by an appropriately qualified contractor. Pre- application discussion is encouraged to establish requirements.

In the City Centre Archaeological Area, where significant archaeological asset types can be shown to be subject to cumulative impact from development, the desk-based assessment should contain appropriate contextual assessment of this impact.

For larger developments in the City Centre Archaeological area, the desk-based assessment should also include a whole site plan (which may be beyond the red line to include a whole campus site, for example) that shows current understanding of any basement and underground servicing, likely locations of hidden archaeological remains, other related heritage assets (including settings) to be considered and explain how this whole-site understanding has helped inform decisions about the layout and location of the development.

Development proposals that affect archaeological deposits and features will be supported where they are designed to enhance or to better reveal the significance of the asset and will help secure a sustainable future for it.

Proposals which would or may affect archaeological deposits or features that are designated heritage assets will be considered against the relevant policy approach (Draft Policy HD2 Listed Buildings, Draft Policy HD4 Scheduled Monuments).

Subject to the above, proposals that will lead to harm to the significance of non-designated archaeological deposits or features will be resisted unless a clear and convincing justification through public benefit can be demonstrated to outweigh that harm, having regard to the significance of the deposits or features and the extent of harm. Where harm to an archaeological or paleoenvironmental asset has been convincingly justified and is unavoidable, mitigation should be agreed with Oxford City Council and should be proportionate to the significance of the asset and impact. The aim of mitigation should be to minimise harm, to promote public enjoyment of heritage and to record and advance

knowledge. Appropriate provision should be made for investigation, recording, analysis, conservation of remains, publication, archive deposition and community involvement.

VIEWS AND BUILDING HEIGHTS

Policy context

- Taller buildings, designed with care and attention, can help to ensure efficient use of land and can make a positive design contribution.
- Tools such as VuCity are available to assist with assessing proposals for taller buildings.
- Particular care needs to be taken over the design and placement of taller buildings in Oxford because development might be in the setting of the buildings which form the iconic 'dreaming spires'. These buildings are a collection of nationally and internationally important buildings of historic and architectural significance. They sit in a compact area in the core of Oxford, which is raised slightly on a gravel terrace, giving more prominence to these historic buildings, and meaning that Oxford's unique skyline can be viewed as a single entity whose composition varies according to the direction of viewing. Taller buildings should not negatively impact on views of the iconic skyline.
- If it is established that a taller building is appropriate in a particular location (e.g. in district centres and on arterial roads), it is important it is designed to ensure it contributes positively to the character of the area, that it does not detract from the amenity of its surroundings, that it is sustainable and creates a good internal environment.

Policy implementation

- The High Buildings Study Technical Advice Note (TAN) should be referred to (Technical Advice Notes). The TAN document supports and provides further information and guidance in relation to high buildings, including how to assess whether a building is a 'high building', what the impact of that height might be and the areas of Oxford where proposals for new high buildings are more likely to be appropriate.
- The area within a 1,200 metre radius of Carfax tower (defined on the Policies Map as the Historic Core Area) contains all the buildings that comprise the historic skyline and where new buildings have high potential to impact on the character of the skyline.
- The View Cones Assessment (2015) (Oxford View Cones) should also be referred to. It sets out a methodology for heritage impact assessment of proposals that could affect the significance of one or more heritage assets and applies this to each of the 10 view cones which are shown drawn as triangles from important viewing points on the Policies Map. Within view cones, proposed new buildings must not detract from the skyline and composition, and even where they will not intrude directly on to it their effect as a frame to it must be considered. Tall buildings that are proposed outside of the view cones might still have an impact on the historic skyline and the View Cones Assessment has guidance that will support assessing impacts of these too.

- To create more visual diversity which enhances the experience of the skyline, the articulation of roofscape, and relatively short units of building are encouraged, with features to create a break in the line incorporated. A maximum ridge or parapet length of 25 metres without either a substantial vertical or horizontal break or interrupting features is a rule-of-thumb guideline that will be followed for Oxford's skyline.
- The City Council will resist the loss of any features, such as chimneys, if the loss would result in a simplification of the skyline.

DRAFT POLICY HD6: VIEWS AND BUILDING HEIGHTS

Planning permission will only be granted for development that will retain or enhance the special significance of views of the historic skyline of the Historic Core Area.

Planning permission will be granted for developments of appropriate height or massing. If the proposal is for development above the prevailing heights of the area and could impact on character or views, the application must demonstrate how all of the following criteria have been met:

a) Design choices regarding height and massing have a clear design rationale; and
b) The guidance on design of higher buildings set out in the High Buildings Study TAN has been applied. In particular, the impacts in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character should be explained; and
c) 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, through their massing, orientation, the relation of the building to the street, and detailed design features including roofline and materials (including colour); and
d) Taller buildings have been designed and orientated to avoid potential negative impacts, including on neighbouring amenity, such as overshadowing, overbearing and overlooking, reduced internal daylight and sunlight and wind-tunnel effects.

The area within a 1,200 metre radius of Carfax tower (the Historic Core Area) contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m (60ft) in height or ordnance datum (height above sea level) 79.3m (260ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height must be limited in bulk and must be of the highest design quality.

Applications for any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher) will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:

e) A Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible (produced in accordance with the Landscape Institute's GLVIA 3d Edition and Technical Guidance note TGN 06 19 or updated equivalents); and
f) Use of VuCity 3D modelling (or equivalent if updated by the City Council in future), shared with the City Council so that the impact of the development can be

understood from different locations, including any view cone views that are affected; and

g) A heritage impact assessment if the proposal would harm the significance of a designated heritage asset including through development in its setting (or a group of assets and their settings) informed by the methodology outlined in the Assessment of the Oxford View Cones report, a full explanation of other options that have been considered that may be less harmful, how that harm has been avoided or minimised, a justification that the benefits outweigh the harm and open book viability assessment if relied upon in the explanation.

Any proposals within the Historic Core Area or the View Cones that may impact on the foreground of views and roofscape (including proposals where they are below the Carfax datum point, for example plant) should be designed carefully, and should meet the following criteria:

h) They are based on a clear understanding of characteristic positive aspects of roofscape in the area; and

i) They contribute positively to the roofscape, to enhance any significant long views the development may be part of and also the experience at street level.

Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view. The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map.

HEALTH IMPACT ASSESSMENT

Policy context

- The built and natural environment is a key determinant of our health and wellbeing, and therefore it is crucial that through the planning system we plan for and design healthier built environments. This will encourage and support good physical and mental health and also help to reduce health inequalities.
- Health Impact Assessments (HIAs) help ensure that development proposed in Oxford promotes and contributes to healthy place shaping.
- Proposals should consider health outcomes from the outset.

Policy implementation

- Those proposing major development are expected to undertake and submit a HIA in support of their application. The scope of assessment for the HIA, including the issues it needs to cover, will vary with the nature of the development; however the structure of the assessment will need to follow a logical format that addresses the key steps outlined in the policy. These steps are important in enabling the HIA to be as targeted as possible and appropriately

scoped to provide the most benefit in terms of the key issues of relevance to the development.

- The analysis presented within the HIA should be of a sufficient level of detail to allow the Council to make a clear determination as to impacts the development will have on the health environment of the city. The analysis should be evidence based and set out how design of the development has taken into consideration the relevant health concerns and how it addresses these including where opportunities have been taken to achieve positive impacts and to avoid or mitigate negative impacts that could exacerbate issues and inequalities.
- Supporting information for how to undertake a HIA including helpful resources can be found in Appendix 6.2 and within the Council's Health Impact Assessment Technical Advice Note.

DRAFT POLICY HD7: HEALTH IMPACT ASSESSMENT

A Health Impact Assessment (HIA) is required to be submitted as part of the planning application for major development proposals.

The analysis within the submitted HIA should be of a sufficient level of detail to allow the Council to assess the potential impacts of the development on the health environment of the city and its residents. As a minimum, the assessment should include the following:

a) A description of the physical characteristics of the proposed development site and surrounding area, including the current use; and
b) Identification of relevant population groups that could be affected by the development and associated health issues, inequalities and priorities in the area, which should be supported with appropriate evidence/data; and
c) An assessment of the impacts of the proposal on the identified population groups and local health issues, inequalities and priorities, including any potential positive and negative impacts, along with any mitigation measures incorporated into the design to reduce identified negative outcomes; and
d) Details of monitoring which will be undertaken in relation to the proposed mitigation to be implemented.

The level of detail should be proportionate to the development and agreed with the relevant case officer. Applicants should refer to the additional information and guidance contained in Appendix 6.2 and the Council's Technical Advice Note.

PRIVACY, DAYLIGHT AND SUNLIGHT

Policy context

- Ensuring all homes are built with adequate privacy, daylight and sunlight (internal and external) helps to ensure the wellbeing of residents.
- It is also important to consider the impacts on neighbouring residential properties to ensure they do not lose their sense of privacy.

- Homes that do not provide a good quality living environment will not be long-lasting, which is not a sustainable approach.
- This policy is particularly important in the context of Oxford, where high density development is expected in some areas of the city to make efficient use of land.

Policy implementation

- The policy approach will ensure that new development provides adequate daylight and privacy for existing and new residents
- Potential for unacceptable overlooking will depend on the proximity of windows to neighbours' habitable rooms and gardens and the angles of views and gardens.
- New homes' access to daylight and sunlight will depend on both the way new and existing buildings relate to one another, and the orientation of windows in relation to the path of the sun.
- Windows that are overshadowed by buildings, walls, trees, or hedges, or that are north facing, will receive less light.

POLICY HD8: PRIVACY, DAYLIGHT AND SUNLIGHT

Planning permission will only be granted for new development that provides reasonable privacy, daylight and sunlight for occupants of both existing and new homes and sensitive workplaces such as schools. Proposals should demonstrate consideration of all of the following criteria:

a) Whether the degree of overlooking to and from neighbouring properties or gardens resulting from a proposed development significantly compromises the privacy of either existing or new homes (or existing other uses where there might be a safeguarding concern, particularly schools); and
b) The size and orientation of windows in both existing and new developments in respect of access to daylight, sunlight, and solar gain (i.e. natural heating from direct sunlight); and
c) Room depths in relation to maximising natural light; and
d) Existing and proposed walls, hedge, trees, and fences, in respects of protecting or creating privacy and also in respect of their impact on overshadowing of both existing and new development.

To assess access to privacy, sunlight, and daylight in residential developments, the 25 degree and 45-degree guidelines will be used as illustrated in Appendix 6.3, alongside other material factors. On constrained sites with proposals for specialist accommodation, developers may use other methods to demonstrate that dwellings will receive adequate daylight.

Planning permission will not be granted for any development that has an overbearing effect on existing homes.

INTERNAL SPACE STANDARDS FOR RESIDENTIAL DEVELOPMENT

Policy context

- It is important to ensure that all new homes are of an adequate size and layout to provide high quality, functional homes that meet the needs of a wide range of people and can adapt to how those needs may change over time.
- Requiring space standards is particularly important in Oxford because the pressure to deliver more homes can lead to increased pressure to deliver smaller homes, which do not offer occupiers acceptable living standards or meet the national aim that everyone should have access to a decent home.
- Government policy is clear that either the national space standards can be applied, if justified, or no standards can be applied.
- The City Council has carefully considered the local need for space standards and the viability impact of taking such an approach and has decided to adopt the nationally described standards.

Policy implementation

- All new dwellings (C3) should be built to meet the nationally described space standards.
- Designs should maximise the useable space within housing through functional layout and provide scope to adapt and modify housing to meet future requirements.
- In addition, minimum bedroom sizes for HMO are governed by the Licensing of Houses in Multiple Occupation (mandatory Conditions of Licences) (England) Regulations 2018.

POLICY HD9: INTERNAL SPACE STANDARDS FOR RESIDENTIAL DEVELOPMENT

Planning permission will only be granted for new dwellings that provide good quality living accommodation for the intended use. All proposals for new build market and affordable homes (across all tenures) must comply with the Nationally Described Space Standards.

In flatted schemes, communal areas must be designed to enable neighbours to meet and interact, for example some fixed seating, and wider areas of corridor or lobby space.

OUTDOOR AMENITY SPACE

Policy context

- The adequate provision of outdoor amenity space is a key factor in supporting the physical and mental health and wellbeing of residents. It provides a space to dry clothes, play, grow

plants and vegetables, and can provide shade and limit urban heat-island effects. In addition, if the space is designed with permeable surfaces it can contribute towards flood risk management.

- Where high density development and subdivision of properties are expected, and where many sites are infill development, high standards for the delivery of good quality outdoor amenity space becomes increasingly important to ensure the health and wellbeing of residents.

Policy implementation

- The policy is flexible in how outdoor amenity space is to be delivered, allowing communal/shared outdoor amenity spaces.
- In all cases, including where there is shared/communal outdoor space, the outdoor amenity space must not be public open space.
- Flats of 3 or more bedrooms and all houses must have an element of private (to that property) outdoor amenity space, which is 1.5m deep by 3m long and which allows for outdoor dining and clothes drying.
- A garden of adequate size and proportions for a house will have space for children to play in, and for family activities. It is important that both public and private amenity and garden spaces are well designed, to ensure that it is clear how each of the spaces are used without the need for extensive signage, avoiding narrow pathways to link spaces, optimising sunlight, and ensuring principles of good landscape design are incorporated.

POLICY HD10: OUTDOOR AMENITY SPACE

Planning permission will only be granted for dwellings (HMO and Use Class C3 except self-contained student accommodation) and the subdivision of dwellings, that have direct, well-related and convenient access to an area of private or communal (but not public) outdoor amenity space (in addition to bin or bike storage space), to meet the following specifications:

a) 1- or 2-bedroom flats and maisonettes should provide either a private balcony or terrace of usable, level space, or have direct and convenient access to a private or shared outdoor space.
b) Flats and maisonettes of 3 or more bedrooms must provide private outdoor areas with space for outside dining and/or clothes drying, with a minimum dimension of 1.5 metres depth by 3 metres length. This may be either a private balcony or terrace of useable level space, or direct and convenient access to a private garden or shared garden with some private space (which should not feel isolated).
c) All houses should provide a private garden, of adequate size and proportions for the size of house proposed, which will be at least equivalent in size to the footprint of the dwelling as built originally. For developments including more than one house, where a directly accessible private outside area is provided, the remaining requirement for outdoor amenity space could be met by provision of shared outdoor space that can be directly and conveniently accessed. The private outdoor areas should allow space for outside dining and/or clothes drying, with reasonable circulation, which will require a minimum dimension of 1.5 metres deep by 3 metres long.

It should also be shown how the following factors have been considered in order to ensure an outdoor space that is adequate and attractive to use:

d) The location and context of the development, in relation to the layout of existing residential plots, and proximity to public open space; and
e) The orientation of the outdoor area in relation to buildings and the path of the sun so that the whole outdoor space will not be continuously in shade or over-exposed; and
f) The degree to which enclosure and overlooking impact on the proposed new dwellings and any neighbouring dwellings; and
g) The overall shape, access to and usability of the whole space to be provided; and
h) Clear delineation between public and private space; and
i) For communal spaces that there is a variety of space, including provision of space to sit and to play, and that space is adaptable to the changing needs of residents, being easy to maintain with resilient materials, but with opportunities for communal gardening or food growing.

ACCESSIBLE AND ADAPTABLE HOMES

Policy context

- Housing provision across the city should meet the needs of everyone, which means provision must be made for those with disabilities by considering the requirements people will have from their homes and how this may change over time.
- Adaptability is important to respond to changes to the size and compositions of households, and an ageing population. Adaptable homes can help older people and those with chronic health conditions and other specialist housing needs remain in their homes, maintaining their independence and helping to alleviate pressure on health and social care.
- The Census 2021 showed 5.3% of the population of Oxford are 75 or over. This is lower than the national average and the trend of Oxford having a markedly young population compared to the national average is expected to continue, but the older population will also continue to grow as people are living longer.
- The Census 2021 also shows that 29% of households in Oxford have one or more people with a disability. The Government has found that 34% of disabled people have had to make adaptations to their homes https://www.gov.uk/government/publications/uk-disability-survey-research-report-june-2021/uk-disability-survey-research-report-june-2021;
- Local authorities can adopt a policy to provide enhanced accessibility or adaptability through requirement M4(2). Accessible and adaptable dwellings and/or M4(3) Wheelchair user dwellings in ‘Approved Document M: access to and use of buildings)

Policy implementation

- Considering that the number of people with a disability is likely to grow, especially with an aging population, the policy requires at least 15% of general market homes to be adaptable according to current needs.

- To ensure available provision for the full range of households on the housing register, and to avoid exclusion, for affordable homes all new homes should at least meet the M4(2) requirement to be accessible and adaptable.

POLICY HD11: ACCESSIBLE AND ADAPTABLE HOMES

Proposals for residential development should ensure that all affordable dwellings and 15% of general market dwellings on sites of 10 or more dwellings are constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4.

5% of all dwellings for which the City Council is responsible for allocations or nominations, on sites of more than 20 dwellings, should be provided to Category 3 (wheelchair user) standards as set out in the Building Regulations Approved Document M4. These M4(3) dwellings should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation.

An exception will be made for flatted schemes that are of three storeys or fewer and/or that are smaller than 50 units, whereby planning permission will be granted when no dwellings meet the requirements of Building Regulations Approved Document M4, if the following conditions are met:

a) It can be demonstrated that there are strong design reasons for providing blocks of flats with a small number of storeys, and it is not purely to circumvent the requirement; and
b) It can be demonstrated that options to provide affordable units in an alternative way that enables level access have been explored, including where possible providing the dwellings required to meet M4 standards on the ground floor.

BIN AND BIKE STORES AND EXTERNAL SERVICING FEATURES

Policy context

- Cycling is popular with Oxford residents and should be encouraged on new developments by incorporating well-designed, secure and easy to use bike storage facilities as part of the move away from cars.

- It is essential that new development optimises the opportunities for residents to recycle as much waste as possible by providing adequate, well-sited bin storage. Bin stores need to be accessible for collection and designed so as not to detract from the appearance and amenity of the area. Servicing features such as meter cupboards, pipes and gutters, flues, vents, and aerials can create a cluttered appearance and detract from the design of the development. This impact can be lessened when they are designed as an integrated element of architecture. They can be used to add detail and rhythm to a facade.

- As the city moves towards becoming net zero there will need to be infrastructure to support this including EV (Electric Vehicle) chargers, air source heat pumps, solar panels etc. These need to be carefully sited and designed within new developments.

Policy implementation

- Attention must be given to the incorporation of these storage and servicing features at the initial stages of the design process to ensure they are well sited and designed.
- Bicycle parking Standards are included in Appendix 7.4 and further advice and guidance is available in Technical Advice Note 12 – Car and Bicycle Parking.
- Guidance on the numbers and sizes of bins that are required for different types of development and design and placement of stores is set out in the Technical Advice Note 3 on Waste Storage.

POLICY HD12: BIN AND BIKE STORES AND EXTERNAL SERVICING FEATURES

Bin and bike stores should be provided in new development and these and external servicing features should be considered from the start of the design process. For new schemes, planning permission will be granted where it can be demonstrated that:

a) Bin and bike storage is provided in a way that does not detract from the overall design of the scheme or the surrounding area, whilst meeting practical needs including the provision of electric charging points for e-bikes where applicable; and
b) External servicing features have been designed as an integrated part of the overall design, or are positioned to minimise their visual impact; and
c) Materials used for detailed elements such as for stores or rainwater goods are of high quality so they enhance the overall design and will not degrade in a way that detracts from the overall design.

Planning permission will be granted for new external features such as bin and bike stores relating to existing developments unless they would cause significant harm to amenity through poor design and siting.

CHAPTER SEVEN

A LIVEABLE CITY WITH STRONG COMMUNITIES AND OPPORTUNITIES FOR ALL

Oxford is a very liveable and accessible city, with most people having easy access to a range of services to meet their daily needs. Most of the city has local services and facilities within a 15-20 minute walk, with other services and facilities accessible by the excellent public transport network. Maintaining and aiming to improve this is vital.

Policies can be used to help achieve, support and sustain liveable cities, including by protecting certain facilities, maintaining the vibrancy of our centres, managing parking and requiring transport assessments and travel plans when new developments are proposed and implemented. This ensures traffic is managed well and that walking, wheeling, cycling and public transport are prioritised, consistent with Oxfordshire County Council's adopted Central Oxfordshire Travel Plan and the transport user hierarchy policy it promotes.

TOWN CENTRES AND TOWN CENTRE USES

Uses that attract lots of people and need to be located in accessible locations are defined as town centre uses in the NPPF. Their co-location within town centres (the city centre, district centres and Local Centres as defined in Policy C1) helps reduce people's need to travel and helps ensure attractive and vibrant centres.

CITY, DISTRICT AND LOCAL CENTRES

Policy Context

- ☐ The city and district centres are highly accessible mobility hubs that include a broad range of facilities including shops, hospitality, community and leisure facilities.
- ☐ Local centres are smaller-scale, but still have an importance beyond the immediate neighbourhood, are well connected and suitable for a range of uses.
- ☐ Small parades of shops with a purely local function do not meet the definition of local centres set out in the NPPF, so are not defined in this category, even though they are very important for local communities.

- ☐ The NPPF says that an impact assessment should be required for retail and leisure developments outside of town centres and the threshold may be set locally.
- ☐ Establishments that promote community cohesion, health and wellbeing are particularly welcomed in the city centre, local and district centres.
- ☐ The availability of hot-food takeaways can encourage unhealthy eating habits that are harmful to health, so limiting new hot-food takeaways can be beneficial, although these uses can also be popular and help to support local centres.

Policy Implementation

- ☐ Policy C1 sets out the hierarchy of centres.
- ☐ Town centre uses should be directed to the city centre, district centres and local centres, then edge of centre locations, and only outside of these where no alternatives are available and the site is suitable. The need to use an out-of-centre location must be justified, and the criteria of the policy worked through to demonstrate the proposed location is suitable.
- ☐ All defined centres (the city centre, district centres and the local centres) are Town Centres according to the NPPF, and town centre uses are therefore suitable in all these defined centres. Town centre uses are defined in the Glossary (and in the NPPF) and they are not restricted to any particular Use Class.

POLICY C1: CITY, DISTRICT AND LOCAL CENTRES

The city centre and district centres defined on the Policies Map are:

- City centre;
- Cowley centre;
- Cowley Road;
- Summertown; and
- Headington.

Local Centres defined on the Policies Map are:

- St Clement's;
- Walton Street and Little Clarendon Street;
- High Street east;
- Rose Hill;
- North Parade Avenue;
- Magdalen Road
- New Marston;
- Underhill Circus;
- Blackbird Leys; and
- Greater Leys.

In the city, district centres and local centres, new Use Class E and other main town centre uses will be permitted where compatible with other policies in the plan, which include:

- ☐ Retail, cafes and restaurants;
- ☐ Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres);
- ☐ Health centres, GPs and clinics;
- ☐ Offices, research and development and light industrial;
- ☐ Community facilities;
- ☐ Residential (where compliant with the active frontages policy, including student accommodation in the city centre and district centres, but not in the local centres);
- ☐ Visitor attractions (Sui Generis uses including pubs, cinemas, live music venues, concert halls, dance halls);
- ☐ Short stay accommodation (in accordance with Policy E5 and where compliant with the active frontages policy C2).

Proposals for new hot food take-aways (Sui Generis Use Class) will not be permitted outside of the city, district or local centres.

A sequential approach should be taken for locating new town centre uses. Applicants must demonstrate how the sequential approach has been applied if town centre uses are proposed outside the city centre, district and local centres, looking at edge of centre areas first then accessible locations well connected to the town centre.

Where the applicant demonstrates an out-of-centre location is justified as no alternative sites are available and where this is not contrary to other policies of the Plan, planning permission will only be granted where all the following criteria are met:

a) It has good accessibility by walking, cycling and public transport; and
b) Impacts on the road network can be mitigated (which is likely to include by minimal parking); and
c) That no unacceptable harm or loss of amenity will be caused to adjoining land uses.

Planning permission for retail and leisure proposals of greater than 350m^2 floorspace and outside of a defined centre will only be granted if a retail impact assessment is submitted with proportionate evidence to demonstrate there is no negative impact on the vitality and viability of existing centres, by assessing:

d) The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposals;
e) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment.

MAINTAINING VIBRANT CENTRES

Policy context

- ☐ Development should respond to and enhance the individual character of the centres to help maintain their attractiveness and therefore their robustness by encouraging people to want to visit and linger.
- ☐ Ensuring active frontages in a centre is a key tool to achieving vibrancy.

Policy implementation

- ☐ Policy C2 provides design principles for each centre to guide future developments and ensure opportunities are taken to enhance and strengthen them.
- ☐ Sections of streets where an active frontage is to be retained at ground floor level are defined on the Policies Map. Within those frontages a minimum threshold is set for the proportion of Class E (commercial, business and service uses) at ground floor level.
- ☐ All thresholds are set above current levels of Use Class E, so the focus of the policy is retention.
- ☐ Any proposed new use within an active frontage, even when the overall proportion of Use Class E would remain above the threshold, will be expected to show how activity will be maintained.

POLICY C2: MAINTAINING VIBRANT CENTRES

The densification and growth of district centres and the city centre is encouraged. High density development is generally expected in the city centre and district centres as set out in Policy HD8, and this should be low car.

Planning permission will be granted for new development within the district centres and city centre where it takes opportunities to deliver the following, where relevant:

a) Improved permeability and connectivity to existing development and wider transport links;
b) Intensification of development to create a high-density centre, including by more efficient use of land, by consolidating uses and through infill;
c) More residential development, including on the upper floors of existing commercial premises;
d) Enhancement of existing buildings and improvement in their relationship to the street by creating active frontages;
e) Rationalisation of public car parking so it is well-located, limits surface-level parking and is reduced where possible, and makes better use of workplace surface-level car parking;
f) Public realm improvements for cyclists and pedestrians and public transport users and rebalancing of the space within streets from vehicles to pedestrians;
g) Improved pedestrian connections across the main roads through the centres;
h) Enhancement and new opportunities for public realm and landscaping such as tree planting, including incorporation of small green spaces where people can stop, dwell, socialise and play;
i) Better integration of the landscape setting and surrounding green spaces;
j) Enabling of the continued successful operation of any street markets;
k) Improvements to shopfronts and signage;
l) Enhance and better reveal heritage assets and their settings.

Active frontages

Planning permission will be granted at ground floor level of the defined Active Frontages (as set out on the Policies Map) for town centre uses that promote the vitality of the centre, and where the proportion of units at ground floor level does not fall below the threshold percentages of Use Class E set out below. Proposals for any new use within the defined active frontages of the city, district and local centres, even when the overall frontage would remain above the threshold, will be expected to

promote the vitality of the centre. Planning permission will be granted if it can be demonstrated how activity will be maintained by:

m) Attracting footfall; and
n) Creating and retaining an active window display; and
0) Not adversely affecting the amenity, availability of services or appearance of the frontage.

Centre name	Threshold % of Use Class E
Headington District Centre	80%
Summertown District Centre	80%
Cowley Road District Centre	75%
Cowley Centre District Centre	80%
City Centre primary frontage	90%
City Centre secondary frontage	70%

Planning permission will be granted for development of upper storeys of the Active Frontages for housing, student accommodation and other uses appropriate to a town centre, as long as the functioning of the ground floor unit(s) in the active frontage is not undermined.

Local Centres

Planning permission will only be granted at ground floor level within the Local Centre Active Frontages for main town centre uses that promote the vitality of the centre and where the proportion of units in the Local Centre at ground floor level in Use Class E does not fall below 50% of the total number of units.

Planning permission will be granted for development of upper storeys of units in the Local Centres for housing and other uses appropriate to the location, as long as the functioning of the ground floor unit(s) in the active frontage is not undermined.

The City Centre, District Centres, Local centres and Primary and Secondary Active Frontages and Local Centre Active Frontages are all defined on the Policies Map.

COMMUNITY, INSTITUTIONAL, SOCIAL AND CULTURAL FACILITIES AND ATTRACTIONS

It is important that our communities are supported by provision of health and community facilities, meeting places, nightlife, cultural and education venues. Access to such facilities greatly improves the quality of life for residents, builds strong communities and helps to address inequalities.

In seeking social inclusion and a high quality of life, a diverse range of facilities should be accessible that meet social, economic, health, leisure, cultural and religious needs of Oxford's diverse communities. Facilities important to local communities may include community centres, schools, children's centres, meeting venues for the public or voluntary organisations, public halls, places of worship, leisure and indoor sports centres, pavilions, stadiums, public houses, club premises or arts buildings.

Sometimes co-locating multiple facilities on a single site can be an efficient way to improve accessibility and support the principles of a liveable city.

PROTECTION, ALTERATION AND PROVISION OF NEW LOCAL COMMUNITY FACILITIES

Policy Context

- ☐ Sometimes existing facilities may not be fit-for-purpose, or they may provide poor accessibility, in which case improvements on site or nearby may be more sustainable.
- ☐ Some local community facilities may have scope to provide some affordable workspace in accordance with Policy E3 to support small startup businesses whose location complements these local community uses.

Policy Implementation

- ☐ Local community facilities fall into Use Class F.2 of the Use Classes Order. This includes a hall or meeting place mainly for the local community, indoor and outdoor pools and skating rinks, and the policy applies to these.
- ☐ Policy C3 does not apply to places for outdoor sport and recreation (which are within the Use Class F.2), because these are dealt with in Policy G1.
- ☐ Shops of no more than 280m2 in size and 1km from a similar facility are classed as having a local community use within Use Class F.2. All other shops are use Class E and can change freely to any commercial use. To protect these local community shops their expansion to a size where they would fall out of use Class F.2 is not permitted.

POLICY C3: PROTECTION, ALTERATION AND PROVISION OF LOCAL COMMUNITY FACILITIES

Planning permission will be granted for new local community facilities and the improvement and expansion of existing facilities where the City Council is satisfied that the following criteria are met:

a) The location is easily accessible by walking, cycling and public transport; and
b) The proposal will not result in an unacceptable environmental impact or loss of amenity.

Opportunities will be taken to secure community use and joint user agreements.

Planning permission will not be granted for development that results in the loss of such facilities unless:

c) Suitable replacement can be provided on-site, or at a location equally or more accessible by walking, cycling and public transport; or
d) There are facilities nearby and within the neighbourhood that can be enhanced to ensure none of the local community function and accessibility is lost; or
e) The proposal is for an alternative community facility for which there is greater need or demand.

Planning permission will not be granted for the expansion of shops that meet the definition of a local shop within Use Class F.2 (not more than 280m2 and where there is no other such facility within 1,000m2) if they would become large enough to be classed as Use Class E rather than F.2.

PROTECTION ALTERATION AND PROVISION OF LEARNING AND NON-RESIDENTIAL INSTITUTIONS (INCLUDING SCHOOLS, LIBRARIES AND PLACES OF WORSHIP)

Policy Context

- Schools, libraries and places of worship all play an important role in servicing the needs of Oxford's communities. The City Council has worked closely with partners including the County Council as the Local Education Authority to plan the educational needs of the city and it 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.

☐ Learning and non-residential institutions (schools, libraries and places of worship) all fall under Use Class F.1: learning and non-residential institutions.

☐ These facilities can attract large number of people, sometimes from quite a wide area, so it is important that new facilities are in accessible locations that minimise any potential traffic impacts and that there is no loss of amenity to existing surrounding uses.

Policy Implementation

☐ These facilities are protected, unless the criteria in the policy are met.

☐ Criteria are included for consideration of proposed new uses to ensure they are suitably located and potential harmful impacts are mitigated.

☐ The policy does not apply to proposals for educational establishments for students exclusively of 18 years and over, such as the universities (although joint user agreements will still be sought where possible).

☐ Where possible joint user/shared user agreements are expected.

POLICY C4: PROTECTION, ALTERATION AND PROVISION OF LEARNING AND NON-RESIDENTIAL INSTITUTIONS*

Planning permission will be granted for new learning and non-residential institutions (use Class F.1) where the following criteria are met:

a) The development will be accessible to those who will use it by walking, cycling and public transport and will not create unacceptable traffic impacts; and

b) The proposal will meet local needs or an existing deficiency in provision or access, or the proposal will support regeneration or new development; and
c) The proposal will not result in an unacceptable environmental or local amenity impact; and
d) Where possible, joint user and shared user agreements are made.

Planning permission will be granted for the redevelopment of learning and non-residential institutions (Use Class F.1) where it can be demonstrated that:

e) If there are any new uses to be introduced, these will not conflict with the existing use and any loss of floorspace of the existing use will not result in it not being able to function and meet needs; and
f) The development will be accessible to those who will use it by walking, cycling and public transport and will not create unacceptable traffic impacts; and
g) The proposal will not result in an unacceptable environmental or local amenity impact; and
h) Where possible, joint user and shared user agreements are made.

Planning permission will not be granted for development that results in the loss of learning and non-residential institutions (Use Class F.1) from a site unless it can be demonstrated that:

i) There is no longer a need or foreseeable need, or there is overriding demand for an alternative use on the site that is of benefit to the local community; or
j) Suitable replacement provision can be provided on-site, or within an alternative suitable location that would continue to be easily accessible to its users by walking, cycling or public transport; or
k) It can be demonstrated that the use can no longer feasibly be provided in its location.

* This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University.

PROTECTION, ALTERATION AND PROVISION OF SOCIAL AND CULTURAL VENUES, PUBS AND VISITOR ATTRACTIONS

Policy Context

- Social, cultural and visitor attractions often add a unique vibrancy to the city and can be important to local communities in a number of ways, for example they may contribute to the evening economy, bring social and leisure benefits, provide a meeting place and provide locations for events and for showcasing the work of different artists.
- Although these venues attract visitors from beyond the city, including tourists, events and activities held at these places are also the cultural lifeblood of the city for many people and as such should be celebrated and protected.
- These venues include theatres, cinemas, pubs, museums and music venues.

Policy Implementation

- Most of these venues such as theatres, nightclubs, pubs, casinos and concert halls, which are Sui Generis uses, which means they are not within a use class so their use cannot switch to or from them without planning permission and proposals can all be considered on their own merits.
- The policy allows for changes to alternative types of venue or attraction in cases where similar needs are provided for.
- The criteria in the policy provide a framework to determine applications against.

POLICY C5: PROTECTION, ALTERATION AND PROVISION OF CULTURAL AND SOCIAL VENUES, PUBS AND VISITOR ATTRACTIONS

Planning permission will be granted for new cultural and social venues, pubs and visitor attractions that add to the cultural and social scene of the city, provided that:

a) The use is located in compliance with the sequential test in Policy C1 and is appropriate to the scale and function of the centre; and

b) They are realistically and easily accessible by walking, cycling or public transport for most people travelling to the site; and

c) They will not cause unacceptable traffic harm or adversely affect residential amenity; and

d) There is no negative cumulative impact resulting from the proposed use in relation to the number, capacity and location of other similar uses (existing or committed) in the area; and

e) They are well related to any existing or proposed tourist and leisure related areas.

Applications to increase capacity, improve access and make more intensive cultural/community use of existing sites will be supported. This may include diversification of pubs or similar through the provision of short stay accommodation (which must be in accordance with draft Policy E5) on upper floors where it does not detract from the operating capabilities of the business and where it does not conflict with other policies of the Plan.

The City Council will seek to protect and retain existing cultural and social venues, pubs and visitor attractions. Planning permission will not be granted for the loss of existing cultural and social venues, pubs and visitor attractions, except in the following circumstances:

f) A suitable new or improved cultural venue or visitor attraction (not necessarily of the same type, but meeting similar needs) will be provided on the site or at a location equally or more accessible by walking, cycling and public transport; or:

g) Evidence is provided to support the application which demonstrates all the following criteria have been met:

   i) There has not been wilful neglect that has resulted in the venue being unattractive to market; and

   ii) All reasonable efforts have been made to market the premises for its existing use, or an alternative cultural or visitor attraction use that meets similar needs (according to Appendix 7.1); and

   iii) It is demonstrated that suitable alternative facilities exist to meet the needs of the local community that may be met by the existing facility.

TRANSPORT AND MOVEMENT IN OXFORD TO HELP CREATE A LIVEABLE CITY

A shift towards sustainable travel is promoted by this plan and by Oxfordshire County Council as transport authority. The many advantages of this include improved air quality, reduced congestion and enhanced public realm. Road space within the city is limited, so to achieve this ambition there is a need to prioritise road space and promote sustainable modes of travel. The County Council has introduced various transport measures to support this shift and has intentions to introduce more during the plan period. Measures to manage traffic include traffic filters, temporary congestion charging, expanded zero emission zone and workplace parking levy. Another ongoing challenge is the prevalence of death and serious injury on our roads. An integrated approach is required to reduce death and injury in alignment with Vision Zero, as set out in the Oxfordshire Local Transport and Connectivity Plan 2022-2050.

TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICING AND DELIVERY PLANS

Policy Context

- Alongside the range of measures to reduce the need to travel and to encourage active travel modes, the policies in the Plan also seek to reduce the opportunities for parking across the city. Over time this will help to reduce car use leading to improvements in congestion, air quality and the environment for walking and cycling. In addition, with fewer private car trips on Oxford's roads, public transport services can flow more freely, further enhancing the attractiveness as an alternative to using a private car for journeys in and around the city.
- The movement of goods and materials by road can have a significant impact on the quality of the environment and the health and wellbeing of residents, in terms of noise, congestion and air pollution. These impacts are severe in Oxford and the city centre in particular. However, commercial deliveries will always need to be made to Oxford and this should be done in the most sustainable way to reduce negative impacts.

Policy Implementation

- A Transport Assessment is a comprehensive and systematic process to ensure that transport impacts of all major applications are properly considered, and where appropriate includes measures to help mitigate development impacts. A Transport Statement is a simplified version of a Transport Assessment and is

often used for smaller developments where the traffic impact is limited in both volume and area impact.

- A Travel Plan is a package of measures tailored to the needs of an individual site and focused on reducing dependence upon the private car. TPs should demonstrate how the occupants of the building are actively encouraged to establish use of sustainable modes of transport. TPs, to be effective, need monitoring, managing and where necessary enforcing.
- Specific Delivery and Servicing Management Plans (DSPs) are required to be submitted for proposals that will affect the city centre or district centres and for sites near residential areas.

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

Planning permission will only be granted for development proposals if the City Council is satisfied that necessary transport-related measures will be put in place.

A Transport Assessment (TA) or Transport Statement (TS) must be submitted so the likely impacts of the development proposal can be assessed, in accordance with the thresholds set out in Appendix 7.2.

Transport Assessments must assess the multi-modal impacts of development proposals and demonstrate the transport measures which would be used to mitigate the development's impact to ensure:

a) There is no unacceptable impact on highway safety;
b) There is no severe residual cumulative impact on the road network;
c) pedestrian and cycle movements are prioritised, both within the scheme and within neighbouring areas;
d) Access to high quality public transport is facilitated, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
e) The needs of people with disabilities and reduced mobility in relation to all modes of transport are addressed;
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[11];
g) The efficient delivery of goods, and access by service and emergency vehicles is allowed for; and
h) Charging of plug-in and other ultra-low emission vehicles is enabled in safe, accessible and convenient locations with designated bays and priority for car clubs

A Travel Plan, which has clear objectives, targets and a monitoring and review procedure, must be submitted for development that is likely to generate significant amounts of movement in accordance with the thresholds set out in Appendix 7.3. Travel Plans must support outcomes (a) to (h) set out above.

Where a Travel Plan is required under this policy and a substantial amount of the movement is likely to be in the form of delivery, service and dispatch vehicles, a Delivery and Service Management Plan will be required.

Where a Delivery and Service Management Plan is provided this should set out how deliveries will be managed and demonstrate how impacts will be minimised including congestion, safety, noise and how zero or ultra-low emission and last mile opportunities will be considered.

A Construction Management Plan (CMP) must be submitted for development that is likely to generate significant amounts of movement during construction. This CMP must incorporate the CLOCS (Construction, Logistics and Community Safety) standards where applicable.

CYCLE AND POWERED TWO WHEELERS PARKING

Policy Context

- Increasing the uptake of cycling further will be an important tool in helping Oxford to achieve its ambitions of improving air quality, reducing congestion, enhancing the public realm and encouraging healthy lifestyles.
- Oxfordshire County Council's Parking Standards for New Developments sets out the parking standards for bicycles and powered two wheelers; these parking standards reflect the need for bicycle storage as shown by research evidence.
- As well as parking facilities, changing rooms, showers and locker facilities in places of work can be important in enabling people to cycle.

Policy Implementation

- The policy links to Oxfordshire County Council's Parking Standards for New Developments
- The criteria in the policy set out where a lower level of parking for student accommodation may be acceptable
- Considerations for the provision of cycle parking are included in the policy to ensure it is well located and designed to encourage cycling

POLICY C7: CYCLE AND POWERED TWO WHEELERS PARKING DESIGN STANDARDS

Planning permission will only be granted for residential developments* that comply with or exceed the minimum cycle and powered two-wheeler parking requirements as set out in Appendix 7.4.

Planning permission will only be granted for non-residential developments that comply with or exceed the minimum cycle and powered two-wheeler parking requirements as set out in

Oxfordshire County Council's Parking Standards for New Developments (as shown in Appendix 7.4).

Provision of cycle parking lower than the minimum standards may be acceptable for new student accommodation if it is:
a) Located close to the institution where most of its occupants will be studying; and/or
b) Where it is adequately demonstrated through a transport assessment that there is existing unused bicycle parking capacity available, in appropriate locations and of an appropriate design standard on site, to accommodate the increased number of bedrooms.

Cycle parking should be well designed and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street. Cycle parking design should comply with LTN 1/20 'Cycle Infrastructure Design' section 11.4 'Cycle parking types and dimensions.'

Cycle parking should be designed to accommodate an appropriate amount of parking for the needs of disabled people, children's bicycles, bicycle trailers and cargo bicycles, as well as facilities for electric charging infrastructure to charge batteries for E bikes.

Changing room, showers and lockers should be provided at commercial/non-residential new development in accordance with the standards set out in Appendix 7.5.

* For the purposes of this policy, residential development includes C3 dwellings, C4 and Sui Generis, HMO, and all C2 development (residential institutions).

MOTOR VEHICLE PARKING DESIGN STANDARDS

Policy Context

- Parking is one of the key means the Local Plan has of helping to promote the shift towards sustainable travel, and to minimise the impacts of car travel. Minimising opportunities for parking will over time help to reduce car use, leading to improvements in congestion, air quality and the environment for walking and cycling.
- Oxfordshire County Council's Parking Standards for New Developments considers parking levels in new developments, and this aligns with the Local Plan.
- Much of Oxford is covered by Controlled Parking Zones (CPZs) and the aspiration of both the city and the county councils is that the whole of Oxford is covered by a CPZ by the end of the Plan period.
- Low-car developments are generally highly feasible in Oxford due to its compact size, availability of facilities and excellent public transport, and the existence of CPZs.

- Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. This covers both residential and non-residential developments with specific levels of requirements set out for each use.
- The Oxfordshire Electric Vehicle Infrastructure Strategy sets out the policies and plans to realise the County, City and District Councils vision for EV charging in Oxfordshire.

Policy Implementation

- For residential development, parking should either be low car, which is pooled (not allocated bays) parking only for disabled, servicing vehicles and pooled cars and working drivers, or it should not exceed the still low maximum parking standards.
- The criteria in the policy set out when low car residential development is expected.
- For all non-residential development, the starting point is to have no additional parking. Additional parking will only be accepted if it can be demonstrated through the transport assessment that the level of provision is necessary to support the development, and if the travel plan demonstrates how the objectives of this plan to promote a shift to sustainable transport are met.
- The design and location of any EV charging infrastructure should consider and avoid negatively impacting on street scene in line with the principles of high quality design and the supporting design checklist.
- The policy links with Policy HD15 Bin and Bike Stores and External Services Features and also with the design checklist (Appendix 1.1)

POLICY C8: MOTOR VEHICLE PARKING DESIGN STANDARDS

Residential developments
Where the following circumstances apply, planning permission will only be granted for residential developments* that are low car:

a) In Controlled Parking Zones (CPZs) (or on greenfield sites immediately adjacent to them); and
b) Where the site is located within a 400m walk to frequent (at least 2 an hour) public transport services; and
c) Within 800m walk to a local supermarket or equivalent facility with a minimum floor area of 130m^2 of retail space which sells essential items such as milk, bread, pasta and fruit and vegetables

(measurements taken from the midpoint of the proposed development)

In these low car residential developments, no car parking spaces allocated to a particular housing unit are to be provided, but only a shared spaces for blue badge holders, for pooled

cars/car club cars, for servicing and delivery vehicles and for working drivers, for example NHS community staff. The numbers of blue badge holder spaces and servicing spaces, pooled car/car club spaces required in all residential developments is set out in Appendix 7.6

In all other locations, planning permission will only be granted where the relevant maximum standards as set out in Appendix 7.6 are not exceeded.

On large residential schemes of 100+ units, car club or pooled cars should be made available according to the standards set out in Appendix 7.6.

Parking spaces should be located to minimise the circulation of vehicles around the site and so that they are well integrated into the landscaping scheme.

Non-residential developments
In the case of all non-residential developments, the starting point is for no additional parking except for blue badge and servicing only. The Council will seek a reduction for highly accessible sites.

Any additional parking provision above existing levels should be kept to the minimum necessary to ensure the successful functioning of the development, with the need being demonstrated through the submitted Transport Assessment (TA), which should justify proposed parking levels based on the development in the context of the whole site. In addition, a Transport Plan (TP) must take into account the objectives of this Plan to promote and achieve a shift towards sustainable modes of travel, and should set out measures introduced to maximise use of sustainable transport modes, and should demonstrate that there will not be unacceptable impacts on the transport network. The TP will be required to be reviewed to ensure that future opportunities to encourage a shift towards public transport and active travel are taken. The requirements for a TP are set out in Appendix 7.3 of the Plan.

Parking spaces should be located to minimise the circulation of vehicles around the site and so that they are well integrated into the landscaping scheme.

*For the purposes of this policy, residential development includes C3 dwellings, C4 and Sui Generis, HMO, and all C2 development (residential institutions).

Electric Vehicle Charging (residential and non-residential)

EV charging infrastructure should be provided in accordance with Part S of the Building Regulations 2010 or any subsequent update to this.

All new blue badge parking bays and all car club parking bays must provide access to live electric vehicle charging infrastructure that is ready for use.

The location of charging points in development proposals should allow for easy and convenient access to the charge point from the relevant parking space and avoid negative impacts.

Both the charging point and electric infrastructure and cabling should be designed and located so that it can be maintained as required. It should be live and ready for use.

When off plot parking is proposed within a new residential development it should incorporate electric vehicle charging infrastructure to enable the charging of electric vehicles on the street in

accordance with the Oxfordshire County Council Street Design Guide, or any subsequent update to this.

CHAPTER EIGHT INFRASTRUCTURE AND NEW DEVELOPMENT

INTRODUCTION

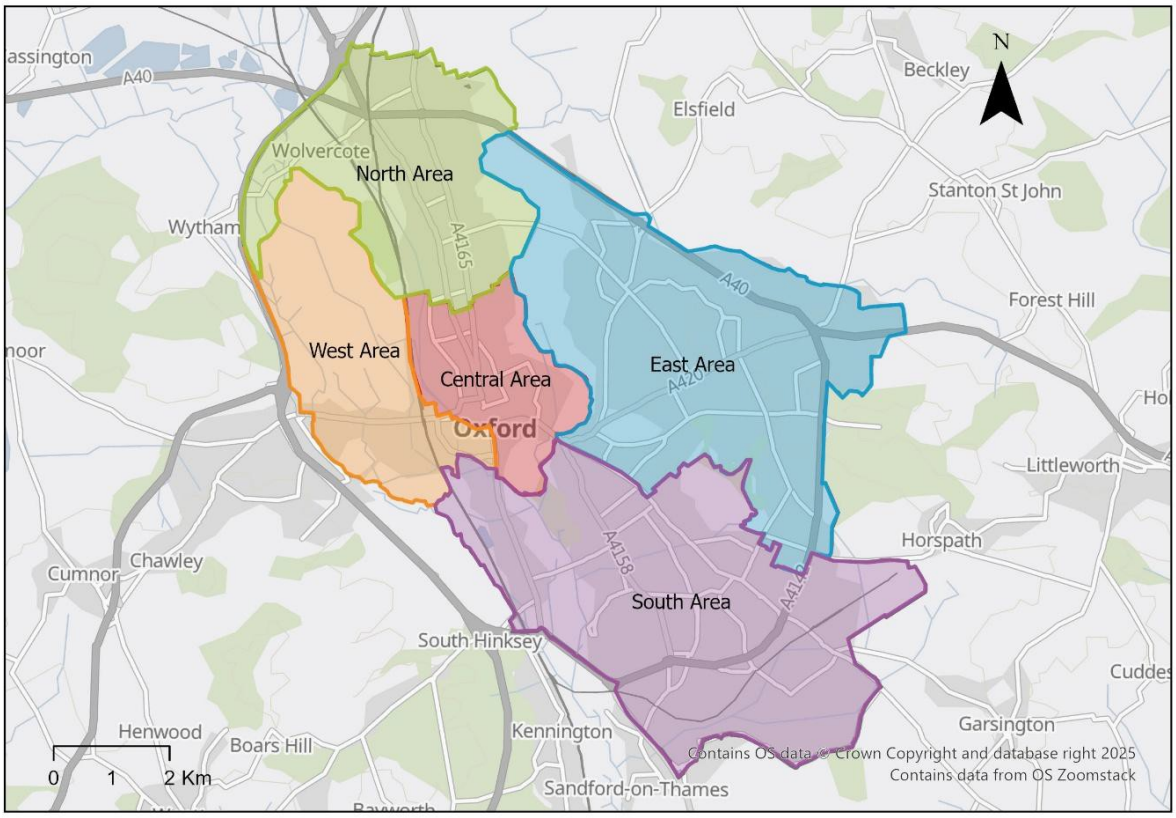
A development site allocation is a planning policy that describes what type of land use, or mix of uses, would be acceptable on a specific site, or whether the site is protected for certain types of development. These policies give guidance and certainty to developers and landowners and help local people understand what may happen in their neighbourhood in the future.

The development site allocation policies have been informed by a thorough process, building upon site appraisals. These thorough site appraisals and capacity assessments have informed minimum housing requirements for relevant sites. Other policies of the plan relevant to specific sites were also considered. The detail contained within the policies in this chapter is intended to give detailed guidance to apply the policies of the plan to the site allocations. The policies cross-referred to within the site allocation policies do not represent an exhaustive list. The site allocations do not supersede the other policies of the Plan, and all other policies remain relevant.

Housing numbers are expressed as a minimum net-gain. This means that sites with existing housing will be expected to re-provide the equivalent numbers, and also the minimum stated in the policy as a net-gain. The minimum number shall be exceeded where it is possible to do so consistent with the other policies in the Plan. The homes should be delivered as general market and affordable housing in accordance with Policy H2 unless the policies of the Plan allow for student accommodation or employer-linked affordable housing. Other specialist forms of housing will be considered on their merits. If communal accommodation is to be provided, the minimum quantum shall be calculated on the basis of the national policy ratio (or any amendment or replacement thereof). On mixed-use sites or phased sites, if only part of the site is being brought forward and the proposal does not include residential development, the potential to achieve the minimum housing capacity on remaining parts of the site when they come forward for development will be considered.

This chapter also outlines five ‘areas of focus’ across the city. These are areas where changes are anticipated over the plan period resulting from new development- including development outside the city adjacent to the city boundaries- and where a wider area consideration will be needed to ensure success.

New development across the city results in additional social, community and transport infrastructure needs. It is important that there are sufficient facilities to meet the needs of existing and future residents. The Infrastructure Delivery Plan (IDP) provides a summary of infrastructure needs across Oxford and sets out infrastructure schemes to meet the needs, taking into account the level of housing and employment growth over the Plan period. The IDP has divided the city into four quadrants



DIGITAL INFRASTRUCTURE TO SUPPORT NEW DEVELOPMENT

Policy Context

- Digital infrastructure is playing an increasingly important role in our day-to-day lives, supporting people to meet various needs, as well as the wider economy and the services businesses provide.
- In national policy significant weight is placed on supporting economic growth and productivity, and there is a requirement for planning policies to set out how digital infrastructure is delivered, made accessible and upgraded over time.
- Oxford at present is broadly covered by mobile networks, but access to the newer 5G network, which can offer more reliable connections in busier places and for higher intensity data transfer, is still limited.

Policy Implementation

- The policy requires new development is serviced by appropriate digital infrastructure, for both residential and commercial development. It is important that this type of infrastructure is factored into the design of new development as with any other type of infrastructure, at the earliest possible stage during the design process.
- Developers are encouraged to engage early with a range of network operators, to ensure that development proposals are designed to be capable of providing this level of connectivity to all end users.
- The policy also supports data centres in appropriate locations, in recognition of their growing importance within the national critical infrastructure. By their nature, data centres often require sizable parcels of land and, depending on their scale, can be

resource intensive. However, due to Oxford's spatial and environmental constraints it is unlikely that many will come forward within the city's boundaries.

- Where data centres are proposed, proposals will be expected to demonstrate how they will mitigate impacts on the wider environment such as in relation to energy and water use (see **Policy R1** and **Policy R5**). Where these uses have the potential to generate waste heat, opportunities should be sought to repurpose this heat, so that it can service other users of heat in the city.

POLICY I1 DIGITAL INFRASTRUCTURE TO SUPPORT NEW DEVELOPMENT

Development proposals should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

Development proposals should:

a) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users;
b) meet expected demand for mobile connectivity generated by the development;
c) take appropriate measures to avoid reducing mobile connectivity in surrounding areas, and providing mitigation if that is unavoidable;
d) where required support the effective use of buildings, outdoor spaces and the public realm to accommodate well-designed and suitably located mobile digital infrastructure;
e) minimise impacts of digital infrastructure. on the visual amenity, appearance and character of buildings and surrounding areas, and minimise impacts on the amenity of occupiers and neighbours of development.

Data centres play an important role in supporting a modern economy. New, expanded or upgraded data centres will be supported on suitable sites in appropriate locations in accordance with other policies of the development plan.

LAND SAFEGUARDED FOR INFRASTRUCTURE

Policy Context

- There are a number of specific strategic infrastructure schemes (included in the Infrastructure Delivery Plan) that involve land both within and outside the city boundary.
- Ensuring that the necessary land is available to deliver these specific infrastructure schemes is of vital importance to their success.
- These strategic infrastructure schemes are also governed by distinct consenting regimes that operate outside of the Oxford Local Plan 2045 process.
- As such, this policy seeks to safeguard land within Oxford administrative boundary, to support their delivery.

Policy implementation

- The necessary land required to deliver the following infrastructure schemes is safeguarded within the city:
    - Oxford Flood Alleviation Scheme; and
    - East West Rail (Oxford).

- Each infrastructure scheme has a distinct safeguarding mechanism.

Oxford Flood Alleviation Scheme

- This is a critical priority infrastructure scheme being delivered primarily to reduce flood risk in Oxford.
- The land safeguarded for the Oxford Flood Alleviation Scheme is shown on the Policies Map.

East West Rail (Oxford)

- The land safeguarded for the East West Rail (Oxford) is shown on the Policies Map.
- The East West Rail Safeguarding Directions (November 2025) confers specific requirements in relation to development proposals involving the land safeguarded for East West Rail (Oxford).

- The following site allocations have the potential to be impacted by the land safeguarded for East West Rail (Oxford):
    - SPN5 – Pear Tree Farm
    - SPCW9 – Oxford Railway Station and Becket St Car Park
    - SPCW10 – Oxpens

POLICY I2 SAFEGUARDING LAND FOR INFRASTRUCTURE

All safeguarded land is shown on the Policies Map.

Oxford Flood Alleviation Scheme

a) Development proposals involving land safeguarded for the Oxford Flood Alleviation Scheme should:
    i. Demonstrate that the land safeguarded for the Oxford Flood Alleviation Scheme has been taken account of in their design; and
    ii. Ensure that consultation with relevant bodies has been undertaken.

East West Rail (Oxford)

b) Planning permission involving land safeguarded for East West Rail (Oxford) will not be granted until the East West Rail Company has been consulted and the procedure set out in the East West Rail Safeguarding Directions (or the requirements of any future equivalent or consenting legislation) has been followed.

NORTH INFRASTRUCTURE AREA

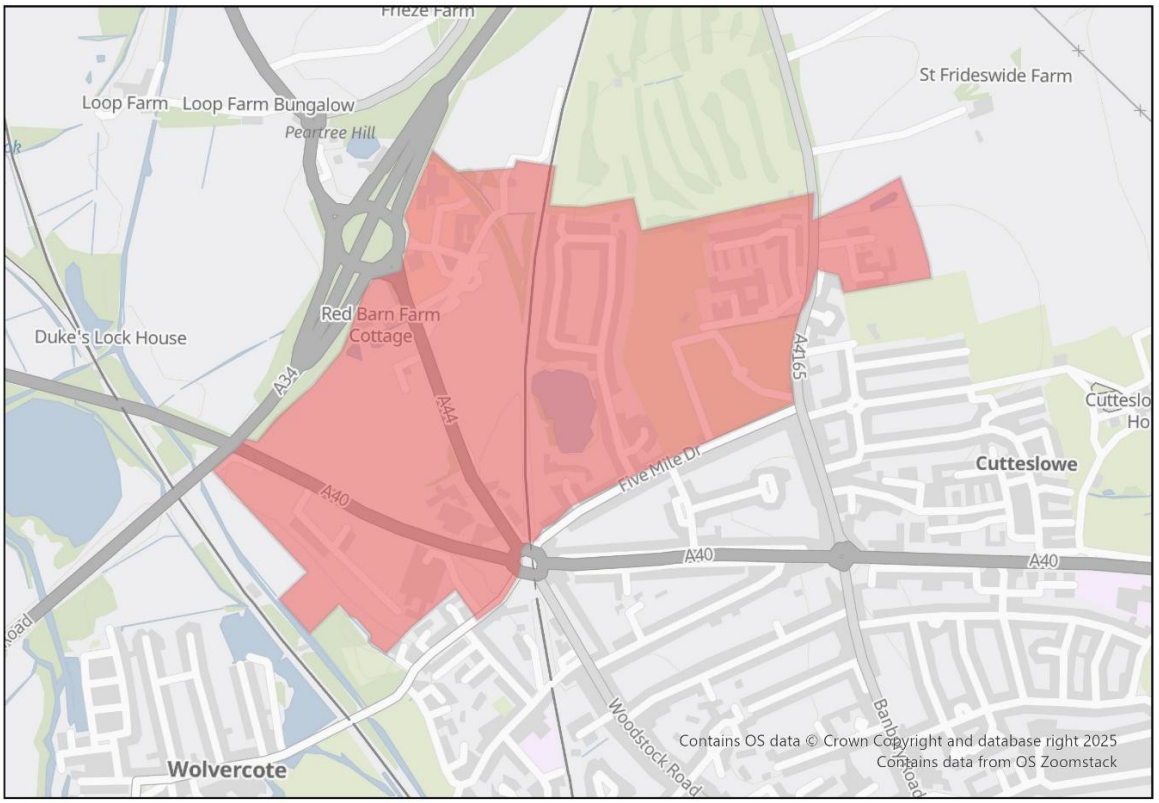
The North Infrastructure Area includes development sites such as Oxford North, which are adjacent to the Cherwell District Council (CDC) development sites, PR6a – Land East of

Oxford Road, PR6b – Land West of Oxford Road and PR6c Land at Frieze Farm, which is the reserved site for the replacement Golf Course extension areas within CDC. Good transport connectivity via public transport, walking, cycling and wheeling is a key need for this area if people are to be able to move easily between these residential areas and the city. As the northern entrance to the city, it is also important to have high quality urban design and good place making and to ensure views into and out of the city are respected.

Key considerations for infrastructure and design common across the area are:

- Improvements to walking, cycling and wheeling routes, and public transport accessibility, including:
  - Safe crossing options at desire lines across the major roads in the area
  - Connectivity by foot and cycle to sites adjoining the city
  - Connectivity of local facilities and services (which may also be also accessible within Cherwell) and communities
  - Connectivity to Oxford Parkway Railway Station allowing sustainable onward travel options
- Increase public access to green spaces
- Reduce air pollution to protect the Sites of Special Scientific Interest/Special Area of Conservation at Port Meadow
- Retain the integrity of the Green Belt by careful design at its edges
- The policies of the Wolvercote Neighbourhood Plan and Summertown and St Margaret's Neighbourhood Plan.

Northern Edge of Oxford Area of Focus



Northern Edge of Oxford Area of Focus

This Area of Focus is located at the northern edge of the city boundary and is the northern entrance to the city. With major transport connections from the A34, A40 and A44, as well as Pear Tree Park & Ride and proximity to Oxford Parkway rail station, it is a gateway location.

The area is currently undergoing significant development with the recent construction of the initial phases of the Oxford North site for large-scale residential and knowledge-economy based economic growth. There are further phases remaining on this site and other sites identified previously in the Northern Gateway Area Action Plan which have yet to come forward. As such this Area of Focus cumulatively represents one of the largest areas for residential and specialised employment growth in the city. As a gateway location there is scope for higher density and high quality urban design including exemplary buildings, which celebrate this area as a gateway and area of innovation whilst also respecting and protecting views into and out of the city.

The Area hosts some of the least deprived wards in Oxford, but is not without its challenges. There are congestion issues on nearby roads and roundabouts/junctions, which have seen some improvements and investment through the earlier phases at Oxford North and Growth Deal/Growth Fund funding, but further work is needed if the area is to realise its potential. Walking, cycling and wheeling connections also still need improvements to ensure safe crossings of some fairly large and busy roads, and connectivity by foot and cycle both across the area and for onwards journeys into the city as well as out to Oxford Parkway to maximise the potential of that connection too.

The area is also close to the Oxford Meadows Special Area of Conservation (SAC), which contains certain habitats and species recognised for their importance across Europe. There are also several Sites of Special Scientific Interest (SSSI) in the vicinity. The area also falls within the Wolvercote Neighbourhood Plan area so proposals should take into account the community aspirations set out in the plan.

The area adjoins several large housing allocation sites, which fall within Cherwell District (PR6a Land East of Oxford Road, and PR6b Land West of Oxford Road and PR6c Land at Frieze Farm,) but nonetheless adjoin existing communities in Oxford. Therefore, it is also crucial to ensure good links and accessibility for people to move easily between these residential areas and the city, particularly as the homes will be helping to meet unmet housing needs from Oxford. Walking, cycling and wheeling improvements are essential to the success of the area to improve connectivity and permeability, to other parts of the city and/or to destinations in neighbouring districts of Cherwell and West Oxfordshire.

Policy NEOAOF: Northern Edge of Oxford Area of Focus

Planning permission will be granted for new development within this Area of Focus (AoF) where it would ensure that opportunities are taken to deliver the following (where applicable):

Supporting active travel

a) Walking, cycling and wheeling infrastructure improvements should be delivered in accordance with the requirements of the Oxford Local Cycling and Walking Infrastructure Plan;
b) Increased connectivity and permeability through developments so people can walk, cycle or wheel across the area and to other parts of the city including from the site

allocations adjacent to the city which are in Cherwell District (PR6a Land East of Oxford Road, and PR6b Land West of Oxford Road and PR6c Land at Frieze Farm,) and West Oxfordshire;

c) Public transport provision enhancements, particularly those identified in the IDP relating to this area;

d) A reduction in car parking in line with Policy C8;

High quality design which capitalises opportunities for growth

e) Good urban design and place making across the AoF, including the introduction of new public open space;

f) Successful integration of new development into the existing built environment and enhanced facilities for both new and existing communities.

g) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental upon views into or out of the city, including views from Port Meadow. Development proposals should be developed in accordance with Policy HD9 and where applicable with the site-specific allocation. Development proposals should respond positively to the surrounding area and should be informed by the High Buildings TAN.

Environmental improvements to benefit biodiversity and the community and future occupiers

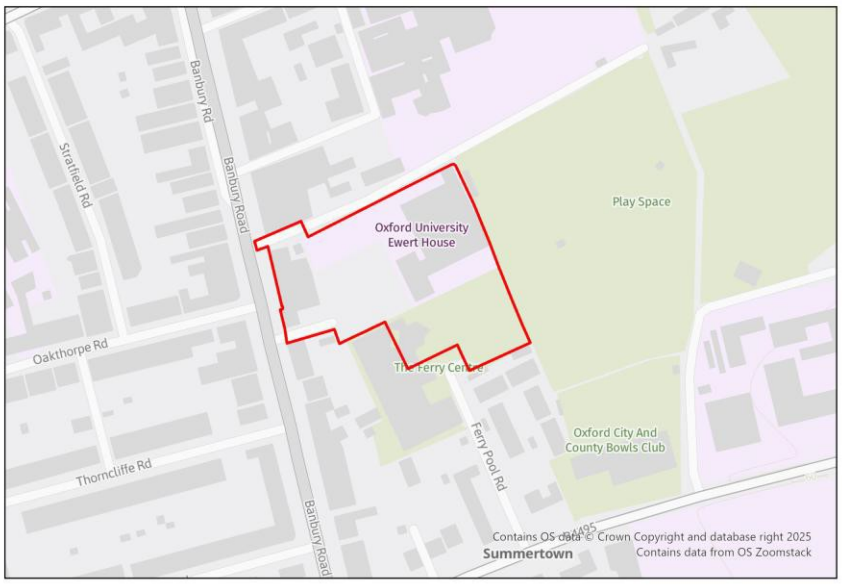
h) Enhancements to the existing Green Infrastructure network which could include landscaping planting; increasing tree cover; enhancing biodiversity green corridors and; incorporating the use of SuDs;

i) Enhancements to existing public open space and creating new public open space, where possible, or where required by specific allocation policies.

Infrastructure

j) Contributions towards expansion of Wolvercote Primary School (1.5-2 FE) to cater for growth in this area of north Oxford

Diamond Place and Ewert House



Site area	1.85ha
Ward	Summertown
Landowner	Oxford City Council and University of Oxford
Current Use(s)	Public car parks, academic offices, community centre
Flood zone	Flood Zone 1
Notable heritage assets	North Oxford Victorian Suburb Conservation Area to the south of the site, somewhat removed, but with potential for views. Grade II listed Diamond Cottages nearby to site. Potential presence of Prehistoric or Roman archaeological remains as adjacent to an area of known cropmarks of this origin.
Notable ecological features	Any potential for protected species on the site is likely to be limited to roosting bats in existing buildings. Falls within the impact risk zones for New Marston Meadows SSSI and Hook Meadow and the Trap Grounds SSSI. The site is within an area identified as having potential hydrological connectivity with the Oxford Meadows SAC.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPN1: Diamond Place and Ewert House

Planning permission will be granted for a mixed-use development including residential use. The minimum number of dwellings to be delivered is 135 (or if delivered as non-self-contained student accommodation, the equivalent number of rooms when the ratio is applied). If development is phased, it must be demonstrated that the remaining part of the site can deliver the remaining minimum number of dwellings.

A range of other uses would also be suitable, including the following:

- A community centre. Replacement of facilities will be required if the existing community centre is demolished **(Policy C3)**;
- Healthcare facilities;
- Town centre supporting uses including additional shops/cafes/services/ Class E uses.
- Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI and Hook Meadow and the Trap Grounds SSSI, new development could have impacts on the functioning of these sensitive ecological sites. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the SSSIs. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).
b) Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant, through the use of appropriate measures including SuDS **(Policy G6)**.
c) Development proposals involving subterranean development must include a hydrogeological investigation which must demonstrate that likely significant effects on groundwater flow have been avoided, or mitigated where relevant **(Policy G6)**.
d) Opportunities should be taken to enhance the ecological value of the site and to bring in greening features with considered landscaping.
e) Greater visual and wildlife links with the green spaces to the east should be achieved by providing green fingers into the site, the current location of the shrubs south of Ewert House providing a particularly strong opportunity to achieve this.
f) The open space requirement should be delivered in a way that is appropriate to the location of the site within a district centre but also where there are few green spaces and few attractive public outdoor areas to either meet or enjoy time sitting outside.

Urban design & heritage

g) Development proposals should be designed with consideration of their impacts on the setting of the nearby conservation area and listed buildings **(Policy HD3)**.
h) Development should take into consideration the potential presence of Prehistoric or Roman archaeological remains **(Policy HD5)**.
i) Clear visual links through the site will be important to maintain legibility
j) The site should provide high quality public open space that appeals to all senses and creates an area to meet and obtain respite in the centre of the busy district centre.
k) New development should be designed to conceal unattractive views of the backs of Banbury Road shops and Ferry Leisure Centre roofline.
l) Care needs to be taken to avoid overlooking of Summer Fields School, especially the boarding accommodation immediately to the north of the site.
m) Public toilet facilities are currently located on the site. Development proposals should demonstrate how these facilities will be re-provided or justify an alternative approach.

Movement & access

n) Residential development should be low car.
o) The City Council will seek to minimise public car parking on the site to a level that is reasonable to serve the area, bearing in mind the public transport connections and its location with a district centre.
p) The principal vehicular access, particularly to the replacement public car parking, should be from Banbury Road.
q) Walking, cycling, and wheeling access should be provided through the site from the north to the southeast, connecting to Cherwell School and to Ferry Pool Road, together with walking, cycling and wheeling access safeguarded for any future development of the adjacent Summer Fields School ground. It should be explored

whether there is potential for improvements to the restricted width of the existing footpath/cycle way adjacent to the Bowls Club, which links to Cherwell School.

Elsfield Hall, Elsfield Way

Site area	0.39ha
Ward	Cutteslowe
Landowner	Oxford City Council
Current Use(s)	Use Class E, vacant offices. A gym occupies the site on a license on a short-term basis.
Flood zone	Flood Zone 1
Notable heritage assets	N/A
Notable ecological features	Kendall Crescent Amenity Green Space is close to the site and there is potential to improve wildlife linkages or habitat continuity. Hedgerow and tree habitats can be found along the boundaries with the potential for bats and nesting birds. Part of the site is within an area identified as having potential hydrological connectivity with the Oxford Meadows SAC.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPN2: Elsfield Hall, Elsfield Way

Planning permission will be granted for residential development, with the minimum number of 27 dwellings delivered. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant, through the use of appropriate measures including SuDS **(Policy G6)**.

b) Development proposals involving subterranean development must include a hydrogeological investigation which must demonstrate that likely significant effects on groundwater flow have been avoided, or mitigated where relevant **(Policy G6)**.
c) Currently the whole site is hard-surfaced with concrete so there is opportunity to improve permeable surfaces by introducing SUDs and permeable garden areas, and to provide biodiversity enhancements.
d) Preliminary analysis suggests that the limited presence of green infrastructure features on the site currently means it is likely to score below the minimum thresholds for green surface cover as required by (**Policy G3)**. As such, proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the policy, demonstrated through submission of the Urban Greening Factor assessment.
e) Vegetation, including hedgerows and trees on the boundaries should be retained and enhanced Opportunities for enhancements to the landscaping along the southern boundary with Elsfield Way/ A40 should be demonstrated in future development proposals.

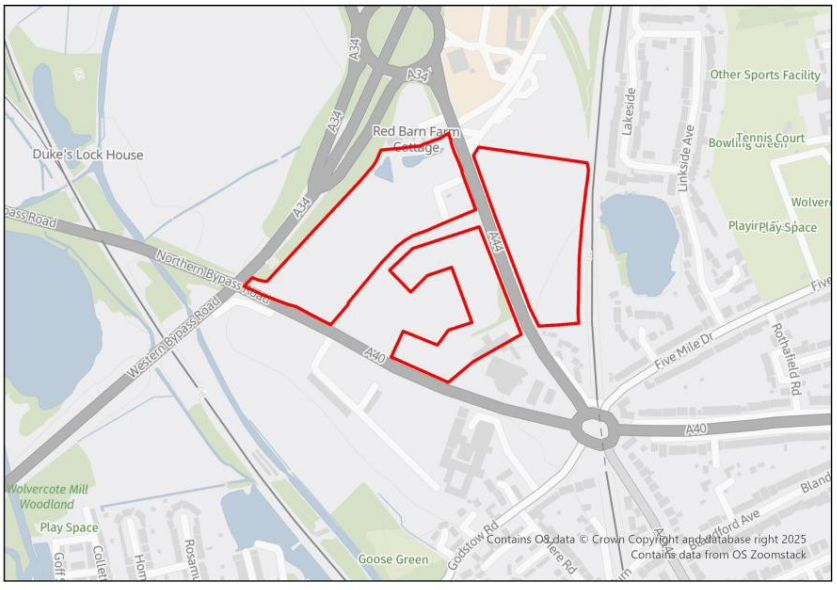
Urban design & heritage

f) Opportunities should be taken to address and improve the staggered building line to the south of the site and improve the relationship with the Elsfield Way frontage.
g) Development proposals should incorporate high-quality design and materials appropriate to the suburban setting (**Policy HD1**).

Movement & access

h) Opportunities should be taken to develop and link into existing walking, cycling and wheeling routes.
i) Development proposals should increase the permeability of the site for residents as well as the access to the adjoining recreation ground and footpaths across it.
j) Proposals should be low car and support opportunities for walking, wheeling, and cycling.

Oxford North Remaining Phases



Site area	13.28 ha
Ward	Wolvercote
Landowner	Thomas White Oxford
Current Use(s)	Site is partially cleared and partially undeveloped greenfield
Flood zone	Flood Zone 1
Notable heritage assets	Close to Wolvercote Conservation Area designation so potential impacts on setting.
Notable ecological features	Within the impact risk zone of Wolvercote Meadows SSSI and Pixey and Yarnton Meads SSSI Part of the site is identified within the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPN3: Oxford North Remaining Phases

Planning permission will be granted for mixed-use development including residential and knowledge-economy employment. The minimum number of dwellings to be delivered is 161 dwellings as part of mixed-use development. Other complementary uses will be considered on their merits.

The priority use for this site is to deliver the remaining residential commitment from the hybrid Oxford North permission.

The site is within a protected Key Employment Site with outline permission for employment development that directly supports the knowledge economy of Oxford. Permission will only be granted for further employment development at this site where the intended uses directly relate to the knowledge economy of Oxford: science and technology, research, bio-technology, spin-off companies from the universities and hospitals, or other intended uses that make a measurable contribution to those sectors. Applicants will be required to demonstrate how their proposals contribute to the knowledge economy of Oxford. The City Council will ensure that these uses are maintained into the future, using legal agreements/conditions

Open space, nature, flood risk

a) The site is within the impact risk zones for the Wolvercote Meadows SSSI and the Pixey and Yarnton Meads SSSI. Development proposals should be accompanied by an assessment of ground water and surface water flows. If employment is proposed as part of development, an assessment of the employment use on air quality to demonstrate no impact on SSSI is required. All proposals should minimise impacts on air quality during construction phase (**Policy G6**).
b) Planning permission will only be granted for developments that provide usable, well designed and good-quality publicly accessible green open space. At least 15% of the total site area must be provided as green public open space; this must be distributed so that at least 15% of any parcel proposed for residential development is green public open space.
c) Small corner on western edge of the parcel on west of A44, and strip running down eastern boundary of the parcel to east of A44 is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for

further details.

d) A 10m buffer to the balancing ponds must be incorporated into proposals (**Policy G2**).

Urban design & heritage

e) The design of new development in this area must be accessible, permeable and legible to ensure easy access to and through the site for all users with priority for walkers, cyclists and wheelers.

f) Design of new development must create a sense of place which has its own identity and with continuous and well-connected streets with well-defined building frontages.

g) Development must ensure that there is a clear distinction between the public and private realms to ensure both private and public spaces are well designed and defined. Careful consideration must be given to the positioning of windows and lighting in this development to ensure there is good surveillance of the public realm, and to mitigate the impacts of the adjoining railway line and busy roads.

h) A high density and landmark buildings style of development is appropriate in this location, whilst taking into account potential impacts on setting of Wolvercote Conservation Area **(Policies HD1)**.

Movement & access

i) Coordinated infrastructure delivery and protection of environmental assets are key to the success of the site, and prioritising good connectivity for walking, cycling, and wheeling and access to public transport from this area to the new residential developments on the unmet need housing sites in the adjoining Cherwell district.

Oxford University Press Sports Ground, Jordan Hill

Site area	3.65 ha
Ward	Wolvercote
Landowner	Oxford University Press
Current Use(s)	Private Sports Ground
Flood zone	Flood Zone 1

Notable heritage assets	The adjacent Wolvercote Cemetery and chapel has heritage interest and areas for various denominations and religions and includes graves of notable people including JRR Tolkien. General potential for Roman and prehistoric activity and specific interest for proximity to Lower Palaeolithic Wolvercote Channel (poorly understood and rare paleochannel with early hominin remains recorded in brick bit to the South East).
Notable ecological features	Local sites (Local Wildlife Sites, Oxford City Wildlife Sites, Local Nature Reserves)
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPN4: Oxford University Press Sports Ground, Jordan Hill

Planning permission will be granted for residential development, playing pitches and public open space at Oxford University Press Sports Ground. The minimum number of homes to be delivered is 90 if the cricket pitch is retained on the site, or more if it is not. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The capacity of the sports provision must be retained unless it can be demonstrated that it is surplus (which is not the case at the current time) or the loss of the sports provision can be otherwise compensated for **(Policy G1)**.
b) Any alternative provision must be delivered and operational prior to the occupation of residential development on the site.
c) Public open space will be required onsite **(Policy G2)**.
d) Opportunities should be taken to create wildlife corridors through the site by enhancing the biodiversity of the hedgerow to the west of the site and connecting it to mature trees in the corner of the Wolvercote Cemetery. Likewise, opportunities should be taken to enhance the existing connection between the semi-natural habitats incorporating the golf course to the north, and the lake and cemetery to the south.
e) Reprovision of pitches and of public open space along the southern boundary would help provide a buffer to the cemetery and provide a green link to the recreation ground.
f) High quality green features within the site will be required, and this could be by gardens and landscaping along streets such as verges, planting and swales, which would help achieve the urban greening factor and contribute to biodiversity net gain.
g) Development should be designed to ensure that there is no adverse impact on the Port Meadow SSSI and will be subject to appropriate traffic mitigation measures.
h) Biodiversity surveys may need to assess the potential for species using the site or parts of the site as a wildlife corridor (nesting birds, foraging and commuting bats, badgers, reptiles and amphibians).

Urban design & heritage

i) There is potential for higher density and heights than the surroundings, particularly in the centre and east of the site.
j) Care will be required to avoid harm to the amenity of existing residential dwellings to the west.
k) A clear street grid pattern will be appropriate.
l) Development should take into consideration the potential presence of Prehistoric or Roman archaeological remains **(Policy HD5)**.

Movement & access

m) Vehicular access to the site should be from Jordan Hill. This is likely to be the only exit and entrance so the road layout will need to allow easy circulation around the site.
n) The design should ensure walking, cycling, and wheeling access through to the adjacent proposed residential site in Cherwell District Council.
o) Traffic generation should be limited, with low parking. Appropriate mitigation measures will be required to avoid any significant increase in traffic to the nearby Wolvercote and Cutteslowe roundabouts.

Pear Tree Farm

Site area	2.54 ha
Ward	Wolvercote
Landowner	Merton College
Current Use(s)	Farmland/greenfield plus farm buildings
Flood zone	Flood Zone 1
Notable heritage assets	This area is of archaeological interest for potential prehistoric and Roman remains, which will require further investigation as part of any sizable redevelopment.
Notable ecological features	Part of the site is identified within the Local Nature Recovery Strategy (LNRS). Substantial tree coverage on site.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.
Safeguarded Land	Part of this site allocation has been identified as having the potential to be within the Safeguarded Land for EWR (Oxford).

Policy SPN5: Pear Tree Farm

Planning permission will be granted for residential-led development at Pear Tree Farm. The minimum number of dwellings to be delivered is 111 dwellings. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The site is contained by the railway line and by a belt of trees, and there is substantial existing tree coverage of the site, so design will need to consider the potential impacts on biodiversity. Due to the relatively vegetated nature of the site, it is likely to already score above the policy target for the Urban Greening Factor and proposals will need to ensure this score is not reduced. In order to maintain the score, proposals could seek to retain existing features wherever possible, particularly higher quality ones, including mature trees and green boundary features that would also help as buffers.

b) The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low-quality trees should be retained where it is feasible to do so.

c) Existing trees around the site should be retained to buffer the noise from the railway and separate the development from the more transient uses to the south (Park and Ride, hotels and petrol station).

d) Public open space will be required onsite (**Policy G2**). The type and layout of this could take the form of wilder, natural areas that are more informal in design and can play a dual role in allowing people to get closer to nature, whilst also supporting existing species. Onsite open space could also help with maintaining the Urban Greening Factor score and for supporting biodiversity.

e) Due to the potential for various types of species to be present onsite, a biodiversity survey will be required to assess the ecological value of the site. Development proposals are expected to demonstrate how any harm to biodiversity on the site will be avoided, mitigated or compensated.

f) Majority of the site, apart from the long strip running southwest, is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

g) A site-specific Flood Risk Assessment (FRA) is required due to a substantial area of the site being at high risk from surface water flooding. The FRA should consider in detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site. The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased (**Policy G7** and **Policy G8**).

Urban design & heritage

h) The site is part of a larger field which is severed by the administrative boundary with Cherwell district, and while the adjoining parcel has been released from the Green Belt for future development is not currently identified for development in the adopted Cherwell Local Plan. The geometry of the part within Oxford means the design and layout of the site could benefit from being developed holistically with the rest of the field which lies within Cherwell (and all under the same landowner).

i) Due to potential impacts of noise from the A34 and adjacent railway line and service station area, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, and should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policy R8**).

j) Block structure should help shield the development from the noise of the railway.

k) A mixture of houses and small flatted blocks would give sufficient flexibility to negotiate the triangular site geometry and change in scale between the hotels on the adjoining services area and the adjoining housing on the east of the site.

l) High quality natural materials such as brick and stone would raise the quality of the area.

m) There is an opportunity to develop a roofscape which is richer and more diverse than its neighbours and the potential to reference agricultural building typologies or materials. Pitched roofscape that celebrates its rural, edge setting.

n) This area is of archaeological interest for potential prehistoric and Roman remains, which will require further investigation as part of any sizable redevelopment **(Policy HD5).**

o) There is an opportunity to include well surveyed open space as part of the development, incorporating SuDs, play spaces and landscaping. Well surveyed public open space within the development to facilitate safe play spaces and sport. There should be a clear delineation between communal open space and private space associated with individual plots.

Movement & access

p) Vehicle access to the site is a constraint as the current single-lane track would not be suitable for this development in its current form and would either need to be upgraded or an alternative access would be required to be appropriate for residential development.

   i. If the existing farm track is upgraded, a new junction onto A44 would need to be agreed by the Highways Authority. The track would also need work to segregate walk, cycle, wheel and vehicle use to avoid conflicts. In addition, access for farm vehicles will need to be maintained should the remainder of the farmland (outside the city boundary) continue in operation. Appropriate lighting should balance the need for safe access with local ecology.
   ii. There is also potential opportunity to create an alternative access through the Pear Tree service area.

q) The layout and design of this area must also facilitate and not compromise the delivery of walking, cycling, and wheeling access through the site, over the footbridge across the railway line to Oxford Parkway station.

r) May be opportunities to connect with residential development to the south, on a reconfigured park & ride, and the remainder of the Oxford North site (mixed use) (**Policy SPN3: Oxford North Remaining Phases**).

s) Parking should be incorporated in the public realm where possible in well surveyed locations. Rear parking courts should be avoided.

t) The land to the north of Northern Gateway lies in Cherwell, part of which is allocated in the Cherwell Local Plan partial review (site allocations PR6a&b). Development should make provision for future connectivity with any development of the sites in Cherwell, which should give potential for vehicular, walking, cycling and wheeling links. It is important that the unmet need sites are well-connected to Oxford, and development at Northern Gateway must facilitate access and

integration for those communities with existing north Oxford communities.

Additional Requirements

u) Planning permission involving land safeguarded for East West Rail (Oxford) will not be granted until the East West Rail Company has been consulted and the procedure set out in the East West Rail Safeguarding Directions has been followed (**Policy I2**).

Red Barn Farm

Site area	0.96 ha
Ward	Wolvercote
Landowner	Merton College
Current Use(s)	Classroom/workshop/office buildings and a motorcross track.
Flood zone	Flood Zone 1
Notable heritage assets	Roman remains recorded in the area.
Notable ecological features	Onsite tree coverage around perimeter.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPN6: Red Barn Farm

Planning permission will be granted for employment development and ancillary uses to support the employment at Red Barn Farm. Other complementary uses will be considered

on their merits.

Permission will only be granted for employment development where the intended uses relate to the knowledge economy of Oxford: science and technology, research, bio-technology, spin-off companies from the universities and hospitals, or other intended uses that make a measurable contribution to those sectors. Applicants will be required to demonstrate how their proposals contribute to the knowledge economy of Oxford.

The site currently provides an important community function by providing education and training to disadvantaged and vulnerable young people, so any proposal will need to demonstrate that the facilities can be re-provided (**Policy C3**)**,** which may be outside of the city.

Open space, nature, flood risk

a) Block arrangements and design of outdoor spaces should seek to incorporate a variety of green infrastructure features, which may include trees and hedges, green roofs or linear features that can facilitate movement through the site and integrate with surrounding areas.
b) Trees should be retained especially along perimeter with A34 to help buffer noise.

Urban design & heritage

c) Red Barn Farm parcel is at a prominent location adjacent to the North Oxford development, and at a key entrance to the city. Given this gateway location, design should be high quality.
d) There is opportunity to orientate employment blocks towards the adjoining balancing ponds for more pleasant views for occupiers and to benefit from passive solar gain, and the existing tree/hedgerow coverage along the edge of the A34.
e) Due to potential impacts of noise and other pollutants from the adjoining A34 and A44, development proposals will need to demonstrate how layout of buildings and public spaces has been approached to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policy R4 and R8**).
f) Proposals should undertake more in-depth evaluation of potential Roman remains **(Policy HD5**)**.**

Movement & access

g) Current vehicle access onto the A44 is unlikely to be suitable for any significant increase in traffic without upgrading. Any plans for a left-in left-out junction would need to be agreed with the Highways Authority. Alternatively, low-car development could be an option given the proximity of the park & ride.
h) Opportunities should be taken to design the development to ensure it shall not compromise the delivery of the walking, cycling and wheeling improvements or the potential future direct cycle link to Oxford Parkway.

SOUTH INFRASTRUCTURE AREA

The South Infrastructure Area includes development sites such as Kassam Stadium, which are adjacent to the South Oxfordshire strategic development sites which will need to be closely integrated with the city, Land South of Grenoble Road (Policy STRAT 11) and Land at Northfield (Policy STRAT 12). The area also includes large employment sites such as ARC Oxford and the Oxford Science Park. Enhanced public transport to these sites will be

important as they grow, to provide a realistic alternative to car use for people travelling to the sites.

The opening up of passenger services along the Cowley Branch Line would provide a welcome public transport alternative for this area of the city. The branch line currently extends over three miles eastwards from Kennington Junction. The potential area of influence of the Cowley Branch Line (CBL), including where its passengers may come from, extends across this area. Two stations are proposed along the line at Littlemore/Oxford Science Park and in the vicinity of ARC Oxford/Oxford Retail Park and Blackbird Leys and Cowley. Major new developments coming forward in this area will be expected to make financial contributions towards the delivery of the Cowley Branch Line to mitigate the impact of their development.

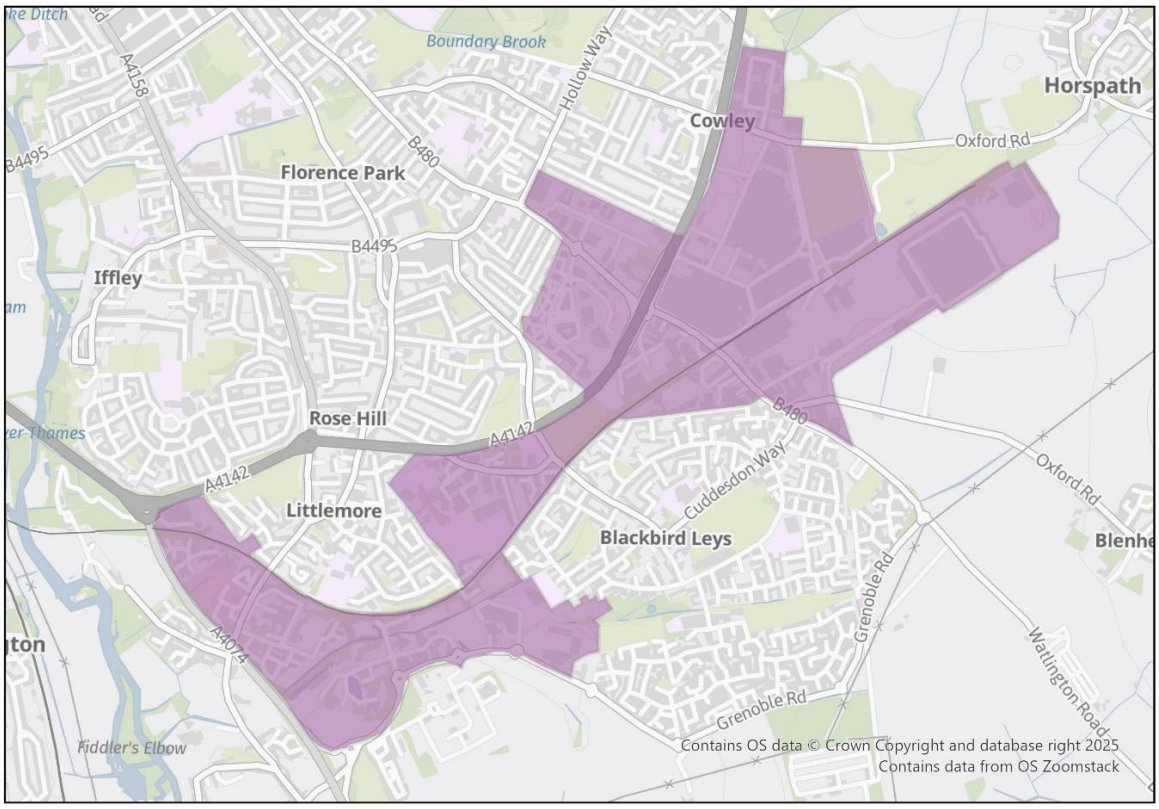
Good transport connectivity via public transport, walking, cycling and wheeling is a key need for this area if people are to be able to move easily between bus stops, potential stations, residential and employment areas and other facilities. This area includes the significant centres of Cowley and Blackbird Leys, which have many facilities essential to their local communities. The vibrancy of these centres needs to be maintained so they can continue to be gathering places offering a range of facilities and services.

Oxfordshire County Council's proposals to introduce an enhanced public transport service as part of the measures made possible through the proposed traffic filters will play an important contribution to this area.

Key considerations for infrastructure and design across the area are:

- Ensure good connectivity by foot and cycle and public transport across the area, including to the proposed locations of Cowley Branch Line stations
- Consider the connectivity of the area to the rest of the city and beyond into South Oxfordshire and the Vale of White Horse District Councils.
- Enhance public transport connectivity to help enable a reduction in car parking across the area
- Ensureland is safeguarded for stations and access for the proposed Cowley Branch Line.
- Increase public access to green spaces
- Ensure good urban design and place making opportunities are taken for the new residential areas to be brought forward
- Support the vibrancy of district and local centres in the area to ensure the facilities and services they include continue to be available
- Increase opportunities to enhance existing tree cover which is the lowest canopy cover across the city.

Cowley Branch Line Area of Focus



This Area of Focus (AoF) includes the area around the Kassam Stadium and the proposed Cowley Branch Line (CBL) where several of the city's key employment sites lie, including MINI Plant Oxford, Oxford Science Park and ARC Oxford, which all employ large numbers of people. Key objectives for this area include:

- Improving and enhancing connectivity to this part of the city by modes other than by private car.
- Creating connections to and between the CBL stations and the surrounding employment sites.
- Strengthening placemaking in this area by successfully integrating new development into the existing built environment and enhancing the existing neighbourhood.

There is a commitment to the re-instatement of passenger trains along the CBL within the Plan period. The opening up of passenger services along the CBL would provide an additional public transport alternative for this area of the city. The branch line currently extends over three miles eastwards from Kennington Junction. Two stations are proposed along the line at Oxford Science Park and in the vicinity of ARC Oxford on the site of the Sandy Lane Recreation Ground to the rear of the Tesco Superstore. The CBL would enable a wider catchment area of workers to be able to access important employment sites such as ARC Oxford and the Science Park by rail, which will help support the local, regional and national economy. There are secondary benefits of rail travel, such as the potential for reduced reliance on the private car, which brings with it the potential for improvements in air quality and reduced traffic congestion on the local highway network. In order for these new stations to be delivered it may be necessary for the closure and/or upgrade of existing level crossings as part of the Public Rights of Way Network. Level crossings in this area include Mallams footpath level crossing and Spring Lane level crossing.

As well as delivering benefits for some of Oxford's key employers, the delivery of the CBL has the potential to enrich the lives of residents by providing an accessible rail route into and

out of the area. Any infrastructure delivery associated with the CBL must therefore be accessible for residents as well as workers who may be commuting into the city from across the county and region. This transformational infrastructure will require significant investment from a number of sources including developer contributions. Development sites within this AoF will be expected to make financial contributions towards public transport, the delivery of the CBL including upgrading walking, cycling and wheeling access to the proposed stations to mitigate the impact of the developments. Walking, cycling and wheeling improvements are essential to the success of the area to improve connectivity and permeability, to other parts of the city and/or to destinations in the neighbouring districts.

In addition to changes resulting from the delivery of the CBL, the area will experience considerable transformation over the plan period as developments on the edge of the city in adjoining South Oxfordshire are built out as allocated strategic sites, particularly the Land South of Grenoble Road (Policy STRAT 11) and Land at Northfield (Policy STRAT 12). It is important that all opportunities are taken to ensure that these strategic developments on the city's boundaries are well connected for walkers, cyclists and wheelers.

These new developments must support existing public transport routes and the expansion of these routes where required to ensure people have the option to use public transport to move around the whole city not just routes that go to the city centre. This AoF also falls within the Littlemore Neighbourhood Plan area so proposals should take into account the community aspirations set out in the plan.

Oxford Stadium Conservation Area lies within this AoF, and Littlemore Conservation Area is within close proximity, both of which should be properly considered in any development proposals that come forward. The AoF also includes the Grade II* Listed Minchery Farmhouse which has been identified as being 'at risk' by Historic England. There are opportunities to preserve and enhance this heritage asset and its setting. The height, scale and massing of new development in this AoF should respond positively to the area and should be informed by the High Buildings TAN and, more specifically, the CBL Densification Study (2025). The CBL Densification Study (2025) supplements the High Buildings TAN by providing technical advice for this area of the city including heatmaps and identifications of important views out of the city towards the surrounding hills. Development proposals should demonstrate how they have been informed by this study.

The CBL AoF includes a variety of publicly accessible greenspace, both within and nearby. Given the predominantly employment-led nature of sites within this AoF, some sites have considerable hardstanding and limited green infrastructure to support habitat linkages. Several watercourses run through the site including the Northfield Brook and the Littlemore Brook. Fluvial flood risk within the AoF is broadly aligned with these watercourses. Surface water flood risk is also present within the AoF however, surface water flood risk occurs within the larger employment areas near to the Garsington Road interchange on the A4142 (eastern bypass).

Development within the AoF creates opportunities to deliver public open space enhancements, both within and near the AoF. It also presents opportunities to deliver habitat linkages within development sites through appropriate landscaping and planting, and through the creation of green roofs and walls as part of redevelopment proposals. Green roofs and walls can also form part of wider SuDS schemes, which can help manage flood risk (including surface water flood risk).

POLICY CBLAOF: COWLEY BRANCH LINE AREA OF FOCUS

Planning permission will be granted for new development within this Area of Focus (AoF) where it would ensure that opportunities are taken to deliver the following (where applicable):

Supporting active travel and infrastructure delivery

a) The new Cowley branch Line (CBL) stations and walking, cycling and wheeling connections to and from these, including bridge access.
b) Walking, cycling and wheeling infrastructure improvements in accordance with the requirements of the Oxfordshire Local Cycling and Walking Infrastructure Plan. Development proposals must take the opportunity to increase connectivity and permeability through developments so people can walk, cycle or wheel across the area and to other parts of the city including from the site allocations adjacent to the city which are in South Oxfordshire Local Plan 2035 (Strat 11 Land South of Grenoble Road and Strat 12 Northfield). Minchery Lane is a key connection between sites within and outside of the city boundary and should be enhanced.
c) A reduction car parking in line with Policy C8;
d) The safeguarding of land for walking, cycling and wheeling access to the proposed CBL railway stations, as referenced in Policies SPS12 Oxford Science Park and SPS15 Sandy Lane Recreation Ground, and connections to bus stops;
e) Enhancements to public transport both improving existing bus services and towards the proposed CBL. Improved accessibility in the southeast of the city is needed to support the anticipated intensification of existing employment use and to improve accessibility to new residential development. The CBL would enable a reduction in car use in this area, supporting this employment use.

High quality design that responds to heritage assets while capitalising on opportunities for growth

f) Good urban design and place making opportunities including delivery of new residential development on redundant retail parks;
g) Strengthened placemaking in this area by successful integration of new development into the existing built environment and enhancement of facilities for both new, and existing, communities.
h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD9 and the site-specific allocation, where applicable. Development proposals should respond positively to the surrounding area and should be informed by the High Buildings TAN and, more specifically, the CBL Densification Study (2025).

Environmental improvements to benefit biodiversity and the community and future occupiers

i) Enhancements to the existing Green Infrastructure network which could include landscaping, planting; increasing tree cover; enhancement of biodiversity green corridors and; incorporation of the use of SuDs;
j) Enhancement of the existing Blue Infrastructure network which includes Littlemore Brook, Boundary Brook and Pottery Stream.
k) Enhancement of existing public open space and create new public open space, where possible, or where required by specific allocation policies.
l) Mitigation of potential negative air quality impacts that arise during the construction and operational phases;
m) No adverse impact on the Minchery Farm, Littlemore and Northfield Brook and Spindleberry Park Oxford City Wildlife Sites (OCWS) without justification and/or mitigation in accordance with Policy G6.
n) No adverse impact on the nearby Littlemore Railway Cutting and Brasenose Wood and Shotover Hill Sites of Special Scientific Interest (SSSI) without justification and/or

mitigation in accordance with Policy G6.

Infrastructure

o) Financial contributions from trip-generating uses within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) towards achieving public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL. Figures 8.5 and 8.6 show the extent of this buffer zone around both proposed railway stations and the site allocations that lie within it. Outside the 1,500m buffer area, financial contributions from new trip-generating development would be sought on a case-by-case basis. These will be tested in accordance with Paragraph 58 of the NPPF.;

474 Cowley Road

Site area	0.34ha
Ward	Donnington
Landowner	St John Care Trust
Current Use(s)	Former use as a commercial timber yard, now vacant.
Flood zone	Flood Zone 3a
Notable heritage assets	N/A
Notable ecological features	Potential interest from perimeter trees and overgrowth. Adjacent to Elder Stubbs Allotments.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS1: 474 Cowley Road
Planning permission will be granted for residential development (or replacement facilities in the lawful use). The minimum number of dwellings to be delivered is 14. Other complimentary uses will be considered on their merits. **Open space, nature, flood risk** a) Development proposals should retain and integrate existing trees and hedgerows

into the design wherever possible. Trees around the perimeter are particularly important to retain where possible, including as a buffer to the allotments.

b) Replacement planting will be required where loss occurs to ensure no net loss of canopy cover.
c) There is potential for the incorporation of green roofs, SuDS, and measures to enhance biodiversity and ecological connectivity on the site.
d) Part of the site is located within Flood Zone 3 and Flood Zone 2, and a sequential approach should be taken to locating development on the site, with development prioritised first within Flood Zone 1 prior to consideration of any siting within Flood Zone 2 or 3a. A site-specific Flood Risk Assessment (FRA) will be required and should consider onsite routes and any infrastructure required to reach the access route. Areas of flood risk are present along the main access route to the site. Given there is no advance flood warning provision for the site, the potential for evacuation before a more extreme fluvial or pluvial flood, considering the effects of climate change for the lifetime of the development, needs to be considered by the FRA, with advice to sought from the emergency services and the local authority's emergency planner (**Policy G7**). A site-specific FRA should also consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site.
e) The drainage strategy for the proposed development should be suitably designed to manage additional runoff arising from the development and ensure that surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G8**).

Urban design & heritage

f) The site is backland, so development should be of a scale that does not dominate the surrounding residential area, reflecting surrounding residential form and density
g) The use of high quality materials (brick, render, detailing) inspired by the local character would be appropriate (**Policy HD1**)

Movement & access

h) Vehicular access for the site will continue from Cowley Road, ensuring there is provision for emergency/service vehicles to access the development
i) Prioritisation of active travel will be sought, enhancing walking, cycling, and wheeling connections to Cowley Road and wider networks
j) Opportunities for new and improved walking, cycling, and wheeling links to nearby recreation spaces should be taken to improve permeability through the site.

ARC Oxford

Site area	35.4ha
Ward	Temple Cowley
Landowner	ARC Oxford (majority)
Current Use(s)	Employment uses including office and lab space
Flood zone	Flood Zone 1
Notable heritage assets	Temple Cowley Conservation Area is immediately adjacent to and runs parallel with the north-western site boundary along Hollow Way (B4495). Grade II Listed *Nuffield Press East Wing and Attached Former School House* is opposite to the western boundary of the site (Hollow Way). Site lies within a wider area of potential for Roman and pre-historic archaeology; it is heavily disturbed and close to a Roman pottery manufacturing zone. Individual plots should be considered on a case-by-case basis, based on the level of disturbance from the demolition of the Cowley car plant.
Notable ecological features	Part of the site is identified within the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS2: ARC Oxford

Planning permission will only be granted for new development or redevelopment that modernises and intensifies the following uses:

- Research and development (R&D), laboratories and office accommodation (Use Class E)
- Light (Use Class E) and general (Use Class B2) industrial uses.
- An element of residential development will be supported at the site in accordance with **Policy E1**. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals should:

i. Deliver new and/ or enhance existing on-site open space. Any new open space provided should be designed to be accessible for all site users and visitors. Wider public access to on-site open space is encouraged.
ii. Provide landscaping that supports and sustains the delivery of a network of green corridors throughout the wider site.
iii. Demonstrate how improvements to existing on-site biodiversity (including at vacant plots), will be delivered. Development proposals involving vacant plots are expected to be supported by a biodiversity survey to assess the biodiversity value of the site. The survey should demonstrate how any harm will be avoided, mitigated, or compensated for.
iv. Seek to enhance existing ponds by undertaking sensitive management and restoration of ponds and pond complexes to improve biodiversity and water quality.
v. Ensure that surface water is appropriately managed on site using SuDS. Green walls and roofs are encouraged as they can help to manage surface water while delivering habitat connectivity and supporting the wider ecological network.

b) A site-wide landscaping and public realm strategy for the site is encouraged and proposals for individual plots should then identify how they will align with/ comply with the overall strategy. Site-specific landscaping schemes should be prepared in accordance with **Policies G2, G3, G4 and G5**.
c) Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

d) There are opportunities for intensification of uses on this site which may be possible through increased building heights. Heights should vary across the site and should be informed by design guidance in the High Buildings TAN and the CBL Densification Study. Higher buildings will be most appropriate within the core of ARC Oxford and along the Garsington Road / Eastern Bypass frontage, where development can be grouped together and will help to better define key gateways / routes. Given the prominence of ARC Oxford in the townscape - and potential impacts associated with higher buildings - there should be variations in scale and massing to limit the overall bulk of development; provide variation in roofscape; and allow views through the site to landscape beyond. Lower buildings will be most appropriate within the fringes of ARC Oxford to provide a suitable interface with surrounding residential areas. Proposals should demonstrate how they have been informed by the guidance set out in the High Buildings TAN and the CBL Densification Study (2025).
e) Development proposals should be designed to deliver high quality public realm and buildings that establish a clear character for the site.
f) Development proposals should seek to enhance and improve the amount and quality of public space and community buildings at the site.
g) The site is of archaeological interest for potential Roman remains (although with some previous disturbance). This will require further investigation as part of any redevelopment (**Policy HD5**).

Movement & access

h) Development proposals should:
i. Contribute to, promote and support improved sustainable transport links

including links to the proposed Cowley Branch Line station

ii. Deliver improvements to the public realm that deliver high-quality well-designed spaces prioritising walking, cycling and wheeling.

iii. Ensure that all site access points provide safe, suitable and appropriate access for all site users (i.e., people walking, cycling and wheeling). Fully contribute towards and/ or deliver a high-quality gateway to the site that provides safe, secure access under the A4142 (Eastern Bypass).

iv. Contribute financially towards the provision of new walking, cycling and wheeling bridge over the railway that provides access to and from the new CBL station located near ARC Oxford.

v. Seek to reduce the amount of surface level car-parking across the site.

vi. Not propose new additional motor vehicle parking and should seek an overall reduction of parking in line with (**Policy C8)**.

vii. Only provide new additional parking provision for blue badge and servicing (**Policy C8**).

i) Proposals assessed prior to the delivery of the CBL will be expected to show how car parking will be reduced once CBL becomes fully operational (i.e., two trains per hour).

Additional Requirements

j) Due to the historic and current land uses proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Bertie Place Recreation Ground

Site area	0.67 ha
Ward	Hinksey Park
Landowner	Oxford City Council
Current Use(s)	Public playground and MUGA
Flood zone	Flood Zone 3b

Notable heritage assets	N/A
Notable ecological features	All of site is in Local Nature Recovery Strategy (LNRS). Site within the impact risk zone of the Iffley Meadows SSSI. Slow worm habitats, a protected species, may be found on site.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS3: Bertie Place Recreation Ground

Planning permission will be granted for residential development with a public playground and MUGA re-provided on site at Bertie Place. The minimum number of dwellings to be delivered is 25. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the Iffley Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the Iffley Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) A site-specific Flood Risk Assessment (FRA) should consider onsite routes and any infrastructure required to reach the access route. Access/egress from the site is over land in moderate flood risk. The FRA should consider the evacuation requirements before the design event and a more extreme fluvial event. Early flood warning will be vital to ensure the access route can be utilised before floodwater inundates the junction of Old Abingdon Road and the A4144. The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G7** and **Policy G8**).

c) 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 recreation needs of teenagers.
    - Open space/public realm landscaping can also incorporate SUDS as part of mitigations against surface water flood risk.

d) All of the site is identified within the Local Nature Recovery as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

e) A buffer should be retained along the river and railway wildlife corridors.

Urban design & heritage

f) There is an opportunity for an increased level of density compared to the immediate surroundings to be delivered on the developable area of this site, subject to constraints arising from areas of flood risk. Increased density can be achieved by thoughtful consideration of layout and block typologies e.g. terraces as opposed to semidetached dwellings, rather than height due to amenity concerns of neighbouring dwellings (overlooking, overshadowing) and respecting

character of surrounding context.

g) To further protect the amenity of adjoining neighbours, careful consideration should also be given to the back-to-back relationships to the existing neighbouring gardens, with setbacks, appropriate massing of buildings and suitable boundary treatments applied as needed.

Movement & access

h) Care should be taken to ensure good circulation around the site for vehicles to avoid potential problems with a single in and out access.

i) Development proposals should not unduly impede existing walking, cycling and wheeling routes through the site.

Additional Requirements

j) Some areas of potential contamination are present on the site so proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Cowley Marsh Depot

Site area	1.71 ha
Ward	Temple Cowley
Landowner	Oxford City Council
Current Use(s)	City Council depot, storage for refuse vehicles
Flood zone	Flood Zone 3b
Notable heritage assets	The only heritage asset is a very small part of site in the northern corner which is within Crescent Road View Cone.
Notable ecological features	Part of the site is identified within the Local Nature Recovery Strategy (LNRS). Boundary Brook adjoins the eastern boundary of the site.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS4: Cowley Marsh Depot

Planning permission will be granted for residential development and public open space at Cowley Marsh Depot. The minimum number of dwellings to be delivered is 83 homes net gain. Other complementary uses will be considered on their merits.

Prior to the development of the site the City Council depot use must be relocated. The City Council also owns the two residential properties within the site, which could potentially be incorporated into a comprehensive redevelopment of the site. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Preliminary analysis suggests that the limited presence of green infrastructure features on the site currently means it is likely to score below the minimum thresholds for green surface cover as required by **Policy G3**. As such, proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the policy, demonstrated through submission of the Urban Greening Factor assessment. These could include introducing green roofs.

b) Public open space will be required onsite (**Policy G2**). The location of the public open space should take into account opportunities to provide connections and enhancements to the adjoining Cowley Marsh Recreation Ground.

c) An area of land along the southern boundary is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

d) Proposals should retain and enhance existing hedgerows around the site boundary and trees around and within the site. Opportunities to support and enhance biodiversity should also include creating connections into wildlife corridors in the adjoining playing fields and Cowley Marsh Nature Reserve/Boundary Brook/Barracks Lane.

e) Currently the whole site is hard-surfaced with concrete, therefore proposals should seek to improve permeable surfaces by introducing SUDs (**Policy G8**) which could include permeable garden areas. Opportunities should be taken to protect and enhance the watercourse adjoining the site and a 10m buffer should be retained between the edge of the watercourse and the built development **(Policy G2).**

f) A sequential approach must be taken to locating development on the site. A site-specific Flood Risk Assessment (FRA) will be required which should also investigate the flood risk the presence of the nearby culvert presents and identify the residual risks relating to the lack of maintenance or blockages of this watercourse. The findings of this investigation should inform the sequential test in order to avoid any areas of potential risks. The FRA should also consider onsite routes across the site and any infrastructure required to reach the proposed access route. Areas of significant flood risk are present along the main access route to the site, and the FRA should consider the evacuation requirements before the design event and a more extreme fluvial event, with advice to be sought from the emergency services, including the local authority's emergency planner. The drainage strategy should be designed to manage runoff arising from the development and ensure that surface water flood risk on and off the site is not increased (**Policy G7** and **Policy G8**).

g) Because of the current use as a depot with a fuel station, some areas of potential contamination are present on the site so proposals will be required to include an

appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Urban design & heritage

h) The Crescent Road View Cone crosses the northern corner of the site; proposals should be designed in a way that responds to this protected view (**Policy HD6**). Heights of buildings should also be compatible with surrounding residential streets.

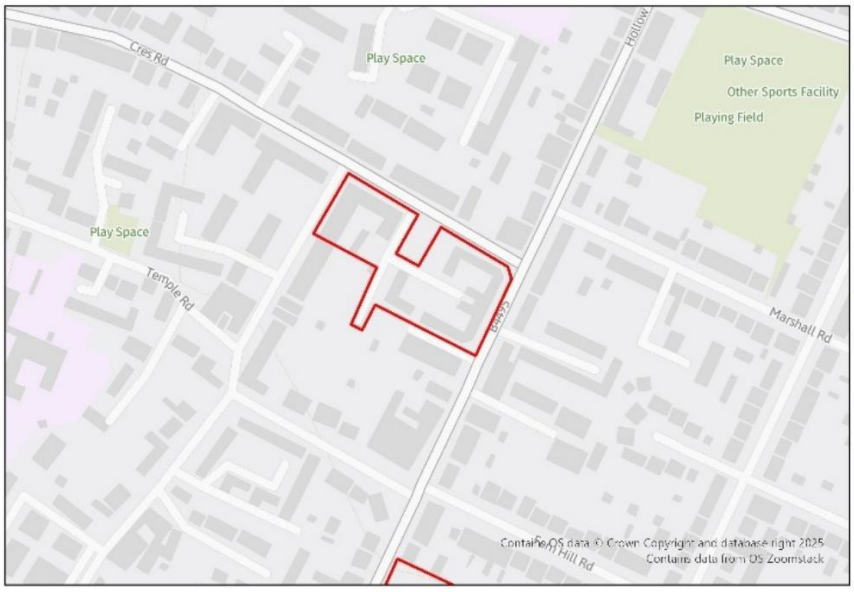
i) Opportunities should be taken to increase permeability of the site including improving and/or creating access to the adjoining recreation ground and the footpaths across it, and the nearby Sustrans route along Boundary Brook.

j) Proposed developments should demonstrate activation of the boundary with the adjoining Cowley Marsh Recreation Ground and improve active frontages along Marsh Road.

Movement & access

k) Opportunities should be taken to develop and link into existing walking, cycling and wheeling routes including the nearby Sustrans route along Boundary Brook.

Crescent Hall



Site area	0.9 ha
Ward	Temple Cowley
Landowner	Oxford Brookes University
Current Use(s)	Student accommodation
Flood zone	Flood Zone 1
Notable heritage assets	Located immediately adjacent to the Temple Cowley Conservation Area
Notable ecological features	Mature trees within/ along the perimeter of the site fronting Crescent Road, Junction Road and Hollow Way which are protected by the Oxford City Council Crescent Road (No.1) Tree Preservation Order 1998.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS5: Crescent Hall

Planning permission will be granted for residential development and/or student accommodation on the site. The minimum number of dwellings to be delivered on the site is 75 net gain (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.

Open space, nature, flood risk

a) Proposals should seek to retain existing features where possible, particularly higher quality elements like large mature trees, many of which are protected under a TPO as well as boundary features that help preserve amenity.
b) Green infrastructure should be enhanced in lower quality areas with a greater variation in planting and new habitat around the new buildings.
c) The potential presence of priority species/habitats on the site (roosting bats and nesting birds) should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly.

Urban design & heritage

d) In the case of infill development, proposals should complement the materials of the existing development (**Policy HD1**).
e) Proposals should be designed in a way that is sensitive to the Temple Cowley Conservation Area of which it lies adjacent to, particularly regarding heights, massing, roofscape and impacts on local character and street scene (**Policy HD3**).
f) Opportunities should be taken to improve the interface with the surrounding streets, particularly along Crescent Road and Hollow Way.

Movement & access

g) Opportunities should be taken to consolidate car parking and reduce the car-dominated feeling of the buildings within the site.
h) Circulation within the site should prioritise walking, cycling and wheeling.
i) New residential development should be low car.
j) Unless a safe alternative can be demonstrated, the principal access should remain in the same location, although opportunities to increase permeability for walkers, cyclists and wheelers should be considered.

Former Iffley Mead Playing Field

Site area	2.04ha
Ward	Rose Hill and Iffley
Landowner	Oxfordshire County Council
Current Use(s)	Vacant Greenfield
Flood zone	Flood Zone 1
Notable heritage assets	Iffley Conservation Area is adjacent to the site. The site is not within a view cone but there is potential for it to impact views from the Rose Hill View Cone. The site has general archaeological potential, as it is located 70m from a Neolithic pit circle and there is potential for further remains. It also has potential for Early Saxon settlement as the Archeox excavation to the north recovered a significant amount of Saxon pottery.
Notable ecological features	It has been vacant for some time and so there is potential for biodiversity value. Site is within the impact risk zone for Iffley Meadows SSSI.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS6: Former Iffley Mead Playing Field

Planning permission will be granted for residential development and public open space at the former Iffley Mead Playing Field site. The minimum number of dwellings to be delivered is 84. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Public open space will be required onsite (**Policy G2**). This open space must be accessible to existing residents and could incorporate a well-designed secure children's play area alongside some Sustainable Urban Drainage Systems (SUDS).

b) The ecological value of the site must be assessed as part of a planning application and existing green features such as mature trees and hedgerows should be retained or enhanced. A biodiversity survey should be submitted in support of any development proposals to demonstrate any harm is avoided, mitigated or compensated for.

c) As the site falls within the identified impact risk zone for the Iffley Meadows SSSI,

new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the Iffley Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

Urban design & heritage

d) Proposals should ensure that the design has taken into consideration the impact on the setting of the Iffley Conservation Area (**Policy HD3**) and on views, particularly from the Rose Hill view cone (**Policy HD6**).

e) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**). Any sizable development will require pre-determination evaluation (geophysical survey and trenching).

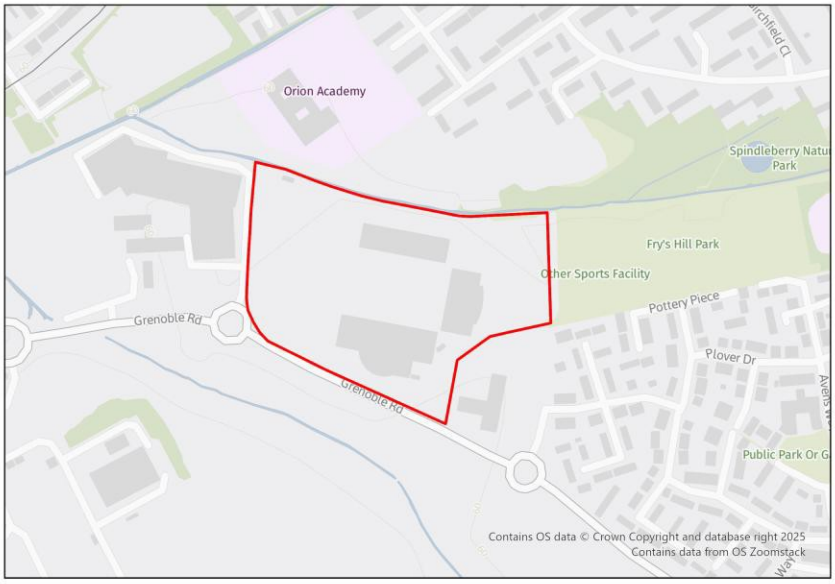
Movement & access

f) Augustine Way offers the greatest potential for vehicular access, but this would be shared with access to the adjacent Iffley Academy school. Therefore, proposals should ensure that access to the site can be achieved without being detrimental to the school.

g) Limited vehicle movements would be beneficial and as the site is located in a CPZ, low car development would be supported.

h) Opportunities to access the site for walkers, cyclists and wheelers from Cavill Road and through the adjacent recreation ground to the north should be explored.

Kassam Stadium



Site area	6.52ha
Ward	Littlemore and Northfield Brook
Landowner	Firoka
Current Use(s)	Football stadium with associated conference facilities, parking

Flood zone	Flood Zone 3b
Notable heritage assets	Within setting of Minchery Farmhouse Grade II* listed building.
Notable ecological features	Close to Spindleberry Park Oxford City Wildlife Site, Littlemore and Northfield Brook OCWS along northern edge, close to Minchery Farmhouse OCWS. Nearby peat deposits to the west, alongside the brook. Part of the site is identified in the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS7: Kassam Stadium

Planning permission will be granted for residential-led development and public open space on the Kassam Stadium site. The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected. There is also a precedent for employment-related uses, so these will be acceptable as a secondary use on the site. The minimum number of new homes to be delivered is 290. Other complementary uses will be considered on their merits. This site is linked to **SPS11** and **SPS13**, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.

Open space, nature, flood risk

a) Development should not have an adverse impact on the Oxford City Wildlife Site.
b) A 10m buffer to the brook should be retained and used to create an enhanced wildlife corridor. Tree edges that screen the surrounding residential districts should also be retained.
c) At least 10% of the sites should be used for public open space (**Policy G2**). The opportunity should be taken to weave this through the site as green space with pocket parks, creating a green corridor that links Fry's Hill Park and Spindleberry Nature Reserve to the surrounding landscape. This also ensures the links to the rural landscape beyond, with characteristic fragments remaining, is retained.
d) A sequential approach must be taken to locating development on the site. Development should avoid the areas of Flood Zone 3 along the brook (**Policy G7**).
e) A site-specific Flood Risk Assessment (FRA) will be required with a drainage strategy to manage runoff and ensure surface water flood risk at the site and around is not increased. Infiltration SuDS solutions may be possible because of the geology, so a geotechnical investigation may be needed (**Policy G7** and **Policy G8**).
f) An area of land along the northern boundary of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) Design should inject character and a sense of place into this area (**Policy HD1**).
h) The interface between the edges of the sites and the surroundings is particularly important. The likely change in character along Grenoble Road as development takes place to the south should be reflected in the style of development along the

southern edge. The northern edge is bounded by the brook and green infrastructure should be retained and enhanced.

i) Development should ensure an enhancement to the setting of the Minchery Farmhouse (**Policy HD3**).

j) The potential for prehistoric, Roman and medieval archaeology will need to be explored as part of any redevelopment **(Policy HD5)**.

Movement & access

k) Development should contribute to improvements to the walking, cycling and wheeling route from Priory Road, which will be an important route to the new branch line station. Development proposals should be designed to be permeable and readable, with obvious routes through to Grenoble Road, the east of the site and across to site **SPS11** and Priory Road.

l) Vehicular access should continue to be from Grenoble Road and design should ensure there is easy circulation for vehicles to and from site **SPS11**.

Additional requirements

m) Because the site includes areas of filled ground, some areas of potential contamination are present on the site, so investigation will be required, and remedial works may be required (**Policy R5**)

Land at Meadow Lane

Site area	0.99 ha
Ward	Rose Hill and Iffley
Landowner	Oxford City Housing Ltd
Current Use(s)	Private green space, in the past rented out for horse grazing
Flood zone	Flood Zone 3b
Notable heritage assets	Within the Iffley Conservation Area; Grade II listed Townsend Close and Tudor Cottage buildings nearby on Church Way Within Rose Hill View Cone

	Potential presence of Iron Age and Roman archaeological remains.
Notable ecological features	Site is within the impact need zone for Iffley Meadows SSSI Site identified in Local Nature Recovery Strategy (LNRS) Adjacent to watercourse
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS8: Land at Meadow Lane

Planning permission will be granted for residential development at Land at Meadow Lane. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the Iffley Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the Iffley Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) The site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

c) A detailed assessment of the site's value for invertebrates and the impacts of the proposed development will be required, with mitigation and compensation measures delivered that fully offset these impacts and functionally support notable species.

d) Any proposed development on the site will require a detailed assessment of protected species, which should inform a package of mitigation and compensation measures that ensure there are no residual impacts on the protected species.

e) The strong belt of vegetation on the southern boundary should be retained and other existing vegetation on the site should be retained and enhanced where possible and when needed as enhanced habitat for invertebrates, following the mitigation hierarchy.

f) Part of the site is located within Flood Zone 3 and Flood Zone 2, and a sequential approach should be taken to locating development on the site, with development prioritised first within Flood Zone 1 prior to consideration of any siting within Flood Zone 2 or 3a. A site-specific Flood Risk Assessment (FRA) will be required and should consider onsite routes and any infrastructure required to reach the access route (**Policy G7**).

g) A buffer should be retained alongside the watercourse.

Urban design & heritage

h) Development proposals should be designed with consideration of the impact on the Conservation Area and heritage assets adjacent to the site **(Policy HD3)**.

i) Development should be of relatively low density and height to allow for suitable plot size and spacing between buildings and integration of green infrastructure as appropriate to the semi-rural character of the Iffley Conservation Area.

j) Proposals should ensure that the archaeological assets are appropriately

investigated and responded to **(Policy HD5)**.

Movement & access

k) Opportunities to improve walking, cycling and wheeling links should be taken to link into existing networks.

l) The semi-rural character of surrounding streets should be maintained and the perception of these as safe for walking, cycling and wheeling not compromised. To achieve this the site should generate minimal traffic, with low parking levels.

m) The vehicle access point should be chosen to minimise transport impacts and to minimise impacts on the character of the conservation area.

Additional Requirements

n) Some areas of potential contamination are present on the site so proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Littlemore Mental Health Centre, Sandford Road

Site area	6.6ha
Ward	Littlemore
Landowner	Oxford Health NHS Foundation Trust
Current Use(s)	Hospital and Staff/Student Accommodation
Flood zone	Flood Zone 1
Notable heritage assets	The site has archaeological potential and is located close to the Littlemore Conservation Area which contains a number of heritage assets.
Notable ecological features	Site is within 200m of a SSSI (Littlemore Railway Cutting) and has established vegetation, trees and hedgerows within the site/on the site boundary.

Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS9: Littlemore Mental Health Centre

Planning permission will be granted for hospital use, and associated residential development which may include employer-linked housing or student accommodation. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals must ensure that existing green infrastructure features on the site are protected and that opportunities are sought to enhance these. An Urban Greening Factor assessment will need to be produced and submitted. Planning permission will only be granted if an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets (**Policies G1, G2 and G3**).

b) Existing onsite biodiversity should be retained, enhanced and integrated into development proposals (**Policies G2 and G4**).

c) Existing drainage features such as the pond and brook should be maintained, enhanced and integrated into the landscape scheme, potentially creating wildlife corridors through the site (**Policy G8**).

d) The potential presence of priority species/habitats on the site should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly. Proposals should also consider impacts on the surrounding areas, particularly, the nearby Littlemore Railway Cutting SSSI (**Policy G6**).

e) Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G7**).

Urban design & heritage

f) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

g) Development proposals should be designed with consideration of their impact on the nearby Littlemore Conservation Area and nearby heritage assets **(Policies HD1 and HD3**).

h) Due to potential impacts of noise and other pollutants from traffic on the A4074, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policies R4 and R8**)

Movement & access

i) Development proposals should demonstrate better management of the existing parking on the site to ensure the most efficient use of land is made.

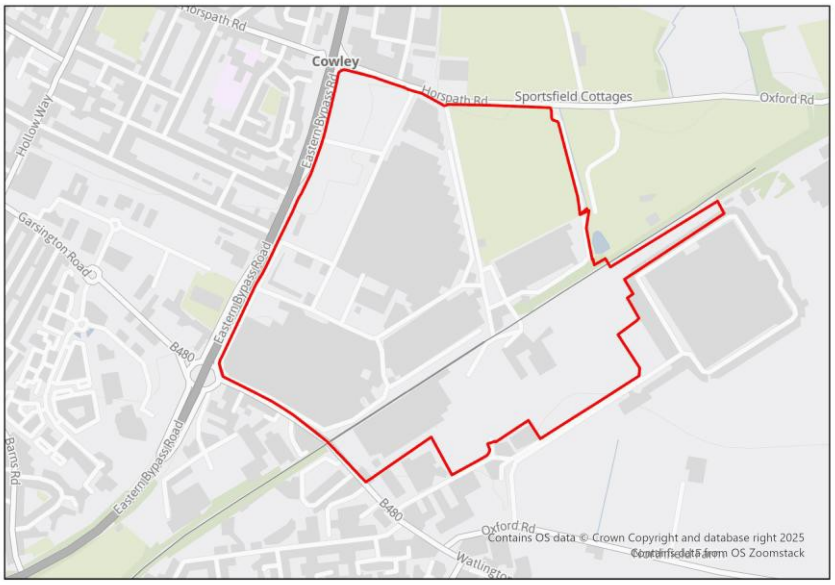
j) Proposals should also improve accessibility through the site, additional routes that effectively separate walking, cycling and wheeling from visitor or servicing traffic, will be encouraged. These measures should be set out within a transport assessment and travel plan and reflected in an agreed masterplan (**Policy C6**).

Additional requirements

k) As the site has a long standing healthcare use, proposals will be required to include an appropriate site contamination investigation and demonstrate how

contamination issues will be resolved where relevant (**Policy R7**).

MINI Plant Oxford



Site area	69.9ha
Ward	Blackbird Leys
Landowner	BMW (UK) Manufacturing Ltd
Current Use(s)	Car manufacturing plant
Flood zone	Flood Zone 1
Notable heritage assets	Site is of archaeological interest as the Dorchester-Alchester Roman road runs through the site and there is potential for roadside settlement. Archaeological remains from the Bronze Age and Roman remains have also previously been recorded.
Notable ecological features	Part of site identified in Local Nature Recovery Strategy (LNRS). Site is located within the impact risk zone of the Brasenose Wood and Shotover Hill SSSI, but this SSSI is sensitive to recreational pressure, which is unlikely to be generated by development of this site.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS10: MINI Plant Oxford

Planning permission will be granted for the intensification and modernisation of the MINI Plant Oxford site to make the most efficient and effective use of the land in accordance with **Policy E1** and in recognition of its importance as a key employment site.

Development and/or changes of use of buildings to Class B2 (general industrial), Class E (offices and light industrial) together with Class B8 warehousing uses or other complementary uses will be supported in principle, even though they may result in a loss of jobs, where these uses are shown to be important to the successful operation of the MINI Plant Oxford.

Open space, nature, flood risk

a) Proposals should include additional greening onsite to help meet the Urban Greening Factor target and maximise the other functional benefits this can provide (e.g. for climate resilience including reducing surface water flood risk, and general amenity). This could be achieved in various ways, including introducing new green features or enhancing existing features on the site.

b) Parts of the site, including areas along the north and eastern boundaries, the railway line and a north-south strip to the south of the railway line, are identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

c) The MINI Plant Oxford site sits in a 'gateway' location and therefore new development should positively respond to its setting and its relationship to key frontages adjacent to the Eastern By-Pass, Garsington Road and Horspath Road. Opportunities to enhance public realm and improve the experience of the site boundaries when viewed from beyond the site should be maximised wherever redevelopment and operational requirements allow.

d) Building design and arrangement will need to be guided by the operational needs of the site, however, proposals should seek to bring forward development that responds sympathetically and contributes positively to the surrounding area including blending into surrounding views, particularly where these front onto the boundaries of the site.

e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar and on the approach, so as to reduce feelings of overbearing and dominating of the adjacent streetscape. Variations in materials, including selection of materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.

f) There is potential for archaeological remains onsite such as Bronze Age and Roman remains, and those related to the Dorchester- Alchester Roman Road. Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

g) There are various access points into the site of varying quality and proposals should explore opportunities to improve these wherever possible and where operational requirements allow.

h) Whilst the site is fairly accessible, proposals should explore ways to provide for improved walking, cycling and wheeling routes, including making enhancements to the existing network and key junctions, as well as providing better connections to existing and planned major developments in the area.

i) Opportunities should be taken through the development of this site to support sustainable travel by providing greater public transport links and services, including supporting linkages for passengers utilising the future Cowley Branch Line, as appropriate.

Additional requirements

j) Impacts of traffic noise and potential air pollution should be considered as part of the design process and responded to where necessary through appropriate design measures, particularly on the boundaries of the site adjacent to the By-Pass and Horspath Road **(Policy R4 and R8).**

k) There is the potential for land contamination on the site due to current or previous uses. Proposals may be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Overflow Car Park at Kassam Stadium

Site area	2.29ha
Ward	Northfield Brook
Landowner	Firoka
Current Use(s)	Overflow parking for the nearby football stadium
Flood zone	Flood Zone 3b
Notable heritage assets	Close to Minchery Farmhouse Grade II* listed building and close to Littlemore Conservation Area. Potential for prehistoric, Roman and Medieval archaeology. The archaeology is dispersed and mostly focused around the fringes
Notable ecological features	Close to Spindleberry Park Oxford City Wildlife Site and close to Minchery Farmhouse OCWS. Littlemore and Northfield Brook OCWS along northern edge of the site. Nearby peat deposits to the southwest alongside brook. Part of the site is identified in the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS11: Overflow Car Park at Kassam Stadium

Planning permission will be granted for residential-led development and public open space on the Overflow Car Park at Kassam Stadium site. The minimum number of new homes to be delivered is 100. Other complementary uses will be considered on

their merits. This site is linked to **SPS7** and **SPS13**, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.

Open space, nature, flood risk

a) A buffer should be retained along the railway corridor to allow for the movement of protected species such as slow worms. A 10m buffer to the brook should be retained and used to create an enhanced wildlife corridor. Tree edges that screen the surrounding residential districts should also be retained.
b) At least 10% of the sites should be used for public open space (**Policy G2**). The opportunity should be taken to weave this through the site as green space with pocket parks, creating a green corridor that links Fry's Hill Park and Spindleberry Nature Reserve to the surrounding landscape. This also ensures the links to the rural landscape beyond, with characteristic fragments remaining, is retained.
c) Development should not have an adverse impact on the Oxford City Wildlife Site.
d) A sequential approach must be taken to locating development on the site. Development should avoid the areas of Flood Zone 3 along the brook and across the whole southwest corner, and these areas should be integrated into the buffer. This corner would be suitable for either pooled parking or the largest area of open space, as long as access routes to the south and west are easily identified. **(Policy G7**).
e) Areas of surface water flood risk are present along the access routes. A site-specific Flood Risk Assessment (FRA) will be required with a drainage strategy to manage runoff and ensure surface water flood risk at the site and around is not increased. Infiltration SuDS solutions may be possible because of the geology so a geotechnical investigation may be needed (**Policy G7** and **Policy G8**).
f) Land around the outer edges of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) Design should inject character and a sense of place into this area (**Policy HD1**).
h) There is greatest potential for higher and larger plot buildings in front of the railway embankment and in the centre of the site, building in height from the outer edges towards the centre and north of the site.
i) Archaeological investigation may be required as part of any proposed development **(Policy HD5).**

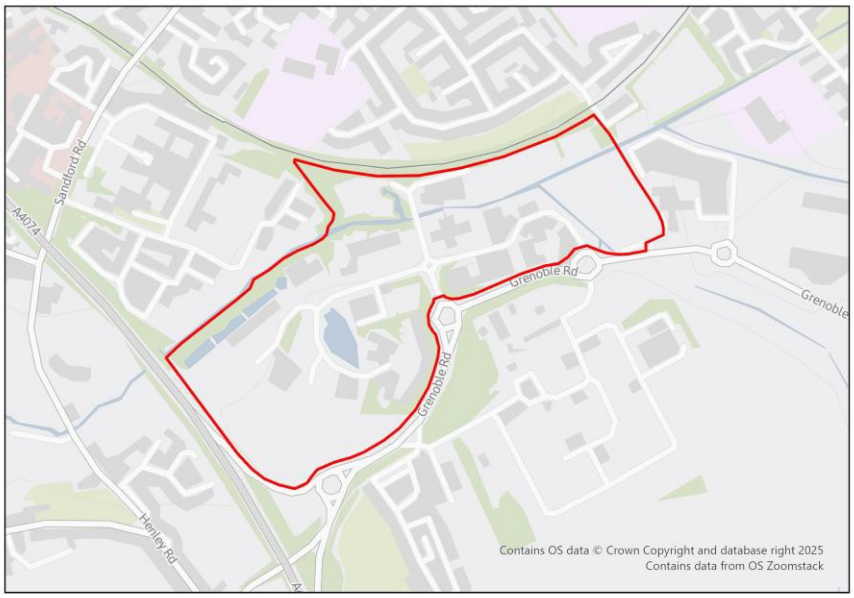
Movement & access

j) Walking, cycling and wheeling routes to access the frequent bus services from Pegasus Road need to be enhanced, including the informal walking access from Falcon Close.
k) Walking, cycling and wheeling access towards Littlemore via Priory Road, which will also be a vital link to the Cowley Branch Line station in the future, must be retained and enhanced in the southwestern corner of the site. The potential for a restricted access for vehicles from this location for servicing and emergency vehicles only should be investigated.
l) The main vehicular access is expected to remain as the bridge over the Littlemore Brook from the Ozone complex and Grenoble Road beyond.
m) To eliminate any risk to railway operations and to ensure the safe operation of the railway, applicants must demonstrate that the design of development considers guidance provided by Network Rail.

Additional requirements

n) Because of the use as a car park, some areas of potential contamination are present on the site, so investigation will be required, and remedial works are likely to be required (**Policy R7**)

Oxford Science Park



Site area	27.33ha
Ward	Littlemore
Landowner	Magdalen College and Ellison Institute of Technology
Current Use(s)	Mix of employment uses (mainly office and labs) as well as ancillary uses including decked car parking and a children's nursery.
Flood zone	Flood Zone 3b
Notable heritage assets	Known archaeological potential for Saxon and Roman remains. Minchery Farmhouse (Grade II*) is adjacent to the site.
Notable ecological features	Littlemore Brook (Oxford City Wildlife Site) runs through and adjoining the site. Site also contains Section 41 (Priority/Principal) habitats that fall within the Biodiversity Duty (Deciduous Woodland). Site contains significant trees, hedgerows, and woodland which form the structural landscaping of the Science Park which are important to public amenity and provide valuable ecosystem services. Northern boundary and area on the east (generally following the watercourse) identified in Local Nature Recovery Strategy as areas that have the potential to become important for biodiversity.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS12: Oxford Science Park

Planning permission will be granted at Oxford Science Park for development of research and development and office employment uses (Class E) that directly relate to Oxford's key

sectors of research-led employment. Other complementary uses will be considered on their merits.

An element of residential development within the defined threshold (**Policy E1)** will be supported.

Open space, nature, flood risk

a) The site contains significant existing trees, hedgerows and woodland which provide landscaping value and are important to public amenity as well as biodiversity value.
b) Some open space onsite (Land Adjacent to Eastern Bypass, and Land Adjacent to Minchery Farm), is identified as supporting green infrastructure (**Policy G1**) so enhancement of remaining GI will be required to mitigate loss. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining areas of open space by improving the functionality of these spaces in terms of wider benefits they provide people and species, or by quantitative reprovision by creating new open space elsewhere on the site. These actions would also contribute to maintaining Urban Greening Factor score.
c) There should be no loss of Core GI (part of the Minchery Farm parcel). Opportunities could include retaining trees and planting new trees to benefit public amenity in the area as part of a landscaping scheme (**Policy G6**).
d) A 10-metre buffer to the Brook should be maintained, and opportunities to improve biodiversity and links through the site should be retained, including a buffer along the railway corridor to allow for the movement of the protected species, and developing opportunities for biodiversity connectivity across the Science Park and beyond e.g. to connect through to Spindleberry Nature Park in Blackbird Leys (**Policy G2**).
e) Parts of the site are Flood Zone 3b, mainly along the Brook, and a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk. A site-specific Flood Risk Assessment (FRA) will be required and should consider onsite routes and any infrastructure required to reach the access route. Access/egress from the site is over land that runs through the flood extents of the Littlemore Brook Tributary, therefore flood warning will be important and should be considered when assessing the need for evacuation from the site. Areas of surface water flood risk are also present within the site and along the access routes, therefore the FRA should consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site. The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G7** and **Policy G8**).

Urban design & heritage

f) New development proposals should seek to improve the place-making on this site and the permeability into and through the site, particularly in terms of routes to and from the Cowley Branch Line stations. Proposals for individual plots should demonstrate how they address and enhance their relationship with the wider Science Park, this could be through a masterplan.
g) Proposals should enhance and increase the public realm and landscaping of the Science Park, including, where possible, the creation of new public open spaces. Any new open space provided should be designed to be accessible for all site users and visitors. Wider public access to on-site open space is encouraged.
h) There are opportunities for intensification of uses on this site which may be possible through increased building heights. Heights should vary across the site

and should be informed by design guidance in the High Buildings TAN and the CBL Densification Study. Higher buildings will be most appropriate to the central and eastern part of site, closest to the Kassam Stadium and Leisure Complex although heights will require modulation and should respond to the setting of the Grade II* listed Minchery Farmhouse. Lower buildings will be most appropriate within the western part of the site, providing a transition to the countryside edge of Oxford / towards the western hills and river corridor. Proposals should demonstrate how they have been informed by the guidance set out in the High Buildings TAN and the CBL Densification Study (2025).

i) The land to the south of Grenoble Road (within South Oxfordshire district) is a strategic site allocation in the SODC Local Plan as an extension to the Science Park and for housing (unmet housing need from Oxford). This will significantly change the character of the area. Proposals should respond to this changing context both in the design of the new development at the Science Park, its connectivity and permeability and the links to future transport infrastructure provision.
j) Development proposals must be designed to preserve the setting of the adjoining Grade II* listed Minchery Farmhouse, particularly plots in the east of the site (**Policy HD3**).
k) Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and remains of Littlemore Priory. Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).
l) Due to the recorded peat reserves along Littlemore Brook and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of peat deposits (**Policy R6)**. Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Movement & access

m) This site has a key role in facilitating public transport improvements in the area. Opportunities should be taken to support sustainable travel by contributing to improved public transport links and services, including the proposed re-opening of the Cowley Branch Line to passengers.
n) Improved pedestrian and cycle links, and enhancements to the existing footpath and cycle networks are required, together with better connections to both existing and planned major developments in the area including to existing communities in Littlemore and Blackbird Leys, and the communities of the proposed urban extension south of Grenoble Road in South Oxfordshire.
o) Developments should also support active travel access to the new Cowley Branch Line station Oxford Littlemore, which is proposed to be located adjoining the site to the east.
p) Proposals should seek to reduce surface level car parking provision across the site. Proposals should not increase the amount of motor vehicle parking, and measures to reduce car parking will be supported, to encourage modal shift and more efficient use of land (**Policy C8**). Proposals assessed prior to the delivery of the CBL will be expected to show how car parking will be reduced once CBL becomes fully operational (i.e. two trains per hour).

Ozone Leisure Park and Minchery Farmhouse

Site area	3.0ha
Ward	Littlemore
Landowner	Firoka
Current Use(s)	Leisure park including ten pin bowling and cinema
Flood zone	Flood Zone 3b
Notable heritage assets	Contains Minchery Farmhouse Grade II* listed building.Potential for prehistoric, Roman and medieval archaeology.
Notable ecological features	Littlemore and Northfield Brook OCWS along northern edge, close to Minchery Farmhouse OCWS, peat deposits alongside brook. Part of the site is identified within the Local Nature Recovery Strategy (LNRS)
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS13: Ozone Leisure Park and Minchery Farmhouse

Planning permission will be granted for mixed-use development within existing lawful Use Class E and with replacement community leisure/sui generis uses. Acceptable uses on the site include:

- Research and development
- Other Use Class E employment uses
- Commercial leisure
- Community and cultural facilities
- Replacement hotel

In accordance with **Policy C5** community commercial leisure uses should be re-provided Other complementary uses will be considered on their merits.
This site is linked to **SPS7** and **SPS11**, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.

Open space, nature, flood risk

a) A 10m buffer to the brook should be incorporated and used to create an enhanced wildlife corridor.
b) Development should not have an adverse impact on the Oxford City Wildlife Sites.
c) Due to the site's proximity to recorded peat reserves, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (**Policy R6**). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.
d) A sequential approach should be taken to locating development on the site. Development should avoid the areas of Flood Zone 3 along the brook (**Policy G7**).
e) Areas of surface water flood risk are present. A site-specific Flood Risk Assessment (FRA) will be required with a drainage strategy to manage runoff and ensure surface water flood risk on and off site is not increased. Infiltration SuDS solutions may be possible because of the geology so a geotechnical investigation may be needed (**Policy G7** and **Policy G8**).
f) Land along the northern boundary of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) The design should be structured around attempting to reflect and maintain the remnants of the semi-rural landscape.
h) Development of the site presents an opportunity to inject character (**Policy HD1**). There is scope for a variety of high-quality materials and design styles and also for some height. High density and larger-plot development is likely to be suitable on this site.
i) Minchery Farmhouse is key to successful design, which should be respectful of and enhance its setting (**Policy HD3**).
j) Archaeological potential will need to be explored as part of any proposed redevelopment **(Policy HD5).**
k) Minchery Farmhouse should be repaired and brought back into a sustainable use.

Movement & access

l) Links through the site for pedestrians, cyclists and wheelers should improved, allowing better permeability through the site.
m) Development on the site currently turns its back on its surroundings and has poor interfacing at the edges. This should be enhanced by the layout.
n) The route along the path to the west of the site is key to future successful connectivity across this area, and it will connect to the proposed Cowley Branch Line station, so enhancement of this route is essential.
o) Circulation into, around and through the site should be enhanced. In particular, every opportunity must be taken to enhance the setting of the Minchery Farmhouse by consolidating parking and servicing and moving it to a less sensitive part of the site.
p) Given the significant amount of parking to the west of the site, the need for parking within this site is limited.

Additional requirements

q) Some areas of potential contamination are present on the site, so investigation will be required, and remedial works may be required (**Policy R7**)

Redbridge Paddock

Site area	3.64 ha
Ward	Hinksey Park
Landowner	Oxford City Council
Current Use(s)	Rough grazing land
Flood zone	Flood Zone 3a
Notable heritage assets	Visible from Iffley Conservation Area, with potential for Norman/medieval archaeological remains
Notable ecological features	Site is within the impact risk zone for Iffley Meadows SSSI. Part of the site is identified within the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS14: Redbridge Paddock

Planning permission will be granted for residential development and public open space at Redbridge Paddock. Proposals should include residential moorings and associated servicing facilities. The minimum number of dwellings to be delivered is 200. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the Iffley Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the Iffley Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).
b) The site is identified as supporting green infrastructure (**Policy G1**) so enhancement of remaining GI will be required to mitigate loss.
c) Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.
d) A 10m green buffer from the edge of the riverbank should be retained, including the mature trees within it that have potential to enhance the design of the proposal.
e) Public open space will be required onsite (**Policy G2**) and the type and layout of this could be linked to the retention and enhancement of natural features across the site.
f) Compensatory improvements should be made to the surrounding areas of remaining Green Belt in accordance with the identification of Opportunities to Enhance the Beneficial Use of Green Belt Land Report (LUC 2018).
g) A flood risk assessment will be required as a very small part of the site is in Flood Zone 3b, which must demonstrate how a sequential approach has been taken to locating development across the site, which is expected to be achieved by ensuring the area of highest flood risk is incorporated as part of the green infrastructure enhancement on the site.

Urban design & heritage

h) Proposals should respond to the natural setting of the river and pastoral floodplain between the site and Iffley.
i) It is important that this gateway site into the city centre is designed to give a clear identity (**Policy HD1**).
j) The design must be sensitive to impacts on the broader landscape setting and the views from and into the Iffley Village Conservation area, for example by reducing heights and density towards the river channel and leaving strategically placed gaps between blocks to retain west - east views (**Policy HD3**).
k) There is potential for Norman/medieval archaeological remains on the site which should be investigated and responded to (**Policy HD5**).

Movement & access

l) Opportunities should be taken to enhance existing good pedestrian and cycle links to the city centre and locations in the south and east of the city.
m) Vehicular access must be from the Abingdon Road, with care to ensure minimum interactions with accesses to Redbridge Park and Ride. Two access points for vehicles would be optimal and essential for pedestrians and cyclists.

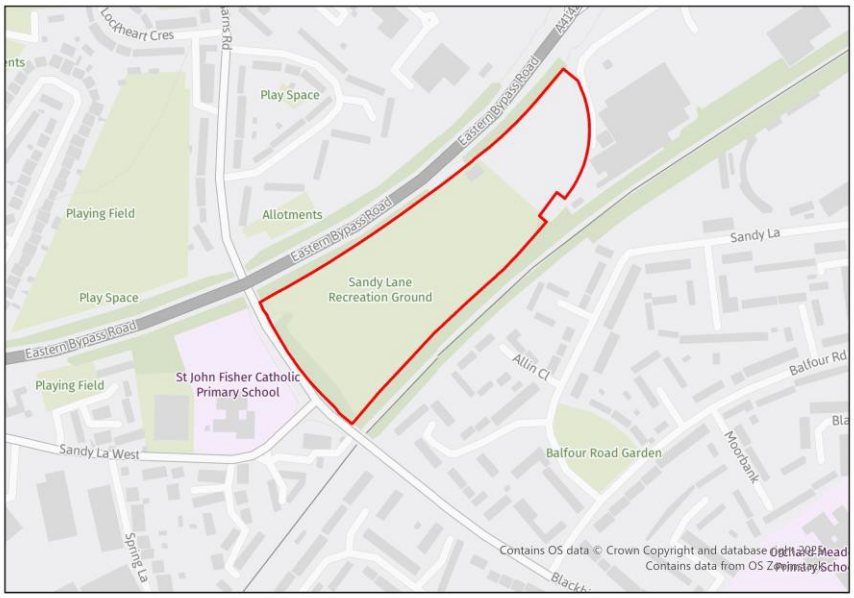
Additional requirements

n) The River Thames is likely to be an important foraging and commuting resource for bats so artificial lighting alongside this corridor should be avoided and a lighting strategy should be submitted in support of any planning application setting out the internal and external lighting associated with the proposed development.

o) The site is adjacent to a main arterial route into Abingdon and the ring road, and therefore air quality needs to be considered and an acoustic design statement is required (**Policy R7**).

p) Proposal will need to demonstrate how contamination issues arising from this former landfill site will be resolved.

Sandy Lane Recreation Ground



Site area	5.15ha
Ward	Blackbird Leys
Landowner	Oxford City Council
Current Use(s)	Playing pitches and associated facilities including small car park and pavilion; vacant car parking off Ambassador Avenue currently used by a motorcycle training company
Flood zone	Flood Zone 1
Notable heritage	Nothing notable above ground, some potential for archaeological

assets	remains onsite based upon previous Roman and medieval finds in close proximity to the site.
Notable ecological features	Part of the site is identified in the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPS15: Sandy Lane Recreation Ground

Planning permission will be granted for residential development at the Sandy Lane Recreation Ground site. The minimum number of dwellings to be delivered is 300 dwellings. However, should an element of outdoor sports provision need to be retained onsite, then a reduced number would be accepted. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The pitches onsite are identified as supporting green infrastructure (**Policy G1**), so enhancement of remaining GI will be required to mitigate loss, including specifically reprovision of pitch capacity on or offsite.
b) If an element of pitch provision is to be retained onsite, there are opportunities to consolidate pitches and improve their quality to accommodate increased use.
c) The City Council's Active Communities Team must be consulted and agree with any relocation of sports facilities.
d) Proposals should preserve existing green features wherever possible, including boundary planting which also serves as important amenity buffers to the railway line and Eastern by-pass, as well as the line of larger trees along the boundary with Blackbird Leys Road.
e) In order to maintain Urban Greening Factor score and mitigate losses of green features, proposals should seek to enhance remaining green space and/or provide new green features onsite. This could include additional planting of retained green areas that delivers additional benefits for people and wildlife; bolstering boundary planting to improve buffering benefits; as well as introducing new linear features that can help break up the development and serve as movement corridors for species across the site.
f) Public open space will be required onsite (**Policy G2**). The type and the layout could be split into smaller spaces throughout the site that provide different functions for residents and visitors or provided through one larger area of open space.
g) The strip of land on the boundary running adjacent to railway line is identified within the Local Nature Recovery Strategy is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.
h) Existing and future surface water flood risk will need to be considered as it is prevalent across significant parts of the site, and this will need to be investigated and mitigated through a robust drainage strategy.

Urban design & heritage

i) Whilst the site is in an area of the city with fewer constraints or less sensitivity in

terms of views, development proposals will need to consider and mitigate impacts on the sensitive skyline and surrounding area, particularly when viewed in combination with existing and planned development on adjacent sites. This could be achieved in various ways, such as by avoiding built forms with excessively overbearing scale or massing and avoiding roofscapes that are excessively uniform.

j) The site straddles two quite different areas of the city in terms of landscape character, between the business and retail parks to the east and predominantly suburban, residential areas to the west. Proposals should therefore explore how densities can transition across the site to help ensure the development responds positively to the surrounding area, exploring more density (and potentially more height), to the northeast, transitioning to lower levels towards the southwest.

k) Proposals should explore ways that character can be injected into the area through the new development being brought forward on the site such as via use of high-quality materials and innovative design choices (**Policy HD1**).

l) There is also the potential presence of archaeological assets on the site based upon finds nearby including Roman and medieval remains. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).

Movement, access and layout

m) Design and layout of the site should respond to the location of the new Cowley Branch Line station and the site's potential as a 'gateway' accommodating increased footfall to this part of the city. This should include new public space providing the setting for the station as well as linkages across the site to neighbouring areas such as the ARC Oxford business park.

n) Proposals should seek to ensure that good permeability through the site is secured for all, both residents and users of the proposed Cowley Branch Line station with active travel options like walking, cycling and wheeling being integral to layout of the site. This should also include considerations of access to the station.

o) The level change from the adjacent Blackbird Leys Road, and the line of mature trees on the boundary of the site, is likely to have amenity impacts for development located to close to the western edge of the site. Proposals should demonstrate how they have responded to this in the approach to layout of that part of the site. This could include design solutions such as setting back any development from that edge, potentially in combination with incorporating an element of open space provision along this edge.

Additional requirements

p) Due to potential impacts of noise and other pollutants from the adjacent railway line and traffic on the Eastern bypass, development proposals will need to demonstrate how layout of buildings and public spaces has been approached to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policies R4 and R8**).

q) As the site is located on previously made ground, including potential landfill, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Templars Square

Site area	3.88ha
Ward	Cowley
Landowner	Oxford Re Value Investments Ltd
Current Use(s)	Mixed use including retail, parking, residential
Flood zone	Flood Zone 1
Notable heritage assets	Beauchamp Lane Conservation Area is adjacent to the site to the west. The Grade II* listed Church of St James and Grade II listed cottage at 1 Beauchamp Lane are located just outside the site boundaries. There is potential for archaeological interest as the site is on the edge of an important Roman pottery manufacturing area and partly located over the area of a medieval settlement.
Notable ecological features	N/A
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS16: Templars Square

Planning permission will be granted for a mixed-use development at Templars Square that supports its ongoing role as a key part of the Cowley District Centre, as well as delivering a significant amount of new residential development.

Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:

- Retail;
- Commercial leisure;
- Financial and professional services;
- Learning and educational uses;
- Evening economy uses such as cafes, restaurants and pubs;
- Community facilities;

- Medical and healthcare facilities such as a health centre;
- Other employment such as offices and small workshops.

The minimum number of dwellings to be delivered is 500 (net gain).

To ensure the site continues to play its vital role as a district centre hub, active frontages will be required along identified principal routes. This may be along the outside edges of the development, facing the main roads, and also should cut through the middle of the development, in locations that ensure permeability and that draw people into and through the centre.

A mix of town centre and community uses are encouraged on this site to retain a vibrant town centre with a mix of uses for local communities, especially those in the east of the city. The City Council will encourage schemes that strengthen and diversify the range of services and facilities on offer to the local community and wider catchment area, alongside the provision of a significant number of new homes. Other complementary uses will be considered on their merits.

Open space, nature and flood risk

a) Greening features will be necessary to achieve the required urban greening factor score. Most appropriate to the urban context of this site will be high quality planting and landscaping along any public realm and integrating green features into the built form. Opportunities should be taken include more street trees and soft landscaping, which are currently lacking around the site.
b) Innovative approaches such as green walls could be used to introduce biodiversity, and greening along new streets and to soften the edges of the development, these will help to achieve the Urban Greening Factor score.
c) Amenity open space for residential development could include greening features, such as rooftop gardens, inset green space and vertical gardens.

Urban Design and heritage

d) A masterplan should be produced to help organise services, access, movement routes, landscape, public realm and heights across the site. It is important that any piecemeal development does not prejudice the overall aim of a comprehensive regeneration across the site.
e) The site plays an important role in the local community, providing a range of services and facilities for a wide area of East Oxford as an alternative to travelling to the city centre. Any redevelopment must maintain this role and continue to be accessible to the public.
f) Development proposals should be designed with consideration of their impact on the setting of the adjoining Beauchamp Conservation Area and the setting of the Grade II* listed Church of St James and Grade II listed cottage at 1 Beauchamp Lane (**Policy HD3**).
g) Because of the position of the site on a ridge in an elevated position relative to the city core, there is potential for development to alter views from and to the Historic Core Area (both in the foreground and background of views). Therefore, the townscape and visual impact of any development on views to, across and from the Historic Core Area must be understood, described and explained thoroughly, including with a Visual Impact Assessment, in compliance with **Policy HD6**.
h) Archaeological work may be required, but because the site is already heavily developed that will depend on the nature of the scheme (**Policy HD5**).

Movement and access

i) Development should provide enhanced public realm through and around the edge of the site that better provides for pedestrians, cyclists and wheelers.

j) Improved pedestrian and wheeler connectivity should be provided across Between Towns Road.

k) The public transport interchange hub at Between Towns Road and Barns Road should be supported, with opportunities taken to improve bus stopping areas, signage and facilities, and the taxi ranks.

l) Opportunities should be taken to consolidate public parking, with enough re-provided to support the needs of the centre. Residential development should be low car.

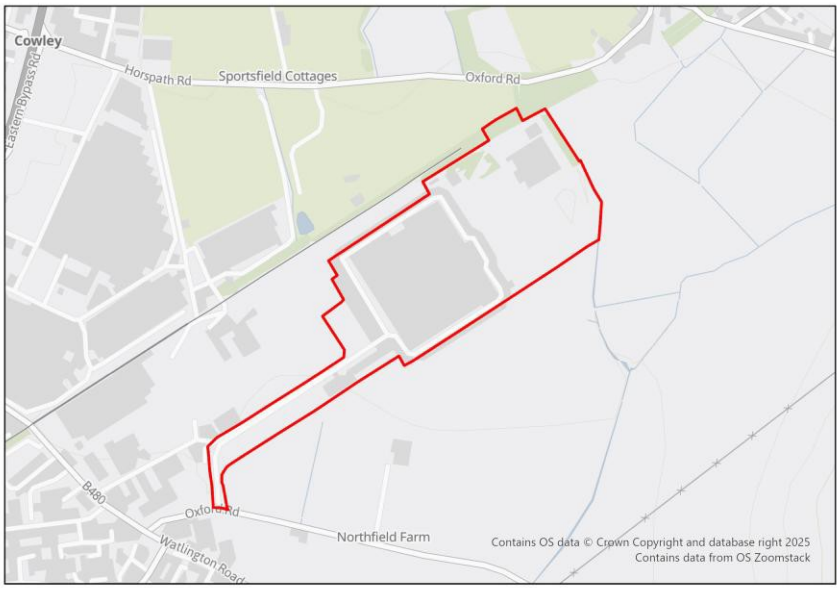
m) Principal routes should be identified around and through the site, which should give permeability for pedestrians and wheelers.

Additional requirements

n) Proposals will be required to include an appropriate site contamination investigation and applications will be required to demonstrate how any contamination issues will be resolved (**Policy R7**).

o) Development proposals should include an acoustic design statement as this site is part of an area which is subject to environmental noise from surrounding roads.

Unipart Site



Site area	30.63ha
Ward	Blackbird Leys
Landowner	Logicor Cowley Investment Ltd
Current Use(s)	Warehousing, industrial uses, offices
Flood zone	Flood Zone 1
Notable heritage assets	Site has potential archaeological interest as part of the access road is on the line of the Dorchester-Alchester Roman road and there is high potential for roadside settlement. There is also high potential for other prehistoric and Roman remains (sites are recorded to the north &

	south of the plot).
Notable ecological features	Parts of the site is in the Local Nature Recover Scheme (LNRS).
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPS17: Unipart Site

Planning permission will be granted for new development, modernisation and intensification of logistics/industrial uses including Industrial (class B2), and storage or distribution (class B8) with ancillary offices, research and industrial processes (class E) uses. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Proposals should take opportunities to integrate a network of green spaces and other features across the site that can have benefits for occupants of the site as well as wildlife which will help to achieve the Urban Greening Factor policy target. Block arrangements and design of outdoor spaces could seek to incorporate a variety of features including functional open spaces; trees and hedges as well as linear features that can facilitate movement through the site and integrate with surrounding areas, utilising the potential to enhance the wildlife corridor function of the railway line in this location, for example.
b) Proposals should explore ways to incorporate planting of native trees and hedgerows to screen buildings, soften industrial activity, and that respond to the sensitivity of the site's borders.
c) Proposals should seek to reduce levels of hard landscaping and integrate more natural surface cover across the site including through integration of Sustainable Drainage Systems which can also secure betterment in surface water flood risk.
d) An undeveloped buffer zone of at least 10m width should be left alongside the watercourse (**Policy G2**). Opportunities to open up access and enhance connections from the watercourse into and across the site could improve amenity and movement for occupants of the site as well as wildlife.
e) Surveys may be required to determine any species or habitats of value, particularly around the edges of the site and within the area of scrub to the north-east in advance of any redevelopment.
f) Some pockets of land along railway line and also in a strip running north to south across part of site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity.
Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) The site would benefit from a comprehensive masterplan to co-ordinate its development and provide a framework for the future modernisation and intensification and to positively promote sustainable development.
h) The site is located between the predominantly industrial character of areas to the west and the more open nature of the areas to the east, this should be a key consideration informing choices about densities, scale and massing of development proposed. Opportunities to sensitively balance and transition between the differing characters of the surrounding areas whilst avoiding the creation of hard edges to the landscape should be explored.
i) Taking into account the current built form on the site, densities and footprints of

buildings should vary across the site. This might include arranging higher densities of development towards the north and west, whilst seeking to achieve a looser and more fine-grained arrangement towards the south and east to ensure that a continuous hard edge to the southern and eastern boundaries isn't created.

j) Variations in high quality materials, including selection of materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.

k) Design of new development should respond to the allocation of the land at Northfield on the southern edge of the site (within South Oxfordshire) and any proposals arising there in due course, in particular, considering walk, cycle and wheel links to future transport infrastructure provision.

l) The site has potential for sensitive archaeology in the form of prehistoric and/or Roman remains. Proposals should ensure that these archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

m) Block arrangements and layout of new development should be designed in a way that secures improved movement and circulation through the site, particularly via active transport modes like walking, cycling and wheeling.

n) Applicants should seek opportunities to improve access into the site, e.g. by exploring potential for new access points along southern boundaries or in the northeast towards Oxford Road, as well as opportunities to support sustainable travel by providing new or improved walk, cycle and wheel links to existing and planned developments in the area, including that adjoining in South Oxfordshire district.

o) Proposals should also explore ways to improve public transport links and services, including opportunities to integrate connectivity of the site with new stations associated with the re-opening of the Cowley Branch Line to passengers.

Additional requirements

p) Because of the existing and previous uses of the site, some areas of potential contamination are likely present on the site. Proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

EAST INFRASTRUCTURE AREA

This area includes a number of sites with a range of uses including education, residential, research and the medical hospitals. As a result of people needing access those sites, particularly the hospitals, there is significant traffic congestion in the area. Improving accessibility, especially to the hospitals, by means other than the car is a key aim for this area.

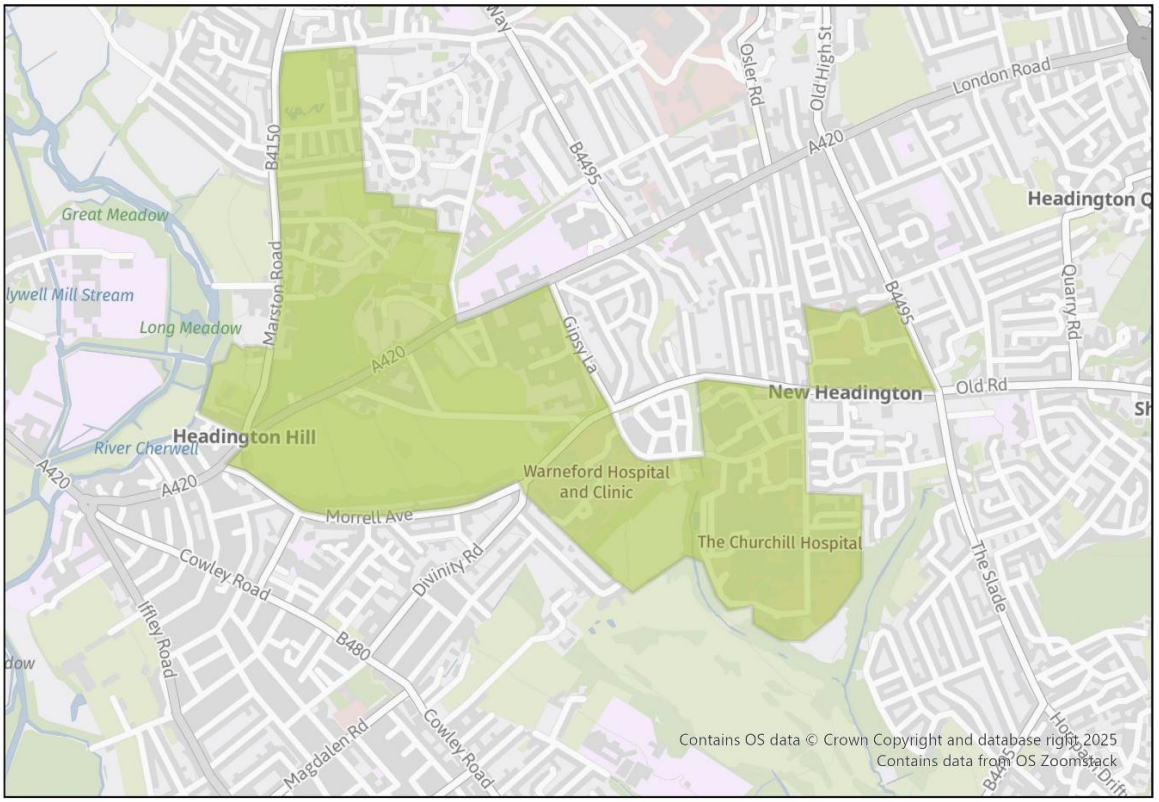
The area includes many significant green spaces, including the Lye Valley SSSI, South Park and Bury Knowle Park.

Key considerations for infrastructure and design across the area are:

- Ensure good connectivity by foot and cycle and public transport across the area, e.g. with safe, attractive routes
- Seek to manage/reduce the levels of car parking on the hospital sites
- Ensure protection of New Marston SSSI and Lye Valley SSSI
- See opportunities to increase active frontages along the southern end of the Marston Road

- Maintain the rural character of Cuckoo Lane whilst taking opportunities to enhance its function as a walking, cycling and wheeling route.

MARSTON ROAD AND OLD ROAD AREA OF FOCUS



This Area of Focus (AoF) supports a mixture of institutional uses. The Marston Road area to the west hosts a range of academic uses including the Oxford Brookes University (Gypsy Lane and Headington Hill sites) and Cheney School. Meanwhile, the Old Road area to the east includes several hospitals (Churchill, Warneford, Nuffield Orthopaedic Centre) as well as the University of Oxford Old Road campus and is increasingly the focus of cutting-edge medical research. New development in the area offers opportunities to support and enhance its role as a setting for academia and as well as medical research linked to clinical practice at the hospitals.

The existing institutional uses are spread over a number of large, distinct sites. Typically, these plots are quite open, with low density development set amongst large areas of greenspace with varying degrees of public access, but also significant areas of car parking and hardstanding. There are various underused plots and opportunities for more intensive use of sites to make more efficient use of land, including rationalising areas of more expansive surface-level car parking and renaturalising surface cover.

The area is set within residential neighbourhoods, and served by several key and busy transport corridors forming connections to the city centre in the east and towards the city boundaries and the ring road in the north and west. There are opportunities to create a more active street frontage along parts of Marston Road, and to improve active travel routes as

well as surveillance and feelings of safety along some of the key movement corridors that provide linkages across the AoF and to surrounding areas.

The AoF is characterised by strong linkages to Oxford's history, with the presence of listed buildings, conservation areas and some significant archaeological interest including in relation to Civil War defences and the Fairfax siege line. The historic Cuckoo Lane also runs east-west through part of the AoF, acting as a valuable walking and cycling route. Equally, there is an abundance of green features providing recreational and ecological value, including larger, more formal open spaces like the parks, smaller areas of green space within the grounds of many sites, as well as various tree-lined streets and rural lanes. This green setting gives parts of the AoF a semi-rural feel and makes an important contribution to views from the historic core of the city and across the Cherwell Meadow, as well as to the setting of various heritage assets.

The strong concentration of historical and ecological interest makes the area sensitive to change. This sensitivity is further heightened by its proximity to watercourses like the River Cherwell to the west and Boundary Brook to the east, also to various important ecological designations in its surroundings. Notably, the nearby New Marston Meadows SSSI and Lye Valley SSSI rely on particular hydrological conditions relating to groundwater and/or surface water which can be harmed by impacts arising across wide catchments that go beyond their boundaries and overlap with parts of this AoF. Beyond simply mitigating harm from new development, schemes may also be able to bring about wider betterment to the hydrological conditions within the catchments of the nearby SSSIs through improvements in the urban environment.

It will be important to ensure that the distinctive and positive character of parts of the AoF, such as the green setting and its historic and biodiversity value, are maintained, this includes the area's relationship to wider views across the city, which could be harmed by introducing significant visual competition or change of character. There are also opportunities for creating a better relationship between development and the natural and historic environment. This includes designing in ways that can enhance the setting of these features, but also by taking inspiration from them to inform the design process, such as by extending the greenery of nearby sites through development sites or incorporating similar materials and styles into new built form. The area also falls within the Headington Neighbourhood Plan area so proposals should take into account the community aspirations set out in the plan.

Policy MRORAOF: Marston Road and Old Road Area of Focus

Planning permission will be granted for new development within this Area of Focus where it would ensure that opportunities are taken to deliver the following (where applicable):

Responding to the green setting and sensitive ecological interest in the area

a) Design that positively responds to any nearby open spaces, preserving and, where possible, enhancing the setting of these assets;
b) Enhancement of the connectivity between open spaces and habitats across the area, such as through use of linear features and green corridors that can support movement of wildlife as well as people;
c) Protection of New Marston SSSI and Lye Valley SSSI, and other sites of

ecological and biodiversity importance, whilst also exploring ways to go further to secure betterment in the particular hydrological conditions that support the habitats and species of these sites.

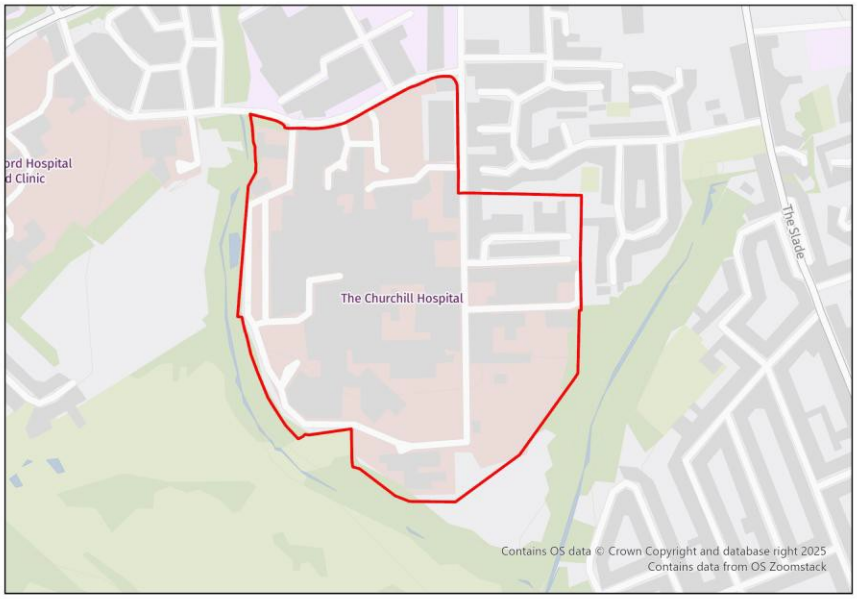
Responding to the historic setting whilst making efficient use of land

d) A positive contribution to and enhancement of the character and setting of conservation areas and other heritage assets;
e) Appropriate building heights for their setting which do not negatively impact on key views or historic skylines;
f) Consolidation and reduction of car parking across the hospital sites;
g) Maintenance of the verdant and rural character of the areas around Cuckoo Lane.

Supporting active travel and sense of security when moving through the area.

h) Increased active frontages and natural surveillance along key transport corridors and walking, cycling and wheeling routes;
i) Improvements to walking, cycling and wheeling infrastructure in accordance with the requirements of the Oxfordshire Local Cycling and Walking Infrastructure Plan.

Churchill Hospital



Site area	3.89 ha
Ward	Churchill and Temple Cowley
Landowner	Oxford University Health NHS Foundation Trust
Current Use(s)	Hospital
Flood zone	Flood Zone 1
Notable heritage assets	Original WWII hospital buildings are non-designated heritage assets. Archaeological potential including Roman pottery manufacturing and

	further Roman archaeological remains.
Notable ecological features	The site lies within impact risk zones for the Lye Valley SSSI which is adjacent to the site, and there are significant existing trees within the site and near to the western boundary growing along Boundary Brook. Mileway Gardens Oxford City Wildlife Site is located to the west of the site. Potential species include reptiles, bats and nesting birds. Part of the site is identified within the Local Nature Recovery Strategy (LNRS). Peat reserves are likely located in the north-west corner of the site and to the south and south-east of the site.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE1: Churchill Hospital

Planning permission will be granted for:

a) further hospital related uses, including the redevelopment of existing buildings to provide improved facilities on the Churchill Hospital Site

b) other suitable uses which must have an operational and/or research link to the hospital could include:

- employment;
- patient hotel;
- primary healthcare;
- education;
- academic institutional and research;
- extra care accommodation, including elderly persons accommodation;
- small scale retail units, provided that they are ancillary to the hospital;
- employer-linked affordable housing;
- Student accommodation.

Other complementary uses will be considered on their merits.

Development of the site should be undertaken as part of a masterplan to ensure all land use issues including parking are considered in a comprehensive way to make the most efficient use of land.

Open space, nature, flood risk

a) While there are no designated ecological features on the site itself, the site directly adjoins a number of designated ecological sites and parts of the GI network. There are also significant existing trees scattered within the site and near to the western boundary growing along Boundary Brook which are important to public amenity in the area and will provide valuable ecosystem services. Therefore, retention and enhancement of the supporting green infrastructure will be required (**Policies G1, G2, G3**). This enhancement could be achieved by increasing both the amount, and diversity of, landscaping and ensuring that development considers how different parts of the site may hold opportunities for ecological connectivity in the wider landscape. Opportunities should be sought to repurpose the existing hard surfaces for other uses including GI and amenity uses, or to

create connections between the site and landscape beyond, or green corridors/routes through the site.

b) Small strips along southeast/southwest boundaries of the site are identified within the Local Nature Recovery Strategy is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

c) As the site is located within identified impact risk zones for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon the Lye Valley SSSI (**Policy G6**), including through impacts on surface or groundwater flows and quality, as well as groundwater recharge. Proposals should be designed to satisfy the applicable tests identified for the relevant impact risk zones set out in the Lye Valley Hydrogeological Impact Assessment report and accompanying Technical Advice Note, this may require additional supporting evidence in the form of a drainage strategy and/or hydrogeological impact assessment.

d) A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI and additional protective and enhancement measures for river and wetland restoration as required around the watercourse and ecological buffers zones (minimum 10metres from bank top) should form part of development proposals.

e) Any planning applications near the Boundary Brook or Lye Valley will also need to assess the potential for additional indirect impacts on the flora and fauna of those areas, including (but not limited to) potential impacts from lighting, noise, and dust, and provide adequate buffers and deliver ecological enhancements as required.

f) Due to the site's proximity to recorded peat reserves associated with the Lye Valley, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (**Policy R6**). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

g) The central part of the site comprises the historical temporary hospital buildings used during the Second World War, which are non-designated heritage assets. Proposals should seek to deliver enhancement of these assets and their settings. This should be achieved by ensuring architectural design takes inspiration from, and respects the context of, the existing non-designated heritage assets (**Policy HD4**).

h) A masterplan-led approach should be used to ensure that buildings and parking are rationalised with consideration given to the location of various uses to improve legibility of the site. Proposals should be designed to create active frontages and greater permeability through and into/ out of the site.

i) Materials and design quality should be improved as poor-quality buildings are replaced. This could be achieved by drawing inspiration from the non- designated heritage assets to inspire and enrich the identity, character and quality of new development on the site.

j) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

k) The site is car dominated with large areas utilised for surface level car parking. Development proposals should demonstrate rationalisation of the existing parking on the site to ensure the most efficient use of land is made.

l) Mitigation measures will be required to ensure that proposals do not lead to increased parking pressure on nearby residential streets.

m) Improvements to public transport, walking, cycling and wheeling access through the site will be required. These measures should be set out within a transport assessment and travel plan and reflected in an agreed masterplan.

n) Development proposals shall not prejudice bus access through the site, and new routes that effectively separate walking, cycling and wheeling from visitor or servicing traffic, will be encouraged. Additional access points to non-vehicular traffic onto the site will also be beneficial.

Additional Requirements

o) As the site has a long-standing hospital use, with potential for some areas of land contamination from historic use, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

East Oxford Bowls Club

Site area	0.3ha
Ward	St Clement's
Landowner	Oriel College, University of Oxford
Current Use(s)	Recreation (disused).
Flood zone	Flood Zone 1
Notable heritage assets	Located entirely within Bartlemas Conservation Area and forms the setting of multiple listed buildings including: Grade 2* Bartlemas Farm House and Bartlemas House and Grade 1 listed St Bartholomew Chapel. Within Crescent Road View Cone.
Notable ecological	Potential for nature conservation interest. The area is characterised by hedged boundaries on all sides and is adjacent to parts of the core

features	green infrastructure network.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE2: East Oxford Bowls Club

Planning permission will be granted for residential development, with the minimum number of 10 dwellings to be delivered. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development should result in enhancement of the hedgerow and existing trees which bound the site. Existing trees should be retained as much as possible. The opportunity to enhance existing wildlife corridors and ecological habitats with enhanced planting, screening and landscaping should be taken.
b) The site is adjacent to core green infrastructure (GI) so proposals should seek to support and enhance the surrounding GI. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining on-site, and adjacent, areas of open space by improving the functionality of these spaces in terms of wider benefits they provide people and species. These actions would also contribute to maintaining the Urban Greening Factor score.

Urban design & heritage

c) Development proposals should be designed with consideration of their impacts on the setting of the Bartlemas Conservation Area, the setting of the nearby listed buildings and views (**Policy HD3**).
d) Landscape design should be a fundamental consideration at the earliest design stage, to enhance the contribution that existing trees and hedgerows make to the rural setting of the Bartlemas settlement, listed buildings, and the Bartlemas Conservation Area.
e) Proposals should be informed by the character and materiality of the Bartlemas Conservation Area. The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.
f) The Crescent Road View Cone crosses the site; proposals should be designed in a way that responds to this protected view (**Policy HD6**). This could be achieved by demonstrating appropriate massing and considering variations in roof forms. Gaps between buildings should be sufficient to retain the sense of openness and views of the green backdrop which enhance the setting of the conservation area.
g) Materials and construction details used for new development schemes should be of high quality, appropriate for the setting and sympathetic to the local context.

Movement & access

h) Development proposals should demonstrate appropriate vehicular access into the site, while preserving the secluded character of the conservation area. Bartlemas Close to the South East is most likely to be the location of the access. Access to the site will need to be considered to minimise the impact of vehicular traffic on the surrounding area.
i) Development proposals should demonstrate how the development enables access by alternative means of transport including improving connectivity to support walking, cycling and wheeling.

Government Buildings and Harcourt House

Site area	2.37ha
Ward	Headington Hill & Northway
Landowner	Oxford Centre for Islamic Studies
Current Use(s)	Car park, offices and cadet accommodation
Flood zone	Flood Zone 1
Notable heritage assets	Southern parcel is in Headington Hill Conservation Area whilst northern parcel is adjacent to it. The site is also opposite St Clements and Iffley Road Conservation Area. Grade II* Headington Hall is nearby (within the park), as is St. Clements Church. Cuckoo Lane intersects the two parcels of the site and is registered on the Oxford Heritage Asset Register (OHAR). Potential for archaeological remains onsite related to the Civil War Parliamentarian siege line previously identified in Headington Hill Park, particularly on the northern parcel of the site. The Headington Hill View Cone passes through the northern parcel of the site.
Notable ecological features	Site is within the impact risk zone of New Marston Meadows SSSI (to the northwest). Site is within 200m of the Long Meadow Local Wildlife Site (to the west), and is also approximately 250m from Headington Hill Viewpoint Oxfordshire County Wildlife Site (to the northeast). Part of the site is identified within the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE3: Government Buildings and Harcourt House

Planning permission will be granted for residential development, which may include student accommodation, as well as academic institutional uses (subject to **Policy H9**). The minimum number of dwellings to be delivered is 68 dwellings (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary commercial uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) Proposals should seek to retain existing features wherever possible, particularly higher quality ones, including: mature trees (especially those subject to TPOs or Conservation Area protection); green boundary features that help to preserve amenity and contribute to the leafy character of the area; as well as areas of priority habitat such as the woodland on the southern parcel of the site.

c) In order to retain the current Urban Greening Factor score, losses in green infrastructure should be compensated for, either through the enhancement of existing lower quality features, or through providing new features, which should seek to enhance connections through the site for wildlife and people through new linear features and wildlife corridors.

d) Public open space will be required onsite (**Policy G2**). Given the characteristics of the area and site, this is most likely to be suitable as natural areas that are more informal in design and can play a dual role in allowing people to get closer to nature, whilst also supporting existing species and achieving adequate greening to meet Urban Greening Factor requirements.

e) Due to the potential for various types of species to be present onsite, as well as indications of priority habitat being present, a biodiversity survey will be required to assess the ecological value of the site. Development proposals are expected to demonstrate how any harm to biodiversity on the site will be avoided, mitigated or compensated.

f) Small section of site (at eastern boundary of southern parcel) is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, taking opportunities to enhance these wherever possible (**Policy HD3**).

h) Development proposals must also take into consideration the potential presence of archaeological remains related to the Civil War Parliamentarian Siege line and should ensure that these (and any other) archaeological assets are appropriately investigated and responded to (**Policy HD5**).

i) The Headington Hill view cone passes through the northern parcel of the site and there are other locally important views identified in the conservation area appraisal such as significant view lines from Headington Hill Hall towards the site and along the paths at the back of the southern parcel of the site. Proposals should be designed in a way that responds to the protected view (**Policy HD6**), and these other local views. This could be achieved by ensuring that building heights, scale and massing have been informed by an analysis and understanding of these views, with particular attention paid to design of new buildings within the view cone, as well as on the eastern side of the site which is more sensitive in terms of

impacts on the setting of the park.

j) Design choices (such as development blocks and selection of materials) should be sensitive to the special historic qualities and character of the area, including heritage assets and wider townscape, ideally seeking to enhance these. Design of new buildings could also take inspiration from other high-quality buildings in the area, such as the Centre for Islamic Studies which is very close by.

k) Boundary features could make use of green features as well as other materials that can help to maintain and enhance the parkland setting of the area and help the site blend into its surroundings. Aligning blocks parallel to the road would also help to create a consistent building line within the setting of the trees.

Movement & access

l) Access into the site at present is primarily focused on vehicles, so proposals should seek to improve upon accessibility for walking, cycling and wheeling. This should include new access into the southern parcel for these users, whilst consideration should also be given towards new crossings on Marston Road. There may also be opportunities to improve connectivity between the two parcels of the site via Cuckoo Lane.

m) New walking and wheeling access points into the park from the site's eastern boundaries should also be explored as this would facilitate access for residents and promote additional opportunities for making use of that open space, although the impacts on the setting of the park will also need to be considered and care should be taken to reduce impacts on the green character of the eastern boundary.

n) Vehicle access points into the site are likely to be most suitable in their current locations. This means single access in and out for each parcel, so circulation around that site needs to be considered carefully. Opportunities to consolidate the existing parking provision on the site should be explored and design of new parking should seek to avoid overuse of hard landscaping, incorporating green features that can help to blend this into the wider setting wherever possible.

Additional requirements

o) Consideration should be given to ensuring that design of new development mitigates amenity impacts on the setting of the adjacent park, which may include more sensitive design of lighting systems and care over noise created by uses on the eastern boundary of the site.

p) The green buffering along the western boundary of the site and fronting onto Marston Road should be retained or enhanced wherever possible in order to help mitigate impacts from traffic noise and air pollution on occupants of the development.

q) Whilst parts of the site have previously been subject to remediation proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Jesus College Sports Area

Site area	0.8ha (Area A) and 0.55ha (Area B)
Ward	Donnington
Landowner	Jesus College
Current Use(s)	Sports field
Flood zone	Flood Zone 1
Notable heritage assets	Within the Bartlemas historic hamlet, and adjacent to Bartlemas Conservation Area. Within the setting of: Grade 2* listed Bartlemas Farm House Grade 2* listed Bartlemas House Grade 1 listed St Bartholomew Chapel. The Crescent Road View Cone falls across the southern portion of Area B.
Notable ecological features	Established hedgerow and existing mature trees, particularly along the northern and eastern boundaries of Area A. The sites form part of the Green Infrastructure (GI) Network as supporting infrastructure.
Urban Greening Factor score	The sites are likely to score above the Urban Greening Factor target.

Policy SPE4: Jesus College Sports Area

Planning permission will be granted for residential development (including graduate accommodation) at Jesus College Sports Area sites which comprise Area A (Playing Field off Bartlemas Close) and Area B (Herbert Close tennis courts).

The minimum number of dwellings to be delivered is 40, which may come forward individually as a minimum of 24 dwellings on Area A and a minimum of 16 dwellings on Area B (or, if delivered as non-self-contained student accommodation, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The entirety of both sites has been identified as supporting green infrastructure (**Policy G1**) so enhancement of remaining GI will be required to mitigate loss. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining on-site, and adjacent, areas of open space by

improving the functionality of these spaces in terms of wider benefits they provide people and species. These actions would also contribute to maintaining the Urban Greening Factor score.

b) Development should result in enhancement of the hedgerow and existing trees which bound the sites. Existing trees should be retained as much as possible. The opportunity to enhance existing wildlife corridors and ecological habitats with enhanced planting, screening and landscaping should be taken. A green corridor should be retained along the north of the Area A to maintain the continuous green network alongside the Oxford Golf Course and towards the Oriel College Sports Ground.

c) There is potential to consolidate and share sports provision on Areas A and B and/or on the retained sports ground adjacent to Area A, as well as with the neighbouring Lincoln College Sports Ground site (**Policy SPE7**). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s).

Urban design & heritage

d) Landscape design should be a fundamental consideration at the earliest design stage, to enhance the contribution that existing trees and hedgerows make to the rural setting of the Bartlemas settlement, listed buildings, and the Bartlemas Conservation Area (**Policy HD3**).

e) Proposals on both parts of the site should demonstrate a holistic approach to shared design, layout and materials to ensure that good placemaking is achieved. This should be informed by the character and materiality of the Conservation Area and the Edwardian and Victorian residential streets on the southern side of Barracks Lane should influence the design of new development (**Policy HD3**).

f) The Crescent Road View Cone crosses the south of Area B; proposals should be designed in a way that responds to this protected view (**Policy HD6**). This could be achieved by creating a graduation of height, lower on the southern edge and increasing in height towards the north, as well as appropriate massing and considering variations in roof forms. Gaps between buildings on Areas A and B should be sufficient to retain the sense of openness and views of the green backdrop which enhance the setting of the conservation area.

g) Proposals should take into consideration the potential for archaeological assets, ensuring they are appropriately investigated and responded to (**Policy HD5**).

h) The relationship between Areas A and B and the Lincoln College Sports Ground (**Policy SPE7**) and remaining sports uses on adjacent sites should be a consideration in future development proposals. Proposals should demonstrate that there would not be detrimental impacts arising from overshadowing/ overbearing/overlooking of the sports pitch(es). Additionally, noise impacts from the surrounding recreational uses upon future occupiers of the development site should be mitigated.

Movement & access

i) Walking, cycling, wheeling and vehicle access should be via the existing access off Herbert Close.

j) Proposals which demonstrate low or car free schemes are encouraged. If graduate accommodation comes forward, then vehicle parking should only be available for servicing vehicles and disabled access.

John Radcliffe Hospital

Site area	27.75ha
Ward	Headington Hill and Northway
Landowner	Oxford University Hospitals NHS Foundation Trust
Current Use(s)	Teaching Hospital
Flood zone	Flood Zone 1
Notable heritage assets	Part of the site (eastern and southern) falls within the Old Headington Conservation Area, with most of the site directly adjacent to it. Grade II listed Manor House, annex and boundary wall within site boundary - notable views across the parkland to the Manor House are identified in the Conservation Area Appraisal. Other buildings onsite such as William Osler House are noted as positive buildings in the Conservation Area appraisal. There are many listed buildings and locally listed buildings adjacent in the Old Headington Conservation Area. The eastern part of the site has significant archaeological potential because it incorporates parts of the medieval village of Headington. Significant new development in undisturbed areas may require evaluation. While not within view cones, the site is very prominent in views across Oxford.
Notable ecological features	Site contains many significant existing trees. Some of the trees are protected by their location within the Old Headington Conservation Area. The southern part of the site falls within an identified impact risk zone for the Lye Valley SSSI.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE5: John Radcliffe Hospital

Planning permission will be granted for:

a) further hospital related uses, including the redevelopment of existing buildings to provide improved facilities on the John Radcliffe Hospital Site; and/or:

b) Other suitable uses which must have an operational link to the hospital and are:
- Employment uses;
- Patient hotel;
- Extra care accommodation, including elderly persons accommodation;
- Primary health care;
- Education;
- Academic institutional;
- Small scale retail units ancillary to the hospital;
- Employer-linked affordable housing;
- Student accommodation.

Other complementary uses will be considered on their merits.

Development of the site should be undertaken as part of a masterplan to ensure all land use issues including parking are considered in a comprehensive way to make the most efficient use of land.

Open space, nature, flood risk

a) Development proposals must ensure that existing green infrastructure features on the site are protected and opportunities sought to enhance these. An Urban Greening Factor assessment will need to be produced and submitted. Planning permission will only be granted if an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets (**Policies G1, G2 and G3**).

b) Existing onsite biodiversity should be retained, enhanced and integrated into development proposals (**Policies G2 and G4**).

c) Existing drainage features such as the brook separating northern car parks should be maintained, enhanced and integrated into the landscape scheme, potentially creating wildlife corridors through the site (**Policy G8**).

d) This site is within an area where development could exacerbate surface and/or foul water flooding. There is an opportunity to address excess of runoff at the John Radcliffe Hospital site by ensuring that any development at the site reduces rather than maintains existing levels. This could take the form of ponds, wetlands or an on-site attenuation feature. A drainage strategy will also need to be produced by the developer in liaison with the City Council, Thames Water and the Environment Agency, to establish the appropriate drainage mitigation measures for any development. Planning permission will only be granted if sufficient drainage mitigation measures are incorporated into the design of proposals (**Policy G7**).

e) As the southern part of the site is located within an identified impact risk zone for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon the Lye Valley SSSI (**Policy G6**), including through impacts on surface or groundwater flows and quality, as well as groundwater recharge. Proposals should be designed to satisfy the applicable tests identified for the relevant impact risk zones set out in the Lye Valley Hydrogeological Impact Assessment report and accompanying Technical Advice Note, this may require additional supporting evidence in the form of a drainage strategy.

Urban design & heritage

f) Development proposals must be designed with consideration of their impact on the Old Headington Conservation Area and views, particularly from the Boars Hill and Elsfield view cones, as well as on the listed buildings (**Policies HD3 and HD6**).

g) For development of new hospital buildings, materials should be consistent with

townscape character and be modern in style and materials. Whilst a more contextual approach should be considered for development of residential, student residential or employer linked housing which would soften the impact of any new development and take inspiration from neighbouring areas. Material choice should not exacerbate the prominence of the hospital in views across the city or the view cones.

h) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

i) Development proposals should demonstrate rationalisation of the existing parking on the site to ensure the most efficient use of land is made.

j) Improvements to public transport, walking, cycling and wheeling access through the site will be required. These measures should be set out within a transport assessment and travel plan and reflected in an agreed masterplan. Development proposals must not prejudice bus access through the site, and new routes that effectively separate walking, cycling and wheeling from visitor or servicing traffic, will be encouraged. Additional access points to non-vehicular traffic onto the site will also be beneficial.

Additional Requirements

k) As the site has a long-standing hospital use, with potential for some areas of land contamination, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Land Surrounding St Clement's Church

Site area	2.31 ha
Ward	St Clement's
Landowner	Magdalen College
Current Use(s)	Greenfield with vacant ATC huts in south and bungalows and plant

	nursery in north.
Flood zone	Flood Zone 3a
Notable heritage assets	Site surrounds Grade II* listed St Clement's Church. Southern half of the site within South Park View Cone. Within St Clement's and Iffley Road Conservation Area and within setting of Headington Hill Conservation Area
Notable ecological features	The site is within the impact risk zone of New Marston Meadows SSSI. Part of the site is identified in the Local Nature Recovery Strategy (LNRS). Potential protected species including roosting bats, foraging and commuting bats, nesting birds, reptiles, water vole and otter
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE6: Land surrounding St Clement's Church

Planning permission will be granted for residential development and/ or student accommodation at the Land surrounding St Clement's Church site. The minimum number of dwellings to be delivered is 50 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Planning permission will also be granted for a children's nursery and a pavilion as complementary uses, and other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

c) Due to the potential for various types of species to be present onsite, as well as indications of priority habitat being present, a biodiversity survey will be required to assess the ecological value of the site. Development proposals are expected to demonstrate how any harm to biodiversity on the site will be avoided, mitigated or compensated. The Cherwell is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination, and neither should the church or flightpaths if it supports roosting bats.

d) At least a 10 metre buffer should be left between built development and the River Cherwell that adjoins the site.

e) Public open space will be required onsite (**Policy G2**). On this site this is most likely to be suitable as a nature area of native and diverse planting in the south west corner where the site is narrow, there is some flood risk and where a buffer to the Cherwell is required.

f) Habitats should be preserved and enhanced, retaining existing hedgerows and mature trees where possible. Mature trees to the west and north of the church, the tree and hedge-lines south of the church and along the Marston Road and the

natural vegetation along the river should be maintained.

g) Gardens with rich planting along boundaries should allow more diverse routes through the site for wildlife, connecting the river with neighbouring sites.

h) Native hedgerow planting alongside the new homes should connect the river to west and the mature trees alongside the Marston Road to the east.

i) A site-specific Flood Risk Assessment (FRA) should be carried out. A sequential approach should be taken to locating development on the site. Development should avoid the area of flood risk in the southwest of the site. A drainage strategy should be carried out to manage run-off arising from the development and ensure that surface water flood risk on and off the site is not increased. Infiltration SuDS may be challenging because of the geology of the site, but a geotechnical investigation may confirm this is viable in some parts of the site. Attenuated discharge may need to be considered as part of the FRA. (**Policy G7** and **Policy G8**)**.**

Urban design & heritage

j) Development proposals should be designed with consideration of their impacts on the significance of the heritage assets ilisted above **(Policy HD3)**.

k) The built form should be highly sympathetic to the sensitive setting, which will mean buildings should reflect the semi-rural character of the site and be relatively limited in height and massing so as not to dominate the church and in response to the surrounding character. For example, terraced or semi-detached housing with pitched roofs would reflect the local vernacular in the character area and should provide a sympathetic setting for the church. There would be an opportunity for larger plots to bookend rows or at junctions, giving variety to the roofscape.

l) The narrow strip to the south of the church will need a bespoke design and there are a number of key considerations. Heights should drop towards the Cherwell, to be sympathetic to the relatively rural setting of the river. The green screening of the church should be retained. The impacts on the adjoining homes to the south will need to be considered carefully, avoiding direct over-looking into windows.

m) There is a clear visual relationship between the river and its meadows, the church and the green slope of Headington Hill, with views from the church across the Cherwell and towards Magdalen College, and these should be referenced in new development.

n) Buildings should be arranged in a way that maintains the openness of the riverside setting, that does not compete with the Grade II* listed St. Clement's Church, and that maintains the hedge and treeline on the Marston Road and the avenue of trees south of the church that screen it and contribute strongly to the character of its setting (**Policy HD3**).

Movement & access

o) One main entrance would allow a highways compliant design while minimising the loss of hedgerow on Marston Road. This being sited towards the north of the site avoids the more sensitive area around the church. The existing access to the bungalows could become the main access.

p) A separate vehicle entrance to the south, where there is existing access to the ATC huts, is likely to be needed to service any development in this southern part of the site, but the impact on the setting of the church must be considered. The shorter, further south and more rural in character the access is the less likely it is to detract from the setting.

q) There is a network of paths and bridges at the northwest corner of the site, in the private ownership of Magdalen College. Opportunities to open these up for public access should be considered. A potential additional walking and wheeling link across the river would help linkages.

r) Walking, cycling and wheeling connections within the site should link the southern

to the northern part of the site.

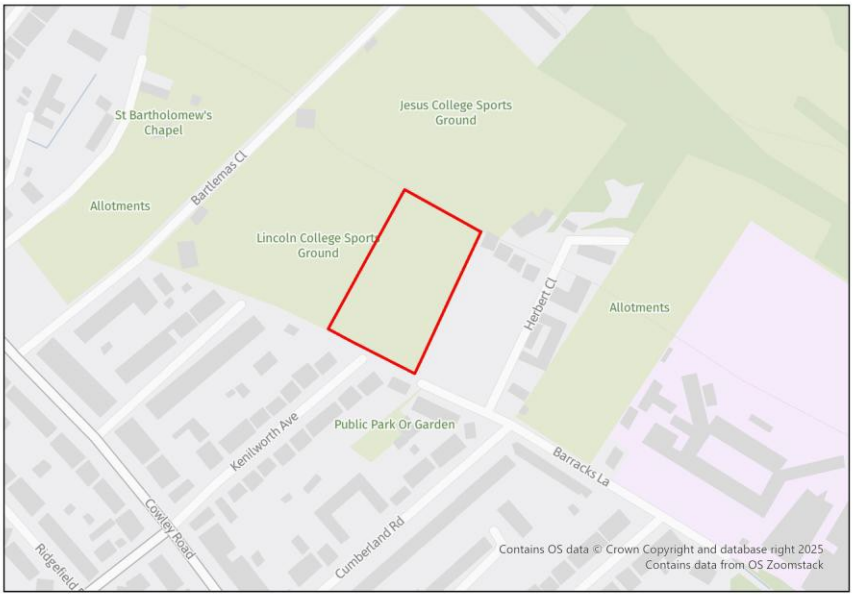
s) Parking should be kept in the public realm where possible and could be located close to the Marston Road, allowing the development to be more focused on walking, cycling and wheeling within the site.

Additional requirements

t) The River Cherwell is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination as a result of any proposed development. If St Clement's Church has the potential to support roosting bats, neither the church nor flightpaths to and from it should be subject to illumination either. A lighting strategy should be submitted in support of any planning application, setting out the lighting associated with the proposed development. This will need to account for both internal and external lighting.

u) Development proposals should include an acoustic design statement to be submitted in compliance with **Policy R8** as this site is part of an area which is subject to significant environmental noise from traffic on the surrounding roads.

Lincoln College Sports Ground



Site area	0.8ha
Ward	Donnington
Landowner	Lincoln College
Current Use(s)	Sports field
Flood zone	Flood Zone 1
Notable heritage assets	Within the Bartlemas historic hamlet. Adjacent to Bartlemas Conservation Area and within the setting of: Grade 2* listed Bartlemas Farm House, Grade 2* listed Bartlemas House, Grade 1 listed St Bartholomew Chapel. The Crescent Road View Cone falls across the southern portion of the site.
Notable	Forms part of the Green Infrastructure (GI) Network as supporting

ecological features	infrastructure.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE7: Lincoln College Sports Ground

Planning permission will be granted for residential development (including graduate accommodation) at Lincoln College Sports Ground.

The minimum number of dwellings to be delivered is 24 (or, if delivered as non-self-contained student accommodation, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The entirety of the site has been identified as supporting green infrastructure (**Policy G1**) so enhancement of remaining GI will be required to mitigate loss. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining on-site, and adjacent, areas of open space by improving the functionality of these spaces in terms of wider benefits they provide people and species. These actions would also contribute to retaining the current Urban Greening Factor score.

b) Development should result in enhancement of the hedgerow and existing trees which bound the site. Existing trees should be retained as much as possible. The opportunity to enhance existing wildlife corridors and ecological habitats with enhanced planting, screening and landscaping should be taken.

c) There is potential to consolidate and share sports provision with the neighbouring Jesus College Sports Area (**Policy SPE4**). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s).

Urban design & heritage

d) Landscape design should be a fundamental consideration at the earliest design stage, to enhance the contribution that existing trees and hedgerows make to the rural setting of the Bartlemas settlement, listed buildings, and the Bartlemas Conservation Area. Proposals should be informed by the character and materiality of the Bartlemas Conservation Area and the Edwardian and Victorian residential streets on the southern side of Barracks Lane should influence the design of new development (**Policy HD3**).

e) The Crescent Road View Cone crosses the south of the site; proposals should be designed in a way that responds to this protected view (**Policy HD6**). This could be achieved by creating a graduation of height, lower on the southern edge and increasing in height towards the north, as well as appropriate massing and considering variations in roof forms. Gaps between buildings should be sufficient to retain the sense of openness and views of the green backdrop which enhance the setting of the Conservation Area (**Policy HD3**).

f) Proposals should take into consideration the potential for archaeological assets, ensuring they are appropriately investigated and responded to (**Policy HD5**).

g) The relationship between the site and sites A and B on the Jesus College Sports Area (**Policy SPE4**), and remaining sports uses on adjacent sites, should be a consideration in future development proposals. Proposals should demonstrate that there would not be detrimental impacts arising from overshadowing/ overbearing/overlooking of the sports pitch(s). Additionally, noise impacts from the surrounding recreational uses upon future occupiers of the development site

should be mitigated.

Movement & access

h) Walk, cycle, wheel and vehicle access should be via the existing access off Bartlemas Close unless it can be adequately demonstrated that suitable access would be possible via Herbert Close and/or Barracks Lane.

i) Proposals which demonstrate low or car free schemes are encouraged. If graduate accommodation comes forward, then vehicle parking should only be available for servicing vehicles and disabled access.

Manzil Way Resource Centre

Site area	0.75ha
Ward	St Clement's
Landowner	Oxford Health NHS Foundation Trust
Current Use(s)	Administrative, part of the site also subleased to Restore (garden and cafe).
Flood zone	Flood Zone 1
Notable heritage assets	Bartlemas Conservation Area is located to the east. Most of site within the Crescent Road View Cone. There is potential for Roman pottery as previously found near Cowley Road hospital.
Notable ecological features	Potential protected species constraints including bats, great crested newts and hedgehogs.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE8: Manzil Way Resource Centre
Planning permission will be granted for improved healthcare facilities and associated administration and/or residential development, including employer-linked affordable

housing and/or student accommodation at the Manzil Way Resource Centre site. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals should include urban greening on the site seeking opportunities to introduce more tree and shrub planting. Existing hedgerows and mature trees along the sites boundaries should be retained where possible (**Policy G1**).
b) Appropriate ecological surveys should be undertaken to ensure that development proposals do not have an adverse impact on protected species (e.g. bats/ breeding birds).

Urban design & heritage

c) Development proposals should respond to the opportunities of the adjoining Manzil Gardens public open space and also support enhancements to Manzil Way to become a high quality spine from which numerous community-focussed buildings are accessed (the health centre, Mosque and Asian Culture Centre, and the community garden cafe) (**Policy G1**).
d) The southern part of the site lies within the Crescent Road view cone. Proposals should be designed in a way that responds to this protected view (**Policy HD6**).
e) The impacts of any development proposals on the adjoining residential development to the east of the site will need to be considered.
f) Proposals should take into consideration the potential for archaeological assets, ensuring they are appropriately investigated and responded to (**Policy HD5**).

Movement & access

g) The existing accesses to the site should be retained with internal circulation designed to avoid conflict of movements between different modes (**Policy C6**).
h) Development proposals should demonstrate how the development enables access by active modes of travel such as walking, wheeling and cycling (**Policy C6**).
i) Given the location in the district centre and within a CPZ any additional residential development should be low car (**Policy C8**).
j) Non-residential development should attempt to reduce parking and should have no more parking than is necessary to serve the development.

Additional Requirements

k) As the site has a long-standing healthcare use, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Marston Paddock Extension

Site area	0.51
Ward	Marston
Landowner	Lucy Developments Ltd
Current Use(s)	Vacant farmhouse and curtilage including outbuildings
Flood zone	Flood Zone 1
Notable heritage assets	Within Old Marston Conservation Area
Notable ecological features	Trees around boundaries. Recently cleared area in the northeast part of the site means the biodiversity value would have been greater than currently and the baseline will need to reflect that prior to the intervention.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE9: Marston Paddock Extension

Planning permission will be granted for residential development at the Marston Paddock Extension site. The minimum number of homes to be delivered is 20. Other complementary uses will be considered on their merits.
(**Policy H2**) As this is a site released from Green Belt through the local plan process, it should deliver 50% affordable housing in accordance with Policy H2, and deliver improvements to accessible green space.

Open space, nature, flood risk

a) Green amenity space with rich planting should help maintain green links through the site.
b) The hedge/tree lines on the northern, southern and eastern boundaries should be retained and enhanced, for example with native tree planting.
c) Biodiversity surveys are likely to be required and mitigation may be needed for any protected species.
d) The biodiversity baseline will need to reflect the scrub/grassland in place prior to the land clearance that has recently occurred.

Urban design & heritage

e) Development proposals should be designed with consideration for their impacts on

the Old Marston Conservation Area (**Policy HD3**).

f) The development should respond carefully to surrounding residential development. Sufficient buffering and screening will be needed along the northern boundary, to avoid harm.

g) Development should be set back from Butts Lane, to help reduce impact on the character of the conservation area.

h) Public realm should retain a green and rural character with a feeling of openness.

i) A variety of styles and materials should be used, as uniformity would undermine the character of the area.

j) The nature of the conservation area means that only relatively low density and low height built form is likely to be appropriate

Movement & access

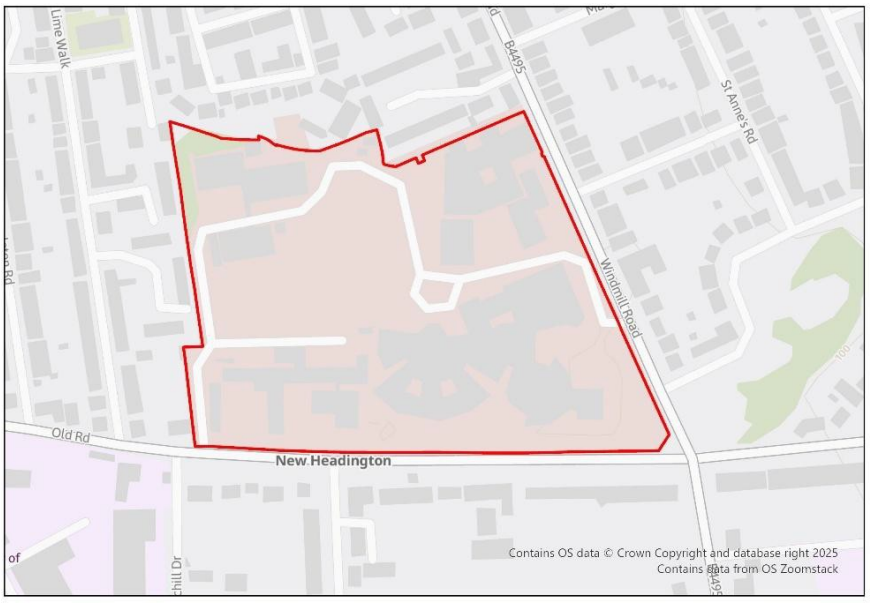
k) Access arrangements should be shown not to be detrimental to highway safety.

l) It should be demonstrated how access by public transport, walking, wheeling and cycling will be supported.

Additional requirements

m) Depending on the nature of proposals, a full contamination risk assessment may be required to quantify contamination risks and determine what remedial treatment actions are required.

Nuffield Orthopaedic Centre (NOC)



Site area	8.38ha
Ward	Headington
Landowner	Oxford University Hospital NHS Foundation Trust
Current Use(s)	Healthcare and Medical Research
Flood zone	Flood Zone 1
Notable heritage assets	All Saints Vicarage outside the site on the SW corner is on the Oxford Heritage Asset Register (OHAR). Site has potential for archaeological interest as Roman remains have been found in the area.

Notable ecological features	Rock Edge geological SSSI situated on Windmill Road adjacent to the site. The site lies within identified impact risk zones for the Lye Valley SSSI which is located within 350m of the site.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE10: Nuffield Orthopaedic Centre

Planning permission will be granted for further healthcare facilities and medical research including staff and patient facilities at the Nuffield Orthopaedic Centre. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Habitats should be preserved and enhanced, retaining existing hedgerows and mature trees where possible.

b) There are significant existing trees scattered within the site and along the boundaries of Old Road and Windmill Road which are important to public amenity in the area and will provide valuable ecosystem services. Therefore, retention and enhancement of the supporting green infrastructure will be required (**Policies G1, G2, G3**). This enhancement could be achieved by increasing both the amount, and diversity, of landscaping and ensuring that development considers how different parts of the site may hold opportunities for ecological connectivity in the wider landscape. Opportunities should be sought to repurpose the existing hard surfaces for other uses including GI and amenity uses, or to create connections between the site and landscape beyond, or green corridors/routes through the site.

c) As the site is located within identified impact risk zones for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon the Lye Valley SSSI (**Policy G6**), including through impacts on surface or groundwater flows and quality, as well as groundwater recharge. Proposals should be designed to satisfy the applicable tests identified for the relevant impact risk zones set out in the Lye Valley Hydrogeological Impact Assessment report and accompanying Technical Advice Note, this may require additional supporting evidence in the form of a drainage strategy.

d) As the site is adjacent to the Rock Edge SSSI a buffer zone will be required during the construction phase to ensure SSSI land is not disturbed.

e) Due to the site's proximity to recorded peat reserves associated with the Lye Valley, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss to these deposits (**Policy R6**). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

f) There may be potential for infill development of repurposed surface level parking areas and redevelopment of the existing low-density buildings in the South–Western part of the site.

g) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

h) Proposals should seek to consolidate car parking, where possible, to make the most efficient use of land and take opportunities to reduce the amount of hard surfacing in favour of increased landscaping or other forms of GI.

i) Development proposals should demonstrate how improvements to public transport, walking, cycling and wheeling access through the site, as well as additional access points to non-vehicular traffic have been incorporated. These measures should be set out within a transport assessment and travel plan and reflected in an agreed masterplan.

Additional Requirements

j) As the site has a long-standing hospital use, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Oxford Brookes Marston Road Campus

Site area	1.18 ha
Ward	Headington Hill & Northway
Landowner	Oxford Brookes University
Current Use(s)	Higher Education Facilities
Flood zone	Flood Zone 1
Notable heritage assets	The site sits just to the south of the Doris Field Memorial Park view cone which begins a short way to the north east and looks south west. Directly adjacent to Headington Hill Conservation Area. Former Milham Ford School Building has been included on the Oxford Heritage Asset Register (OHAR)
Notable ecological features	Milham Ford Nature Park, which lies directly adjacent and forms the eastern boundary of the site, and the internal quad formed within Milham Ford School grounds are both designated as Local Wildlife Sites. The site is within the impact risk zone of New Marston Meadows

	SSSI.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE11: Oxford Brookes Marston Road Campus

Planning permission will be granted for residential development, with the minimum number of 42 dwellings delivered (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) The main Milham Ford Nature Park should be excluded from any development area, and the designated internal quad should be retained (**Policy G6**).

c) Development proposals should seek to enhance and connect the existing green infrastructure, specifically between the Milham Ford Nature Park, inner quad and the surrounding GI network (**Policies G1 and G2**).

d) The tree lines on the perimeter are well-established. They provide amenity for the residential neighbours and for occupiers of the site and should be retained where possible.

e) Proposals for the site, regardless of the development options, should include more natural features and surface cover types to enhance the Urban Greening Factor score for the site (**Policy G3**), the policy requirements for which will require an uplift from existing levels regardless of the use.

Urban design & heritage

f) Proposals on this site should respond positively to the directly adjacent Headington Hill Conservation Area context (**Policy HD3**).

g) Design proposals should acknowledge the Milham Ford School buildings status as a local landmark in a historic, social and physical sense. The OHAR designation report highlights the elements that are distinctive to the building and its significance.

h) Reuse of the original building fabric is encouraged where this is feasible, not only to respect the local historic significance of the site but also for sustainability reasons. Because of the designation of the inner quad as a Local Wildlife Site, it should be retained as open natural space even if wholesale redevelopment of the site is the chosen option.

<u>Movement & access</u>

i) Proposals should explore opportunities to improve non-vehicular movement through the site, particularly from north to south. Car free and low car development proposals will be strongly supported.

Rectory Centre

Site area	0.21ha
Ward	St Clement's
Landowner	Oxford Health NHS Foundation Trust
Current Use(s)	Healthcare
Flood zone	Flood Zone 1
Notable heritage assets	Site is within Crescent Road View Cone.
Notable ecological features	There is limited natural vegetation on the site as it is mainly a developed area, though there is a single established tree within the site boundary, which is adjacent to a cluster of trees to the east.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE12: Rectory Centre

Planning permission will be granted for improved health-care facilities, associated administration and/or residential development, which may include student accommodation. For a residential scheme, the minimum number of homes to be delivered is 21 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Development of this site for residential use would lead to the loss of community facilities, so these should be re-provided elsewhere, in accordance with (**Policy C3)**, which may be through consolidation onto other healthcare sites.

Open space, nature, flood risk

a) Most of the site is made up of hard surfaces either from tarmac or building roofs with little vegetation or permeable surfaces present so there is an opportunity to increase the amount of green infrastructure on site. This could be achieved by implementing elements of smaller and individual green features as part of gardens, as well as around boundaries, which should be implemented to complement any residential development which will in turn create a more pleasant living environment for residents.
b) Preliminary analysis suggests that the limited presence of green infrastructure

features on the site currently means it is likely to score below the minimum thresholds for green surface cover as required by Policy G3. As such, proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the policy, demonstrated through submission of the Urban Greening Factor assessment.

Urban design & heritage

c) The site lies within the Crescent Road View Cone; proposals should be designed in a way that responds to this protected view (**Policy HD6**).

d) Any development should respond to both the character of the Victorian suburb and the vibrant Cowley Road District Centre.

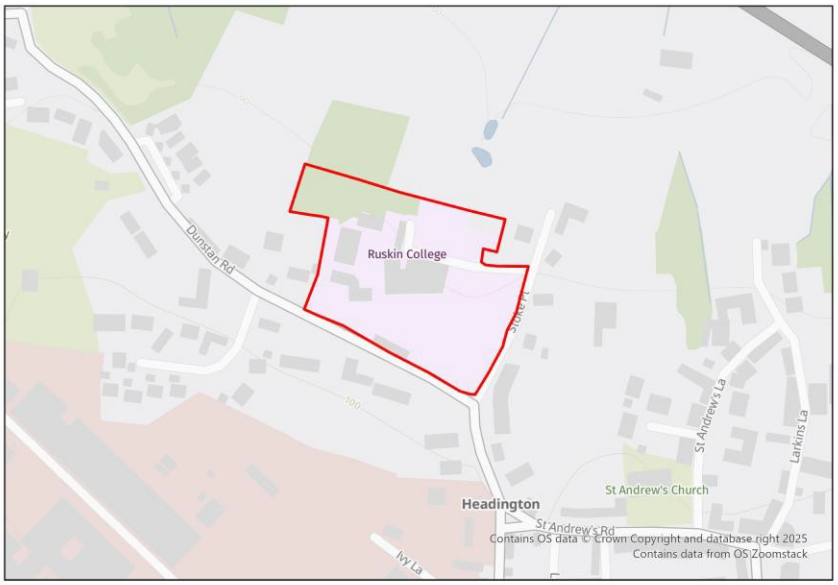
Movement & access

e) The constrained nature of the site means that the site is only accessible via Rectory Road from the west. The site should be easily navigable for residents, although applicants will be expected to demonstrate how the development improves connectivity to support walking, cycling and wheeling.

Additional Requirements

f) The site has potential contamination so a site investigation will be required, and remedial works are likely to be necessary to be undertaken (**Policy R7**).

Ruskin Campus



Site area	1.86ha
Ward	Headington
Landowner	University of West London (UWL)
Current Use(s)	University campus site
Flood zone	Flood Zone 1
Notable heritage assets	Site is entirely within the Old Headington Conservation Area. The Rookery (Grade II listed) is within the site and there is a Grade II

	listed wall on the edge of the site (Walls of Walled Garden at Ruskin College). The site is close to a number of other listed buildings: Stoke House, Grade II listed, 8 Dunstan Road, Grade II listed, The Manor Farmhouse and Garden Wall of Manor Farmhouse, both Grade II, Church of St Andrew, Grade II*. Evidence of Iron Age activity and Roman pottery production has been recorded.
Notable ecological features	Potential for protected species constraints within the site may include roosting bats, nesting birds, reptiles and amphibians.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE13: Ruskin Campus

Planning permission will be granted for academic institutional uses (subject to **Policy H9**), student accommodation and residential development, including student accommodation and employer-linked housing). The minimum number of dwellings (net gain) to be delivered is 30 (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Trees and hedges at the edges of the site provide a rural character and should be retained.
b) Trees of the greatest value and quality should be retained and other trees within the site should be protected where possible, and if their loss is justified it must be compensated for within the development, with new native hedge and tree planting to connect existing trees and hedgerows.
c) Detailed biodiversity surveys may be required, depending on the nature of the proposals, to ascertain what protected species are present and any mitigations that may be needed.
d) There should be no overall loss of sports provision as a result of any proposals.
e) Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (**Policy R6**). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

f) Development proposals must be designed with consideration for their impact on the Old Headington Conservation Area (**Policy HD3**).
g) Retention of the significant green features within the site is important to retain the semi-rural feel of the conservation area and links to green spaces beyond the site.
h) Development should be sensitive to the setting of the listed buildings within the site and nearby (**Policy HD3**).
i) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

j) Existing access to the site from Dunstan Road should remain as the access to the site.

k) Opportunities should be taken to enhance walk, cycle and wheel links into the site and circulation around the site.

Ruskin Field

Site area	3.51ha
Ward	Headington
Landowner	University of West London (UWL)
Current Use(s)	Greenfield vacant land with GI function
Flood zone	Flood Zone 1
Notable heritage assets	Site is entirely within the Old Headington Conservation Area and as a vestige of the rural landscape, the site makes an important contribution to the character, appearance and significance. There is a Grade II listed wall on the edge of the site. The site lies within the settings of a number of other listed buildings: The Rookery, Stoke House, 8 Dunstan Road, The Manor Farmhouse and Garden Wall of Manor Farmhouse, all Grade II listed and Church of St Andrew, Grade II* listed. The site is not within a view cone but there is potential for it to impact views from the Elsfield View Cone. Evidence of Iron Age activity and Roman pottery production has been recorded from the adjacent college campus site, so it has archaeological potential.
Notable ecological features	Potential for nature conservation interest. The site consists of a series of neutral grassland fields. They appear semi-improved ranging from species-poor to moderately species-rich (semi-improved – good). There is a pond in the southern part of the site. Some of the boundary hedges are wide and dense and likely to have value to birds. Potential protected species constraints include roosting bats, foraging and commuting bats, breeding birds, reptiles, amphibians and invertebrates.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE14: Ruskin Field

Planning permission will be granted for residential development, which may include employer-linked affordable housing or student accommodation. The minimum number of dwellings to be delivered is 28 (or, if delivered as self-contained student rooms, the equivalent number of rooms when the relevant ratio is applied. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) The green character of the site is important to the setting of the Old Headington Conservation Area. The hedgerows and treelines are likely to have ecological value. For this reason, trees and hedgerows at the boundaries of the site and running through the site should be retained as far as possible, and opportunities taken for enhancement.
b) New native hedge and tree planting should connect existing trees and hedgerows.
c) Gardens and amenity spaces will need to have rich planting along boundaries to allow more diverse networks through the site for wildlife.
d) The southern part of the site should be kept as open space, with opportunities taken for enhancement, particularly of any wetland features, and/or extension of the deciduous woodland priority habitat to the south.
e) Detailed biodiversity surveys will be required at the right times of year to ascertain which if any protected species are present and any mitigations that may be needed.
f) Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (**Policy R6**). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

g) Significant green features should be incorporated to retain the function of the site as one of the few vestiges of the rural character of the conservation area, important to its setting and understanding its history.
h) Buildings should be carefully placed to retain important views across the site and visual link with rural hills beyond, e.g. the important view from Stoke Place across the site to Elsfield (**Policy HD6**).
i) Built development should avoid the southern part of the site where there is a pond with potential for wetland species, and a greater potential for peat deposits. This area should be used for enhancements to biodiversity and green infrastructure.
j) Development should be kept low to reflect the rural character and role of the site in linking the conservation area to its more rural origins.
k) Development must be accompanied by a Landscape Visual Impact Assessment to demonstrate impacts.
l) Development should be sensitive to the setting of the listed buildings nearby **(Policy HD3).**
m) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

n) Foxwell Drive is likely to provide the only option for vehicular access.
o) Stoke Place is not suitable for providing vehicular access, but access to it for walkers, cyclists and wheelers should be considered in order to ensure

permeability.

Additional Requirements

p) Due to potential impacts of noise and other pollutants from traffic on the A40, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policies R4 and R8**).

Slade House

Site area	1.21ha
Ward	Lye Valley
Landowner	Oxford Health NHS Foundation Trust
Current Use(s)	Children's Mental Health Services
Flood zone	Flood Zone 1
Notable heritage assets	Parliamentarian siege line may cross through this plot. May require evaluation depending on building footprint.
Notable ecological features	Site is located within the impact risk zone of the Brasenose Wood and Shotover Hill SSSI which is sensitive to recreational pressure. It is also partially within the impact risk zone of the Lye Valley SSSI, which lies to the west of the site.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE15: Slade House

Planning permission will be granted at the Slade House site for improved health-care facilities, associated administration, employment-generating use (of no bigger area than that present on the site at the time of adoption of the Plan), and/or residential development, including employer-linked affordable housing. Other

complementary uses will be considered on their merits, including academic institutional and education uses.

Open space, nature, flood risk

a) A Tree Protection Order applies across the whole site, meaning the design of any redevelopment should be led by the presence of the trees on the site and be prepared in a way that these would be retained (**Policy G1**).
b) Any new development to be arranged in a way that is sympathetic to the existing trees and green spaces and could utilise/or even enhance these to its benefit, maintaining a more natural and pleasant environment for potential residents.
c) The potential presence of priority species/habitats on the site should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly.
d) Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G7**).
e) Planning permission will only be granted if it can be demonstrated that there would be no adverse impact on the integrity of the Brasenose and Shotover Park SSSI. Development proposals must be accompanied by an assessment of potential recreational pressure on the SSSI that may arise from increased numbers of visitors, along with plans to mitigate this impact as necessary (**Policy G6**).
f) As the site is located partially within an identified impact risk zone for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon the Lye Valley SSSI (**Policy G6**), including through impacts on surface or groundwater flows and quality, as well as groundwater recharge. Where layout of new development is unable to avoid the risk zone to the west of the site, proposals should be designed to satisfy the applicable tests identified for the relevant impact risk zones set out in the Lye Valley Hydrogeological Impact Assessment report and accompanying Technical Advice Note. This may require additional supporting evidence in the form of a drainage strategy and/or hydrogeological impact assessment.

Urban design and heritage

g) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).
h) Opportunities for densification should be taken, for example by redeveloping areas of unused hard standing, and replacement of the lower-storey buildings.
i) The impact on surrounding residential areas should be considered, with greater potential for height to the west and south, with greater height adjacent to the road, transitioning down to a residential scale at the back.
j) Consideration should be given to arranging rooftops to have a pitch and style that mirrors the surrounding buildings as well as those on the site may help to fit in with the local vernacular.

Movement & access

k) Applicants will also be expected to demonstrate how the development mitigates against traffic impacts and maximises access by alternative means of transport, including access into and through the site for walkers, cyclists and wheelers **(Policy C6**).

Additional requirements

l) Due to potential impacts of noise and other pollutants from traffic on the Eastern bypass, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policies R4 and R8**)

m) As the site has a long standing healthcare use, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Thornhill Park (phase 2)

Site area	3.39ha
Ward	Quarry and Risinghurst
Landowner	Shaviram Group
Current Use(s)	Residential, car parking and a sports ground.
Flood zone	Flood Zone 1
Notable heritage assets	N/A
Notable ecological features	Previous ecological assessments indicate the site is comprised of species-poor grassland, scattered trees, scrub, and developed land. It contains a medium population of great crested newt (GCN) and multiple bat roosts. Other potential protected species constraints include reptiles, nesting birds, and badgers. The site is not designated for its nature conservation value. However, it is located in close proximity to the CS Lewis Nature Reserve. The site contains significant existing trees around the boundaries and scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. All trees within the site are protected by the OCC - London Road (No.1) TPO, 1994. Existing trees will influence developable area of site and its capacity. Part of this site is in the Local Nature Recovery Strategy (LNRS).

Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE16: Thornhill Park (phase 2)

Planning permission will be granted for a residential-led mixed use redevelopment on the remainder of the Thornhill Park site, which should include some employment use (offices Class E). Other complementary uses will be considered on their merits and could include a café, restaurant, gym, hotel. The minimum number of new homes to be delivered is 170. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Proposals for development should be informed by an updated ecological assessment in relation to biodiversity and to consider potential for known species of interest (great crested newts and bats) as well as potential for other species including reptiles, nesting birds and badgers. Recreational impacts on the CS Lewis Nature Reserve should be assessed and mitigation measures included, if necessary **(Policy G6).**

b) Opportunities exist to reduce the overall amount of hard surfacing in favour of increased natural landscaping. Existing mature trees should be retained where possible as with other high-quality GI in order to preserve the Urban Greening Factor score. Layout should incorporate a network of amenity spaces such as pocket parks, or other forms of GI that provide linear connections across the site particularly where this can assist with movement of wildlife.

c) A minimum of 10% public open space will be required onsite (**Policy G2**).

d) The existing pavilion is 25 years old and at the end of its lifespan, unable to comfortably accommodate the needs. The loss is considered acceptable provided a contribution is made towards a replacement pavilion as set out in the previous planning permission.

e) Southeast section of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

f) Development proposals that exceed the height stated in the High Buildings TAN may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed as listed in **Policy HD6**.

g) New development should respect design sensitivities particularly in the southern part of the site which is likely to have a visual impact on the countryside (**Policy HD1**).

Movement & access

h) Walking, cycling and wheeling should be promoted in this site and opportunities taken to improve connectivity from the site through to neighbouring areas.

i) The site is in an air quality hot spot area. Development proposals should demonstrate compliance with **Policy R4** by ensuring that all necessary mitigation measures against poor air quality have been incorporated during the construction and operational phases and ensuring that any potential negative air quality impacts are adequately mitigated on an ongoing basis, within and surrounding the site.

j) Extensive site investigation works have been completed over parts of the site already, however a contamination investigation would be required in other areas due to its previous use and potential contamination risks, and an application should demonstrate how contamination issues will be resolved (**Policy R5**).

k) Development proposals should include an acoustic design statement in compliance with **Policy R8** as this site is part of an area which is subject to significant environmental noise from the traffic on the A40.

Additional requirements

l) There is the potential for land contamination on the site due to previous uses, and as a result proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

m) Due to potential impacts of noise and other pollutants from the site's proximity to the A40, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors (**Policy R4 and R8**).

Union Street Car Park

Site area	0.24 ha
Ward	St Clement's
Landowner	Oxford City Council
Current Use(s)	City council owned car park
Flood zone	Flood Zone 1
Notable heritage assets	No designated buildings, spaces or structures on site. Site is within the Crescent Hall View Cone.
Notable ecological features	Mature trees line Collins Street.

Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPE17: Union Street Car Park

Planning permission will be granted for student accommodation or residential led mixed use development on this site. The minimum number of dwellings to be delivered is 15 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Established natural features on the site and in its immediate vicinity including the mature trees lining Collins Street, should be retained and a setback maintained to allow for greatest access to their amenity. Integrating natural features including trees, along the frontages of Union and Chapel Streets should be explored. Alternative opportunities should be explored for integrating elements such as green roofs, green walls, roof gardens etc into any schemes (**Policy G3**).

Urban design & heritage

b) Setbacks and boundary treatments need to be carefully considered to creative an attractive frontage that is active, is suitably overlooked and which does not have an adverse impact on the amenity of occupiers of onsite development, neighbours and users of the paths (**Policy HD8**).

c) Block layouts and massing should be carefully considered to avoid being overbearing to sensitive adjoining uses, particularly the primary school opposite.

d) The height, massing and roofscape of proposals should be designed with consideration of their impacts of protected views (including the Cresent Hall View Cone) and the visual streetscape of the local area (**Policy HD6**).

Movement & access

e) Car parking spaces should be retained to a level at which the City Council considers is reasonable to serve and safeguard the vitality of the district centre. Supporting information justifying the proposed level of car parking spaces should accompany any application. The retained car parking could be in a different form such as beneath ground level (undercroft), decking or surface level with buildings above.

f) Because the site is in a highly sustainable location it is expected that any development will be low car i.e. no parking provision allocated onsite for occupiers of the development.

g) Permeability of the site to walkers and wheelers should be enhanced to improve access to amenities on Cowley Road (**Policy C6**).

Additional requirements

h) There is the potential for land contamination on the site due to previous uses, and as a result proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Warneford Hospital

Site area	8.67 ha
Ward	Churchill
Landowner	Oxford Health NHS Foundation Trust
Current Use(s)	Hospital, research, playing fields
Flood zone	Flood Zone 1
Notable heritage assets	Adjacent to the Headington Hill Conservation Area. Listed buildings onsite include the Warneford Hospital; Nurses Home; Chapel; Mortuary; lodge and front garden area wall and gate piers at entrance; stone in Warneford lane opposite entrance (all Grade II listed). The Grade II Barn at Cheney Farm is located just over the Warneford Road to the north west. Oxford Heritage Asset Register includes Warneford Meadow and Orchard OCWS, which is adjacent to site. Archaeological potential onsite includes Roman remains. A historic bund which runs along the boundary and into the site also has heritage value.
Notable ecological features	The site lies within an impact risk zone for the Lye Valley SSSI which lies to the east. Warneford Meadow and Orchard OCWS is directly adjacent to site on the southeast boundary, with Boundary Brook Corridor - Mileway Gardens OCWS also close by (to the east). The site contains large mature trees (some of which are protected with TPOs) and areas of priority habitat woodland. Part of this site is in Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPE18: Warneford Hospital

Planning permission will be granted for healthcare facilities and related uses at Warneford Hospital, including any of the following complementary uses:

- extra care accommodation;
- residential development, including employer-linked affordable housing and

student accommodation;

- employment and research that has a link to healthcare;
- additional academic institutional and education uses subject to compliance with relevant local plan policies.

- Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Proposals should seek to retain existing features where possible, particularly higher quality elements like large mature trees (some of which are protected with TPOs); boundary features that help preserve amenity; and areas of priority habitat woodland present on the site. The loss of the former sports facility is considered justified only due to the need for and benefits of new hospital development.

b) In order to retain the existing Urban Greening Factor score, any losses in green features should be compensated for. Losses of open space identified as supporting green infrastructure (**Policy G1**) will also need to be mitigated through enhancement of remaining GI. These requirements could be met in different ways, such as through enhancement of remaining areas of amenity grassland, additional planting such as new trees that can enhance canopy cover and the setting of the listed buildings, or improvements in linkages to nearby habitat, as well as new habitat creation.

c) The potential presence of priority species/habitats on the site should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly. Proposals should also consider potential for impacts on the adjacent Oxford City Wildlife Site and be designed in a way that avoids negative impacts for the species and habitats, which could include setbacks or buffers, as well as careful design of new lighting.

d) As the site is located within an identified impact risk zone for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon the Lye Valley SSSI (**Policy G6**), including through impacts on surface or groundwater flows and quality, as well as groundwater recharge. Proposals should be designed to satisfy the applicable tests identified for the relevant impact risk zones set out in the Lye Valley Hydrogeological Impact Assessment report and accompanying Technical Advice Note, this may require additional supporting evidence in the form of a drainage strategy.

e) A narrow strip of land along southeast boundary, adjacent to Warneford Meadow and Orchard OCWS is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity.
Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

f) Due to the site's proximity to recorded peat reserves associated with the Lye Valley, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (**Policy R6**)**.** Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

g) Redevelopment of the site offers a valuable opportunity to enhance mental healthcare provision and associated research, whilst addressing previous piecemeal development of parts of the hospital complex, bringing about improvements in site layout and the setting of listed buildings on the site. Developers are encouraged to follow a coordinated masterplan approach for the site to encourage holistic development and maximise on opportunities to improve efficient use of land; layout and connections through the site that prioritise walkers, cyclists and wheelers; and enhance the historic character and setting of the listed buildings.

h) The relatively elevated nature of the site means that it also has some sensitivity in terms of impact of new development on the surrounding area. New buildings should therefore be of an appropriate height, scale and massing that responds to this wider context, with plots being arranged in a way that seeks to avoid further loss of the open character of the site such as by incorporating green gaps between them.

i) As identified above, there are various designated heritage assets on the site or close by and proposals should be informed by an appropriate assessment and strategy that responds to these. In particular, proposals should be designed in a way that preserves and enhances the significance of the listed buildings (including their setting); as well as the broader landscape and adjoining Headington Hill Conservation Area. This could be done in various ways, such as by selecting materials that take inspiration from the adjacent Conservation Area or the existing Listed Buildings on the site; or by ensuring new buildings located close to designated assets are positioned sensitively (**Policy HD3**).

j) There is also the potential presence of archaeological assets on the site including Roman remains. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).

Movement & access

k) The potential for impacts on the sensitive heritage features along the boundary including the listed wall, gate piers and historic bund will need to be addressed if new access points are proposed into the site. Applicants will also be expected to demonstrate how the development mitigates against traffic impacts and maximises opportunities for access to the site by alternative means of transport, including access into and through the site for walkers, cyclists and wheelers.

l) Redevelopment of the site offers the opportunity to consolidate car parking and reduce the car-dominated feeling of the grounds and proposals that can shift priority of circulation towards other forms of travel, such as walking, cycling and wheeling, will be strongly supported. This could include incorporating additional linkages through the site for walkers and wheelers; providing space for cycle storage; and utilising elements of open space for additional public access or the benefit of occupants where appropriate to the wider operation of the site.

Additional requirements

m) Proposals should be designed in a way that seeks to preserve the amenity of neighbouring residents including mitigation of negative amenity impacts such as excessive lighting, noise, or air pollutants (**Policy R8)**.

n) The historic and ongoing uses of the site as a hospital may mean that some areas of potential contamination are present on the site. Proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

CENTRAL AND WEST INFRASTRUCTURE AREA

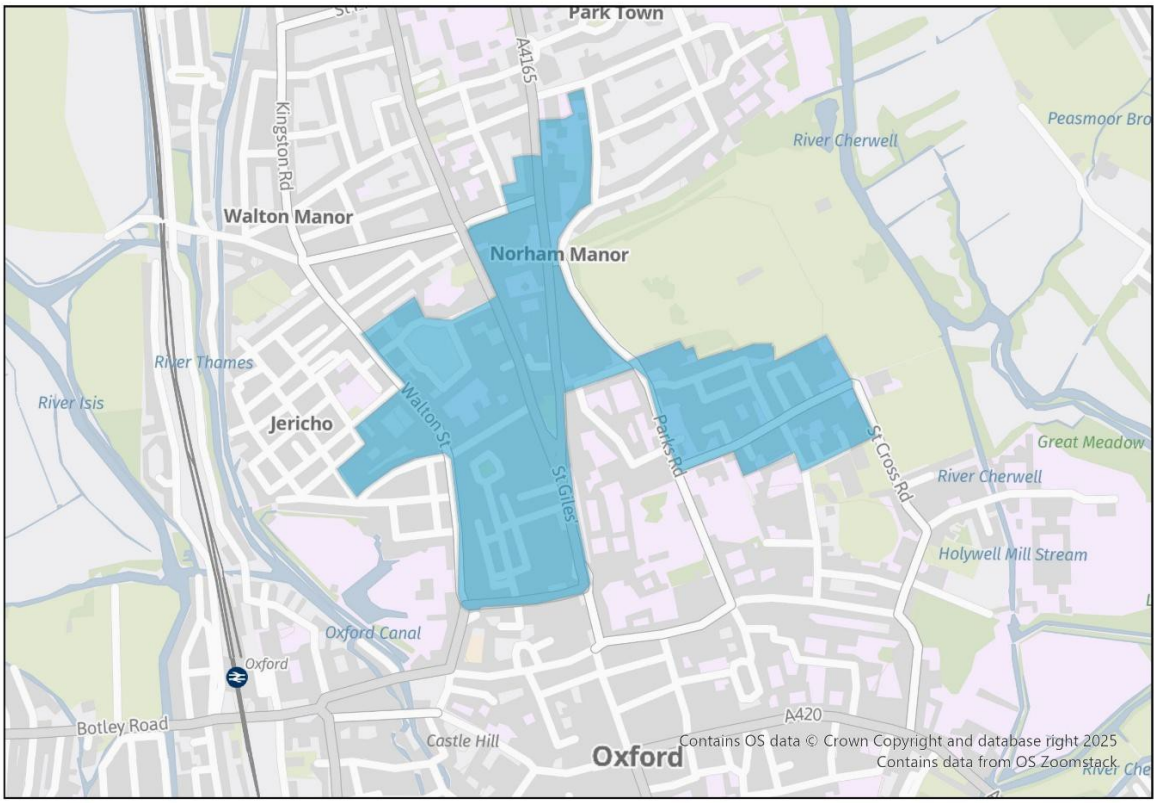
This area contains a wide variety of buildings and uses. It is a key area of public transport provision for rail and bus, and includes the Oxford railway station, Gloucester Green coach station and Seacourt Park & Ride. It contains most of the Oxford colleges and most of the faculties of the University of Oxford. In addition, it is the retail heart of the region and contains venues that attract people from a wide area, including cinemas, theatres, live music venues and the ice rink. The large numbers of people visiting together with those interchanging on public transport can create congestion and conflict in the public realm. High quality, thoughtfully designed public realm is key to the success of the area.

Some parts of the area are at high flood risk and so may be unsuitable for residential development. Flood mitigation measures, including new areas of flood storage and SuDS, integrated into green infrastructure enhancements, are likely to be necessary in the southern and western parts of the area.

Key considerations for infrastructure and design across the area are:

- Create high-density urban living with good provision and access to public open space
- Maintain a vibrant mix of uses
- Contribute to the knowledge economy
- Integrate flood risk mitigations into the public realm and green infrastructure
- Provide bridge suitable for walking, cycling and wheeling over the Thames to Oxpens
- Enhance accessibility and permeability of the area through good walking, cycling and wheeling links and enhanced public realm
- Support the redevelopment of Oxford railway station to create an easy and attractive transport interchange between rail, bus and active travel.

UNIVERSITY AREAS NORTH OF THE CITY CENTRE AREA OF FOCUS



University faculties and colleges dominate the area, with two large University of Oxford sites, the Radcliffe Observatory Quarter and the Science Area. These sites, and the area generally, is subject to continuous change. Many individual buildings are of high quality, as are the green spaces just outside the area (particularly University Parks) A particular challenge in this area is that large areas of university use can obscure routes for other users. They create spaces that do not appear public, even though they are, for example because of small areas of private parking and routes that can be dominated by servicing features at the back of buildings such as the large vents and tanks that serve lab spaces. Development in the area presents many opportunities to improve connectivity, landscaping and coherence between buildings and public space, making the area more welcoming.

Large buildings don't always interface well with the street or each other, but can appear as unrelated blocks. The ROQ site, having benefited from a masterplanned approach, represents an evolving modern institutional campus with a range of well-designed high-quality new buildings that relate well to each other and their surroundings. Whereas the land to the north of Keble Road is more of a patchwork of mid-to-late 20th century buildings from around the 1960s onwards, some of which lack the quality of their modern counterparts, located only a street or so away.

Busy roads running north-south sever the area, meaning that east west connections can be difficult. Redevelopments can offer opportunities to improve east-west connections for walkers, cyclists and wheelers. Walk, cycle and wheel improvements are essential to the success of the area to improve connectivity and permeability.

Apart from some tree-lined streets, there is a limited amount of green infrastructure. The area is framed by rivers, with the Thames to the west and Cherwell to the east, even so it is at very limited flood risk.

Heritage assets in the area include significant potential for archaeological interest, from late Neolithic-early Bronze Age onwards. The area around Beaumont Street and St John Street contains the site of a 12th Century Royal Palace and later Carmelite Friary, and the projected line of the Royalist Civil War defences also cross through this area. The area is located within three conservation areas- the Central (City and University) Conservation Area, Jericho Conservation Area and North Oxford Victorian Suburb Conservation Area. There are also many listed buildings within the area, notably the Ashmolean Museum and Taylor Institute (Grade I); Church of St Giles (Grade I); and the University Museum and Pitt Rivers Museum (Grade I).

POLICY NCCAOF: UNIVERSITY AREAS NORTH OF THE CITY CENTRE AREA OF FOCUS

Planning permission will be granted for new development within this Area of Focus where it would ensure that opportunities are taken to deliver the following (where applicable):

Greater public accessibility and perception of public accessibility through and within the area

a) community and public uses of institutional buildings where possible, especially at ground floor level e.g. cafes and exhibition spaces;
b) improved demarcation and legibility of public routes through the area, using urban design and wayfinding;
c) provision of new publicly accessible routes, particularly running east-west;
d) better integration of servicing infrastructure into the built form so that it does not dominate public spaces and routes or make them look like private servicing areas.

High quality design that responds to heritage assets as well as the area's vital academic role

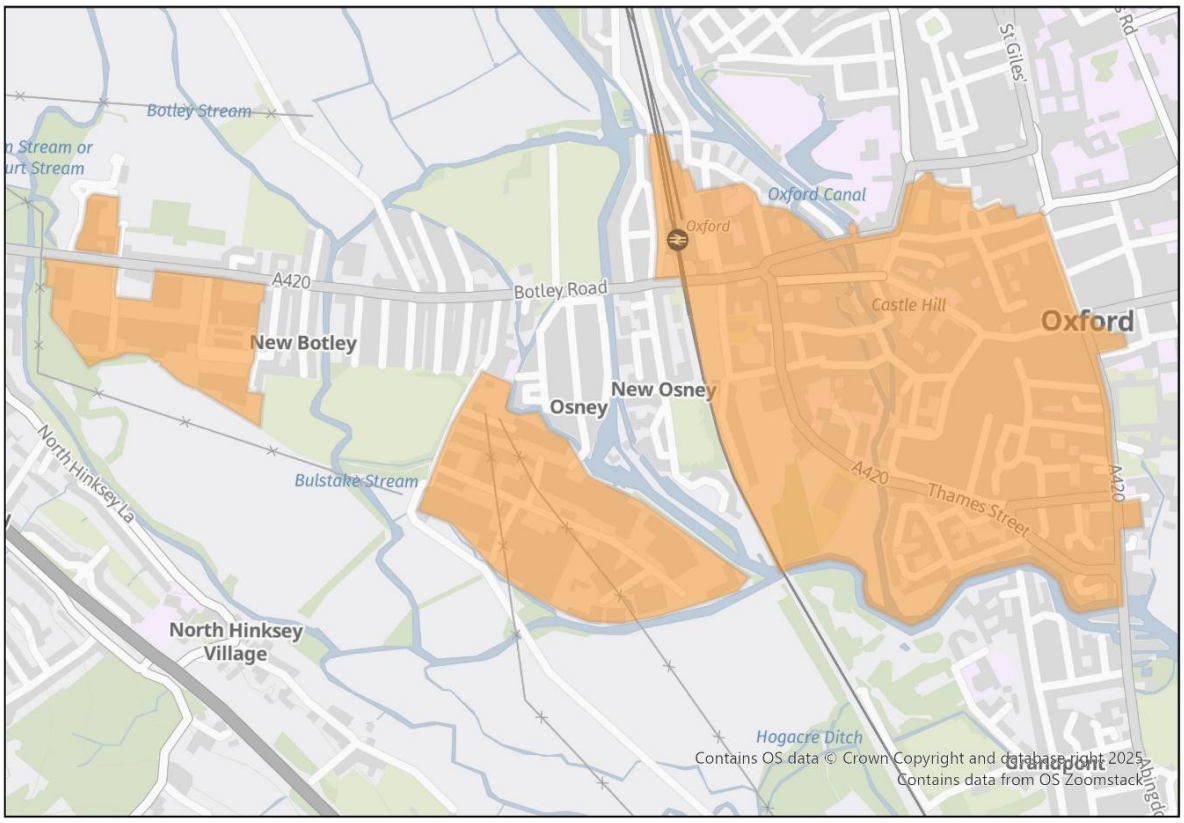
e) building heights and roofscapes that are appropriate for their setting and that do not negatively impact on historic skylines, roofscapes or key views, particularly from University Parks, to and from the Cherwell Valley and to and from the historic towers and spires of the city centre;
f) creation of a strong and well-defined building line along the streets;
g) a design that balances the existing historic buildings onsite coupled with the celebration of cutting-edge science and research.

Environmental improvements to benefit biodiversity and the community and future occupiers

h) enhanced landscaping, including tree planting and enhanced biodiversity and green corridors and SuDs;
i) mitigation of potential negative air quality impacts that arise during the construction and operational phases;
j) no adverse impact on the New Marston Meadows SSSI (part of the area is in proximity to the SSSI).

WEST END AND BOTLEY ROAD AREA OF FOCUS

The West End and Botley Road Area of Focus covers three distinct areas along the western corridor into the city centre: the West End, Osney Mead and Botley Retail Park.



Oxford's West End

Oxford's West End is located in the south-west corner of the city centre and includes Oxford Railway Station. The process of transforming this under-performing area has been ongoing for a number of years with large projects such as the Westgate Centre already delivered. There is further potential for the West End to become a vibrant city quarter through the successful development of a number of other key sites in the area.

Public/ civic spaces in the West End are in short supply. While existing spaces are well-used, the limited amount of them restricts the ability of residents and visitors to stay longer in the area. Opportunities therefore exist to create new publicly accessible spaces within the West End that incorporate appropriate green infrastructure.

The walking and wheeling experience of the West End is not always positive, with conflict between different roads users occurring in a range of ways. Some roads are dominated by vehicular movement with a lack of human scale and poor crossing opportunities for walkers and wheelers. There are also some links and footpaths that are narrow and poor-quality, for instance, parts of the towpath that will link Osney Mead and the West End (via the Oxpens River Bridge) are narrow, in poor condition and prone to flooding. Walk, cycle and wheel improvements are essential to the success of the area to improve connectivity and permeability, to other parts of the city and to destinations in neighbouring districts.

The West End has been developed and redeveloped numerous times through history and area as a whole has significant heritage value, being largely within the Historic Core Area, and parts being within the Central Conservation Area and the Osney Town Conservation Area. This provides an opportunity for well-designed high-quality buildings, public realm and streets that reflect and are well-related to, the historic core, the watercourses, and views into

and out from the area. Care therefore needs to be taken to ensure that the city's unique character and setting is not lost or harmed through redevelopment and regeneration of the area.

As such, the heights of new buildings will be an important consideration in this Area of Focus and there is likely to be a degree of tension in delivering development that protects and enhances Oxford's iconic dreaming spires and the ambitions of delivering certain development types. Wherever high buildings are proposed (over 15 metres), they should be accompanied by a visual impact assessment which clearly shows how the proposal relates to Oxford's historic skyline and will need to have regard to the High Buildings TAN.

Throughout the West End there are opportunities to enhance or improve the area where poorly integrated incremental development and large blocks with little relationship to the street detract from the heritage quality and experience of walkers and wheelers.

The transformation of Oxford Station is fundamental, not just to improve user experience, but to facilitate additional capacity to help deliver East West Rail and the re-opening of the Cowley Branch Line to passenger services. The delivery of these projects would connect people and businesses both locally and more widely across the Oxford-Cambridge Growth Corridor. Collectively, they would open up new journeys, reduce travel times, ease congestion on local roads and would bring more jobs within the reach of local people.

Osney Mead

Osney Mead sits outside the city's historic core, however given the close proximity to Oxford's dreaming spires, some similarities exist including the relationship between the historic views of the city's iconic skyline and the potential conflict with the scale of redevelopment ambitions in this area.

Osney Mead is a centrally located Key Employment Site. It is accessibly located close to the Oxford Railway Station, however there is a need for improvements to walking, cycling and wheeling connections into the wider area. It is important that this site maintains its role in creating a diverse employment base as it makes an important contribution to Oxford's employment land supply. However, changes to how space is used, the type of jobs provided and wider technologies mean that the employment function could be provided in a reduced area and an enhanced environment.

A transformation of Osney Mead has the potential to be delivered within the plan period. Planned infrastructure improvements including a bridge suitable for walkers, cyclists and wheelers ("the Oxpens River Bridge") to link Osney Mead directly to the West End via the Oxpens site are programmed to be delivered within the early part of the plan period which would provide better accessibility from Osney Mead and help create a natural extension of the city centre into this location.

West End and Osney Mead SPD

The West End and Osney Mead Supplementary Planning Document (SPD) is an area-based SPD, produced to support the delivery of sites in this part of the city centre. The SPD provides guidance about infrastructure interventions including green and blue infrastructure, public realm and walking, cycling and wheeling improvements that would enhance and improve the area. Infrastructure improvements should be made in line with the SPD.

Botley Road Retail Park

Botley Road Retail Park is a large 1980s-style retail park at the western edge of the city, featuring a variety of large single storey retail stores with associated surface-level car parking. The retail park is located adjacent to a residential area. The fields to the south form an important part of the historic landscape setting of the city, and the site is adjacent to the historic City and Liberty Boundary.

In recent years, the Botley Road Retail Park has been undergoing a transition towards a modern urban science district. Flexible lab-enabled, research and development (R&D) floorspace is being delivered to support growth in key sectors such as life sciences and the knowledge economy, including AI that support Oxford's key strengths.

Redevelopment at the Botley Road Retail Park has the potential to impact views into and out of the city. As such, the Botley Road Retail Park Design Brief TAN was produced and should be consulted in relation to design principles, building heights and the assessment of views alongside the High Buildings TAN.

Osney Mead and Botley Road Retail Park are both at risk from flooding.
Both these sites contain land within flood zones 3a and 3b and are surrounded by land in flood zone 3. This level of flood risk would have significant implications for the type and nature of development permissible at each site, and also where it can be located.

A comprehensive flood risk management strategy will need to be developed to ensure that uses here are delivered in a way which enables safe access and egress in times of flood. A Strategic Flood Risk Assessment Level 2 has been carried out.

POLICY WEBRAOF: WEST END AND BOTLEY ROAD AREA OF FOCUS

Planning permission will be granted for new development within this Area of Focus where it would ensure that opportunities are taken to deliver the following (where applicable):

Open space and nature

a) Enhanced landscaping, including tree planting, enhanced biodiversity, green corridors, including to connect to the green spaces beyond the area, and integration of flood risk management and green spaces, including through SuDS.
b) Enhanced provision of public spaces, including pocket parks and other civic spaces.
c) Enhanced public frontage alongside the river and canal.

Urban design and heritage

d) Positive contributions and enhancements to the character and setting of conservation areas and other heritage assets.
e) Good quality urban design and place making including appropriate building heights for their setting that do not negatively impact on key views or historic skylines.
f) Development opportunities at the Botley Road Retail Park in line with the guidance set out in the Botley Road Retail Park Development Brief TAN.
g) Integration of servicing and plant infrastructure into the built form.

Movement and access

h) Optimised connectivity and permeability for people wishing to walk, cycle or wheel in the area to other parts of the city. Walking, cycling and wheeling infrastructure improvements must be delivered in accordance with the requirements of the Oxford Local Cycling and Walking Infrastructure Plan.
i) A reduction in car parking across the area.
j) Improved demarcation and legibility of public routes through the area into the city centre, using urban design and wayfinding;

Infrastructure

k) The redevelopment of Oxford Station to deliver a strong sense of arrival to Oxford and an improved environment for passengers aligning with the principles and priorities outlined in OxRail 2040: Plan for Rail.
l) Enhancements to Frideswide Square to facilitate the creation of a western gateway;
m) Mitigation of potential negative air quality impacts that arise during the construction and operational phases
n) Public realm improvements undertaken in line with the infrastructure interventions set out in the West End and Osney Mead SPD.

Banbury Road University Sites – Parcel B

Site area	1.26 ha
Ward	Walton Manor
Landowner	University of Oxford and Hertford College
Current Use(s)	Academic and student accommodation
Flood zone	Flood Zone 1
Notable heritage assets	Within the North Oxford Victorian Suburb Conservation Area; Site includes Grade II listed 59 Banbury Road. . Many other Grade II listed

	buildings within the vicinity of the site, notably across Banbury Road including Wycliffe Hall, Wykeham House, 60 and 62 Banbury Road, and Gees' Restaurant located immediately adjacent to the north of the site on Banbury Road. Archaeological potential onsite includes prehistoric and Roman remains.
Notable ecological features	Surveys undertaken for recent planning application identified numerous bat roosts on part of the site bounded by Bevington Road. Proposed mitigation may need to ensure roosting opportunities remain post-development. Numerous mature trees, both within the site and alongside the perimeter fronting onto the three highways. One of these (in front of 10 Winchester Road) is protected by a Tree Preservation Order, whilst the others (of a certain size) benefit from conservation area protection. Within the impact risk zone of New Marston Meadows SSSI. The site is within an area identified as having potential hydrological connectivity with the Oxford Meadows SAC.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPCW1: Banbury Road University Sites – Parcel B

Planning permission will be granted for academic institutional uses, student accommodation, and/or residential development. The minimum number of dwellings is 54 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant, through the use of appropriate measures including SuDS (**Policy G6**).

c) Development proposals involving subterranean development must include a hydrogeological investigation which must demonstrate that likely significant effects on groundwater flow have been avoided, or mitigated where relevant (**Policy G6**).

d) Proposals should seek to retain existing features where possible, particularly higher quality elements like large mature trees and boundary features that help preserve amenity.

e) In order to retain the existing Urban Greening Factor score, any losses in green features should be compensated for either through enhancement of lower quality areas with a greater variation in planting and new habitat, such as within and around the boundaries of new gardens, as well as additional planting such as new trees that can enhance canopy cover and the setting of the listed buildings and conservation area.

f) The potential presence of priority species/habitats on the site should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly. Proposals should also consider impacts on the surrounding areas, particularly, the nearby designated sites such as New Marston SSSI (**Policy G6**).

Urban design & heritage

g) Proposals should be informed by an appropriate assessment and strategy that responds to the designated heritage assets on the site or close by. In particular, proposals should be designed in a way that preserves and enhances the significance of the listed buildings (including their setting); as well as the broader landscape including the North Oxford Victorian Suburb Conservation Area. This could be done in various ways, including selecting materials that take inspiration from within the conservation area or the existing listed buildings on and near to the site; ensuring new buildings located close to designated assets are positioned sensitively and buffered through use of green features (**Policy HD3**).

h) There is also the potential presence of archaeological assets on the site including prehistoric and Roman remains. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).

Movement & access

i) Opportunities should be taken to consolidate car parking and reduce the car-dominated character within the site. Proposals that can prioritise other forms of travel, such as walking, cycling and wheeling, will be strongly supported. This could include incorporating additional linkages through the site from north/south for walkers and wheelers.

Additional requirements

j) Design measures may be necessary to mitigate negative amenity impacts such as those arising from noise pollutants as this site is part of an area which is subject to significant environmental noise from the traffic on Banbury Road and Winchester Road.

k) Proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel

Site area	Total of 0.84ha (all sites) Consists of the following three sites: - 3-15 Botley Road and The River Hotel – 0.34ha - Land to the South of Cripley Place – 0.31ha - Westgate Hotel, Botley Road and 3 - 7 Mill Street – 0.19h
Ward	Osney and St Thomas
Landowner	Christ Church
Current Use(s)	613 - Mixed uses including River Hotel with associated car park, residential dwellings (5-15 Botley Road) and retail - Use Class E (3 Botley Road). 614 – To the south of Cripley Place, currently in residential use. 615 – Westgate Hotel and 3-7 Mill Street, currently in use as a hotel and residential.
Flood zone	Flood Zone 3a
Notable heritage assets	All three sites are within the Historic Core Area and within view cone(s) (e.g., Boar's Hill). All three sites are located within the City Centre Archaeological Area. Part of the site lies adjacent tothe Osney Town Conservation Area. Part of the allocation is included on the Oxford Heritage Asset Register (OHAR) - River Hotel and Westgate Hotel. There are several OHAR assets in the immediate vicinity of the sites, including the River Thames and Towpath and No. 2 Botley Road. The three sites are located close to a section of the Botley causeway as such there is some archaeological potential for localised remains.
Notable ecological features	In close proximity to parts of the core green infrastructure network (Osney St Thomas Allotments). There are mature trees within the site, including two within parcel 614 which are the subject of Tree Protection Orders (TPOs). The entire site is within Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPCW2: Botley Road Sites around Cripley Road including

River Hotel and Westgate Hotel

Planning permission will be granted for a residential-led development. The minimum number of dwellings to be delivered across the three sites is 20.

Other suitable uses for the site could include:

- Hotel accommodation;
- Replacement retail (Use Class E)

Development proposals involving hotel accommodation should be in accordance with **Policy E5**.

Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) A sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk. A site-specific Flood Risk Assessment (FRA) is required and should consider onsite routes and any infrastructure required to reach the access route. Areas of flood risk surround the site to the east, with no completely flood free egress options and part of the access/egress route from the site over land with high flood risk. Given there is no advance flood warning provision for the site, the potential for evacuation before a more extreme fluvial or pluvial flood, considering the effects of climate change for the lifetime of the development, needs to be considered by an FRA, with advice sought from the emergency services and the local authority's emergency planner. Flood warnings will be essential for safe access and egress to the sites, ideally ensuring that the route identified can be utilised before the onset of flooding. Areas of high surface water flood risk are also present along both access routes, therefore the FRA should consider in more detail the nature of the flood risk to determine how quickly it occurs and the degree of hazard. The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited. A geotechnical investigation should be undertaken at this site to obtain further information relating to infiltration rates to confirm whether infiltration could be viable in some areas (**Policy G7** and **Policy G8**).

b) The whole site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity.
Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

c) Development proposals should seek to retain the mature trees adjacent to the river. A 10-metre watercourse buffer should be maintained or reinstated where possible.

d) Appropriate ecological surveys should be undertaken to ensure that development proposals do not have an adverse impact on protected species. A lighting strategy may also be required given the proximity to the River Thames which could provide a foraging habitat for bats.

Urban design & heritage

e) Development proposals should be designed with consideration of their impacts on the setting of the Osney Town Conservation Area **(Policy HD3)**.

f) The Boar's Hill view cone covers the entire site allocation. Proposals should be designed in a way that responds to this protected view (**Policy HD6**).

g) Development should be based upon a clear understanding of the significance of the site and its surrounding context. The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.

h) Development proposals that exceed the height stated in the High Buildings TAN may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed as listed in **Policy HD6**.

i) Materials and construction details used for new development schemes should be of high quality, appropriate for the setting and sympathetic to the local context.

j) There is also some potential for archaeological remains on the site relating to the Botley Causeway. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).

Movement & access

k) The most appropriate vehicular access would be to continue use of Botley Road. Applicants will be expected to demonstrate how the development enables access by alternative means of transport including improving connectivity to support walking, cycling and wheeling.

Canalside Land, Jericho

Site area	0.49ha
Ward	Carfax and Jericho
Landowner	Cheer Team, Canal and River Trust, Oxford City Council, The Church of England
Current Use(s)	Boat hire facility, open space and derelict workshops

Flood zone	Flood Zone 3b
Notable heritage assets	Lies within the Jericho Conservation Area and is adjacent to both the Grade I listed St Barnabus Church and Registered Park and Garden (Worcester College, Grade II*)
Notable ecological features	The site is adjacent to the Oxford Canal, an Oxford City Wildlife Site. All of the site is within a Local Nature Recovery Site (LNRS) Within 600m of Port Meadows SSSI (part of the Oxford Meadows SAC)
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

POLICY SPCW3: Canalside Land, Jericho

Planning permission will be granted for a mixed-use development at the Canalside Land site that includes the following:

- Residential dwellings;
- A community centre to replace the existing Jericho Community Centre on Canal Street;
- Public open space;
- Replacement operating boatyard;
- Electric charging points for mooring boats;

Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Planting that enhances the waterside and promotes connections between it and the wider area is encouraged, as well as habitat features that can support the foraging and shelter of wildlife of the adjacent ecological designated sites.

b) The site contains significant existing trees including a false acacia and silver birch in the public open space north of the church and an ash tree in the church grounds next to Cardigan Street. There is also a row of important trees adjacent to the site along the western side of the canal towpath. These trees are collectively important to public amenity in the area and provide valuable ecosystem services, they should be retained where possible.

c) Development proposals should be accompanied by an assessment of potential recreational pressure on the immediate setting including the canal towpath and the Oxford Meadows SAC that may arise from increased numbers of visitors, along with plans to mitigate this impact, as necessary.

d) Development proposals should be accompanied by ecological and lighting assessments of the potential impact on ecology and protected species on site and adjacent canal and Castle Mill Stream, along with plans to mitigate this impact as necessary. This is because the canal is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination as a result of the proposed development.

e) All of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they've explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further detail.

f) Planning applications should be accompanied by a site specific Flood Risk Assessment (FRA) and development should incorporate any mitigation measures. The FRA should look at options for early warning. Areas of flood risk surround the site to the east so a site-specific FRA should consider the evacuation requirements

before the design event and a more extreme fluvial or pluvial event taking account of the site layout and advice to be sought from the emergency services, including the local authority's emergency planner.

g) The majority of the site is located within Flood Zone 2 with areas of Flood Zone 3 located along the boundary with the tow path and extending into the central parcel of the site adjacent to the church. A sequential approach should be taken to locating development on the site, with development prioritised first within Flood Zone 1 prior to consideration of any siting within Flood Zone 2 or 3a. Part of this site is also at significant risk from surface water flooding, therefore a site-specific FRA should also consider the nature of the surface water flood risk in more detail to determine how quickly it occurs and the degree of hazard on site. A drainage strategy will be required to manage run-off arising from the development and ensure that surface water flood risk on and off the site is not increased **(Policy G7).**

Urban design & heritage

h) The design should respect the waterfront heritage of the site, the conservation area and conserve or enhance the significance of the Grade I listed St Barnabas Church in compliance with (**Policy HD3)**.

i) An area of public open space should be created to support the community and boatyard uses and open up views of St Barnabas Church from the canal. If necessary, the wall separating the church and any proposed open space could be demolished, however, as the wall is curtilage listed and as it relates to an active place of worship, separate Faculty approval would be required from the Diocese. Listed building consent would not be required for such demolition.

j) The location, size and design of the public open space should consider the potential to facilitate community events (e.g. street markets), as well as, land a bridge crossing and endeavour to avoid fettering any future opportunities to provide a bridge crossing.

k) Proposals should consider the adjacent Registered Park and Garden (Worcester College, Grade II*) in compliance with (**Policy HD3)**.

Movement & access

l) Development proposals should deliver improvements to the connections into and around the site, specifically over the canal and towards Oxford City Centre along the towpath. This could also be secured via financial contribution(s) where viable.

m) Applicants will be expected to demonstrate how the development enables access by alternative means of transport including improving connectivity to support active travel such as walking, cycling and wheeling.

Additional requirements

n) As the site contains a historic boatyard, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

o) Due to potential impacts of noise and other pollutants from an on-site boatyard, development proposals will need to demonstrate how layout of buildings and public spaces has been approached so as to minimise amenity impacts for users, including locating these away from these key pollution sources. This should also be informed by an acoustic design assessment that addresses the potential for significant environmental noise from these transport corridors. The on-site boatyard may need some sealed storage areas if fuels, paints and chemicals are

being used (**Policy R4 and R8**).

p) The existing Jericho Community Centre on Canal Street has been identified as being in a state of poor repair and failing to achieve modern accessibility standards. Development proposals should include provision for a replacement community centre, the size and scale of which should be justified through the submission of a Community Needs Assessment and sustainable business plan to accompany future planning applications.

Faculty of Music

Site area	0.33 ha
Ward	Holywell
Landowner	Christ Church / University of Oxford
Current Use(s)	Academic institutional
Flood zone	Flood Zone 2
Notable heritage assets	Within the Central (University and City) Conservation Area; several Grade I and Grade II listed buildings in close vicinity, particularly towards the north of the site on St Aldate's. The Grade II listed Christ Church Footbridge and flanking walls in the Memorial Garden and Screen all lie immediately adjacent to the north of the site, with part of Christ Church Meadow; a Grade I Registered Park and Garden just beyond. Archaeological potential onsite includes Middle-Late Saxon Archaeology (adjacent to possible causeway).
Notable ecological features	N/A
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPCW4: Faculty of Music

Planning permission will be granted for academic uses, residential development (potentially including employer-linked housing if academic institutional uses remain on the site) and/or student accommodation on the site. The minimum number of dwellings to be delivered on the site is 23 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Proposals should seek to retain existing features where possible, such as the large mature trees fronting onto St Aldate's which contribute amenity benefits.

b) Opportunities should be taken to protect and enhance the watercourse adjoining the site and a 10m buffer should be retained between the edge of the watercourse and the built development (**Policy G2**).

c) In order to retain and where necessary increase the existing Urban Greening Factor score, any losses in green features within the site should be compensated through enhancement of lower quality areas with a greater variation in planting and new habitat within the site.

Urban design & heritage

d) Proposals should be informed by an appropriate assessment and strategy that responds to the designated heritage assets in close proximity to the site. In particular, proposals should be designed in a way that preserves and enhances the significance of the adjacently sited designated heritage assets (including their setting); as well as the broader landscape including the Central (University and City) Conservation Area. This could be done in various ways, including selecting materials that take inspiration from within the conservation area or the existing listed buildings near to the site; ensuring new development located close to designated assets are positioned sensitively and buffered through use of green features (**Policy HD3**).

e) Proposals should reflect the materials of the existing development. They should be designed in a way that is sensitive to the Central (University and City) Conservation Area of which it lies within, particularly regarding heights, massing, roofscape and local character and street scene (**Policy HD6**).

f) There is also the potential presence of archaeological assets on the site including middle-late Saxon archaeology remains. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).

Movement & access

g) Opportunities should be taken to reduce the level of car parking along Floyds Row.

h) Circulation within the site should continue to prioritise walking, cycling and wheeling.

i) New residential development should be car free.

j) The principal access should remain in the same location, although opportunities to increase permeability for walkers, cyclists and wheelers should be considered.

Jowett Walk (South)

Site area	0.21 ha
Ward	Holywell
Landowner	Merton College
Current Use(s)	Site currently a house, gardens and car park.
Flood zone	Flood Zone 1
Notable heritage assets	Within the Central (University and City) Conservation Area and within the Historic Core Area and the City Centre Archaeological Area. Opposite the Grade II listed School of Geography, and adjacent to buildings fronting Holywell Street, most of which are listed.
Notable ecological features	Green infrastructure on the site including mature trees. Within the impact risk zone of the New Marston Meadows SSSI.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPCW5: Jowett Walk

Planning permission will be granted for residential development or student accommodation on this site. The minimum number of dwellings to be delivered is 14 (net gain) (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) Development proposals should retain and enhance existing trees and vegetation on site, and take opportunities to strengthen biodiversity corridors and habitat linkages.

c) There is potential for swifts and bats on site; development proposals should take opportunities to improve wildlife linkages or habitat continuity across the site and with neighbouring areas.

Urban design & heritage

d) Development should be sensitively designed to respect the site's location within the Central Conservation Area, demonstrating high-quality architectural design that reinforces the historic and collegiate character of the surroundings, including listed buildings **(Policy HD3)**.

e) The site is within the City Centre Archaeology Aea and there is a high potential for medieval archaeology (as demonstrated by 1990s excavation directly to the east). Any proposals would be likely to require assessment and evaluation **(Policy HD5)**.

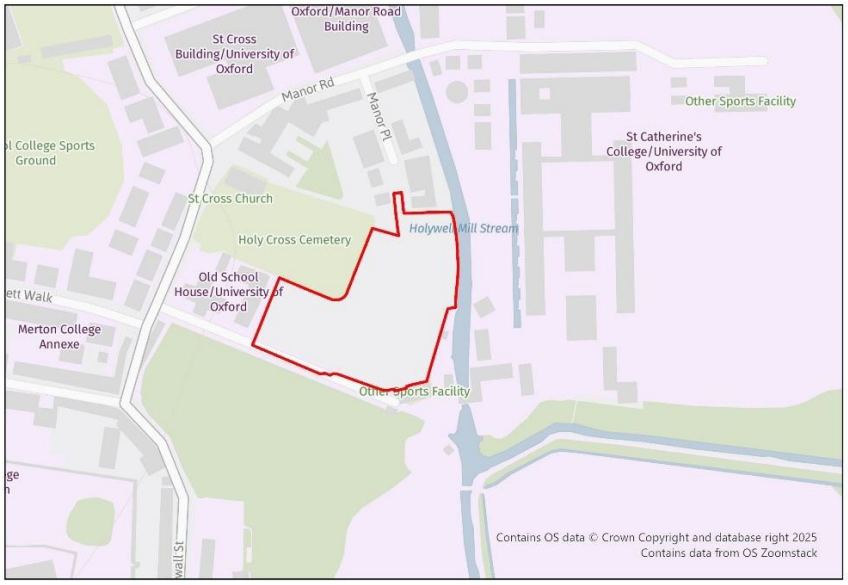
Movement & access

f) Opportunities should be taken to improve permeability for walkers, cyclists and wheelers, providing direct links to existing footpaths, cycle networks, and adjoining recreation ground.

g) Because the site is in a highly sustainable location it is expected that any development will be low car i.e. no parking provision allocated onsite for occupiers of the development.

h) Any re-development of this site would be likely to require a site investigation and contamination risk assessment.

Manor Place



Site area	1.24ha
Ward	Holywell
Landowner	Merton College
Current Use(s)	Former tennis courts/allotments/orchards
Flood zone	Flood Zone 3a
Notable heritage assets	Site is entirely within the Central (University & City) Conservation Area. It also lies within the Historic Core Area and City Centre Archaeological Area. It is adjacent to multiple Grade I, II, and II* listed

	buildings. The site lies within the setting of 15th c Magdalen Precinct wall, and GD I &II. St Catherine's College (and affiliated buildings) St Cross Building, 10 Cross Road. It is adjacent to Magdalen College Grade I Registered Park and Garden. The site is in line with the Elsfield, Doris Field and Headington Hill Allotments view cones but may also appear in others as it is located in the Historical Core Area. Archaeological information submitted with the latest planning application suggests the site contains the likely line of the Civil War outer Defences. The site contains the line of Royalist defences that should be preserved in situ.
Notable ecological features	Site is in within the impact risk zone of New Marston Meadows SSSI. Site is adjacent to Magdalen Grove geological SSSI. The area is characterised by hedged boundaries and several mature/semi mature trees established on the site, particularly at the northern and southern corners. The site itself contains various types of natural ground cover including grass, scrub and scattered trees. These contribute to the green, semi-rural character of the setting of the site which includes Holywell Cemetery, St Cross Annex and the Magdalen College Deer Park and likely have high biodiversity value. The site contains Section 41 (Priority/ Principal) habitats that fall within the LPA.
Urban Greening Factor score	The site is likely to score above the Urban Greening Factor target.

Policy SPCW6: Manor Place

Planning permission will be granted for student accommodation or car free residential development or a mix of both uses. The minimum number of dwellings to be delivered on the site is 43 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (**Policy G6**).

b) As the site is adjacent to Magdalen Grove SSSI a buffer zone will be required during construction phase to ensure the SSSI land is not disturbed.

c) Part of the site is located within Flood Zone 3a and Flood Zone 2, and a sequential approach should be taken to locating development on the site, with development prioritised first within Flood Zone 1 prior to consideration of any siting within Flood Zone 2 or 3a. A site-specific Flood Risk Assessment (FRA) will be required and should consider onsite routes and any infrastructure required to reach the access route. Access/egress from the site is over land in low flood risk, however the FRA should consider the evacuation requirements before the design event and a more extreme fluvial event. Early flood warning will be vital to ensure the access route can be utilised before floodwater inundates the northeastern part of the site, given the site's proximity to the River Cherwell (**Policy G7**).

d) The drainage strategy should be designed to manage runoff arising from the

development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G8**).

e) The hedged boundaries are an important characteristic of the area and should be retained, as should the mature trees and areas of trees in the northern and southern corners, helping retain the green, semi-rural character of the setting.

Urban design & heritage

f) Development should seek to preserve the special character of the conservation area within which it lies **(Policy HD3).** The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.

g) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**), preserving the Royalist Civil War rampart and ditch line in situ.

h) Materials and construction details used for new development schemes should be of high quality, appropriate for the setting and sympathetic to the local context.

Movement & access

i) The most appropriate vehicular access would be to widen and extend the existing walk, cycle and wheel access from Manor Place to the north of the site, incorporating land in Merton College's ownership.

j) Vehicular access should be minimised by low-car residential development or student accommodation.

k) Access via Holywell Mill Lane to the south is unlikely to be deliverable as it is not under the control of Merton College and the visibility at the junction with St Cross Road is substandard.

l) Applicants will be expected to demonstrate how the development enables access by alternative means of transport including improving connectivity to support walking, cycling and wheeling.

Nuffield sites (Island Site/ Worcester St Car Park and Pub/ Land South of Frideswide Square)

Site area	Total of 1.42ha (all sites) Consists of the following three sites: Island Site - 0.65ha Worcester St Car Park and Public House - 0.51ha Land South of Frideswide Square - 0.26ha
Ward	Osney & St Thomas and Carfax & Jericho
Landowner	Nuffield College
Current Use(s)	Mix of uses across the three sites including hotel, employment, ground floor retail, cafes, and surface level car park.
Flood zone	Island site: • Flood Zone 3b Worcester St Car Park and Public House: • Flood Zone 3a Land South of Frideswide Square: • Flood Zone 2
Notable heritage assets	Central (City and University) - Island site (070) adjacent to boundary. Worcester St Car Park (081) and Land South of Frideswide Square (624) are within the Central (City and University) Conservation Area. The Island site is adjacent to the boundary. All three sites are located within the Historic Core Area and within several view cones (e.g., Raleigh Park and Boar's Hill) Island site: • Close proximity to Grade II Listed Coopers Marmalade Factory • Close proximity to Scheduled Ancient Monument: Oxford Castle and earlier settlement remains (including Castle motte/ mound • Close proximity to Rewley Abbey Scheduled Ancient Monument – predominantly below ground. Upstanding remains exist along Beesley Lane. • Includes Local Heritage Assets on the OHAR: Former Hartwells Garage and Royal Oxford Hotel Worcester St Car Park, in close proximity to: • Grade I Well House, Oxford Castle • Grade II Listed Nuffield College • Grade II Listed Boundary Wall on Worcester College • Scheduled Ancient Monument: Oxford Castle and earlier settlement remains (including Castle motte/ mound) • Grade II* Worcester College Registered Park and Garden Land South of Frideswide Square: • Close proximity to Grade II Listed Coopers Marmalade Factory, (frontage)- also near Island Site (070) • Close proximity to Grade II Listed St Thomas Vicarage (to the rear) • Close proximity to Grade II Listed Church of St Thomas the

	Martyr (Becket St) • Contains Local Heritage Assets on the OHAR: former Castle Hotel, Park End St All three sites lie within the locally designated, City Centre Archaeological area. The sites are of archaeological interest with fragments of industrial archaeology having been excavated previously.
Notable ecological features	Parts of the site is identified in the Local Nature Recovery Strategy (LNRS). There are mature trees along the northern edge of the Castle Mill Stream (within the Worcester St Car Park site), and to the rear of the Land to the South of Fridiswide Square, which are protected (TPO) due to their location within the Central (City and University) Conservation Area.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPCW7 – Nuffield Sites

Planning permission will be granted for a mix of uses across the three sites that delivers residential and/or student accommodation, employment uses, and appropriate other uses including retail, cafés/restaurants and other uses that support the evening economy. A minimum number of 59 dwellings (net gain) (or if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied).

Development proposals across the three sites should be brought forward in accordance with a masterplan-led approach that sets out the anticipated development phases in which the sites will be brought forward. Where a phased delivery strategy is proposed, it should include the location and phase that will bring forward the residential development and ensure the minimum number of dwellings can be delivered in full.

Development proposals should have regard to the principles set out in the West End and Osney Mead SPD. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals should take opportunities to enhance biodiversity along the waterfront. Such measures could include bank restoration measures at the western bank of the Wareham Stream. Improvements to habitat connectivity across the three sites will be sought. Appropriate tree-planting should be provided and the incorporation of green roofs/ walls should be considered to support biodiversity.

b) Opportunities should be taken to improve access to Castle Mill Stream from the Worcester St Car Park site.

c) Parts of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

d) Appropriate ecological surveys should be undertaken to ensure that development proposals do not have an adverse impact on protected species (e.g. bats/ breeding birds). A lighting strategy may also be required given the proximity to the Wareham and Castle Mill Streams, both of which could provide a foraging habitat for bats.

e) A site-specific Flood Risk Assessment (FRA) will be required, and a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding. A site-specific FRA should consider onsite routes and any infrastructure required to reach the access route. Access/egress from the site is over land in low flood risk, however the FRA should consider the evacuation requirements before the design event and a more extreme fluvial event, particularly given that there is no advance flood warning provision for the site. The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G7** and **Policy G8)**.

Urban design & heritage

f) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Applications must be supported by a full assessment so that the full impacts can be understood and assessed.

g) Prior to undertaking any landscape or visual assessment work, the key views should be discussed and agreed in advance in writing with the City Council. Special attention will need to be paid to views from the Castle Motte to avoid harm to the setting of Oxford Castle.

h) Development proposals should show how the design of the scheme has been influenced by and has considered the city's heritage. Proposals should demonstrate how the existing designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach.

i) Ground floor uses that seek to activate building frontages will be sought throughout these sites.

j) Public spaces created within the development should seek to create their own identity, form and function. The creation of new public/ managed space at the Island site and/ or the Worcester St Car Park site should be complementary to existing and proposed public spaces within the wider West End area. If more than one public space is proposed within the Nuffield sites, these spaces should be designed to complement each other rather than directly competing with each other.

k) The inclusion of inspiring public art to support wayfinding is encouraged.

l) The creation of new routes through the sites should consider how to re-imagine, protect or enhance existing views of the city's heritage assets.

m) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

n) The development should contribute to the cost of public realm improvements to Hythe Bridge Street and Park End Street which could include new and improved crossings, and other environmental improvements to create a safe and legible environment for walkers, cyclists and wheelers.

o) New well-designed route/s through the development should be created, in particular where these can facilitate movement between Hythe Bridge St and Park End St. Improvements to the internal circulation for users within the sites should also be investigated. New walk, cycle and wheel routes created within the sites should be supported by appropriate wayfinding.

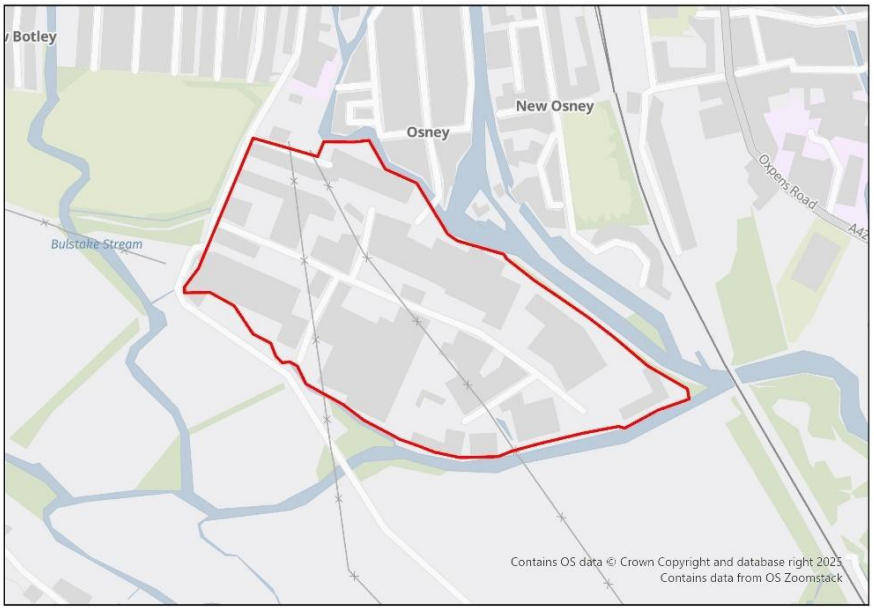
p) The frontage of the Island site onto Frideswide Square should deliver

improvements that establish this part of the site within its context as part of the western gateway to the city. Both the Island site and the Worcester St Car Park provide opportunities to use the city's heritage to support routes through the sites and to deliver clear access from the public realm. Walk/cycle/wheel routes through the Nuffield sites should demonstrate how they have been informed by the city's existing built heritage.

Additional requirements

q) Due to likely contamination risks related to previous uses on these sites, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

Osney Mead



Site area	17.8ha
Ward	Osney and St Thomas
Landowner	University of Oxford (majority) and others
Current Use(s)	Industrial estate with a mix of uses including office, industrial, wholesale and trade retail, academic institutional uses, vacant buildings and hardstanding including surface level car parking. Electricity substation and pylons present on site.
Flood zone	Flood Zone 3b
Notable heritage assets	Part of the site is located within the Historic Core Area and forms part of several view cones (in particular, the Raleigh Park and Boar's Hill view cones). Osney Town Conservation Area extends across the River Thames and includes the mature trees along the riverbank (the northern boundary of the site follows the Conservation Area boundary). The site of Osney Abbey is located near the site (north of

	the River Thames) - it is a Scheduled Ancient Monument, a Grade II Listed Building, and is included on the Oxford Heritage Asset Register (OHAR). The Grade II Listed "Memorial 300 Yards South of Osney Lock" is located close to the eastern-most corner of the site. The site also contains recorded Bronze Age site and high potential for Saxon to medieval trackways.
Notable ecological features	Parts of the site is identified in the Local Nature Recovery Strategy (LNRS). There are a number of mature trees along the riverbank (adjacent to the site) and the site itself also contains numerous mature trees. The watercourses are likely to act as wildlife corridors.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPCW8 – Osney Mead

Planning permission will be granted for a mix of uses including:

- Employment (office/ R&D/ light industrial);
- Employment (B2/ B8);
- Academic institutional uses including teaching and research;
- Residential (subject to outcome of further FRA work), including employer-linked affordable housing, and student accommodation.

The development is expected to deliver a minimum of 247 dwellings (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied), unless further flood risk work undertaken cannot find a solution to ensure the safety of residents.

The development of an innovation quarter is encouraged. Other complementary uses will be considered on their merits including uses which help activate appropriate ground floor street frontages. Such uses could include culture, arts and leisure uses.

To maximise the full potential of the site, a comprehensive approach to future planning and redevelopment should be undertaken. Development proposals should be delivered in accordance with a masterplan-led approach that sets out the anticipated development phases in which the site will be brought forward. This is to ensure that site constraints, new infrastructure provision and land-use considerations (in particular) are resolved on a site-wide basis. Any development proposals coming forward should not prejudice the comprehensive redevelopment of the site. Short-term incremental opportunities for development will be assessed on their merits and will need to have regard to the delivery of any agreed wider masterplanning ambitions for the site.

Development proposals across the site should have regard to the principles set out in the West End and Osney Mead SPD. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals should take opportunities to enhance biodiversity along the waterfront. Such measures could include bank restoration measures. A 10-metre watercourse buffer should be maintained or re-instated where possible (**Policy G2**).
b) Any new open space provided should be designed to be accessible for all site users and visitors. Wider public access to on-site open space is encouraged. Any opportunities to deliver new and/ or enhance existing on-site open space that makes a positive contribution to the green infrastructure network should be taken. Given the relationship with the surrounding fields to the south, development proposals

should investigate extending wildlife corridors through new green infrastructure provision on site.

c) A site-wide landscaping and public realm strategy should be prepared for the site. Proposals for individual plots should identify how they will align with/ comply with the overall strategy. Appropriately managed on-site landscaping that supports and sustains the delivery of a network of green corridors throughout the wider site should be delivered.

d) A site-specific Flood Risk Assessment (FRA) will be required, and a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding, with car parks and other ancillary uses in higher risk areas where possible. The site-specific FRA should consider onsite routes and any infrastructure required to reach the access route. Areas of significant flood risk are present along the main access route to the site. Given there is no advance flood warning provision for the site, the potential for evacuation before a more extreme fluvial or pluvial flood, considering the effects of climate change for the lifetime of the development, needs to be considered by an FRA, with advice sought from the emergency services and the local authority's emergency planner. Early flood warning will be vital to ensure the access route can be utilised before it is inundated by floodwaters. (**Policy G7**).

e) The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G8**).

f) Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

g) Development layout should be designed to enhance the relationship and connection between the site and the river; and the physical and visual permeability of the site.

h) The redevelopment of the site creates opportunities to deliver public spaces that support the creation of lively, dynamic and safe environment. These should:
   i. create their own identity, form and function; and
   ii. be designed to complement each other rather than directly competing with each other; and
   iii. be complementary to existing and proposed public spaces within the wider West End area.

i) The creation of new routes through the sites should consider how to re-imagine, protect or enhance existing views of the city's heritage assets. The inclusion of inspiring public art to support wayfinding is encouraged.

j) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views and the Raleigh Park view cone (**Policy HD6**). Views from Raleigh Park and Boar's Hill to the historic core, views out of the historic core, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work, the key views should be discussed and agreed in advance in writing with the City Council.

k) Applications must be supported by a full assessment of the heights and heritage assets (including the Osney Town Conservation Area so that the full impacts can be understood and assessed (**Policy HD3**).

l) The site contains a recorded Bronze Age site and has a high potential for Saxon to medieval trackways. Development proposals should ensure that the archaeological

assets are appropriately investigated and responded to (**Policy HD5**).

m) The masterplan-led approach should consider the form that the existing electricity infrastructure will take as the site is redeveloped; and investigate the development implications of retaining this infrastructure in its current position.

Movement & access

n) Development proposals should contribute to, promote and support improved sustainable transport links, securing well-designed new and improved routes through the development that prioritise walking, cycling and wheeling.

o) Any opportunities to open up existing site access points for wider public use should be taken, seeking to deliver high quality well-designed entrances to the site supported by high-quality public realm improvements and enhancements.

p) Improvements to the public realm that deliver high-quality well-designed civic spaces that prioritise walking, cycling and wheeling should be delivered, securing a well-designed internal site layout that promotes good internal site circulation and avoids large cul-de-sacs where possible.

q) Footpaths and cycleways to and through the site should be provided and existing routes enhanced to increase accessibility and promote permeability. Any new walk, cycle and wheel routes created within the site should be supported by appropriate wayfinding.

r) The masterplan-led approach should comprehensively address how new and enhanced walking, cycling and wheeling connections will be provided both within the site and into the wider area, including supporting connectivity across the river with the future bridge link from Grandpont to Oxpens.

Additional requirements

s) Due to likely contamination risks related to previous uses on the site, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

t) Due to the potential impacts of noise from a number of sources, development proposals should be informed by an acoustic design statement that addresses the potential for significant environmental noise. **(Policy R8)**

Oxford Railway Station and Becket St Car Park

Site area	2.56ha
Ward	Osney & St Thomas
Landowner	Network Rail
Current Use(s)	Railway Station and associated buildings and infrastructure including surface level car park for rail users.
Flood zone	Flood Zone 2
Notable heritage assets	The site is located within the Historic Core Area and within several view cones (in particular, Raleigh Park and Boar's Hill). The site contains the Scheduled Ancient Monuments of Rewley Abbey (predominantly below ground) and Swing Bridge at Sheepwash Channel. The southern end of this plot extends into the precinct of Osney Abbey.
Notable ecological features	There are mature trees with TPO protection at the main station site.
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.
Safeguarded Land	All of this site allocation has been identified as Safeguarded Land for EWR (Oxford).

Policy SPCW9 – Oxford Railway Station and Becket Street Car Park

Planning permission will be granted for a new station and associated public realm alongside a mix of uses including residential and/ or student accommodation, employment uses (Use Class E), and complementary town centre uses including retail, cafés and evening economy uses, which activate ground floor frontages and help to create a vibrant city quarter. The development is expected to deliver a minimum of 52 dwellings (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied).

The redevelopment of Oxford Railway Station is expected to enhance its function as a major transport hub; deliver a well-designed high quality, station building and associated enabling development; provide high quality public realm, supported by green infrastructure; and deliver safe routes through and to the site for walking, cycling and wheeling. Redevelopment of the Oxford Station should be delivered to align with the principles and priorities outlined in OxRail 2040: Plan for Rail.

Development proposals across the two sites should be brought forward in accordance with a masterplan-led approach that sets out the anticipated development phases in which the sites will be brought forward. Where a phased delivery strategy is proposed, this should ensure that all the residential development can be delivered across the whole development. Development should have regard to the principles set out in the West End and Osney Mead SPD. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Proposed layouts should seek to improve and create green routes through the site to encourage and support biodiversity. The use of green walls, roofs, tree planting,

and the creation of green space within the development are all encouraged.

b) Where new green infrastructure is delivered on site, it is expected to be delivered in such a way that supports existing habitats by creating linkages between them.

c) A site-specific FRA should be undertaken as the whole site is more than 1ha and is currently located within Flood Zone 1.

d) The Becket St car park site is raised up above Becket St, which lies in Flood Zone 2. Where development proposals involving level changes to the Becket St car park are proposed, a site-specific Flood Risk Assessment (FRA) would be needed if the change in level results in changes to the flood risk zone.

Urban design & heritage

e) Development proposals concerned with the redevelopment and regeneration of this site allocation should be brought forward in accordance with a masterplan-led approach.

f) The redevelopment of this site provides an opportunity to deliver high-quality public realm improvements. Opportunities for new civic spaces exist at both the Becket St car park site and the main eastern station entrance site. The creation of a new civic space should be created within at least one of the development sites.

g) Public realm improvements should be delivered that create an enhanced sense of arrival.

h) Development proposals should not be of such scale, form and massing so as to obstruct or compete with views to, from and across the historic city core.

i) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work (to support the masterplan-led approach, or development proposals), the key views should be discussed and agreed in advance in writing with the City Council. A full assessment should accompany proposals so that the full impacts can be understood and assessed.

j) The site is of archaeological interest. The southern end of the main station site extends into the precinct of Osney Abbey and any significant groundworks in this area would require evaluation. A recent watching brief has demonstrated that Victorian railway infrastructure is buried beneath the build-up of Becket Street Car Park, which may require mitigation recording. This will require further investigation as part of any redevelopment (**Policy HD5**).

Movement & access

k) Routes within the site should be designed to strengthen links to the wider area and should enable clear and direct access to the station both from the south, via Oxpens, and from the north, via Rewley Road.

l) Development proposals should deliver anew enhanced bridge across the Botley Road to enable safe, secure access for all station users. Improvements to Cemetery Bridge that enhance its appearance and support a wider range of users would are encouraged.

m) Development proposals should incorporate public realm improvements that deliver priority for walkers, cyclists, and wheelers. The use of public art to support wayfinding is encouraged.

n) The access to the main station site should be enhanced and any improvements should support the delivery of a multi-modal transport hub including secure cycle parking and a reduction in car parking spaces (subject to ORR confirmation and approval). Opportunities to improve priority for walkers, cyclists and wheelers at the main station entrance should be investigated and delivered as part of the masterplan-led approach for the site.

o) Any new walk/cycle/wheel routes through the Becket St car park site should be safe, secure and legible. Routes through the whole length of the Becket St site that run parallel to the western site boundary (i.e., the railway line) should be avoided.

p) The masterplan-led approach should identify how bus and taxi provision (including layover and feeder ranks) are to be provided. Where bus and taxi provision (and associated infrastructure i.e. bus stops or rail replacement bus facilities) are proposed outside the site allocation boundary, this should be agreed in writing with the City Council.

Additional Requirements

q) Development proposals involving operational land should demonstrate that any operational requirements have been satisfactorily addressed. Any proposed solutions involving land outside the redline boundary of the site allocation should be agreed in advance in writing with the City Council and the applicant should demonstrate that the relevant consent/s have been secured from the landowner.

r) Due to likely contamination risks associated with the railway use, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (**Policy R7**).

s) Planning permission involving land safeguarded for East West Rail (Oxford) will not be granted until the East West Rail Company has been consulted and the procedure set out in the East West Rail Safeguarding Directions has been followed (**Policy I2**).

Oxpens

Site area	6.3ha

Ward	Osney & St Thomas
Landowner	OxWED (majority landowner)
Current Use(s)	Mix of uses on site including Oxford Ice Rink, car park, former filling station, open space, sheltered housing and businesses
Flood zone	Flood Zone 3b
Notable heritage assets	The whole site is located within the Historic Core Area and is contained within several view cones (in particular, Raleigh Park and Boar's Hill view cones). Site lies within the City Centre Archaeological Area. Potential for Civil War defences, and 19th/early 20th Century remains. The site has recorded prehistoric, medieval and early modern remains of interest that would require mitigation. Oxford Heritage Asset Register (OHAR) assets nearby include Oxpens Meadow, and the Oxpens Road Bridge.
Notable ecological features	Part of the site is identified within the Local Nature Recovery Strategy (LNRS). Oxpens Meadow is to the east of the Oxford Ice Rink and there are mature trees within the site
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.
Safeguarded Land	Part of this site allocation has been identified as Safeguarded Land for EWR (Oxford).

Policy SPCW10: Oxpens

Planning permission will be granted for a mixed-use development that delivers: Residential and/ or student accommodation, Employment uses (Use Class E), and complementary town centre, leisure and community uses including retail, cafés and evening economy uses, which activate ground floor frontages and help create a vibrant city quarter.

The development is expected to deliver a minimum of 450 dwellings (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals should demonstrate how green and blue infrastructure will be integrated across the site in particular opportunities should be taken to create links between the river with the city centre.

b) An undeveloped buffer zone of at least 10m width should be left alongside the River Thames watercourse (**Policy G2**).

c) Planning permission will only be granted for development on Oxpens where it enhances Oxpens Meadow to create a high quality public open space. Oxpens Meadow should be expanded into the heart of the site and development proposals should respond appropriately to the riverside setting.

d) Part of the site is included within the Local Nature Recovery Strategy which highlights potential measures that could be implemented when delivering biodiversity improvements.

e) A site-specific Flood Risk Assessment (FRA) will be required, and a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding, The FRA should consider onsite routes and any infrastructure required to reach the access route. Access/egress from the site is partly over land that has a high level of flood risk. The FRA should consider in more detail the nature of the flood risk to determine how quickly it occurs and the degree of hazard, as well as

the evacuation requirements before the design event and a more extreme fluvial event. Early flood warning will be vital to ensure the access route can be utilised before floodwater inundates Oxpens Road (**Policy G7**).

f) The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (**Policy G8**).

g) Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

h) New high quality and well-located public space should be provided at the heart of the site.

i) Development should be designed to create an attractive public realm and the buildings to form active frontages, in particular along Oxpens Road.

j) The relationship and connection between the site and the river and the physical and visual permeability of the site should be enhanced by the development proposals.

k) Development proposals should have regard to the design principles set out in the West End and Osney Mead SPD.

l) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered (**Policy HD6**). Prior to undertaking any landscape or visual assessment work (to support the masterplan-led approach, or development proposals), the key views should be discussed and agreed in advance in writing with the City Council. A full assessment should accompany proposals so that the full impacts can be understood and assessed.

m) Development proposals should not be of such scale, form and massing so as to obstruct or compete with views to, from and across the historic city core (**Policy HD3**).

n) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (**Policy HD5**).

Movement & access

o) Development proposals should provide for the landing of the new Oxpens River Bridge across the Thames in order to facilitate walk, cycle and wheel access from south of the city, Grandpont and Osney Mead to the Station and city centre.

p) The development should contribute towards the cost of new infrastructure improvements to the public realm along Oxpens Road and seek to improve circulation through the site. New well-designed walk/cycle/wheel routes should be created that encourage users to enter and move around and through the site.

q) Routes within the site should be designed to strengthen the link to Castle Mill Stream and the Westgate and to enable clear and direct access towards the station.

Additional Requirements

r) Due to likely contamination risks, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination

issues will be resolved where relevant (**Policy R7**).

s) Planning permission involving land safeguarded for East West Rail (Oxford) will not be granted until the East West Rail Company has been consulted and the procedure set out in the East West Rail Safeguarding Directions has been followed (**Policy I2**).

St Thomas School and Osney Warehouse

Site area	0.41ha
Ward	Osney and St Thomas
Landowner	Christ Church
Current Use(s)	St Thomas site is a former school building now in use by various organisations including charities and social enterprises. Osney Warehouse site is in use as visual arts company including studio, exhibition, education spaces/community uses.
Flood zone	Flood Zone 2
Notable heritage assets	Site is within the Historic Core Area and City Centre Archaeological Area. Western half of the site is within Central (City and University) Conservation Area). Site within an area of archaeological potential that includes medieval settlement remains and Civil War defences.
Notable ecological features	The two parts of the site are separated by a line of mature trees adjacent to the conservation area boundary. Site potential to provide habitat for bats (roosting and foraging) and nesting birds. Parts of the site is identified in the Local Nature Recovery Strategy (LNRS).
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPCW11: St Thomas School and Osney Warehouse

Planning permission will be granted for mixed use development which should include retention or reprovision of community facilities. The minimum number of dwellings to be delivered on the site is 10 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) A sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk. A site-specific Flood Risk Assessment (FRA) is required and should consider onsite routes and any infrastructure required to reach the access route. Access/egress from the site is over land that runs through the flood extents of the Wareham Stream and Castle Mill Stream. Given there is no advance flood warning provision for the site, the potential for evacuation before a more extreme fluvial or pluvial flood, considering the effects of climate change for the lifetime of the development, needs to be considered by an FRA, with advice sought from the emergency services and the local authority's emergency planner. Early flood warning will be vital to ensure the access route can be utilised before it is inundated by floodwaters. Areas of surface water flood risk are also present within the site and along the access routes, therefore the FRA should consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site. The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited. A geotechnical investigation should be undertaken at this site to obtain further information relating to infiltration rates to confirm whether infiltration could be viable in some areas **(Policy G7** and **Policy G8).**

b) Part of the site is identified in the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

c) Mature trees on the site should be retained where possible.

Urban design & heritage

d) Development proposals should be designed with consideration of their impacts on the setting of the Central (University and City) Conservation Area, the setting of the nearby listed buildings and views, and demonstrate compliance with **policies HD3 and HD6.**

e) Development should be based upon a clear understanding of the significance of the site and its surrounding context. Development should seek to preserve the character of the Western Fringe Area of the wider conservation area. The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.

f) Development proposals that exceed the height stated in the High Buildings TAN may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed as listed in **Policy HD6**.

g) Materials and construction details used for new development schemes should be of high quality, appropriate for the setting and sympathetic to the local context.

h) Proposals should consider retention of the St. Thomas's School building where possible because of its townscape value and clear representation of past usage of

the area.

i) There is also some potential for archaeological remains on the site. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).

Movement & access

j) The most appropriate vehicular access would be to continue to use of Osney Lane to the north of the site improve access to the current warehouse site via Woodins Way.

k) Development proposals should demonstrate how the development enables access by alternative means of transport including improving connectivity for walking, cycling and wheeling.

West Wellington Square

Site area	0.88 ha
Ward	Carfax & Jericho
Landowner	University of Oxford
Current Use(s)	Academic Institutional uses
Flood zone	Flood Zone 1
Notable heritage assets	Site wholly located within the Central (City and University) Conservation Area Grade II Listed Buildings (2-63 St John St and 5 Pusey St). Site has archaeological potential it is the site of a former workhouse and on the projected line of Royalist Defences.
Notable ecological features	Numerous mature trees near the site benefit from conservation area protection
Urban Greening Factor score	The site is likely to score below the Urban Greening Factor target.

Policy SPCW12: West Wellington Square

Planning permission will be granted for a mix of the following uses:

- Academic institutional uses;
- Residential development (including employer-linked affordable housing in accordance with Policy H4);
- Student accommodation;
- Appropriate uses to the local centre of Little Clarendon Street and Walton Street as set out in Policy C1.

The minimum number of homes to be delivered is 13 dwellings net gain (or if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

a) Development proposals should seek to ensure that the mature and semi-mature gardens and greenspaces to the rear of the properties at Walton Street and to the rear of Wellington Square are retained.

b) Proposals are encouraged to enhance and improve any other existing greenspaces

Urban design & heritage

c) Proposals will be required to demonstrate how the design of the scheme has been influenced by and has considered the surrounding heritage.

d) Proposals should demonstrate how the surrounding designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach (**Policy HD3**).

e) Archaeological assets must be appropriately investigated and responded to (**Policy HD5**).

Movement & access

f) Access to the site is limited. As such, Development proposals should deliver a low car residential scheme in accordance with **Policy C8**.

g) Non-residential car parking should be in accordance with **Policy C8**.

h) Every opportunity should be taken to enhance walking and wheeling links between Walton Street and Wellington Square.

GLOSSARY

Term	Definition
Active travel	Refers to modes of travel that involve a level of activity. Central Oxfordshire Travel Plan (COTP) – This plan sets out the transport strategy for Oxford and travel connections between the city and Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley
Affordable Housing	Affordable housing – This comprises of Social Rent, Affordable Rented, and intermediate housing (with varying levels of ownership of the home) provided to eligible households whose needs are not met by the open market. The high property and rental values in Oxford are so extreme that many of the models for affordable housing do not achieve genuine affordability for people looking to rent or buy in Oxford. The most recent Tenancy Strategy will be used to assess whether proposed forms of affordable housing are genuinely affordable in Oxford. Affordable housing will also comply with one or more of the following definitions: **a) Affordable housing for rent:** meets all of the following conditions: i) the rent is set in accordance with the Government's rent policy for Social Rent (see separate definition) or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); ii) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider except for any social rented element of the scheme. This may also include employer-linked housing); and iii) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent). **b) Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute at the time of plan-preparation or decision-making. Income restrictions should be used to limit a household's eligibility to purchase a starter home to those who have maximum household incomes of £80,000 a year or less (or £90,000 a year or less in Greater London). **c) Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. **d) Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public

	grant funding is provided there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement. Campus sites of the colleges of the University of Oxford and of Oxford Brookes University - These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employer-linked housing.
Affordable workspace	Workspace that overcomes a market failure and is delivered to support certain social, or cultural or economic purposes including: - Sectors that have social value such as charities, voluntary and community organisations or social enterprises; - Sectors that have cultural value such as creative and artists' workspaces, rehearsal and performance space and makerspace; and - Supporting start-up and early-stage businesses or regeneration. Affordable workspaces should be provided using a discounted or "alternative" rent model, and/ or by providing suitable premises to meet end-user requirements (i.e., through the provision of a specific use class).
Affordable workspace strategy	A strategy which sets out the details of the affordable workspace to be delivered on site which will include details of the size, marketing, servicing, management and how the space provided will meet end-user requirements.
Arterial road	The principal routes for the movement of people and goods within the city. Arterial roads in Oxford include Botley Road and Iffley Road among many others
Biodiversity	A collective term for the variety of wildlife and flora that are present in a particular area. More species and greater variety is generally reflective of higher biodiversity, this can be important for ensuring greater resilience to pressures such as climate change and pollution
Biodiversity net gain	Biodiversity net gain is a strategy to develop land and contribute to the recovery of nature. It is a way of making sure the habitat for wildlife is in a better state than it was before development
Built environment	Refers to aspects of our surroundings that are built by humans, that is, distinguished from the natural environment. It includes not only buildings, but the human-made spaces between buildings, such as parks, and the infrastructure
Campus	Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special facilities) and/or administrative uses (offices and administrative functions).
Circular Economy	Unlike traditional linear economy whereby materials and products are created, used and then thrown away, a circular economy promotes conservation of energy, reduction in waste and extending the lifetime of products through various means such as sharing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible
Climate Change Adaption	A process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities
Climate Change mitigation	Actions to reduce the impact of human activity on the climate system. Entails interventions to reduce the emission of greenhouse gases like carbon dioxide, or to increase their storage within 'sinks' (adapted from IPCC)
Communal Accommodation	A type of residential development providing managed accommodation. These cover 'traditional' university and college student halls, hospital staff accommodation, care homes and hostels
Conservation	An area of special architectural or historic interest, the character or appearance of

areas	which it is desirable to preserve or enhance
Construction, Logistics and Community Safety (CLOCS)	A set of requirements for construction vehicles and construction traffic operations designed to eliminate collisions with vulnerable road users and mitigate the negative community and environmental impacts of construction traffic
Contaminated Land	Where substances are causing or could cause: significant harm to people; property or protected species, significant pollution of surface waters (for example lakes and rivers); or groundwater or harm to people as a result of radioactivity.
Critical infrastructure	Facilities, systems, sites, information, people, networks and processes, necessary for a country to function and upon which daily life depends
DEFRA biodiversity metric	The biodiversity metric is a habitat based approach used to assess an area's value to wildlife. The metric uses habitat features to calculate a biodiversity value. Use of the metric is required to demonstrate net gain requirements in line with the Environment Act legislation
Demographic	The measures (such as age, gender and income) of a specific group of people.
Design flood event	A flood event of a 1 in 100 probability, factoring in the maximum estimated water level during the design storm event, with an allowance for climate change set in accordance with national planning guidance (the design flood level). Mitigation measures should respond to this and the suitability of proposals will be assessed in accordance with it.
District centres	District centres comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library
Ecological buffer zone	A primarily undeveloped area of land adjacent to the watercourse which is designed to secure benefits for nature and people, whilst also forming a natural buffer to the waterfront.
Ecological network	This is one component of the overall green infrastructure network and where the term is used in the Local Plan, this specifically relates to the collection of spaces in the city which play a particularly vital role in supporting ecology and have been designated for this primary purpose
Ecosystem services	The direct and indirect goods and services that nature contributes to our health and wellbeing, including benefits like food production, water quality, regulation of floods, resilience to soil erosion, as well as more intangible benefits like stress reduction and contributing to our sense of place and character of the city
Embodied Carbon	The carbon dioxide in producing materials, including the energy used to extract and transport raw materials as well as emissions from manufacturing processes. The embodied carbon of a building can include all of the emissions from the construction process and materials used throughout; as well as from deconstructing and disposing of it at the end of its lifetime (adapted from UCL fact sheet)
Employer-linked affordable housing	Housing that is provided on specified sites by key employers in the city for staff carrying out their work. The housing should be rented at levels that are affordable to a cross-section of the key employer's employees, and should be available at Affordable Rent levels in perpetuity.
Employment generating uses	Employment generating uses are referred to in planning terms as employment floorspace or employment land. Employment generating uses include the sectors that make up the following Use Classes: - Use Class EG(i): Office - Use Class EG(ii): Research and Development (R&D)

	- Use Class EG(iii): Light Industrial - Use Class B2: General Industrial - Use Class B8: Warehousing, Storage and Distribution
Existing employment sites not designated as Key Employment Sites	Outside the city and district centres, these sites are usually smaller employment sites which can be less-well located and that do not perform an important economic function, or are unlikely to be able to in the future. Within the city and district centres, centres these are existing employment sites that are less than 2ha.
Existing university or college campus or academic site	An existing university or college campus or academic site is one that exists at the time the Plan is adopted
Flood zones	Areas with different probabilities of flooding as set out in the Planning Practice Guidance: Flood Risk and Coastal Change: Zone 1 (low probability) - Land having a less than 0.1% annual probability of river or sea flooding. Zone 2 (medium probability) - Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. Zone 3a (high probability) - Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. Zone 3b (the functional floodplain) - Land where water from rivers or the sea has to flow or be stored in times of flood. This is land that is designed to flood.
Frequent bus service	Every 15/20 mins in both directions.
Green infrastructure	A network of spaces and features including parks, playing fields, woodland, allotments, private gardens, green roofs and walls, street trees. The term also incorporates 'blue infrastructure' such as streams, ponds, canals, and the rivers
Gross Value Added (GVA)	This measures the contribution to an economy of an individual producer, industry, sector or region. It is used in the calculation of gross domestic product (GDP). GDP is commonly estimated using one of three theoretical approaches: production, income or expenditure. When using production or income approaches, the contribution to an economy of a particular industry or sector is measured using GVA
Heritage assessment	May also be referred to as a Heritage Statement or Heritage Impact Assessment (HIA). This should set out the significance of a heritage asset or landscape within its wider setting and outline the proposal, assess the impact on significance and set out a mitigation strategy. The local Historic Environment Record should be consulted, and expert assessment will be required. It should have a level of detail appropriate to enable an informed decision to be reached
Heritage assets	A building, monument, site, place, area, or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by Oxford City Council during the process of decision-making or through the plan-making process (including local listing)
Historic core	area of the city centre comprising the spires and towers that make up the historic skyline, and in which any additions of height will intrude directly into the view of the skyline.
Housing and Economic Land	A strategic assessment reviewing the supply of potential sites and their capacity to meet future needs for housing, and for economic growth.

Availability Assessment	
Housing Delivery Test	A check run by the Government to check whether the level of housing delivery in each planning authority is meeting the housing requirement set out in the local plan
Housing in Multiple Occupation (HMO)	A house, flat or building will be a house in multiple occupation (HMO) if it meets the definition under the Housing Act 2004 s254 or s257. A HMO is usually a house or flat that is shared by 3 or more people, who are unrelated, form more than 1 household and is their only main residence. There are 2 types of HMO: C4 HMO, and sui generis HMO. A C4 HMO is a small house or flat that is occupied by 3-5 unrelated people who share basic amenities such as the bathroom and/or kitchen. A sui Generis HMO is the same as a normal C4 HMO except that it is a large house or flat occupied by 6 or more unrelated people and can be subject to slightly different planning rules.
Housing Need	Housing need is an unconstrained assessment of the number of homes needed in an area (DLUHC).
Housing target/requirement	The number of homes set out to be delivered in the plan period to 2040, also expressed as an annual requirement. In the case of Oxford this number reflects the capacity rather than the need, as the need is greater than can be met
Inclusive economy	An Inclusive Economy is defined in Oxford's Economic Strategy 2022-32 as "growing prosperity that reduces inequality and is sustainable" (Plymouth Inclusive Growth Group). An Inclusive Economy offers a genuine progressive conceptual frame in which greater consideration is given to social benefits that flow from, and feed into, economic activity. (Centre for Local Economic Strategies)
Infrastructure Development Plan (IDP)	The IDP assesses the potential risks of infrastructure not being delivered in a timely manner to support development
Intermediate housing	Housing at prices and rents above those of Social Rent, but below market or affordable housing prices or rents. These can include shared equity (shared ownership and equity loans), intermediate rent and other low cost homes. The Council will consider the suitability of other forms of intermediate housing, such as low-cost market housing, in light of its genuine affordability to those in housing need. NB: Key worker housing is defined separately from intermediate affordable housing
Key Employment Sites	Key Employment Sites are larger employment sites that make a contribution to the national or local economy or are recognised for the social value that they bring to an area. When located: - outside the city and district centres, Key Employment Sites are at least 0.25ha - within the city and district centres, Key Employment Sites are very large sites (2ha or more)
Key worker	The broad definition of key worker is someone employed in a frontline role delivering an essential public service where there have been recruitment and retention problems. In Oxford, a key worker is any person who is in paid employment solely within one or more of the following occupations: i) NHS: all clinical staff except doctors and dentists; ii) Schools: qualified teachers in any Local Education Authority school or sixth form college, or any state-funded Academy or Free School; qualified nursery nurses in any Oxfordshire County Council nursery school; Universities and colleges: lecturers at further education colleges; lecturers,

	academic research staff and laboratory technicians at Oxford Brookes University or any college or faculty within the University of Oxford; iii) Police & probation: police officers and community support officers; probation service officers (and other operational staff who work directly with offenders); prison officers including operational support; v) Local authorities & Government agencies: those providing a statutory service, including but not limited to social workers; occupational therapists; educational psychologists; speech and language therapists; rehabilitation officers; planning officers; environmental health officers; clinical staff; uniformed fire and rescue staff below principal level Ministry of Defence: servicemen and servicewomen in the Navy, Army or Air Force; clinical staff (with the exception of doctors and dentists); and vi)Unregistered Workforce (Support Workers): In Health roles may include: Assistant Practitioner, Care Assistant, Healthcare Support Worker, Maternity Support Worker, Nursing Assistant, Occupational Therapy Assistant, Physiotherapy Assistant, Radiography Assistant, Speech and Language Therapy Assistant, Senior Care Assistant. In Adult Social Care roles may include: Activities worker, Day Care Assistant, Day Care Officer, Domiciliary care worker, Home care worker, Nursing Assistant (in a nursing home or a hospice), Personal Assistants, Reablement Assistant, Residential Care Worker, Senior Home Care Worker, Support Worker.
Listed Building	A building deemed to be of special architectural or historical interest is placed on a statutory list maintained by Historic England. Such buildings cannot be demolished, extended, or altered without special permission from a local planning authority, which typically consults with Historic England before determining an application. The designation regime is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 Listed buildings are classified into three grades: Grade I buildings are of exceptional interest Grade II* buildings are particularly important buildings of more than special interest Grade II buildings are of special interest warranting every effort to preserve them
Listed building consent	permission required from a local planning authority before making changes that affect the character or appearance of a listed building
Liveable city	Where essential needs can be met locally such as food, open spaces, cultural activities, community needs
Liveable neighbourhoods	A neighbourhood where local residents can reach facilities such as small shops, community facilities, primary school within a 15- 20 minute walk
Local centres	Local centres (classified as Town Centres in the NPPF) include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. Small parades of shops of purely neighbourhood significance are not classified as local centres
Local connection (for intermediate housing)	The applicant is currently resident in the local area and has been for a continuous period of at least 12 months, or the applicant is currently employed in Oxford and has been for at least the previous six months, or the applicant has close family members (parents or adult children) who have lived in the area for at least 5 years.
Main Town Centre	The National Planning Policy Framework (NPPF) defines main town centre uses as

Uses	retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)
Major development	The National Planning Policy Framework (NPPF) defines major development as follows: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Market housing	Housing provided by the private sector with no intervention from public bodies and sold or rented via the private market
Micro-renewables	Small-scale non-commercial renewable energy installations such as a domestic solar panel array
Mobility hubs	An area in which a variety of transport modes and community assets are co-located for seamless interchange. These facilities provide added benefit to communities and combined they make up an easy-to-use transport network
Multi-functional	In the context of green infrastructure, the term multi-functional means the multiple benefits that features and spaces can provide simultaneously, often contributing to better health and wellbeing for people and the natural environment (e.g. supporting mental/physical health; providing space for biodiversity; climate resilience etc). Some types of GI may provide more benefits than others
Native planting	A native plant is one that has evolved naturally in its location without direct human intervention, as opposed to species that have not existed historically in an area but are introduced by human activities
Net zero carbon	A situation where any emissions of carbon dioxide are balanced out by removal elsewhere – equating to no net increase (adapted from IPCC)
Oxford Heritage Assets Register	A register of buildings, structures, features, or places that make a special contribution to the character of Oxford and its neighbourhoods through their locally significant historic, architectural, archaeological or artistic interest
Oxford Living Wage	The Oxford Living Wage is an hourly minimum pay that promotes liveable earnings for all workers and recognises the high cost of living in Oxford. For 2023-24 the rate is £11.35 per hour
Oxford Short Stay Accommodation Study	A study that provides a summary of findings with an analysis of the impact on the development of policies which will influence both the existing stock of short stay accommodation as well as the amount and type of future provision to meet future forecasted demand
Parking Standards for New Developments	A document produced by Oxfordshire County Council used to help determine the level of parking at new developments
Planning Practice Guidance	A web-based resource that brings together national planning practice guidance for England
Principal elevation	In most cases the principal elevation will be that part of the house that fronts (directly or at an angle) the main highway serving the house (the main highway will be the one that sets the postcode for the house concerned). It will usually contain the main architectural features such as main bay windows or a porch serving the main entrance to the house. Usually, but not exclusively, the principal elevation will be what is understood to be the front of the house. Where there are two elevations that may have the character of a pincipal elevation, for example on a

	corner plot, a view will need to be taken as to which of these forms the principal elevation
Registered Parks and Gardens	Registered Parks and Gardens are designed landscapes, such as parks and gardens, that have been identified as being of special historic interest. Each registered park and garden is listed on the National Heritage List for England (NHLE).
Renewable energy	Energy that uses technologies which generally rely on the elements (e.g. sunlight, wind, rain), biomass, or on generating energy from the earth itself
Residual risk	Residual risk is the risk that remains after efforts to identify and eliminate some or all types of risk have been made
Resilience	Our ability to anticipate, absorb, accommodate, or recover from the effects of a hazardous event in a timely and efficient manner. When talking about climate resilience such events could include flash flooding or intense heatwave events
Retro-fitting	In the context of this chapter, retro-fitting describes improvement works to an existing building for the purpose of improving its energy efficiency (such as by making them easier to heat or by replacing fossil fuel systems with renewable energy-based systems), or its resilience to climate change
East West Rail Safeguarding Directions	This refers to the *Safeguarding Directions for development affecting the route and associated works for the East West Railway Project* which came into force on 19 November 2025. The East West Rail Safeguarding Directions include a requirement to consult the East West Rail Company on any planning application on land covered by the Directions. They also introduce specific requirements which must be followed before planning permission can be granted.
Scheduled Monuments	Archaeological sites and structures that have been recognised as nationally important due to their historical or cultural significance. These can include both above-ground and below-ground features such and standing stones, burial mounds, or the remains of monastic buildings, among others. Monuments are added to the Schedule by the Secretary of State if they are deemed of national importance.
Short stay accommodation	Accommodation providing residential tenancies, typically provided on a daily basis, principally for short stays by visitors. Accommodation will typically be in self-contained space consisting of complete furnished rooms or areas for living/dining and sleeping, with amenities (e.g. television, internet) included in the rent. This accommodation type includes hotels, bed and breakfast (B&B), Aparthotels, short-term lets, and serviced accommodation.
Site of Special Scientific Interest (SSSI)	Areas identified by Natural England as being of special interest for their ecological or geological features. Natural England is the government's advisor on the natural environment
Site specific flood risk assessments (FRAs)	A study that determines how a proposed development will manage flood risk from all possible water sources to the site in question
Social Rent	Homes that are let at a level of rent set much lower than those charged on the open market. The rent will be calculated using the formula as defined in the Rent Standard Guidance of April 2015 (updated in May 2016) or its equivalent or replacement guidance (relevant at the time of the application).
Special Area of Conservation (SAC)	Special Areas of Conservation are areas that have been designated at a European level as important for nature conservation
Standard Method	The Government has set out a Standard Method for identifying housing need. This should be the starting point for assessing housing need and it identifies an overall minimum average annual housing need figure

Student accommodation	Accommodation whose main purpose is to house students in higher education, registered on full-time courses of an academic year or more in Oxford
Sui Generis	A term used to categorise buildings that do not fall within any particular use class for the purposes of planning permission. Such as petrol stations and cinemas
Sustainable Urban Drainage Systems (SuDs)	Sustainable Urban Drainage Systems are a sequence of water management practices and facilities designed to drain surface water and protect against flooding. These include porous roads, high-level road drainage, swales, soakaways, filter trenches, wet and dry attenuation ponds and ditches. SuDS helps mimic natural drainage processes and can provide benefits in terms of sustainability, water quality and amenity
The City Centre Archaeological Area	Area of the city centre where archaeological remains are almost certain to be present
Traffic filters	Cameras that are intended to reduce traffic levels in Oxford by managing the use of certain roads in the city by private cars
Transport assessment	A thorough assessment of the transport implications of development
Transport statement	A 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts)
Whole building approach	In the context of retrofitting, taking a Whole Building Approach means that improvements are informed by an understanding of how the entire building and the different materials that it is comprised of currently performs, considering issues such as air quality, damp management and ventilation. It involves selecting fabric improvements and other upgrades that complement each other to ensure the best results for the long-term sustainability of the building and health of occupants and avoiding problems of maladaptation, whereby improvement projects can have unintended, negative consequences (such as excessive moisture build-up, or inadequate ventilation)
Working drivers	Residents and drivers who are dependent on their vehicle more than 50% of their working day to earn a wage. Where the vehicle is required to undertake multiple journeys in the city (or wider) to deliver the service provided by the business. Examples include NHS community-based staff, carers working for private care companies, delivery drivers, plumbers, electricians and other trades, mobile hairdressers, dog grooming, food bank staff
Zero Emission Zone	An area within Oxford that prevents vehicles that emit Carbon Dioxide for travelling through without an associated charge

APPENDIX 1 – STRATEGIC

APPENDIX 1.1 DESIGN CHECKLIST

Introduction

Purpose of this design code/guide - what it does
The design guide sets out the key considerations that applicants will need to respond to in order to demonstrate high-quality design in line with requirements of Policy HD1.

The guide also brings together broader design considerations in Oxford which will arise from the requirements of policies across the Local Plan.

Structure of this design code/guide
The design guide is structured as a series of questions which the City Council will look to see answered as part of a planning application. These answers will explain the design approach, most likely in the design and access statement. Under each question are a series of prompts intended to help flag key issues, the relevant Local Plan policies are noted, as are helpful guidance documents or information sources. Many of the topics are inter-related, cross references are provided where this is clear although the issues covered should also be considered as a whole. Context should always be the starting point of the design process, and the contextual analysis will inform many aspects of design. For major developments, where early consultation with the community is encouraged in the Statement of Community Involvement, this should include engagement on context and how that may inform design.

The structure of the document has been loosely guided by the key principles of high-quality design as set out in the National Design Guide, tailored to an Oxford setting.

Context

The context refers to the attributes of the site and its surroundings. Understanding and responding to context is complex. It applies to the physical, but also cultural and historic context. Understanding context is important, but an appropriate response will not merely be to copy existing built forms and densities. A thorough understanding of context is a key starting point in good design, as not only will it help to ensure a high-quality development, it will also help to identify the key opportunities and constraints that the design process will need to work at an early stage to ensure a successful application.

C.1 What are the key features identified in the contextual analysis that should inform the design?

The constraints and opportunities plan should form a key part of the design and access statement, explaining the design story and showing how the key features of the site have been identified and help to inform the design proposal. The analysis should therefore be wide-ranging, including but not limited to:

- What is the landscape/townscape character of the area (e.g. Riparian edge, clay hills, gravel raised bed) and the urban character of the area? What is the built-form in the area? Are there features that have a positive or negative impact on character, and how should this affect the design? Relevant may be roofscapes, materials, detailed features such as windows, boundary treatments and height and massing. Heritage assets on or near the site will need particular attention. See: Oxford in its Landscape Setting:

https://www.oxford.gov.uk/downloads/download/1054/014_des_-_design_and_heritage

- What are the major movement corridors around the site – including roads, public transport routes, cycleways and footpaths. What is movement like along these corridors at present? Are there barriers or pinch points which constrict movement? What is access like into the site?
- What is the natural landscape like around and on the site? Is there green open space and what function does it provide? What is tree canopy cover like? Are there green or blue corridors or is there the potential to establish these by connecting up fragmented areas? What habitats are present and are there designated ecological or geological sites that could be susceptible to harm? Are there waterways or other blue features? See: Oxford Urban Forest strategy; Green Infrastructure study 2022; Playing pitches study; Natural England mapping
- What is the heritage context of the area? This is expanded upon in section C2 below.
- What other constraints could be present (e.g. areas of flood risk, air pollution hotspots, noise environments)?
- What features/constraints could be present below the ground (e.g. utilities, soil quality/typologies; groundwater levels and movement; archaeology; contaminated land)?

Additional data sources (such as up-to-date satellite imagery, biodiversity/ contamination/hydrology surveys) could be used to inform the site-specific context.

C.2 What is the heritage and cultural context of the site and are there any heritage assets that may be affected by the development?

The historic character of the city is unique and comprises a range of heritage assets, many of which are designated either locally or nationally.

- When considering whether there are any heritage assets that may be affected by the development, the setting of these must also be considered. If there is to be any impact on a heritage asset, a heritage statement will be required. This may be standalone or form part of the design and access statement. Policies HD1-HD6 and HD9 set out what is expected.

The following sources of information will help to identify whether any heritage assets or their setting may be affected by the development:

- Historic England List https://historicengland.org.uk/listing/the-list/map-search?clearresults=True/
- Historic England Heritage at Risk Register https://historicengland.org.uk/advice/heritage-at-risk/search-register/
- Conservation Area Maps and Appraisals https://www.oxford.gov.uk/info/20195/conservation_areas/871/conservation_areas
- Oxford Heritage Asset Register https://www.oxford.gov.uk/info/20196/oxford_heritage_asset_register/874/oxford_heritage_asset_register_-_overview

Heritage assets offer an opportunity to maintain and inject local character. They are distinctive, and responding to them positively will help ensure a contextually rich design, as well as maintaining the significance of the asset.

C.3 How has the design rationale responded to the presence of important views across the city?

Views are particularly important in Oxford: there are wide-ranging views to and from and across the buildings in the historic core which include the internationally renowned skyline, which as an entity is considered a heritage asset; and views out towards the city's unique setting (which includes the green hills rising up around the city and the low-rise character of its suburbs). Also relevant are the views and setting of each individual tower and spire that comprises the iconic skyline, as this includes individually listed buildings of the highest significance.

Several types of views need to be considered:

- Long ranging views across the city that are protected (Policy HD6) - information on these can be found at: https://www.oxford.gov.uk/info/20064/conservation/876/oxford_views_study
- Views identified in conservation area appraisals – typically shorter in range but important role in supporting the character of these areas – information on these can be found at: https://www.oxford.gov.uk/info/20195/conservation_areas
- Views out towards the city's landscape setting and low-lying suburbs and landform which visually present the story of Oxford's history and development
- Locally important views that create or aid appreciation of the townscape and character of the area, including those potentially identified in neighbourhood plans.

The high buildings TAN identifies four principal visual characteristics that are worth considering when assessing views and how a building could impact on them:

- The iconic spires and silhouette of the historic city centre.
- The open and natural character of the river floodplains.
- The green (wooded or agricultural) backdrop to the city formed by the surrounding hills.
- The enclosed and often intimate views within the city centre.

As set out in policy HD6, the methodology outlined in the Assessment of the Oxford View Cones report will support in assessing potential impacts of high buildings on heritage significance.

Built form

Built form refers to the 3-D arrangement of streets, open spaces, development blocks and buildings. An appropriate built form and the design rationale will need to explain how the contextual analysis has informed this. It is important that the elements of built form set out below are not considered in isolation later sections in the guide such as movement and public space also play an important role in determining the correct arrangement for the site.
Site layout and block arrangement

B.1 Has the proposed site layout been informed by the features identified through the contextual analysis? ;

The layout of development on a site and the siting of uses within that need to consider the contextual analysis. A comprehensive analysis should help to inform which parts of the site are more sensitive to development or need to be avoided completely. Policy HD2 sets out important considerations regarding the site's context that will affect the overall density of the development.

- Does the contextual analysis suggest that any areas of the site need to be left undeveloped, for example because of archaeological remains, valuable habitats, mature trees or areas of flood risk? These undeveloped areas will not only affect

site layout and block arrangement but also height/massing and density, and will influence the pattern of streets.
    - Certain constraints may be able to be overcome through targeted design measures to allow development to come forward in an acceptable way – e.g. contaminated land could be remediated; noise concerns could be overcome with sufficient attenuation measures, open space may be able to be re-provided.
    - Other constraints may necessitate an arrangement of the site that completely avoids the concern – for example if part of the site is particularly high risk from flooding or to ensure a sufficient buffer to a sensitive ecological site nearby or a watercourse.
- The built form of the surrounding area will likely influence site layout. The design will need to respond to the way that buildings and spaces are arranged around the development site, including their heights, massing and density. Existing building lines should also be considered, and in most cases it will be appropriate to continue these where relevant. If that is not the design choice, the rationale should be explained.
- Movement will also be a key part of informing the site layout. The contextural analysis should identify existing accesses, roads and footpaths, and key destinations in the surrounding area. The Movement section has more detailed considerations but particular questions that may influence layout could include:
    - Are existing accesses adequate, or do they need to be moved or enhanced?
    - Can access be achieved (or are any additional accesses needed) for vehicles or just for cyclists and pedestrians to improve their choice of routes and to allow direct crossing of desire lines?
    - How direct is access through the site to surrounding destinations such as shops and bus stops and can it be made more direct?
    - How easy is it to navigate through the public realm? Key navigating points, or nodes, may be marked by buildings with notable features to make clear that it is a significant point in the network and to make routes memorable. Small block sizes can help maximise choice of routes.

B.2 What is the strategy behind the configuration of development blocks and how has this been tailored to the opportunities and constraints of the site?

Proposals should consider how different configurations of block typologies can satisfy the need of the development and respond to existing context. In general, key considerations will be the orientation of blocks, how they fit into the surroundings and maintain or create views and glimpses, the impact on solar gain, any wind tunnel effects and so on. The location of uses within blocks may need to be tailored to specific constraints on the site and surrounding area, for example noise pollution. Retail and similar uses that create activity will be best located on a frontage on primary streets. The uses proposed will influence the type of blocks. There are specific considerations for particular block arrangements:

- Standalone detached blocks may be more suitable for constrained sites or infill development, however standalone buildings can also be used in key locations on larger sites as statement buildings that can bring interest and improve legibility of site. Careful consideration needs to be given to the spaces between buildings to ensure they are integrated into their surroundings successfully. They typically give fewer opportunities to establish defined open space so the surrounding public realm will be particularly important establishing their character and setting.
- Courtyard or perimeter block arrangements establish more continuous building lines along the boundaries of an urban block and can offer more opportunities to contain shared space within. The shape and size of shared spaces within the

blocks can be varied based upon the needs of the occupants but should also be based upon wider environmental considerations such as presence of daylight/overshadowing.

- Where a site requires more flexibility but an appropriate amount of space more hybridised blocks arrangements can be more effective. This incorporates more breaks in building lines that can act as secondary access routes. Hybrid arrangements can allow for more variation in heights and massing, introducing more visual interest as well as opportunities to attain greater levels of floorspace whilst also keeping the footprint of the building minimised. Because of the more open nature of this type of arrangement, they can include semi-private amenity spaces that have a stronger relationship with the surrounding public realm.

B.3 How have the heights and massing of buildings been determined and how is this justified?

Oxford is particularly renowned for its spires and iconic skyline. Heights and massing of buildings should be informed by the context of the site (neighbouring uses and local built form and character) as well as the needs of the uses proposed.

- The height at which a building is considered to be high will be dependent on its surrounding context and will vary across the city. Even an increase in height of a single storey may constitute a high building. Building heights may impact views and Policy HD6 relates to high buildings. An understanding of context is critical. High buildings may offer visual interest and higher density. The choice of height should be design led, and the overall design will affect the impact of the height. Buildings at greater mass will often be more impactful at a lower height than a building of less mass. The impact on the heritage asset of the historic core is particularly important to consider.
- Vu City can be a useful resource for determining impacts of heights and reference should also be made to the methodology outlined in the Assessment of the Oxford View Cones report in accordance with policy HD6. In addition, the high buildings TAN sets out four visual tests which should be investigated as part of the design iteration process and included in the final submission proposal to demonstrate the potential effects a high building may have to the character, visual and heritage resource. These tests are:
- Visual obstruction – the physical obstruction of a feature or component in the view caused by a high building.
- Visual Competition / Complement – the siting of a high building within the same view as the feature such that the two are viewed together.
- Skylining – when high buildings break the skyline, horizon or silhouette, which may be formed by built form or vegetation.
- Change of character – occurs when the composition of a view is altered to the extent the character of the view is discernibly different to that of the existing.
    - There are other key design considerations when designing tall buildings. The profile or silhouette of the building is important. The articulation of built form should clearly respond and contribute positively to Oxford's skyline. The scope for diversity of profile / silhouette will depend on demonstrating a clear understanding of the context and positive contribution to the modulation of the city's skyline. High building designs should provide well organised and designed roof environments and contribute to the modulation of the city's skyline.
    - Microclimate is another important consideration as greater heights have greater potential to modify the microclimate. Effects may include the tunnelling of wind, partial or permanent shading of adjacent areas and / or intensification of solar irradiation. Privacy and access to light will also need

to be considered and the massing will need to be designed in a way that supports this.
    - Think about how the visual impact of the development will be influenced by the bulk and massing of buildings including the relationship between different sections of the building (e.g. how its base, its middle and its top are balanced out). Larger, unbroken facades that form bulky or homogenous building lines can have a more significant impact on the streetscape and views from a distance, which may be more harmful in more sensitive areas of the city. Taller buildings of slender form are more likely to be more appropriate than bulky tall buildings.
- Whilst more complicated massing which results in a higher surface area (sometimes referred to as a high form factor) can come at a detriment to energy efficiency (see Resources section), consider how massing and building facades can be strategically designed to create visual interest through use of smaller components or features that can create depth and rhythm where appropriate (see Articulation of building features under the Identity and Character section).
- Consider the experience of people within the streetscape as they pass by and use the building. Think about how the building fronts onto the street and how design relates to the human scale so that spaces created between buildings are welcoming and pleasant to inhabit.

B.4 How do alterations to existing buildings respect the form, scale, character and appearance of the existing building and surrounding area?

The same design principles apply when considering alterations to existing buildings; any alterations should respect the form, scale, character and appearance of the existing building. When extending a building, the impact on the existing building and surrounding buildings needs careful consideration.

The privacy and internal daylight and sunlight of the existing property and surrounding properties maybe negatively affected. Policy HD8 sets out expectations for levels of privacy, sunlight and daylight, including the 25o and 45o guidelines. With an extension there is more limited scope to consider orientation, meaning the height and length of the extension and any impacts on overshadowing will be particularly important, as well as the size and placement of windows and rooflights.

Movement

The quality of the movement network into and through a development plays an integral role in establishing its character and how it functions. Particular focus should be on enabling safe and easy walking and cycling as well as on the needs of those who are less mobile. A quality movement strategy will play a role in supporting people to access daily needs such as shops and facilities; employment and services; accessing open space and nature without having to rely on private vehicles. The way that streets are laid out can support social interaction and promote a safer public realm. Movement considerations will also need to address access to public transport for journeys beyond the local area and balance out the need for parking for those who do rely upon private vehicles.

M.1 Has movement into and through the development been considered and what is the strategy for this?

It is important that sites integrate well with the surrounding area. As part of the contextual analysis (as discussed in the Context section) movement corridors of various transport modes in and around the site should have been identified including barriers and opportunities to movement which new development could respond to.

- New developments should provide permeable streets to tie in with existing street networks and secure improved connectivity.
- Levels of movement will vary, with higher levels of activity likely to be located around particular uses like shops, schools and areas of employment and lower levels of activity in other areas such as residential streets.
- Very large sites may have streets across a hierarchy e.g. primary, secondary and tertiary routes. Even for small sites with a single access route, consideration of the position of this route within the surrounding street hierarchy should inform design.
- The street width, building height, enclosure, set backs and uses are likely to differ between the different street types to help distinguish between them (and therefore aid wayfinding) and to accommodate the level of activity of movement on them.
- Streets should not be vehicle dominated but should reflect a more human scale and allow for and encourage more active and sustainable modes of transport. Opportunities will be available for accommodating other design features, such as greening in the form of trees or SuDS, as well as street furniture and services but a balance needs to be struck to ensure that these spaces do not become cluttered.
- Narrower streets (secondary and tertiary routes) offer opportunities to slow down or remove through traffic and prioritise active travel like walking and cycling and are likely to be more fitting of residential areas. The design of new streets and alterations to existing ones should seek to encourage social interaction, natural surveillance and opportunities for active and sustainable traffic by prioritising the quality of the public realm and removing the dominance of the car in the street user hierarchy.

M.2 Has active travel been prioritised and how has design been used to ensure safety and security for all modes and different groups?

On routes of all sizes, pedestrian and cyclist friendliness should be maximised to ensure that all users are safe and comfortable throughout Oxford's movement network. The street user hierarchy should prioritise children, pedestrians, cyclists over motor vehicles and the built form and street design should reflect this. Oxfordshire County Council's Local Transport and Connectivity Plan should be referred to and its Street Design Guide provides useful advice.

- Oxford's communities are diverse with varying needs and vulnerabilities that can modify their experience of the public realm at different times; this needs to be taken into consideration in designing movement routes. Is there sufficient pavement space for different users needs – e.g. those with pushchairs, individuals in wheelchairs or with other assisted mobility needs?
- Consider how route design will impact perceptions of security and promote safety for different groups, such as by facilitating desire-lines for pedestrians and cyclists wherever possible including across open spaces. Avoid creation of spaces and routes that feel cut off or lacking in visibility and take opportunities to reduce street crime/fear of crime and deter anti-social behaviour. Think about how different routes might be experienced at different times of the day and in different seasons, how could perceptions of safety change at night or in bad weather and how can street design be used to improve these (e.g. lighting, shade and shelter).
- Consider also how use of planting could be incorporated into roads, streets and paths to soften the urban fabric and encourage active travel across the site and beyond. Green features like trees that provide canopy cover can be beneficial for providing shade to pedestrians during the summer months as well as movement corridors for wildlife; careful placement of hedges can act as a buffer to air pollutants as well as softening noise impacts. However, care should be taken in choice of species and placement to ensure negative impacts are avoided – for

example certain species can produce pollutants that reduce air quality, whilst poor design can also trap air pollution (e.g. large tree canopies reducing air flow within narrower street canyons). See Nature section for more information.

- Think about how street design can support active travel in other ways, for example by providing secure storage for cycles to ensure that people have somewhere safe to leave bikes in between travelling. Think about how and where these should be located, think about where the demand for storage would be. Is it convenient to use? Does it benefit from natural surveillance? Has situation avoided creating hazards for other road users?

M.3 How does the layout and design of streets promote access to public transport and create areas with minimal traffic

Lower traffic streets allow more space for social interaction and for children to play and have been demonstrated to increase 'neighbourliness' and access to active and more sustainable travel and freedom of movement for children. Even in a relatively small scheme, attention can be given to creating areas with low or no vehicular traffic.

- Placement of parking areas is important, particularly on schemes with only one vehicular access. Is it possible to position parking so that cars do not need to circulate around the whole development? Has permeability been maximised for pedestrians and cyclists?
- Most schemes in Oxford will be smaller, infill schemes on or near to existing bus routes, but will not have new bus routes within them. However, in cases where bus routes are needed within a scheme, these must be direct, wide and straight enough to be easily navigated for a bus driver with adequate space for passenger to wait comfortably, without conflicting with other road users.
- Think about requirements of other services like delivery vehicles and waste collection and design routes to ensure they can move efficiently. All streets should have some provision for emergency access, regardless of hierarchy. Solutions for otherwise pedestrian areas, such as designated delivery zones, may be useful.

High quality public spaces

Except for the smallest developments, most new developments will include public spaces. Multi-functionality is encouraged, from allowing movement and access to allowing social activities and recreation. The link with the Green Infrastructure strategy will influence whether there are long, narrow strips of green corridor, larger and more formal spaces, natural spaces or small pocket parks.

P.1 Are all spaces clearly defined, with a clear purpose, with no awkward or leftover spaces?

Public spaces should be well-defined and clearly distinguished from private spaces. The purpose of the public spaces should be clear, with a certain amount of flexibility about their future use. For example, if routes are segregated, with pavements or cycle lanes for pedestrians and cyclists, the divisions should be clear, but potential for change in the future should also be considered, for example to a shared space. Public open spaces should be obviously public, clearly visible, and accessible. Awkward patches of land that are too small to have an obvious function should be avoided. Landscaping and street furniture such as benches and carefully locating small spaces within the network to create a small social or stopping place will help to ensure they are functional and not wasted.

P.2 How are public spaces designed to give a sense of safety

When a public space is overlooked, with doors and windows fronting onto it, it can offer the user passing through a sense of security, this is particularly important at night and for more vulnerable pedestrians. Is there overlooking to create a sense of surveillance? Are all external public spaces such as streets and parks overlooked by windows serving habitable rooms in buildings and adjacent activity?

P.3 How do public spaces support social interaction and is there adequate space in the public realm to linger and walk side-by-side?
The public realm should do more than just enable people to walk from a to b. Except in the smallest infill sites with only a short access road, there should be an opportunity to design the public realm to include wider and more spacious areas that enable people to interact with others. Routes for pedestrians should not be so narrow as to require single-file walking. Oxfordshire County Council's Street Design Guide provides useful advice.

P4 How are any public open spaces designed with all ages and needs in mind?
Public spaces should be useable and attractive for everyone. Playable space and playful streets that are welcoming to all support sustainable communities and wellbeing. This is important in all of the public realm, not just large parks and squares and playgrounds. Smaller, informal spaces including pavements, pocket parks and small community gardens and growing spaces can all provide these opportunities. Those with visual or hearing impairments benefit from well-designed spaces that are easy to navigate and pleasant to use.

P.5 How has the public realm been designed to be flexible, adaptive and stimulating
Public realm should be able to respond and adapt to various uses and needs and it should also be engaging. Variety in the public realm will help achieve this. How will there be opportunities for children and adults to play games and be active or stop and watch the world go by? All senses should be considered, including the sounds that different planting and surfacing may make, visual variety and smells.

Identity and character

Identity and character are influenced both at a broad level as was discussed under the Built Form section, but also on a more detailed level, by the articulation of specific features of buildings and spaces as well as the choice of materials. Where these elements come together successfully, they can help to generate local character that makes a development distinctive and memorable and gives users a sense of pride as well as establishing places that are sustainable and resilient for the future.

Articulation of building features

I.1 Do the proposals contribute positively to the roofscape?
Oxford has a rich roofscape and new development needs to consider any impact on it. The positive design of roofscape will help to enhance any significant long views the development might be part of and also the experience of the place at street level. The contextual analysis undertaken on the development site will help inform an appropriate approach to the design of rooftops.

- How the design of roofscape sits within longer views will be particularly important where the development is sited within the protected views that cross the city, but also where it is sited within views identified within Conservation Areas Appraisals – See Views section.
- Along with the presence of protected views, consideration should be given as to whether there are specific characteristic aspects of roofscape in the area – this

will be of particular relevance where the site is located within a conservation area – for many of the CAs the style of rooftop is an important element in their designation.

- Variety in the roofscape through a mixture of flat and articulated roofs can help to provide visual interest. Think strategically about the appropriateness of additional features such as dormers or extractors. Where incorporated carefully, these can add visual interest and punctuate the roofline, but their incorporation needs to consider the wider context of the area as well as the overall balance of other features on the building.
- Where roofscape design is less constrained and particularly on larger developments or those within constrained site boundaries, consider how design could support the use of rooftops as communal areas or private amenity space. Equally, think about how rooftops can support wider environmental/sustainability objectives such as promoting biodiversity, and rainwater harvesting, as well as roof-mounted photovoltaics (which can be integrated with green or biodiverse/brown roofs). See Nature and Resources sections.

I.2 How have façade details such as windows and entrances been designed with consideration of any positive characteristics in the area?

As with roofscape, the articulation of façade features like windows and doors can play a major role in contributing to the character of the building and the setting of the wider area. Again, think about the contextual analysis and what factors might need to be considered in the design of these features.

- Articulation of the windows on surrounding buildings including their size, positioning and the types of materials used in their construction. Think about how the design of window/doors will fit in with the rhythm of adjacent buildings so that they respect and enhance the positive character of the area where possible. Where contrasting design choices are made, these should be justified.
- As well as the location of windows/doors, think about how the specific glazed features are designed, including how individual panes are subdivided. Large uninterrupted areas of glazing (e.g. a wide, undivided patio door) can give the impression of voids which may be detrimental to overall design depending on where they are located. Conversely, use of glazing that is subdivided on particular facades can draw attention to these elements in a positive way, but can be equally disruptive where multiple styles of sub-division, or uneven subdivision are located on one frontage.
- Think about the impacts of window/door sizing and spacing on internal amenity. Larger areas of glazing can allow for more daylight but could disrupt privacy, so may be more appropriate at levels higher than ground floor. Equally, size and positioning of glazing can impact solar gain and indoor thermal comfort – there are specific requirements for meeting overheating tests set out in the Building Regulations (Part O – Overheating) which need to be balanced out against design aspirations to ensure planning permission is not in conflict with building regulations. See Resources section.

I.3 Attention to detail: storage, waste, servicing and utilities

Design will need to take into account a range of external features servicing the development and its occupants; it is important that their impact is considered both in terms of their location and the materials they are devised from. Are external servicing features such as bin storage facilities, rainwater goods integrated into the design of the development with well considered placement?

- The positioning of features like bins and storage for outdoor equipment (including bikes) at the front of buildings can have a negative impact where they protrude inappropriately as well reducing the perceived activity of frontages which can

impact the street scene and reduce perceptions of safety. Think about how these could be positioned away from facades intended to provide active frontages, potentially to the rear of properties and away from the streetscene where possible, though it is important to ensure that there is good access for users and it is acknowledged this isn't always feasible. Where positioning away from street scene is not possible, there will be a need for high quality materials and more careful design that can reduce impacts.

- Think about the impact of other external features required to provide for essential services such as meter boxes, gutter pipes, satellite dishes and Electric Vehicle charging (see Resources section for more on EVs). Whilst these should again be located in a way that minimises their visual impact and best fits in with the character of the building and the local area, it may not be feasible to fully limit visual impact by position alone. Again, this is where it is important to pay attention to material choice and specific design characteristics like size, colour, and location and factor this early into the design process. Can these features be designed with a similar colour to the wider building? Can features like guttering be integrated into the façade?

I.4 How do the materials chosen reinforce the overall design concept, respect the local context and ensure high quality?

It should be explained in the DAS how the contextual analysis been used to inform the materials chosen. Considerations that may be of relevance as part of the design rationale for materials used could include:

- In many cases it is likely to be appropriate to select materials and vernacular used in the local area as well as wider Oxford. Where contrasting materials are deliberately chosen for example to create visual interest and distinctive style, the design rationale should be justified, including with regard to the impact on existing character.
- It may be appropriate to use combinations of materials or different materials on different parts of the building for example on different storeys or in order to articulate certain parts of the structure. In those cases, the change from one material to another should appear logical and be justified within the design rationale.
- The selection of materials should consider various characteristics including colour, variation, reflectivity, texture of materials.The extent and character of glazing will also influence the appreciation of a building. The use of prominent colours and materials should be carefully considered; muted colours that respect the existing character of Oxford may be most appropriate. Substantially glazed elevations should demonstrate sensitive appreciation of orientation and reflectance.
- Consider the way materials are seen and appreciated under different atmospheric conditions, for example in bright sunshine and at different times of the day and night. This should be tested through the provision of visualisations agreed during pre-application consultation.
- Materials utilised in external/detailed elements like rainwater harvesting (e.g. guttering), boundary treatments (e.g. fences, walls) and other extraneous features, also need careful consideration, particularly where these are publicly visible. Are these of a high quality, durable and in keeping with the wider context of the building and the local area?
- Consideration should also be given to how the materials will perform over time; they should be chosen to be long-lasting and wear and weather well, without degradation of their aesthetic appeal or functionality. This applies to materials used in the buildings and also external areas including private amenity space and public realm which will be subject to differing levels of wear (e.g. weathering). In

external areas, materials should be easy to maintain and repair, and when it comes to replacement, easy to source matching materials.

- Other considerations of relevance to material selection could include how they will support other design choices and sustainability. For example, considering the embodied carbon cost of particular materials, as well as thermal performance of fabric materials which is important for energy efficiency and maintaining a comfortable indoor environment throughout year (see Resources section and policies R1, R2 and G9).

Nature - Green Infrastructure and biodiversity

Given the constrained nature of the city and increasing pressures on landscapes and biodiversity arising from all sizes of development, it is essential that the provision of green and blue infrastructure are considered at the earliest stage in the design process. Natural and designed landscapes that integrate existing features and incorporate new features should offer multi-functional benefits including for health and wellbeing, biodiversity, water management and climate change. Impacts on existing biodiversity should be avoided and new spaces for wildlife and flora prioritised, integrating with the wider ecological network wherever possible, so that development can help to enhance biodiversity across the city.

N.1 How has design been informed by an understanding of the quality of existing Green Infrastructure features on and around the site and are these being retained/enhanced wherever possible?

Design should be informed by an understanding of the quality of existing green and blue features on and around the site and the value they contribute to the local area as well as wider GI network. A range of factors should be considered in determining quality – think about not only age and physical condition but also their value to wider amenity of the area as well as other functions that may not be as visible – such as benefits for biodiversity; climate adaptation and carbon storage; as well as being of heritage significance (e.g. Registered Parks) or contributing to the setting for heritage assets or for physical recreation.

- Retention of existing green infrastructure should always be the priority, particularly where this is high-quality and could be challenging or time consuming to replicate elsewhere. Mature trees and hedgerows for example take many years/decades to establish and it is preferable for development to be designed in a way that avoids adverse impacts such as their removal.
- Certain functions of green infrastructure are specific to their existing location, making them infeasible to relocate, for example where they contribute to setting of heritage assets; protect reserves of carbon heavy peat; or act as flood storage within the functional flood plain.
- The potential for enhancement of lower quality features should also be considered, this can help meet the requirements of the Local Plan such as for the Urban Greening Factor (Policy G3) or biodiversity net gain (Policy G4).
- It is important that design not only considers the site itself but also the areas that extend beyond the boundaries and the interconnections between green features wherever possible. This will help meet the requirements of Policy G2 on enhancement and provision of green and blue features.
- Consider whether there are existing linear features such as lines of trees, hedges, pockets of green spaces or watercourses that extend into or alongside the site. These can be important spaces for movement of wildlife and people and support an array of habitats. Consideration should be given to strengthening these existing connections, enhancing existing habitats, and avoiding any further fragmentation. Potential for recreation and movement should also be considered.

A range of tools and metrics are available to inform assessments of existing GI and should be utilised where relevant including existing information in the Oxford GI study 2022; the Council's Urban Greening Factor tool; Natural England's GI standards; the DEFRA Biodiversity metric as well as other best practice such as the British Standards for trees BS.5837:2012 (or its future equivalent). Refer to satellite mapping as well as other data sources that details the types of green features, spaces and habitats that surround the site.

N.2 How have new Green Infrastructure features been designed to deliver multiple functions/benefits for the sustainability of the environment and health and wellbeing of people?

Green infrastructure needs to be considered in design with the same level of importance as traditional 'grey' infrastructure like sewers and roads, particularly as it is often able to perform multiple roles that support the sustainability of a development and its occupants. This is especially important in Oxford where our green space is limited or unevenly distributed. Policy G2 sets out the various multi-functional benefits that new GI should seek to deliver, and green and blue features should be selected to meet the needs of the proposal and the wider area in this context. Highlighting where design features are addressing multiple policy requirements (for example providing green space for occupants as well as SuDS features that can reduce flood risk) will help in demonstrating the merits of an application and the overall approach.

- The functionality of open space and the role any type of provision plays in supporting occupants of the development should also be informed by an understanding of the wider local context as well as the needs of the users of the development. Consider what types of spaces are available already in the local area, whether there are deficiencies in certain types of space that could be addressed by the proposal.
- The scale of the development is likely to influence the levels of opportunity for provision of green spaces but all sites should be able to provide some level of high-quality greening – this will be an expectation on major development, to be demonstrated via the Urban Greening Factor (Policy G3). On larger sites, networks of green spaces can help to break up urban fabric as well as green corridors. For larger applications with public open space provision, engagement with the local community will help inform the type of space needed.
- Simple design solutions such as avoiding extensive areas of artificial surfaces like tarmac or concrete can be beneficial for the long-term sustainability of a site and can be beneficial in helping to meet specific policy requirements such as those set out for the Urban Greening Factor (Policy G3) and Soil quality (Policy R6).
- On building facades such as roof and walls, use of green features where carefully installed can further reduce artificial surfaces and promote more multi-functionality. This approach can be particularly helpful on more constrained sites, where opportunities are limited elsewhere.
- The plan for ongoing management and maintenance of green features should be set out. Care will be needed during the establishment period (including watering and feeding as well as replacement of failed specimens) but also ongoing care needs such as pruning of trees and shrubbery and maintenance of green spaces.
- Green spaces with a mixture of play features for young people will enhance wellbeing – these spaces do not have to be overly designed or dominated by fixed equipment, but could also be compromised of wild areas and facilities that encourage engagement with nature and free-play.
- Opportunities for communal food growing, which could be small scale and informal such as community orchards can also meet an important need not only for food but also social engagement and mental health.

Information is available published data sources from the Council (such as the Oxford GI Study 2022, the Playing Pitches study). National data sets such as the mapping accompanying the Natural England Green Infrastructure Framework and OS data.

N.3 Are there protected species or other biodiversity/habitat features on the site or in proximity to the development and how has the design been tailored to avoid adverse impacts and/or enhance these features?

- Part of the contextual analysis informing design should be an understanding of the potential for protected species or other biodiversity value (such as important habitat) on the site and ensuring design responds in a way that avoids adverse impacts in line with the mitigation hierarchy and ideally enhance these features.
- The site layout will need to be informed by considerations arising from proximity to important habitats and take into account the potential for causing impacts even at a distance.
- Where a development is proposed in proximity to a designated ecological site, the layout of the site may need to be designed in a way that incorporates sufficient buffering – potentially through use of landscaping features and informed by appropriate ecological expertise. Buffering may also be required where there is proximity to blue corridors.
- Where there are sufficient indicators of species of interest, there may be a requirement for detailed biodiversity surveys which
- ascertain the specific nature of species present and help inform any mitigation that may be necessary.

A range of information sources are available detailing the presence of biodiversity interests in the city, including a detailed set of records held by Thames Valley Environmental Records Service (TVERC); as well as habitat data from Natural England (Magic tool), and the network of ecological sites designated by Policy G6.

N.4 How have external areas and features provided on the site been designed to support biodiversity and allow wildlife to flourish?

It is important to consider the types of landscaping features and how these can support feeding and shelter of various forms of wildlife where possible. Care should also be taken in the design of site features which could impact wildlife.

- The inclusion of native and/or pollinator friendly planting, as well as species that bear fruits/nuts is encouraged in order to support feeding for example.
- Making space for areas of informal planting that can grow wilder during the year can provide opportunities for shelter and hibernation within the urban environment.
- Species selection should avoid invasive species or those that are particularly harmful to people or the wider environment.
- Consider how the design of external lighting could impact on the wider environment and avoid overuse of artificial lighting where it could be particularly detrimental to nocturnal species. Seek to ensure that outdoor lighting is targeted and proportionate to the needs of the development and its users.
- Try to limit other sources of disturbance such as noise from plant equipment and emission of pollutants into the air or water – these are considerations which will be of equal importance during the construction phase as much as during the operational phase and will help to meet the requirements of Policy R5 and R8.

Resources

It is essential that development responds to the challenges of climate change. This includes meeting net zero carbon and having buildings that are resilient to hazards like overheating

and flooding, and prudent use of natural resources. Many of the responses to these challenges, such as energy efficient design and efficiently performing buildings will need to be thought about at the beginning of the design process. Careful design choices can secure efficient buildings and reduced impacts on the environment, whilst also securing high-quality design and benefits for the health and wellbeing of occupants.

R.1 How has development been designed to ensure it is net zero carbon in operation and in accordance with the energy hierarchy?

Policy R1 sets out the energy hierarchy and its application in the design of new buildings. The first step in the hierarchy is designing so that demand for energy to operate the building and its systems is minimised, this could be achieved in a number of ways many of which align with Passivhaus principles such as:

- Orientation - Design the orientation of the building so as to maximise solar gain in the winter (e.g. south-facing) and minimise overshadowing. Dual aspect, south-facing facades are particularly beneficial for this where a site allows.
- Massing - Consider how the massing of the building will influence energy required for heating/cooling. Be strategic in how the articulation of elements such as roof shape, the use of insets and overhangs as well as the grouping of dwellings are used to achieve character without resulting in excessive form factor (the ratio between the external surface area and the internal treated floor area) which will require greater amounts of energy to heat/cool. Also think about whether all spaces require heating/cooling - grouping of 'cold spaces' like garages and bike sheds can allow for a more efficient layout.
- Facades including glazing - Think about how the proportions of glazed surfaces like windows/doors can influence performance. Design glazing with considerations of orientation, daylight and thermal comfort in summer. It is important to minimise heat loss towards the northern elevations in winter, such as by incorporating smaller windows on northern facades, whilst solar gain needs to be maximised on southern facades where window sizes could be bigger. Equally, higher storeys are likely to benefit from more light so could include reduced levels of glazing than lower levels.
- Fabric-first - Take a fabric-first approach which seeks to incorporate high levels of insulation; a very air tight building fabric as well as minimising thermal bridges. Use of triple glazing in windows/doors will help with thermal efficiency of these elements.
- Ventilation - Include efficient ventilation systems in order to preserve good indoor air quality, avoid overheating and moisture build up. Because of the need for high air tightness in building fabric as outlined above, net zero carbon homes are likely to require some form of mechanical ventilation with heat recovery which will allow for a constant rate of ventilation. Consider the placement of these systems to allow for easy access and maintenance. Habitable rooms need to have openable windows – ideally try to ensure windows are placed on opposing sides of the building to facilitate purge ventilation providing bursts of fresh air through the building as required.

After minimising energy use, the second step in the energy hierarchy as set out in Policy R1 is that design should consider how energy is used as efficiently as possible and sourced renewably. Each development site will have its own considerations but some factors to consider include:

- Use of heat pumps that can secure cooling as well as heating and can be up to 3x more efficient than other heating systems. Where a building has followed the principles of high fabric efficiency above, they will be well set up for the more gradual heating method of technologies such as air source heat pumps.

- Consider the orientation of the roof and how this can maximise performance of solar photovoltaics and thermal technology. Consider the types of systems the building will accommodate, the orientation of the roof to maximise solar irradiation, and the structural considerations to support pv in high winds.
- Careful design can allow solar pv and green roofs to exist mutually with the correct orientation and placement of panels – indeed the cooling effect of green roofs can support the performance of pv (which can reduce at very high temperatures).
- Design of the renewable energy generation system can be made more efficient through incorporating battery storage to make use of the renewably generated energy at times of low capacity. Space will need to be made to incorporate such systems.
- Design considerations for electric vehicles chargers such as location and placement, size of unit and colour for example will be particularly relevant where installing in a sensitive area of the city (e.g. conservation area). Properties without a driveway may need to consider potential for other solutions such as pavement cable channel as a priority before considering the need for creation of new driveways. There is additional information on the City Council website and the County Council's website.

Where proposals involve the retro-fitting of existing buildings (including traditional buildings), policy R3 sets out the importance of being guided by a Whole Building Approach, as well as other guidance that should be considered in design. Reference should also be made to the Council's Retro-fitting Technical Advice Note as well as Historic England's advice note.

R.2 How has consideration of the carbon footprint embodied within the construction process been incorporated into the design?

The issue of embodied carbon in the construction process is not a simple one and will be influenced by various considerations such as the types of materials selected, where they are sourced from, how they are put together and their longevity. Nevertheless, having consideration of this issue upfront and throughout the design process will ensure opportunities to reduce carbon emissions embodied in the construction process are not missed. Think about:

- Reuse of buildings - consider whether demolition of existing buildings is really necessary and reuse buildings where possible (try to reuse demolition materials if not). Maximise recycling on the site and the use of recycled materials more generally and minimise waste.
- Source of materials - consider where materials are sourced from and how these are to be transported to the site. Can modular construction techniques be utilised to prepare parts of the building in advance and be brought to site? This is also a good way to reduce waste in the construction process.
- Types of materials - certain materials have a higher carbon cost to produce than others. Some materials can come in lower carbon alternatives such as low carbon concrete mixes. Natural materials like wood and hemp which may be used in the structure, insulation or the finishing, can even sequester (lock up) more carbon than is emitted in their production. In terms of the finishing, can elements be left open/uncovered without the need for additional finishes being applied?. For example, careful selection of the material used to construct the floor can mean there is no need for additional carpeting or other coverings.
- Maintenance - think about the entire lifespan of the building. Ensure that easy maintenance of the building and its systems are considered to support longevity.
- The future - consider how design of features and layout could allow the building and its spaces to adapted to alternative uses in the future. What will happen at

the end of its life span? Plan for ease of deconstruction in selection of materials and construction methods.

R.3 How does the design consider resilience to the impacts of overheating and water stress/drought in a changing climate?

A highly fabric efficient building should be as good at keeping heat out during the summer months as it is in keeping heat in during the winter months. However, the performance of the building during high heat events should be an integral consideration in the design process and additional measures that can reduce the risk of overheating are greatly encouraged. There are certain requirements that will need to be met to pass Building Regulations (specifically the requirements of Part O: Overheating) - as these requirements can have a close relationship with design process, it is helpful to consider them together.

Policy G9 sets out the importance of design being guided by a cooling strategy which follows the principles of energy saving and efficiency in line with the energy hierarchy, promoting passive cooling options in the first instance before exploring more energy intensive measures. The following hierarchy should be used as a guide for selecting cooling interventions:

- Minimise internal heat generation and reduce amount of heat entering a building in summer through energy efficient design and careful building layout/design (e.g. orientation, shading, albedo, fenestration, insulation and green infrastructure)
- Manage the heat within the building through exposed internal thermal mass and high ceilings
- Passive ventilation
- Mechanical ventilation
- Active cooling systems (ensuring only most energy efficient technologies are used).
- Consider how the design of façade elements such as windows can reduce solar gain during the summer months. Windows on southern elevations will experience sunlight coming in at a higher angle in the middle of the day which can be easier to address through fixed shading like wider eaves (and other forms of overhang like balconies). Use of shutters and windows that open to allow rapid ventilation through the building can allow occupants to quickly respond to temperature extremes.
- Consider how water saving measures such as water efficient fixtures and fittings as well as grey water recycling can be incorporated into the design to reduce water use, alongside rainwater harvesting features to collect water for uses such as gardening. Where these features require elements on the roof, there will need to be sufficient space to accommodate these alongside other features like green infrastructure, renewables and plant equipment.

R.4 How does the design consider resilience to the impacts of flooding in a changing climate, avoiding increasing flood risk elsewhere and ideally reducing existing flood risk?

The approach to site layout needs to be informed by a comprehensive understanding of current and future flood risk on the site (taking into account the impacts of climate change) as part of the Flood Risk Assessment. There is a range of detailed guidance and data sources that should be considered. The Flood Risk Assessment needs to be integral to informing the design process and how the development is planned. Some general considerations that will need to be factored into the design process include:

- The current context of the site including existing land uses and how these may contribute to or increase flood risk. This includes whether there are areas of

existing flood storage or natural features which contribute to mitigating surface run off (e.g green space and areas of planting).

- Taking a sequential approach to the layout of uses on the site with more vulnerable uses (see NPPF for vulnerability classifications) being located in areas of lowest risk from flooding on the site.
- Incorporating a range of design features into the fabric of the building itself to improve resilience to flooding and helping occupants to recover more quickly. Such measures are generally broken down into two categories: dry proofing, which seeks to keep water out at times of flood; and wet proofing which seeks to allow the building and its systems to continue to operate during flooding and be dried out quickly.
- Thinking about how design can support emergency management at time of flooding – are there clear and safe access/egress routes into the site and individual buildings, are evacuation routes easily identified for occupants including those who may have reduced mobility (e.g. elderly and disabled); how will emergency services access the site if necessary; what provision is there for alarm systems and alerts?
- Taking account of the age, construction and heritage significance of any existing buildings and structures on the site. Where retro-fit is being proposed, follow the guidance of policy R3 in relation to Whole Building Approach.

R.5 How have Sustainable Urban Drainage Systems been incorporated?

Sustainable Urban Drainage Systems (SuDS) features should be an integral component of the design of outdoor spaces in line with the requirements of Policy G8. Applicants should refer to the Council's SuDS planning guidance as well as guidance prepared by the County Council in how to design SuDS features into the development, available here. In particular, it is expected that high quality design in relation to SuDS will factor in a number of considerations including:

- Design of SuDS should follow a strategic process that seek to slow down and capture rainfall first, allowing as much of it as possible to evaporate or soak into the ground close to where it fell. The rest is then directed in a way that improves water quality towards the nearest watercourse to be released at the same rate and volumes as before development. The types of features selected should be informed by the context of the site. The Council's preference is that natural surface features which are primarily green are prioritised, these could include green roofs, ponds, wetlands and shallow ditches called swales.
- Additional context informing SuDS selection should consider the geological and hydrological conditions of the site, informed by appropriate ground investigations including percolation testing as well as testing to understand the potential presence of contamination. Issues that may be of relevance and may make certain types of drainage features inappropriate could include: unstable ground, contaminated ground, poor infiltration, proximity to buildings, the highway or other sensitive areas; presence of other services/infrastructure; as well as existing ground water levels/potential for pollution.
- Whilst SuDS features need to prioritise their water management benefits including flood retention and improving water quality of runoff, design should follow the principles of multi-functional design so that these landscape features can perform multiple benefits in the development throughout its lifetime, particularly when they are not in use at times of low rainfall. See guidance on multi-functional green infrastructure features in the Nature section.
- All SuDS should have a comprehensive maintenance plan in place in order to ensure they remain functional and safe for the lifetime of the development.

Homes and buildings

Well-designed homes and communal areas within buildings should provide a good standard and quality of internal space. The needs of occupants will relate not only to the internal space provision and how this allows them to live day to day (e.g. socialising, working and keeping active) but also to external space provision in the form of private or communal outdoor spaces. Well-designed homes also consider the varying needs of different groups in the community including the disabled and the elderly and are easily adapted to meet changing needs over time.

H.1 Are internal spaces of sufficient size and proportion for their intended functions?

It is important to ensure that new homes are of an adequate size and suitable layout to provide high quality, functional homes that meet the needs of a wide range of people, and consider how those needs might change over time. This applies to development at all scales, from large strategic sites to infill development. While there is added pressure to deliver as many homes as possible, this should not automatically result in the creation of smaller homes, or housing that has unacceptably small or poor functioning internal spaces that do not meet appropriate standards.

- Policy HD9 sets out the requirement for internal dwelling spaces to meet at a minimum the Nationally Described Space Standards. These are technical standards, distinct from the Building Regulations, that have been developed as a means to create a common baseline that can be applied across all planning authorities. It contains requirements for the Gross Internal (floor) Area of new dwellings at defined levels of occupancy, and includes areas and dimensions for key parts of the home - notably bedrooms, storage and floor to ceiling height.
- Along with living space, dwellings should allow for a usable amount of storage space integrated within internal layouts. Without it, people's belongings and items for everyday use will encroach on the space available within rooms and limit enjoyment of them. Space requirements should also consider other needs such as waste and recycling storage, which are essential for enabling people to live sustainably.
- Think about the more specialised accessibility needs of the disabled such as the need for wheelchair adapted housing, the requirements for which are contained in (Category 3 homes in Part M of the Building Regulations). Also is the dwelling designed to accommodate aging occupants and changing mobility over time? See lifespan section for more.

H.2 Does the development provide sufficient private and/or communal open space?

Occupants of new homes also need to have access to outdoor space for socialising, exercise and meeting other needs like drying clothes. Ideally there should be access to private outdoor space (such as gardens, balconies, roof terraces) but it may be appropriate to provide access to communal spaces also.

- Where outdoor space is provided, this should be easily accessible to the occupants of the development it is serving,
- Consider wider amenity issues that might affect the space such as privacy/overlooking, security, light and safety.

Lifespan

High quality design should consider how development will be sustained in the long term. Consideration needs to be given to how these places will be maintained and cared for in the future so that they can retain their quality for generations to come. Buildings and spaces

need to be flexible and adaptable to changing needs over time to allow them to remain usable and useful without needing to be replaced.

L.1 Is there a proposed management plan or approach in place for future maintenance and upkeep?

High quality design should mean that places are well-managed and maintained in the long term. For larger and more complex schemes, management and maintenance regimes should be established from the early stages of the design process and set out in a management plan.

- Consider the wide range of elements in a development and their on-going maintenance and management including buildings, landscaping, streets and open spaces, public art, sustainable drainage systems etc.
- Management and maintenance responsibilities should be clearly defined for all parts of a development. They should consider potential impacts on communities such as in the form of service charges or where management will pass into their control.
- Management of local waste, cleaning, parking, internal common spaces, shared spaces and public spaces are all considered from the outset. These include play areas, open spaces, streets and other public spaces.

L.2 How easy will it be to maintain, repair or source matching materials? Have the materials been proven to be robust and weather well?

Materials should be selected that are robust, easy to use and look after, and enable their users to establish a sense of ownership and belonging, ensuring places and buildings retain their aesthetic appeal and functionally for the long term.

L.3 How will the scheme be flexible to changing needs?

Well-designed spaces are adaptable to the changing needs of users and to evolving technologies and innovations. The aspiration is for public places that are inclusive to all. Well-designed private places, such as homes and gardens, should be designed to be flexible to adapt to the changing needs of their users over time. This would include changes such as growing households and mobility due to health changes as well as adaptability to remote home working. How easily can buildings and spaces be adapted without costly or extensive construction works?

- In keeping with the evolving nature of work, development should include adequate space and servicing to facilitate remote working. At the minimum, spaces must at least be flexible enough to be easily adapted for use as living and work and back again.
- There are broader changes to living patterns that should be integrated in design schemes, or sufficient flexibility to adapt to such changes as needed. These would include the reduction in emphasis on dedicated car parking spaces, access to EV infrastructure, adequate and integrated bin and cycle storage.
- Well-designed places should also have consideration for how digital and connectivity infrastructure can be integrated into designs from the outset, as well has how such infrastructure can be maintained and upgraded with the minimum level of disruption to wider users or compromising the functionality and aesthetic appeal.

APPENDIX 1.2 STRATEGIC POLICIES

S1 Spatial Strategy and Presumption in Favour of Sustainable Development
S2 High Quality Design
S3 Infrastructure Delivery in New Development

S4 Plan Viability
H1 Housing Requirement
H2 Delivering Affordable Homes
H3 Affordable Housing Contributions from Other Development Types
H4 Employer-Linked Affordable Housing
H8 Location of New Student Accommodation
H9 Linking New Academic Facilities with the Adequate Provision of Student Accommodation
E1 Employment Strategy
G1 Protection of Green Infrastructure
G2 Enhancement and Provision of New Green and Blue Features
G6 Protecting Oxford's Biodiversity Including the Ecological Network
G7 Flood Risk and Flood Risk Assessments (FRAs)
R1 Net Zero Buildings in Operation
HD1 Principles of High-Quality Design
HD2 Making Efficient Use of Land
HD3 Designated Heritage Assets
HD5 Archaeology
HD6 Views and Building Heights
C1 City, District and Local Centres
C2 Maintaining Vibrant Centres
C6 Transport Assessments, Travel Plans and Service and Delivery Plans
C8 Motor Vehicle Parking Design Standards
I2 Safeguarding Land for Infrastructure

Site allocations: All Protected Key Employment Sites and sites with a minimum housing capacity of 50+
Area of Focus Policies

APPENDIX 2- HOUSING

APPENDIX 2.1 METHOD FOR CALCULATING AFFORDABLE HOUSING CONTRIBUTIONS

Contributions for payments in lieu of providing affordable housing onsite (eg in relation to Policies H3 and H4) are based on seeking 40% of the value of the land being developed as a financial contribution (in other words the equivalent contribution if the land had been developed for residential use and delivered onsite affordable housing).

The formula that will be applied to calculate payments in lieu is:
$X = ((A - B) \times C) - ((A \times C) \times D)$

Where:
X = the payment in lieu
A = the market value of a square metre of floorspace in the development
B = the value of affordable housing per square metre of floorspace (reflecting the blend between affordable rent and shared ownership)
C = the notional number of square metres that would be required to meet the target in Policy H2

D = additional developer costs (the difference between the profit applied to market housing and affordable housing; and marketing costs on the affordable units converted to private housing).

In addition to this, a 5% administration charge will be levied on the calculated sum payable.

The formula for calculating the contribution towards affordable housing from new employment-generating uses is as follows: GIA (net sqm) x £10

APPENDIX 2.2 HMO CALCULATION

Policy H7 states that planning permission will only be granted for the conversion to or a new HMO where the proportion of buildings used in full or part as an HMO within 100 metres of street length either side of the application site does not exceed 20%.

The illustrations below show what is meant by this. The buildings highlighted in the examples would all be included in assessing whether the 20% threshold has been exceeded. It should be noted that, for the purposes of applying these guidelines:

i. Buildings containing flats are counted as an HMO only if any one of the flats within the building are being used as an HMO;
ii. Non-residential buildings are counted as an HMO only if any part of the building is in residential use as an HMO;
iii. Buildings NOT counted as an HMO include all single dwellings that are occupied by a family, a homeowner together with up to two lodgers, or by up to 6 people receiving care (e.g. supported housing schemes for people with disabilities). Also NOT counted as HMO are social housing, care homes, children's homes, religious communes, and all buildings occupied by students and managed by the educational establishment (this includes student accommodation), as well as all buildings entirely used for non-residential purposes;
iv. Any building on a plot with a curtilage that lies partially within 100 metres will be included in the calculation, although non-habitable buildings (e.g. garage blocks) will be excluded from the calculation.
v. The 100 metres street length will include non-adopted roads and footpaths (but does not include roads wholly situated within private largely non-residential sites such as hospitals).

In counting individual properties, the City Council will have regard to the number of houses, flats or buildings that are licenced HMO, or for which a licence application is pending. The Council may also count any other property for which reasonable evidence exists that the property is in use as an HMO.

100 metres
Application Property
Buildings within 100m on application street on same side of road
Buildings within 100m on application street on opposite side of road
Principal elevation

100 metres
Application Property
Buildings within 100m on application street on same side of road
Buildings within 100m on application street on opposite side of road
Principal elevation

100 metres
Application Property
Buildings within 100m on application street on same side of road
Buildings within 100m on application street on opposite side of road
Principal elevation

APPENDIX 2.3 METHOD FOR CALCULATING THRESHOLDS FOR LINKING ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

Student threshold calculation Policy H9 applies to full-time taught course students. To inform each annual Authority Monitoring Report the universities will be asked to provide information relating to their student numbers and the number of student accommodation rooms they provide and, in the case of Oxford Brookes, purpose-built student rooms they are aware are occupied by their students. A snapshot of information will be requested from a point in time in the Autumn of the monitoring year in question. The monitoring year is the one-year period from 1st April - 31st March. The 'snapshot' figures provided for the Annual Monitoring Report will be representative of the monitoring period and applicable to Policy H9.

If a university is shown in the snapshot to be in breach of threshold, but are able to demonstrate a reduction in numbers during the year that brings them under their threshold, this will be accepted as an update by the City Council alongside an application for development of academic, research or administrative facilities. The universities will be asked to state how many students they have and specify how many of them are in each of the following categories. The following categories of students are not relevant for the purposes of Policy H9 and they will be excluded from the total number used in the calculation under Policy H9. There may be students who fall into more than one of these categories and they should not be excluded more than once:

- Part-time and short-course students
- Students studying a research based post-graduate degree
- Students studying a Further education course or a foundation degree
- Vocational course students who will at times during their course be training on work-placements including student teachers and health care professionals who have a split study arrangement between the university and the NHS including student nurses, midwifery students, paramedics, physiotherapists, occupational therapists and student doctors
- Students with a term-time address outside of the city (OX1, 2, 3, 4)
- Students living within the city (OX1, 2, 3, 4) prior to entry onto a course
- Students not attending the institution or studying at a franchise institution
- Students studying outside Oxford (e.g. at Oxford Brookes' Swindon campus)
- Specific course exclusions (BTh Theology and MTh Applied Theology)
- Students who also have an employment contract with the university
- Students on a year abroad and other placement students away from the university

The following student accommodation types will be counted as university-provided accommodation:

- Purpose built student halls managed by the university
- Rooms in other student halls for which the university has nomination rights secured, or in the case of Oxford Brookes, also rooms in purpose-built student accommodation that they are aware their students are occupying during term times.
- Other university leased or owned housing stock

The number of students who meet the definition of the policy (i.e. the total number of students minus the exclusions detailed above) will be subtracted from the total number of student rooms provided by the university, and the resulting figure will be taken to represent the number of students living outside of university provided accommodation in Oxford.

APPENDIX 3 – EMPLOYMENT

APPENDIX 3.1 - KEY EMPLOYMENT SITES

The following university/ research sites:

- Old Road Campus
- Radcliffe Observatory Quarter (ROQ)
- University of Oxford Science Area and Keble Road Triangle

The following hospital research sites:

- Churchill Hospital
- John Radcliffe Hospital
- Nuffield Orthopaedic Hospital
- Warneford Hospital

The following major publishing sites:

- Oxford University Press, Great Clarendon Street

The following major manufacturing/ research sites:

- Mini Plant Oxford
- Unipart site

The following Science and Business Parks

- Oxford North
- Oxford Science Park
- ARC Oxford

The following key knowledge / innovation sector centres:

- Wood Centre for Innovation

West End and Botley Road:

- Botley Road Retail Park
- New Barclay House, 234 Botley Road
- Osney Mead
- Oxpens

Woodstock Road and Banbury Road:

- Jordon Hill Business Park, Banbury Road

St. Clements and Cowley Road:

- 496 Cowley Road
- Newtec Place, Magdalen Road
- The Gallery Marston Street

Cowley and Horspath:

- Horspath Industrial Estate Pony Road, Horspath

Risinghurst

- Light Industrial Units, Green Road

Garsington Road Cluster:

- Ashville Way Industrial Estate, Watlington Road
- Chiltern Business Centre, Garsington Road
- Fenchurch Court, Bobby Fryer Close
- Huw Grays, (formerly Buildbase), Watlington Road
- Oxford Bus Company, Cowley House, Watlington Road
- Oxford Trade Centre, Harrow Road
- County Trading Estate, Watlington Road

Sandy Lane West:

- Eastpoint Business Park
- Nuffield Industrial Estate, Ledgers Close
- Oxford Trade City and Network Oxford

APPENDIX 4 – A GREEN BIODIVERSE CITY THAT IS RESILIENT TO CLIMATE CHANGE

APPENDIX 4.1 - URBAN GREENING FACTOR

The Urban Greening Factor (UGF) is a planning tool used to improve the provision of Green Infrastructure and increase the level of greening on new development. Policy G4 sets out that all major development will need to demonstrate how it has included urban greening as a fundamental element of site and building design, demonstrating no net loss of greening score and that it meets the minimum target score for the development type (0.3 for predominantly residential and 0.2 for predominantly non-residential schemes). Its use is encouraged on other schemes as a way to assess current levels of greening and the changes proposed but is not mandatory.

The UGF score provides a figure for the proportion of urban greening in comparison to the total area of a given development site. It is based on the assessment of surface cover types within the site boundary, and is measured for the existing situation and post development conditions following building and landscape proposals. Each surface cover type is assigned a weighting factor (between 0.0 to 1.0) that reflects its environmental and social value in urban greening; its functionality in providing ecosystem services, including improving permeability; and its benefit in supporting biodiversity and habitat creation.

The UGF score is calculated by multiplying the area of each of the various surface cover types within the site boundary by its factor; each figure is then added together and divided by the total area within the red-line boundary of the development site. The result is assessed against the policy target score for the type of development.

Calculation of Urban Greening Factor Score :

$$\text{Urban Greening Factor Score} = \frac{\text{Sum of each Surface Area type } (m^2) \text{ (Surface Area A x Factor A + Surface Area B x Factor B + Surface Area C x Factor C, etc.}}{\text{Total site area } (m^2)}$$

For the purposes of Policy G4, the Local Plan follows the categorization of green infrastructure elements and surface cover types set out in the Green Infrastructure Standards from the Natural England Green Infrastructure Framework to calculate a UGF score. For surface cover types not specified on the list, a suitable approach will be to select the closest match in the description, in discussion with the Council where appropriate.

A copy of the assessment matrix is available on the website to download. This should be completed and submitted along with the application. All surface cover types utilised in the assessment should be clearly highlighted on associated landscaping/elevation plans.

Natural England's surface cover weightings* for the calculation of UGF Score.

No.	UGF Surface Cover Type	Category	Factor	General Description
1	Semi-natural vegetation and	Vegetatio	1.0	Protection and enhancement of

No.	UGF Surface Cover Type	Category	Factor	General Description
	wetlands retained on site (including existing / mature trees)	n & Tree Planting		existing vegetation within the development site including mature trees and habitats.
2	Semi-natural vegetation established on site	Vegetation & Tree Planting	1.0	New areas of vegetation and species-rich habitats within the development site that are connected to sub-soils at ground level.
3	Standard / semi-mature trees (planted in connected tree pits)	Vegetation & Tree Planting	0.9	Tree planting established within engineered and interconnected systems with structural soils to maintain tree health at maturity.
4	Native hedgerow planting (using mixed native species)	Vegetation & Tree Planting	0.8	Dense linear planting of mixed native hedgerow species, at least 800mm wide and planted two or more plants wide.
5	Standard / semi-mature trees (planted in individual tree pits)	Vegetation & Tree Planting	0.7	Tree planting established within separate designed tree pits with structural soils to maintain tree health at maturity.
6	Food growing, orchards and allotments	Vegetation & Tree Planting	0.7	Areas and facilities provided for local allotment and community-based food growing including formal orchards with fruit trees.
7	Flower rich perennial and herbaceous planting	Vegetation & Tree Planting	0.7	New areas of mixed native and ornamental herbaceous and perennial plant species to support seasonal cycles of pollinating insects.
8	Mixed hedge planting (including linear planting of mature shrubs)	Vegetation & Tree Planting	0.6	Dense linear planting of native or ornamental shrub and hedgerow species, closely spaced with one or more plants wide.
9	Amenity shrub and ground cover planting	Vegetation & Tree Planting	0.5	Areas of formal and informal non-native shrub and ground cover planting connected to sub-soils at ground level or in planters.
10	Amenity grasslands including formal lawns	Vegetation & Tree Planting	0.4	Areas of short-mown grass and lawn used for active sports or informal recreation that is regularly cut and generally species-poor.
11	Intensive green roof (meets Green Roof Organisation / GRO Code)	Green Roofs & Walls	0.8	High maintenance accessible green roof with planting and a depth of growing substrate with a minimum settled depth of 150mm.
12	Extensive biodiverse green roof (meets the GRO Code, may include Biosolar)	Green Roofs & Walls	0.7	Green roof with species-rich planting, with limited access, may include photovoltaics, the depth of growing substrate is 100 - 150mm.
13	Extensive green roof (meets GRO Code)	Green Roofs & Walls	0.5	Low maintenance green roof, limited species mix in planting and with no access, the depth of growing

No.	UGF Surface Cover Type	Category	Factor	General Description
				substrate is 80 - 150mm.
14	Extensive sedum only green roof (does not meet the GRO Code)	Green Roofs & Walls	0.3	Low maintenance sedum green roof, no access, combined depth of growing substrate, including sedum blanket, is less than 80mm.
15	Green facades and modular living walls (rooted in soil or with irrigation)	Green Roofs & Walls	0.5	Vegetated walls with climbing plants rooted in soil supported by cables or modular planted systems with growing substrate and irrigation.
16	Wetlands and semi-natural open water	SuDS & Water Features	1.0	Areas of semi-natural wetland habitat with open water for at least six months per year contributing to surface water management.
17	Rain gardens and vegetated attenuation basins	SuDS & Water Features	0.7	Bio-retention drainage features including vegetated rain gardens and attenuation basins that also provide biodiversity benefit.
18	Open swales and unplanted detention basins	SuDS & Water Features	0.5	Sustainable drainage systems to convey and temporarily hold surface water in detention basins with minimal vegetation cover.
19	Water features (unplanted and chlorinated)	SuDS & Water Features	0.2	Ornamental and generally chemically treated water features providing amenity value but with minimal biodiversity and habitat benefit.
20	Open aggregate and granular paving	Paved Surfaces	0.2	Porous paving using gravels, sands and small stones as well as recycled materials that allow water to infiltrate across the entire surface.
21	Partially sealed and semi-permeable paving	Paved Surfaces	0.1	Semi-permeable paving using precast units and filtration strips that allow water to drain through defined joints and voids in the surface.
22	Sealed paving (including concrete and asphalt)	Paved Surfaces	0.0	Impervious paving constructed of concrete, asphalt or sealed paving units that do not allow water to percolate through the surface.

**Correct as at time of publication. As the framework is new some information may be subject to change. Any updates will be published via the Green infrastructure and biodiversity TAN which applicants should refer to.*
***Canopy measurements should be based on their extent on maturity or 25 year growth*

APPENDIX 4.2 - BIODIVERSITY POINTS

In line with the requirements set out in Policy G5, applicants are expected to incorporate a selection of features as part of the design of their development to support local species. Applicants should select features from the biodiversity points list in line with the below requirements, moving through pots 1 to 3 in order.

Type of application	Pot 1 Mandatory requirements	Pot 2 Shelter and movement features	Pot 3 Supporting landscape features

		requirements	requirements
Householder	All mandatory features (where applicable)	N/A	N/A
Minor development	All mandatory features (where applicable)	1 feature	1 feature
Major development	All mandatory features (where applicable)	2 features	2 features

The policy requires that biodiversity features selected to secure the required points for an application are clearly demonstrated on related landscape/elevations plans submitted as part of the application. Requirements/design specs. The biodiversity points list is included below, however, the intention is for this to be kept as a 'live list' updated and/or added to throughout the lifetime of the Local Plan, therefore, the Green Infrastructure and Biodiversity Technical Advice Note should be referred to for the most up-to-date version where appropriate (along with additional guidance on the requirements of the list).

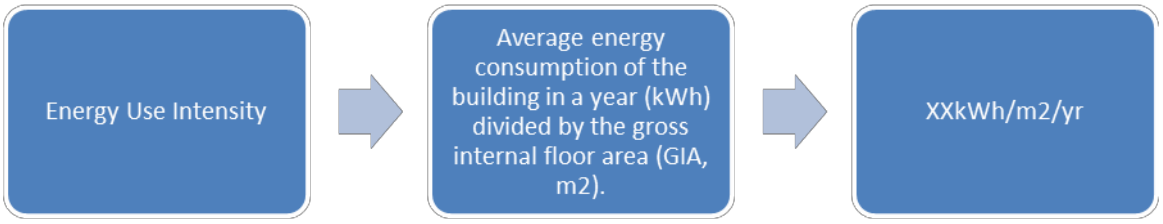
Biodiversity feature	**Priority areas in Oxford**	**Additional details to be provided in Technical Advice Note**
Pot 1: Mandatory requirement - Household/Minor/Major		
At least one swift box or swift brick	If within an identified swift hotspot	Mapping and general guidance on location/maintenance of boxes
At least one bat box	If within 200m of rivers/ woodland	Mapping and general guidance on location/maintenance of boxes AND licensing requirements
Pot 1: Mandatory requirement - Minor/Major		
At least one bird box per dwelling (resi) or per 1000m2 footprint (non-residential), including consideration of building-dependent species.	City-Wide	General guidance where needed.
At least one bat box for every five dwellings (resi) or per 2000m2 footprint (non-residential)	City-Wide	General guidance where needed.
Choose two of the following: insect hotel, planting for pollinators, night-flowering species	In valuable areas/corridors identified in the TAN	Mapping and general guidance on species choice
Pot 2: Shelter and movement features for wildlife		
Hedgehog highways in new boundary fencing	City-wide	General guidance where needed.
Reptile hibernacula in suitable location	City-wide	General guidance where needed.
Amphibian hibernacula in suitable location	City-wide	General guidance where needed.
At least one insect hotels per dwelling	City-wide	General guidance

(residential) or per 1000m2 footprint (non-residential)		where needed.
Provision of at least one dark corridor through the site	City-wide	General guidance where needed.
Pot 3: Supporting landscape features for wildlife		
An appropriate amount of the trees and bushes on the site bear fruit/ berries and/or nuts	City-wide	General guidance where needed.
An appropriate amount of vegetation provides a range of food and host plants for local invertebrate populations	City-wide	General guidance where needed.
Suitable size freshwater pond(s) designed to support aquatic species (no fish or invasive plant species)	City-wide	General guidance where needed.

APPENDIX 5 – CARBON/RESOURCES

APPENDIX 5.1 - WORKED EXAMPLE OF POLICY R1

The following sets out a worked example of the key requirements for Policy R1, additional expanded guidance will be set out in the Energy and Carbon Technical Advice Note.



1. **Determine the Gross Internal Floor Area of the proposed new dwelling (m2):**
   - Measure the internal floor area of all the enclosed spaces within the building in m2.

2. **Determine the average annual energy demand for the building:**
   - Determine the overall energy demand after one year in kWh.
   - This calculation will need to be informed by modelling software using a Council approved methodology that helps to predict how the building will operate. It takes into consideration various factors influencing the energy demand once in operation, such as:
     - The form of the building (its shape), as well as the layout and orientation;
     - The specifications of the fabric of the building including type of materials and their thermal efficiency (the U values) etc.
     - Energy demands from regulated loads and unregulated loads e.g. energy used for lighting, cooking, washing, drying, IT equipment, lighting, audio/visual, other appliances.
     - Average number of occupants and typical occupant behaviour – this is likely to differ between residential and non-residential buildings.
     - External factors like typical climate and solar gain.
   - Informed by the above, a projection of average energy consumption can be determined (though it will likely be subject to some uncertainties). Some methodologies may look to produce several scenarios with varying certainties.

3. **Calculate Energy Use Intensity (EUI) for the proposed development:**
   - Using the outputs of the previous steps, the Energy Use Intensity for the building can be calculated as follows:

Average annual energy demand
For example: 3325 kWh per year

÷

Gross Internal Area (GIA)
For example: 95 m2

=

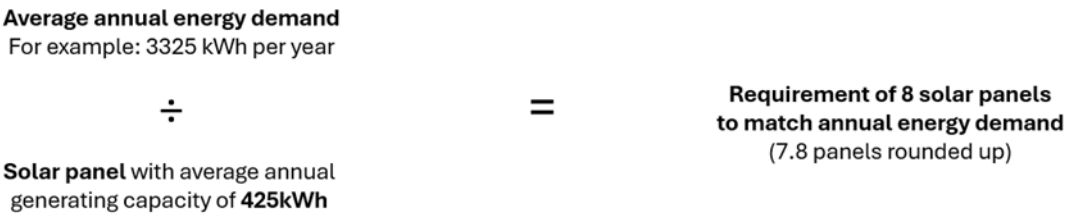
Energy Use Intensity
35 kWh/m2/yr

4. **Calculate space heating demand for the proposed development:**

- A highly efficient building fabric will help to secure a lower space heating demand for the building, as well as other factors such as ensuring an efficient building layout, orientation, and maximising solar gain during winter months.
- Related to heating considerations, remember to ensure no fossil fuels are used in the building and that different types of heating technologies will have varying benefits - e.g. some are more energy efficient than others. There may be opportunities to connect into communal or district heat networks also.

5. Net zero building in operation should match average annual energy demand through renewable energy generation, ideally generated onsite:

- If the average annual energy demand for the building is 3325 kWh per year, then this needs to be matched by an appropriate level of renewable energy provision.
- If installing residential 450W solar panels with capacity to produce approximately 425kWh per year each (subject to factors like orientation, tilt, and shading), then an appropriate number of panels needed can be worked out as follows:



6. Compare the building's performance to the targets set in Policy R1:

- Refer to the targets set out in Policy R1 – note that whilst the space heating demand target is the same across all development, residential and non-residential development is subject to differing Energy Use Intensity targets.
- If the Energy and Carbon statement (with reference to relevant evidence such as energy performance modelling) can demonstrate that the building will perform at or below the policy targets – the relevant criteria in Policy R1 are considered met.
- If the performance does not meet the policy targets – e.g. EUI or space heating demand exceeds Policy R1 criteria, or onsite energy generation does not match total energy demand. Various options should be explored, which could include but are not limited to:
    - Revisit the energy hierarchy and look for opportunities to revise design e.g:
        - Can layout be altered or more efficient materials to reduce energy demand for heating (and by extension overall energy demand)?
        - Can more efficient technologies be utilised in the operation of the building?
        - Can roof space and rooftop equipment be reorganised to accommodate additional pv provision, or are there opportunities to explore provision on neighbouring buildings?

7. Determining offsetting payment meet policy requirements as a last resort:

- If, after exploring all options for maximising provision, renewable energy generation cannot be provided to sufficiently match the development's average annual energy demand, the deficit in provision can be addressed via payment into energy offsetting fund.
- An S106/developer contribution will be agreed and the process for determining the amount of this contribution. Costs figures will be kept updated regularly to keep up with inflation and applicants will need to refer to the current pricing which will be published on the website.

APPENDIX 5.2 - ADDITIONAL EXTERNAL GUIDANCE ON NET ZERO CARBON DESIGN

Guidance around designing buildings to net zero carbon standards is constantly evolving, however, there are a number of useful resources that can support applicants in designing buildings in ways that reduce their carbon footprint. Whilst the following are not Council resources and should be treated as independent, the below is a list of some external reference sources which may be helpful in implementing the requirements of policies R1, R2 and R3 of chapter 5:

- Low Energy Transformation Initiative (LETI)
- UK Green Building Council (UKGBC)
- Royal Institute of British Architects (RIBA)
- Climate Change Committee
- Historic England -- retrofit and energy efficiency guidance for historic buildings
- UK Net Zero Carbon Buildings Standard

A fuller list of guidance will be kept updated within the Energy and Carbon Technical Advice Note.

APPENDIX 6 – DESIGN AND HERITAGE

APPENDIX 6.1 - CONSERVATION AREAS

Oxford has 18 Conservation Areas at present. They include a diverse range of qualities from the compact college environment found in the city centre, the open green space found in the Headington Hill Conservation Area, to the vast meadows in Wolvercote and Godstow. See all conservation areas on a map. Architectural styles and landscape qualities are diverse, but they all have the common element of containing features that contribute to our historic past. It is the protection of these elements that need to be properly managed, ensuring future generations will value and enjoy their special qualities. Oxford's Conservation Areas:

- Bartlemas
- Beauchamp Lane
- Binsey
- Central (University and City)
- Headington Hill
- Headington Quarry
- Iffley
- Jericho
- Littlemore
- North Oxford Victorian Suburb
- Old Headington
- Old Marston
- Osney Town
- Oxford Stadium, Sandy Lane
- St Clement's and Iffley Road
- Temple Cowley
- Walton Manor
- Wolvercote with Godstow

APPENDIX 6.2 - HEALTH IMPACT ASSESSMENT PROCESS

Health Impact Assessment

A Health Impact Assessment (HIA) is a tool used to identify the health impacts of a plan or project and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities. By bringing such health considerations to the fore, HIAs add value to the planning process.

When is a Health Impact Assessment required?

Policy HD7 requires that a HIA is undertaken for major development proposals (e.g. 10 or more dwellings or 1000m² or more of non-residential development).

How to undertake a Health Impact Assessment?

The Council recommends that applicants refer to the Health Impact Assessment toolkit created by Oxfordshire County Council for resources and guidance on completing a HIA,

which is available on their website[1]. The scope of the assessment, extent of stakeholder engagement, as well as use of alternative HIA methodologies should be discussed and agreed with the relevant case officer to ensure a proportionate approach to the HIA is taken.

Whilst the specific details of what to include in the HIA will vary with the nature of the development, the HIA methodology should usually be structured into five key stages, which are outlined in greater detail in the Oxfordshire HIA toolkit:

1) Description of the proposed development;
This will need to include a description of the physical characteristics of the site of the proposed development site and surrounding area, including the current use.

2) Identification of population groups affected by the development;
Most proposals will not affect all individuals or groups across a community in the same way, so consider which groups of the existing population would be affected by the proposed development.

3) Identification of geographical area and associated health needs and priorities;
Identifying localised health priorities will enable a HIA to focus on the key issues for a particular location of a development, ensuring any HIA submitted to a Planning Authority is targeted and appropriately scoped so that it provides the most benefit. The expectation set out in Policy HD7 is that analysis on health trends set out in the HIA is supported by appropriate evidence/data - for example from local health statistics.

4) Assessment of health and recommendations; and
A series of assessment tables should be completed for each of the health priorities identified as relevant to a proposed development guiding the reader through the process of establishing a baseline of the existing situation, building an evidence base around health impacts associated with a health priority, and identification of likely effects (positive and negative), and the population groups likely to experience these effects. The policy requires that mitigation measures are identified that can address any identified negative effects and these should be presented as part of this assessment.

Typical health priorities likely to be affected by a proposed development could include: Housing, Physical activity, Healthy food environments, Air quality, Noise, Traffic and Transportation, Crime and anti-social behaviour, Economy and Employment, Education and Skills, Local natural environment and access to green spaces, and Access to Services.

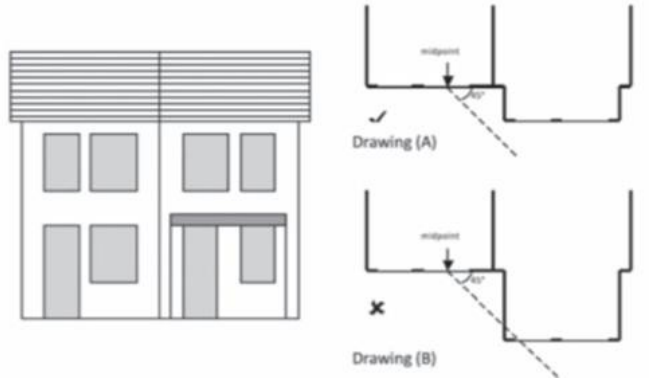
5) Monitoring.
The HIA should set out where the applicant will undertake monitoring in relation to the findings of the HIA. These should be linked to the proposed mitigation measures identified to address negative impacts from the development identified by the assessment and be S.M.A.R.T.

Please refer to both our Technical Advice Note and the online Oxfordshire Health Impact Assessment Toolkit for further information on how to complete a thorough HIA for major development in Oxford.

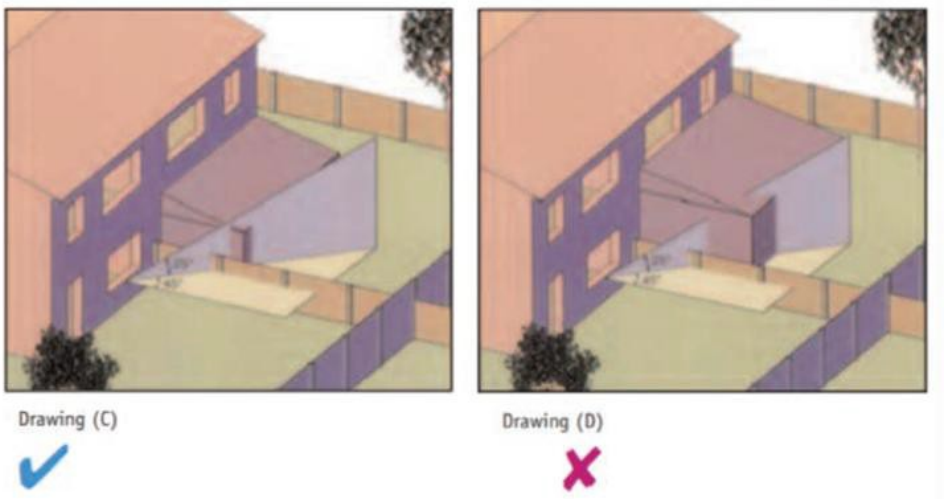
APPENDIX 6.3 - PRIVACY, DAYLIGHT AND SUNLIGHT: THE 45 AND 25 DEGREE GUIDELINE

Many factors are significant in assessing whether new dwellings will enjoy adequate sunlight and daylight, both internally and externally, and the same factors must be taken into account when assessing the impact of new development on existing dwellings. Reflected light and the amount of sky visible affect daylight within a room or garden. Applicants must consider the function of the room or that part of the garden, and also whether other windows serve the affected room. Existing features including boundary walls, trees, proposed buildings and any change in ground level between sites are all relevant factors that also need to be taken into account. Applicants must also consider the impact on outlook - it is important not to create conditions that are overbearing (oppressive or claustrophobic) for existing or future occupiers. While development proposals will be considered in the light of these factors, as a guideline to assess their impact on daylight, sunlight and outlook, the City Council will use the guidelines illustrated below. In normal circumstances, no development should intrude over a line drawn at an angle of 45° in the horizontal plane from the midpoint of the nearest window[2] of a habitable room and rising at an angle of 25° in the vertical plane from the sill. If a main window to a habitable room[3] in the side elevation of a dwelling is affected, development will not normally be allowed to intrude over a line drawn at an angle of 45° in the vertical plane from the sill.

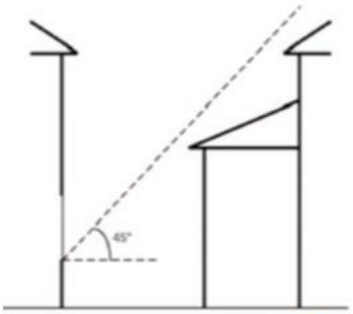
Example 1 A single storey extension as shown below is generally acceptable if the projection is limited as shown in Drawing (A). It may not be acceptable if the projection intrudes beyond the 45° line as shown in Drawing (B)



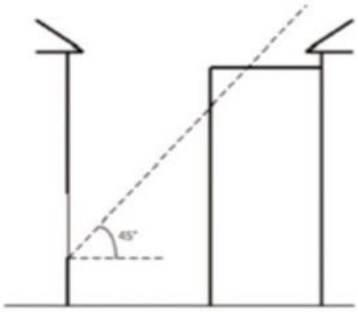
Example 2 If the 45° rule is broken, generally the proposal will still be acceptable if the line drawn outwards at 45° is tilted upwards at 25° from the sill level, and is unbroken by the highest part of the extension. This is shown as Drawing (C). The example shown as Drawing (D) is unlikely to be acceptable.



Example 3 If a main window to a habitable room in the side elevation of a dwelling is affected, development will not normally be allowed to intrude over a line drawn at an angle of 45° in the vertical plane from the sill.



Drawing (E) Cross-section showing side elevations ✔



Drawing (F) Cross-section showing side elevations ✘

APPENDIX 7 – COMMUNITIES

APPENDIX 7.1 - MARKETING EXPECTATIONS

A property should be marketed for its existing use as a public house or live performance venue for a minimum period of at least 12 months, or for any other cultural or visitor attraction for its use or a use that meets similar needs.

The applicant should then submit a supporting statement to accompany a planning application for a change of use that contains evidence to confirm the length of time the site has been marketed for; details of the agent used; information to show where this marketing has taken place for example in the local press, through signs on site, on the internet and/or in journals or publications used by the trade.

The statement needs to confirm the price the property was advertised for to show that it has been pitched at a 'reasonable' rate to generate interest from potential operators. Finally there needs to be a summary of the interest received and the reasons why offers have not been accepted.

APPENDIX 7.2 - TRANSPORT ASSESSMENTS

Where a Transport Assessment (TA) is required for a development proposal, it should be submitted alongside the planning application. The City Council may agree to the scope of TA being reduced if the development proposal is in a suitable location and in line with planning policy. TAs should address the desirable modal split and provide for a package of measures designed to reduce the role of car travel to the site. If the potential modal split is difficult to predict, the TA will need to consider whether and how far it may vary. The TA should be easy to understand for non-technical people.

Thresholds

The Transport Assessment of a proportionate level of detail will generally be required if the development:

a. is likely to generate car traffic, particularly at peak times, in an already congested or heavily trafficked area;
b. is likely to introduce a new access or additional traffic (any mode) onto a trunk road or other dual carriageway;
c. is likely to generate significant amounts of traffic;
d. is for a new or expanded school facility; and
e. would be refused on local traffic grounds but where mitigation measures can be implemented to overcome any adverse impacts;
f. A detailed TA will be required for developments likely to generate in excess of 10 freight or 200 vehicle movements a day.

Proposals over 500m^2 or which may generate over 100 vehicle movements or 5 freight movements per day will require at least a transport statement. For residential development in Oxford, this equates to developments of 20 dwellings or more.

Contents

All TAs and TSs must include a non-technical summary and must address:

a. location and layout including access and egress points;

b. size, in terms of site area and floorspace per activity; and/or number of dwellings and number of bedrooms per dwelling; and use of the site eg. staff, students, patients, visitors;
c. proposed uses and activities; and
d. issues such as timing and type of access requirements

Where a detailed TAs is required, this must additionally address the following:
a. Potential travel characteristics: accessibility by all modes and predicted modal split. TA should consider ease of access and catchment areas by travel-to-site times for each mode.
b. Measures: influencing travel patterns and minimising the need for parking using measures to improve access by walking, cycling or public transport in order to minimise non-essential car travel. TA should consider appropriateness of location, scale, density and uses of the site and development.
c. Impact appraisal and mitigation: maximising accessibility by sustainable transport modes such as through minimising prominence of car parking, management of access and parking, and organisational policies. TA should determine whether the development is acceptable or not in terms of the transport impacts, and propose measures to mitigate the impacts in terms of accessibility, integrating modes of travel, reducing environmental impact and promoting safety.

APPENDIX 7.3 - TRAVEL PLANS

If a Travel Plan (TP) is required for a development proposal, it should be submitted with the planning application.

Thresholds

TPs must be submitted alongside planning applications if the development:
a. is likely to generate significant amounts of travel in or near the city centre air quality management area (AQMA);
b. is for new or expanded school facilities; and
c. would be refused on local traffic grounds but where the TP sets out to overcome any adverse impacts.

Proposals over the following thresholds will require a TP:

Food retail . . . . . 1,000m^2
Non-food retail . . . . . .1,000m^2
Leisure . . . . . .1,000m^2
Cinemas and conference facilities . . . . . .1,000m^2
Stadiums . . . . . .1,500 seats
Offices . . . . . 2,500m^2
B2 industry . . . . . .5,000m^2
B8 distribution and warehousing . . . . . .10,000m^2
Hospitals . . . . . 2,500m^2
Higher and further education . . . . . .2,500m^2

TPs must recognise the potential for modal shift and therefore the early stages of the TP are likely to focus on those car drivers “most able” or “most likely” to change their mode of travel. This does not mean that other categories should be neglected. Greater effort in terms of more measures will be needed in the longer term to address the needs of those less likely to switch from driving.

The reasons for car use, the distances travelled, and from where journeys start, and finish must be assessed. There are many ways that information could be assessed and represented in the TP.

For example, on a proposal to expand an existing site, surveys of current staff would be useful. For a relocated organisation, current staff surveys could indicate travel habits at the new site. An isochrone map can be useful in indicating distances from a site, accessibility by various modes, or potential catchment areas.

Modal split targets are normally displayed as percentages. However, this does not address the issue of rising staff numbers for example, and over time may in fact hide an increase in the number of cars being brought to a site. Targets should be stated as actual numbers as well as percentages.

Contents

There is no right or wrong way to present a useful and effective TP. However, the following guidelines should be considered:

Background:

Information about the organisation must be stated clearly, including:

a. Staff details such as numbers (for example, full-time/part-time, staff on payroll/fulltime equivalents[4]), times of travel (for example, Monday to Friday at 9am and 5pm or shift pattern), where they travel from, and how they currently travel;
b. Site assessment including current access and egress (pedestrian/cycle/vehicular) into and within the site, cycle facilities, accessibility by public transport, accessibility of nearby shops and services, and car parking;
c. Assessment of non-staff travel (for example, visitors, deliveries, fleet vehicles);
d. Attitudes of staff towards travel to and from the site and towards their travel needs.

Objectives:

The statement of objectives should identify the motivation behind the TP and clearly state its purposes. (For example, reasons for a TP include reductions in car usage (especially single occupancy journeys at peak times), and increased use of walking, cycling and public transport). It may be relevant to address:

a. Reducing traffic speeds, improved road safety and personal security (especially for people on foot or cycle); and
b. More environmentally friendly delivery and freight movements, including home delivery services.

Measures:

The TP must identify what needs to be done to achieve its objectives and what measures need to be implemented.

Targets:

Targets must be specific, measurable, realistic and split into identifiable time frames based on the short term, medium term and long term and preferably dated by month and year.

Monitoring and Review:

The effects of TPs must be monitored, and they must state clearly how monitoring will take place (for example by stating what will be monitored by whom and when). Baseline data must therefore be provided (for example, as part of the background information). The outcome of monitoring may suggest that a review of the measures and/or targets is necessary. (For example, it is not necessarily a bad thing to discover through monitoring that a measure is no longer feasible, but new measures will then need to be set to meet the objectives of the TP.)

Enforcement:

The TP must set out arrangements for appropriate enforcement action in case agreed targets are not met.

APPENDIX 7.4 - CYCLE AND POWERED TWO WHEELER PARKING STANDARDS

Cycle Parking Standards:

Residential:
Houses and flats up to 4+ bedrooms . . . . . 2 spaces per bedroom
HMO . . . . . 1 space per bedroom
Student Accommodation . . . . . .1 space per study bedroom

Non – Residential: Minimum cycle parking standards

B2 General Industrial.	1 space per 175sqm for staff and 1 space per 250sqm for visitors
B8 Storage.	1 space per 250sqm for staff and 1 space per 500 sqm for visitors.
C1 Hotels.	1 cycle space per 5 car-parking spaces provided or 1 space per 5 non-resident staff plus 1 space per resident staff, whichever is greater.
C2 Residential Care Homes	0.5 spaces per bedroom available to residents, visitors, and staff.
E Commercial, Business and Services - Shops and retail.	1 space per 50sqm for staff and 1 space per 50sqm for customers.
E Commercial, food retail (supermarket)	1 space per 50sqm for staff and 1 space per 50sqm for customers
E Commercial, Business and Services – Financial and Professional Services.	1 space per 100sqm for staff and 1 space per 250sqm for visitors
E Commercial, Business and Services – food and drink (mainly in premises) i.e. restaurants and cafes.	1 space per 4 staff and 1 space per 25sqm for customers.
E Commercial, Business and Services – office, research and development and light industrial process.	1 space per 100sqm for staff and 1 space per 250sqm for visitors.
E Commercial, Business and Services – Non residential institutions (medical or	1 space 50sqm or 1 per 30 seats capacity. Plus 1 space 5 per employees.

health services, creches, day nurseries and centres.	
E Commercial, Business and Services – Assembly and Leisure (indoor sport, recreation or fitness, gyms).	1 space 50 sqm or 1 per 30 seats capacity. Plus 1 space 5 per employees.
F.1 Non-residential institutions (education, art gallery, museum, public library, public exhibition hall, place of worship, law courts, and other than primary/junior schools, senior/secondary schools and non-residential higher/further education).	Staff provision 1 space per 20 staff. Students; 1 space per 10 students.
F.1 Primary/junior schools	1 space per 5 pupils, plus 1 space per 3 staff.
F.1 Senior/secondary schools	1 space per 2 pupils, plus 1 space per 3 staff.
F.1 Non-residential higher/further education	1 space per 2 students (based on anticipated peak number of students on-side at any one time), plus 1 space per 5 staff.
F.2 Shop no larger than 280sqm (selling mostly essential foods and at least 1km from another similar shop); community hall, outdoor sport/ recreation area, indoor or outdoor swimming pool, skating rink.	1 space per 50sqm for staff and 1 space per 50sqm for customers.
Sui Generis, Public House, wine bar, drinking establishment	1 space 4 staff and 1 space per 25sqm for customers.
Sui Generis, Hot Food Takeaway.	1 space 4 staff and 1 space per 25sqm for customers.
Sui Generis, Cinema, Concert Hall, Bingo Hall, Dance Hall, Live Music venue.	1 space per 20sqm for staff plus visitor / customer cycle parking.

Other developments . . . To be treated on their individual merits, guided by the general principle of 1 space per 5 people

Cycle parking provision should be made on the site. If there is a shortfall of on-site parking provision, a contribution may be sought towards off-site cycle parking or associated facilities, based on the standards set out in this appendix.

The standards will be applied to ensure that there would be adequate provision if permitted development were carried out, unless applicants are willing to accept a condition restricting their permitted developments rights in this respect.

The reference to staff should be taken to mean the peak number of staff expected to be onsite at any one time, whether part-time or full-time.

The standards are intended as minimum standards for new development and where appropriate, change of use. One space means that one cycle can be secured. A bike stand, for example a Sheffield style stand, can provide two cycle-parking spaces.

Cycle parking should be future proofed to ensure that the infrastructure to support the charging of electric cycles is supported.

Powered Two Wheeler Parking Standards:

Residential . . . . . .1 space per 5 dwellings
Non-residential developments . . . 1 space per 400m^2 up to 2000m^2, 1 space per 1000m^2 thereafter

APPENDIX 7.5 - SHOWER, CHANGING ROOM AND LOCKER FACILITIES PROVISION IN COMMERCIAL/NON RESIDENTIAL DEVELOPMENT

The City Council will seek the provision of shower, changing and locker facilities in commercial/non residential developments on the following basis:
-Office . . . 1 shower per 500m^2 up to 1000m^2, 1 shower per 4,000m^2 thereafter
-Warehousing and retail warehousing . . . 1 shower per 5,000m^2 up to 10,000m^2, 1 shower per 8,000m^2 thereafter
-Other . . . 1 shower per 2,500m^2 up to 10,000m^2, 1 shower per 4,000m^2 thereafter

The application of these standards will be subject to the merits of each proposal. Except where specified, all areas quoted refer to gross floor measured externally, i.e. where proposals are submitted to extend, consolidate or reconfigure an existing site, these standards may be applied to the site as a whole rather than just the additional floor space, to ensure adequate provision on site.

APPENDIX 7.6 - VEHICULAR PARKING STANDARDS

Vehicular parking standards:

Policy C8 sets out Oxford City Council's policy on providing parking for new residential developments. The standards below should be read alongside Policy C8 and the supporting text.

Any dwellings*1 space per dwelling (may be allocated or unallocated) to be provided within the development site

Houses in Multiple Occupation Parking standards to be decided on a case-by-case basis.

Wheelchair accessible or adaptable houses and flats . . . 1 space per dwelling, to be provided on-plot must be designed for wheelchair users in accordance with Part M of Building Regulations)
Retirement homes . . . . . 1 space per 2 residents' rooms
Sheltered/extra care homes . . . . . 1 space per 2 homes plus 1 space per 2 staff
Nursing homes . . . . . .1 space per 3 residents' rooms plus 1 space per 2 staff
Student accommodation . . . . 0 spaces per resident room. Operational parking and disabled parking to be considered on a case-by-case basis in accordance with Policy H8.

*Any parking provided on plot to be excluded from a permit for any future CPZ and only 1 permit to be provided per dwelling on street when not provided on plot.

Disabled Parking/Blue Badge Holders:

On developments of 4 or more homes, wheelchair accessible or adaptable homes should provide dedicated space for blue badge holders/disabled parking, irrespective of location. On sites of 20 or more homes blue badge holders/disabled parking should be provided for at

least 5% of dwellings. Disabled parking should have level access to, and be within 50 metres of, the building entrance which it is intended to serve.

Low car parking standards for working drivers, pooled cars/car clubs and visitor spaces:

0.2 car parking spaces per 20 units should be provided on site for working drivers, service and delivery vehicles, pooled cars/car clubs and visitor spaces. For sites which are constrained evidence must be submitted to satisfy the local planning authority as to why this threshold should be reduced.

Non-residential development:
Existing employment uses . . . . . No additional increase in parking spaces
All other uses . . . To be determined through pre-application meetings/planning applications in the light of their Transport Assessment and Travel Plan

Local Plan 2045 - Monitoring Framework

The table below sets out the proposed approach Oxford City Council will take to monitoring the effectiveness of the Local Plan, as well as its impacts in line with the requirements of Sustainability Appraisal combined with Strategic Environmental Assessment. The approach to monitoring is broken down into two key reporting areas which are separated under each of the themes of the Local Plan. It is envisaged that certain elements of monitoring will be undertaken annually and reported upon in the Authority Monitoring Report (AMR) or the Infrastructure Funding Statement (IFS). The second element of the framework addresses longer-term trends which the Council intend to monitor but would be reported upon less frequently because of the increased resource demand or due to monitoring data being available less frequently and these link to environmental standards set out in our Sustainability Appraisal.

Whilst the details set out below highlight the priority monitoring the Council will seek to report upon within the AMR on a regular basis, there are often other mechanisms for monitoring the impact of other Local Plan policies which are not touched upon below. These include other data collection methods and reporting mechanisms such as 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).

Local Plan Theme	**Monitoring of Local Plan 2045 outcomes (every year)**	**Key Policies**	**Longer term monitoring of sustainability outcomes**	**Related SA/SEA topic**
A healthy inclusive city to live in	Cumulative requirement and cumulative supply, including 5YHLS.	H1 – Housing requirement	Change in population / households	Local housing needs

	Net completions including: - Affordable housing (including employer linked) - Student - Care - Other communal - Self- build/ community led housing Applications permitted for: - Affordable housing (including employer linked) - Student - Care - Other communal - Permanent/transit residential pitches or plots - Residential moorings on Oxford's waterways - Boarding school accommodation - Self- build/ community led housing - Houses in Multiple Occupation	H1 – Housing requirement H2 – Delivering affordable homes H3 – AH Contributions from Other Development Types H4 – Employer linked affordable housing H6 – Development involving loss of dwellings H7 – Houses in Multiple Occupation H10 – Homes for travelling communities H11 – Homes for boat dwellers H12 - Older persons and other specialist accommodation H13 - Self-build and custom housebuilding H14 – Boarding school accommodation	N/A	Inequalities Local housing needs
	Applications permitted for student accommodation and redeveloped or refurbished academic research or administrative accommodation	H8 – location of new student accommodation H9 - Linking new academic facilities with the adequate provision of student accommodation	N/A	Local housing needs

A prosperous city with a globally important role in learning, knowledge and innovation	Net completions including - Employment generating uses Applications permitted including: - Employment generating uses	E1 - Employment strategy E2 – Warehousing, Storage and Distribution Uses	Change in floorspace including employment generating uses	Economic growth
	Number of Community Employment and Procurement Plans (CEPPs) secured	E3 – Community Employment and Procurement Plans	Number of skills and employment opportunities secured for local residents in priority areas Percentage or amount (£) spent locally (i.e. money that supports the local economy)	Economic growth
	Number of Affordable Workspace Strategies secured	E4 – Affordable Workspace	Amount of affordable workspace floorspace delivered	Economic growth
	Applications permitted for short stay accommodation	E5 – Hotel and short stay accommodation	N/A	Economic growth
A green biodiverse city that is resilient to climate change	Applications permitted on protected green space	G1 – Protection of the GI network	N/A	Efficient use of land, Leisure
	Biodiversity net gain being delivered in the city	G4 – Delivering mandatory gains in biodiversity	Change in area (ha) in areas of biodiversity importance & Condition of SSSIs, integrity of SACs	Biodiversity
	Applications permitted against Environment Agency flood risk advice	G7 – Flood risk	Change in no. homes in flood zone 3	Climate change resilience
A city that utilises its resources with care, protects the air, water and soil and aims for net zero carbon	S106 contributions secured and proportion of fund spent against climate change offsetting fund	R1 – Net zero buildings in operation	Change in per capita CO2 emissions	Carbon emissions
	Air quality progress: NOx, PM10, PM2.5	R4 – Air Quality Assessments and Standards	N/A	Transport and air pollution
	N/A	R5 – Water Resources and Quality	% river length assessed as fairly good or very good for chemical quality and biological quality	Water

	Applications permitted on protected peat reserves	R6 – Soil quality	N/A	Efficient use of land
A city of culture that respects its heritage & fosters design of the highest quality	Applications permitted that result in the loss of listed buildings, registered parks and gardens, scheduled monuments	HD3 – Designated Heritage Assets (Conservation areas Listed buildings, Registered Parks and Gardens, Scheduled monuments)	Updates on how the City Council is managing its conservation areas. Change in no. heritage assets at risk	Urban design and heritage
	N/A	HD7 – Health Impact Assessment	Index of Multiple Deprivation & Health dimension of Index of Multiple Deprivation	Inequalities
A Liveable City with Strong Communities and Opportunities for All	Class E % share of total use classes Footfall statistics within the city centre, district centres, and local centres (where data available)	C1 – City, District and Local Centres C2 - Maintaining vibrant centres	N/A	Economic growth
	Applications permitted for new community spaces, cultural venues and visitor attractions	C3 - Protection, alteration and provision of local community facilities C4 – Protection, alteration and provision of learning and non-residential institutions C5 - Protection, alteration and provision of cultural venues and visitor attractions	Significant new community assets, cultural venues and visitor attractions	Services, facilities and infrastructure Leisure
			Modal split of journey in Oxford	Traffic and air pollution

Appendix 2 - Regulation 19 Sustainability Appraisal Report (inc. background papers)

Sustainability Appraisal report (Regulation 19 consultation): page 2

Appendix A (Feedback from the consultation bodies on the scope of the SA report): page 145

Appendix B (Detailed SA appraisal of select policy options sets): page 150

Appendix C (Site assessments): page 183

Background Paper 001 – Housing Need, Requirement and Mix: page 556

Background Paper 002 – Affordable Housing: page 580

Background Paper 003 – Specialist Housing: page 605

Background Paper 004 – Employment and Inclusive Economy: page 654

Background Paper 004a – Key Employment Sites Methodology: page 719

Background Paper 005a – Green Infrastructure: page 743

Background Paper 005b – Biodiversity: page 820

Background Paper 006 – Green Belt: page 848

Background Paper 007 – Flood Risk, SuDS and Drainage: page 893

Background Paper 008 – Carbon Reduction and Climate Resilient Design: page 918

Background Paper 009 – Natural Resources (Air, Water, Land): page 961

Background Paper 010 – Health and Wellbeing: page 993

Background Paper 011 – Urban Design, Placemaking, Heritage and Archaeology: page 1030

Background Paper 012 – Transport: page 1063

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Background Paper 013 – Liveable City: page 1106

Background Paper 014 – Infrastructure: page 1137

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OXFORD CITY COUNCIL

Sustainability Appraisal report (Regulation 19 consultation)

Oxford Local Plan 2045

Oxford Local Plan 2045

Regulation 19 Sustainability Appraisal report

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1. Non-technical summary

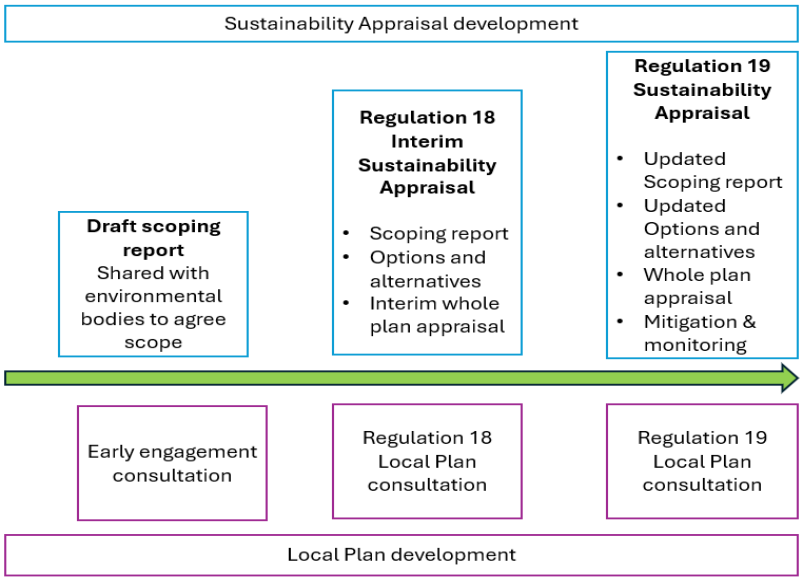
1.1 Introduction and process for undertaking Sustainability Appraisal

1.1 The Oxford Local Plan 2045 will update the Oxford Local Plan 2036. It will allocate sites for housing, employment and other uses, and provide policies to manage development in the city. It will need to include measures to improve public transport, protect and enhance the natural and historic environment, reduce carbon emissions, and protect against flooding. It will be used to make decisions about planning applications.

1.2 The environmental, social and economic impacts of Local Plans must be assessed through Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). SA/SEA aims to ensure that the decisions taken in the context of the Local Plan's preparation are made in the knowledge of all likely sustainability effects of the proposed policies and reasonable alternatives, seeking to minimise negative impacts and maximise positive ones. The Oxford Local Plan 2045 SA process incorporates the requirements of SEA within them, and any reference to the Sustainability Appraisal/SA should be taken as also including the Strategic Environmental Assessment/SEA where relevant.

1.3 Sustainability Appraisal is an iterative process that aligns with the various stages of the Local Plan's development (as per Figure 1.1). The report is supported by a range of topic-specific background papers which expand on key information, particularly in relation to scoping and options for policies.

Figure 1.1. The Sustainability Appraisal and the wider Local Plan preparation process



1.4 This Sustainability Appraisal report, which accompanies the Regulation 19 Local Plan consultation, sets out how the Council has undertaken work associated with the formal SA process stages, as set out in Table 1.1. The Council has previously consulted on two versions of the emerging SA, including an early draft of the scoping report that was shared with the Environment Agency, Historic England and Natural England (February 2025), and an Interim Sustainability Appraisal that was published as part of the Regulation 18 consultation (June/July 2025).

Table 1.1. The Sustainability Appraisal (SA) process and the stages of the Oxford Local Plan 2045 preparation

Stages of the Sustainability Appraisal process	**Relevant consultation**
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft of scoping report to agree scope (Feb-March 2025) **Complete** Updated version of scoping report published as part of Interim SA Report (Part 1) for Summer 2025 Reg 18 consultation **Complete**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as part of the Interim SA Report (Part 2) for Summer 2025 Reg 18 consultation **Complete**
Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects Task B5: Propose measures to monitor significant effects of implementing the Local Plan *Stage C: Prepare the SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Published as part of this Regulation 19 SA report - including updated information related to earlier stages. **Current stage**
Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

* *The Environment Agency, Historic England and Natural England*.

1.2 Policy context

1.5 The National Planning Policy Framework (NPPF) requires local authorities to deliver enough homes, build a strong economy, support non-car travel, protect the Green Belt, support good design, deal with climate change, and protect nature and heritage. This is underpinned by various pieces of online guidance in the Planning Practice Guidance, as well as specific guidance in relation to design via the National Design Guide and Model Design Code. The Environment Act 2021 will require development to deliver at least 10% biodiversity net gain.

1.6 The Levelling Up and Regeneration Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes. Many of the changes provided for in the legislation are dependent on subsequent regulations, including replacing SA/SEA with "environmental outcomes reports", setting up national development management policies that would apply to all local authorities, and removing local authorities' duty to cooperate with neighbouring authorities.

1.3 Sustainability context and existing problems

1.7 The city of Oxford is a compact one, with areas of dense urban development, interspersed by areas of natural green space and various blue corridors such as the rivers, streams and canal that interweave them. The city has a wealth of historic assets, and hosts a number of important ecological habitats of varying designations. The presence of the rivers and urbanisation in many areas makes flood risk a particular concern in many areas of the city; the impacts of climate change are likely to exacerbate this as well as other risks such as overheating.

1.8 The population of the city skews particularly to younger age groups and hosts a significant student population due to the two universities. Whilst there are areas of wealth, there are also areas characterised by high levels of deprivation and inequalities are a significant challenge in relation to health and wellbeing, as well as skills and access to jobs for some residents. Constraints on the city make space for new development limited, this has various knock-on-effects, particularly for access to housing and housing affordability.

1.9 The adopted Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development, as well as new local aspirations such as the target of being a net zero carbon city by 2040. There are ongoing challenges such as the continued housing crisis, the changing picture of retail, pressures on biodiversity and impacts of pollution on the environment from various activities.

Table 1.2. A summary of the current situation and likely future without a plan.

SA topic	Current situation	Likely future without plan	Summary findings
1. Carbon emissions	-	-	Carbon emissions in Oxford show a steady decline, principally in line with decarbonisation of the national grid which is expected to continue, though pace is uncertain. Despite an overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. There will be an ongoing need for significant retro-fitting of existing development, and behaviour change as well as enabling the shift away from reliance on fossil fuels at various scales.
2. Resilience to climate change	--	-	A significant area covering properties and other land uses in Oxford is at risk from flooding. This risk is likely to increase with climate change. National policy is strong on flood risk, also a flood alleviation scheme (OFAS) is proposed for the west side of Oxford, although this will not mitigate flood risk everywhere. Overheating is an increasing risk facing the city although national building standards have been updated to address overheating to some degree.
3. Efficient use of land	0	0	Increased housing pressure means that there will be more pressure on undeveloped land. Without a new plan, housing may be developed in less sustainable locations. Development density and protection of undeveloped land have been good to date, which also helps protect soils and some known peat-rich soils.
4. Local housing needs Need and supply	--	--	Oxford's housing need is more than the identified capacity in the city. The city is limited in terms of large housing sites. Some of Oxford's housing needs may therefore need to be met outside the city.
Affordable housing	--	--	House prices in Oxford are already very high, including for rent, and future prices are likely to continue to rise more quickly than average salaries. Annual provision of affordable housing has been increasing as a result of new development and the city council's own house building and delivery programme but still unlikely to meet need.
Students and student accommodation	0	0	The existing Local Plan sets a threshold on student numbers living outside of university owned or managed accommodation to reduce the loss of family homes, and to manage competition for residential sites.
5. Inequalities and health Inequality	-	--	Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health, likely exacerbated by the cost of living crisis.

General health	+	+	Despite more localised inequalities, Oxford residents' general health is good and the higher-than-average levels of activity and healthy weight need to be maintained and increased.
Health and housing	-	--	Beyond the Local Plan, there are plans for improving the existing areas of regeneration in the city, such as Blackbird Leys and West End. Physical regeneration interventions, however, need to be supported with a package of social, economic and environmental measures to ensure the maximum wider benefits.
6. Services, facilities and infrastructure Community facilities	0	-	Oxford's compact nature means there are many areas which benefit from good access to services/facilities, however this is not universal across city. Increasing population will become make it more important to protect and enhance facilities. Economic shocks like the pandemic, rising costs of energy and living in general continue to put pressure on services and facilities, however. Changes to use class order (e.g.use class E) make it harder to protect particular services/facilities locally.
'Grey' infrastructure	-	-	There are some known utilities issues in the city, including capacity concerns with the wastewater treatment plant and potential challenges around energy supply as the city moves towards net zero carbon. The Local Plan has enabling role in supporting improvements but alone has limited influence. They also rely upon investment and infrastructure upgrades by others with primary responsibility such as the utilities providers.
Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
7. Green infrastructure and leisure	++	+	Oxford has a wide range of green spaces which are generally of good quality, although unevenly distributed and protected through existing Local Plan. As Oxford's population increases, there will be increasing pressure on green spaces. Limited development opportunities mean an ongoing demand for infill development making use of garden spaces and reducing local green infrastructure features.
8. Traffic and air pollution Air quality	-	+	All of Oxford is an Air Quality Management Area for NO2, and there are air quality 'hot spots' at various major road junctions. Most of the city's air pollution comes from the transport sector according to the most recent source apportionment studies. Since the launch of the city's Air Quality Action Plan, good progress in terms of reductions in NO2 levels have been recorded although there is still work to be done. County led actions as well as national phasing out of petrol/diesel cars will help to improve air quality.
Traffic levels and congestion	--	-	Congestion on Oxford's main roads is endemic even though Oxford has very good bus services and higher levels of cycling and public transport use than many comparable cities. Population and job growth envisaged for Oxfordshire means a continuation of existing levels of car use would threaten to over-burden the transport network. Various measures are planned or in progress to tackle combined issues of congestion and poor air quality, see also the analysis above against 'air quality'.
9. Water Water resources	-	--	Oxford is in an area of serious water stress and current Local Plan sets water use limits on new development in line for this reason. Water resources are currently adequate but may not be by 2045 due to challenges like climate change and a growing population. Thames Water have various interventions planned through their Water Resources Management Plan (2024) to help address resources. There are various ecological sites in the city which are sensitive to changes in hydrology and the Local Plan 2036 protects these sites.

Water quality	-	?	Water quality in the Thames catchment is moderate or poor in certain watercourses. Some of the causes of this are outside of Local Plan influence though impacts from increased development could worsen this. The extant Local Plan includes policies that help address water quality however. Upgrades are in progress to address capacity concerns for the Oxford Sewage Treatment Works, and as these come online the situation is likely to improve for water quality.
10. Biodiversity	-	0	Biodiversity is plummeting worldwide including in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally, superseding existing policy in Local Plan 2036. The new Local Nature Recovery Strategy identifies a range of enhancement opportunities across the city but these are reliant on willing landowners/investment. Wider challenges such as climate change, invasive species and pollution (e.g. air, water) are likely to continue.
Nature conservation areas	+	0	Nature conservation areas such as Oxford Meadows SAC are currently well protected nationally and locally. The absence of a new local plan after 2036 could reduce protection for local sites (although many may benefit from other tangential protections e.g. Green belt).
11. Urban design and historic environment	++	+	Oxford has a high-quality landscape and historic environment and various national protections exist for designated historic assets. Non-designated local assets will continue to be protected under current Local Plan. High levels of development and tourism continue to put a strain on natural and historic sites and Oxford's landscape/townscape.
12. Employment and economy Employment	++	++	Oxford has a very strong economy, with high employment and with strong demand for research and development uses, which is a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges.
Unemployment	++	++	Future employment growth in Oxford is likely to be in high-skill sectors: without appropriate skills and training, these jobs will not be accessible to local people. Also, see analysis against 'employment' above.
Education, skills and employability / training	+	?	Oxford's population overall is highly skilled, but there are parts of the city where the local population is classified within the 10% most deprived for educational skills and training in the country. State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages. Greater opportunities for start-ups and SMEs are important for Oxford's economy to fully function, and diverse job opportunities are needed, otherwise an 'inclusive economy' will not be realised.
Regeneration and economic revival	0	0	Unlikely that significant new employment sites will be identified in Oxford: the focus at present is on the redevelopment, intensification and renewal of existing sites. Ensuring the right balance of employment and housing growth supported by infrastructure is fundamental to ensuring sustainable growth in Oxford. It is important to ensure that the capacity for housing in the city is delivered including on employment sites. Oxford's housing shortage and its affordability cause problems for businesses and key sectors in both recruiting and retaining staff.

1.10 Key problems in Oxford include:

- Oxford has very high housing costs, limited land available for housing, and difficulty in providing affordable housing.
- There are high levels of inequality across the city which particularly affect economic advantages for certain residents as well as health and wellbeing.
- Much of Oxford is prone to flooding: this is likely to increase with climate change.
- Oxford is still far from achieving its 2040 target of net zero carbon emissions.
- All of Oxford is an Air Quality Management Area because of transport pollution.
- Nature in Oxford, and nationally, is under pressure from climate change, air pollution, and development.
- Oxford is in an area of serious water stress and experiences ongoing challenges around water quality in its watercourses due to various sources of pollutants, although good progress is being made working with Thames Water and the EA on the issue of wastewater treatment, which is a key contributor.

1.4 SA/SEA Framework

1.11 This SA/SEA uses the framework at Table 1.2 to assess the impacts of the Oxford Local Plan 2045 policies. An adapted framework, with more site-specific criteria underlying each objective, is used for development sites.

Table 1.2: The SA/SEA framework used to assess the impacts of the new Local Plan policies.

SA/SEA Framework
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.
5. To reduce poverty, social exclusion, and health **inequalities**.
6. To provide accessible essential **services and facilities**.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.
9. To achieve **water** quality targets and manage water resources.
10. To conserve and enhance Oxford's **biodiversity**.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

1.12 The scoring matrix set out in Table 1.3 is used for assessing various impacts throughout this report. The scoring highlights whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 1.3: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	++
Positive impacts (compared to the current situation)	+
Neutral / none	0
Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation	--
Unclear	?
Depends upon implementation	I

1.5 Developing and testing Local Plan options

1.13 The SA report explores options / alternative approaches with a focus on key elements of the Local Plan in order to ensure that the SA focuses only on 'significant effects', which are as follows:

- The Local Plan growth strategy
- Select thematic policy areas
- Site allocations

1.14 Oxford has many constraints such as flood plain, designated sites of ecological importance, and designated heritage assets which limit the amount of available land over which growth can occur within the city's tight administrative boundaries. Six growth strategy alternatives have been identified and appraised (Table 1.5), each involving a different approach to balancing housing and employment, as well as wider development

needs alongside other Local Plan objectives. The growth strategy alternatives are framed around two key questions:

1. should the focus be on balancing development needs with wider Local Plan objectives or, alternatively, fully maximising the development capacity of sites whilst minimising requirements for other provisions like open space or greening (with a distinction between brownfield and greenfield sites); and
2. should the focus first be on meeting housing needs or employment land needs. The chosen growth strategy for the Local Plan is a balanced one that has a focus on providing for housing.

Table 1.5: Growth strategy alternatives considered for Oxford Local Plan 2045.

	Balanced development	**Boost brownfield supply**	**Boost greenfield supply**
Prioritise housing	Option 1a (The chosen growth strategy)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

1.15 The growth strategy alternatives have been appraised using the SA framework. The results of the appraisal (Table 1.6) indicate that Option 1a, (the chosen growth strategy for the Oxford Local Plan 2045), performs most sustainably and is associated with the most positives and fewest negatives. Whilst a case could be made for options 2b, 3a and 3b from either a housing (option 3a), or an economic growth perspective (options 2b and 3b), this would come at considerable cost in terms of wider objectives.

Table 1.6: Summary of appraisal results for the growth strategy alternatives

SA Objective	**Option 1A**	**Option 1B**	**Option 2A**	**Option 2B**	**Option 3A**	**Option 3B**
1. Carbon emissions	-	--	-	--	--	--
2. Resilience to climate change	+	+	+/-	+/-	--	--
3. Efficient use of land	+	+	+/-	+/-	--	--
4. Local housing needs	+	+/-	+	-	++	-
5. Inequalities	?	?	?	?	?	?

6. Services and facilities	**+/-**	**+**	**+/-**	**+**	**-**	**-**
7. Green infrastructure, leisure and recreation	**+**	**+**	**+/-**	**+/-**	**--**	**--**
8. Traffic and associated air pollution	**+/-**	**-**	**+/-**	**-**	**-**	**--**
9. Water	**+/-**	**+/-**	**-**	**-**	**--**	**-**
10. Biodiversity	**0**	**0**	**0**	**0**	**-**	**-**
11. Good urban design / the historic environment	**+**	**+**	**--**	**--**	**--**	**--**
12. Economic growth	**+**	**+**	**+**	**++**	**+**	**++**

1.16 Guided by the overall growth strategy, the policy team considered different ways of writing the Local Plan, including identification of various policy options to help inform the preferred approaches to the 40+ draft policies. The supporting background papers document the sets of options/alternatives for each of the policies consulted on at Regulation 18 stage, referred to as 'options sets'.

1.17 All options sets were appraised at a high-level against the SA objectives (as is documented in the relevant background papers). Some of the options for particular policies were considered to have likely significant effects against one or more of the SA objectives. These options sets were scoped into the Sustainability Appraisal for a detailed appraisal to more fully understand how they performed in sustainability terms and are as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

1.18 The findings from these appraisals contributed to the decision about preferred approach for these policies and were helpful in informing where potential mitigations might be needed to ensure the overall strategy was as sustainable as possible. The background papers each set out how the Council came to identify its preferred options for policies and this drew upon the testing that was undertaken as part of the Sustainability Appraisal where relevant.

1.19 The Local Plan also includes site allocation policies. Identifying and developing site allocations is an iterative process that draws from multiple areas of work including the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Needs Assessment (ELNA).

1.20 The Council has followed a 'no stone left unturned' approach to identify as many allocations for development as possible in order to meet identified need for the city. This includes initially identifying a large list of potential sites from a wide range of sources. These potential sites are then assessed and filtered with consideration of their availability for development (e.g. landowner intent) and suitability for development (bearing in mind fundamental environmental constraints) resulting in a refined list of allocations.

1.21 The proposed list of allocations were assessed against a modified version of Sustainability Appraisal Framework Draft which considers sustainability impacts against the 12 SA objectives. An individual SA site assessment proforma has been completed for all proposed allocations and these are published separately. The assessment process informs the appraisal of Local Plan sustainability impacts and any necessary mitigation to avoid significant effects by identifying where an allocation could have particular sustainability concerns (e.g. proximity to a watercourse, or sensitive heritage asset) in relation to the SA objectives.

1.6 Assessing the Local Plan's impacts

1.22 Table 1.7 sets out a summary of the overall impacts of the Local Plan which is set out more fully in Chapter 6 of the report. Other plans, projects and underlying trends will have additional impacts and these are discussed in the full table in Chapter 6 also.

Table 1.7: Summary of overall impacts of the Local Plan

SA/SEA topic	Overall impact	Comments
1. Carbon emissions	**+/-**	Local Plan includes a range of policies which will support meeting local and national net zero carbon targets, including net zero buildings in operation, embodied carbon and retro-fitting as well as policies supporting walking/cycling/wheeling and public transport access. Additional growth, including 9,267 of new homes to 2045 will be associated with some level of new emissions, particularly in relation to construction. Some impacts are likely to reduce, e.g. as national grid continues to decarbonise, other impacts will be take longer to address and will require further advances in technologies/construction practices (e.g. in relation to carbon impacts of construction).

SA/SEA topic	Overall impact	Comments
2. Resilience to climate change	**+/-**	Local Plan includes a specific resilient design policy as well as other policies supporting aspects of climate resilience including greening policies, flood risk, SuDS, Health Impact Assessment. New development is likely to further urbanise parts of the city, resulting in some loss of green space, and some development in areas of flood risk including some site allocations. The new Oxford Flood Alleviation Scheme will help to address flood risk in parts of the city, however, climate change will continue and this could exacerbate climate risks like overheating or introduce new ones.
3. Efficient use of land	**+/-**	Efficient use of land is a theme running throughout the Local Plan, with specific policies encouraging appropriate densities, restrictions on new car parking, retaining high-quality green features, all helping to ensure limited land is used efficiently. Arguably, strong protection for a network of green space and heritage could be seen to reduce efficient use of land, but this would support sufficient safeguards for wider environment. The requirement for new homes will result in some loss of green field sites, but these would potentially allow for more efficient development in terms of higher density and reduced reliance on cars than if they were built elsewhere.
4. Local housing needs	**+**	The Local Plan prioritises new housing across available sites over other uses in response to the city's high housing need. The city's identified housing need is for 1,087 new homes per year and the Local Plan's capacity based requirement looks to provide for 9,267 of new homes (463 homes per year) to 2045. Whilst the Local Plan's requirement will make an overall positive contribution to housing need in a highly constrained area whilst balancing out other Local Plan objectives, this will leave an under-provision which adjacent local authorities would likely need to fill. The Local Plan includes policies that seek to secure affordable housing and a number of policies addressing specialist housing to meet needs of other groups.
5. Inequalities	**+**	The focus on delivering new homes in the city, including affordable housing will help to address a key source of inequality in the city. The Local Plan strongly supports walking/cycling/wheeling and access to public transport and other daily needs via local/district centres, helping people who do not have access to a car. Policies supporting protection of green spaces, new greening on developments as well as a specific health impact assessment policy will also support health and wellbeing. Some wider pressures such as the ongoing cost-of-living crisis bring about some level of uncertainty about wider impacts on inequality and how these will interact with the Local Plan's proposals.
6. Services and facilities	**0**	Additional growth is likely to put additional pressures on key services, facilities and infrastructure, however, the Local Plan aims to ensure that adequate infrastructure, including services in district and local centres, are provided to support planned growth. The plan aims to prevent the loss of community facilities, schools and cultural sites and to direct certain uses towards accessible locations in the city/district/local centres.
7. Green infrastructure, leisure	**0**	The Local Plan includes strong protection for a network of green spaces of various types and other features across the city, as well as policies seeking to ensure minimum levels of greening across new development sites. Equally, the provisions for growth including new housing will result in the loss of some green infrastructure,

SA/SEA topic	Overall impact	Comments
and recreation		though the Local Plan policies and specific requirements in the allocations seek to focus losses on lower quality features and to mitigate impacts.
8. Traffic and associated air pollution	**+/-**	The Local Plan has various policies that seek to reduce reliance on car including requirements for low car development, vibrant centres, appropriate development densities, and bike parking. Additional housing provision in the city could help to reduce numbers of in-commuters as more people are enabled to live closer to work, however, it could increase levels of car ownership depending on how this housing is implemented. Unmet housing need that would have to be delivered beyond the boundaries may have impacts, but this is highly dependent on the manner in which it is brought forward (e.g. location and access to public transport). The Local Plan includes requirements for addressing impacts on air quality, and whilst there may be short term impacts on air quality (e.g. from new vehicles or construction) these are likely to reduce over time in combination with county measures and national drivers (e.g. phasing out of fossil fuel vehicles).
9. Water	**-**	Population growth/new housing will incur additional demands on water. In terms of water resources, the Local Plan sets limits on water use and seeks a range of water saving measures to limit impacts, though it is unlikely to totally mitigate additional demand and additional measures planned for by Thames Water will be important for helping to meet future demands on water supplies. The Local Plan includes various requirements for protecting water quality, including buffers for water courses, measures to prevent impacts of pollution, as well as greening policies which should help to mitigate impacts of further urbanization. Alongside important upgrades in progress to the Oxford Sewage Treatment Works to address current and future demands on wastewater treatment, impacts on water quality are expected to be able to be mitigated.
10. Biodiversity	**+/-**	The Local Plan is protecting a network of green infrastructure across the city which will have benefits for supporting a range of species, alongside additional protections for designated sites. There are also policies requiring onsite enhancements for species and minimum levels of greening which should complement national requirements for Biodiversity Net Gain. However, biodiversity continues to be under pressure across the country, subject to a range of national/internation drivers like climate change. Additional urbanization in the city associated with new development will also result in some losses of green features that could impact species (though the Plan also includes mitigation requirements to address impacts).
11. Good urban design / the historic environment	**+/-**	The Local Plan's heritage policies aim to protect the city's heritage. Its design policies promote high-quality design. There are a number of site allocations within conservation areas or in proximity to designated assets that could have impacts on townscape and heritage unless these are appropriately mitigated in line with the Local Plan's requirements. Equally, various sustainability requirements, e.g. in relation to net zero carbon and greening, will necessitate different approaches to design than what has been built in the past, though equally these could be construed as important components of 'high-quality' design today, so impact on local townscape could be mixed and will be highly dependent on implementation.
12.	**+**	The Local Plan's employment strategy seeks to modernise and intensify existing employment sites, while supporting a flexible approach to land-uses within the city

SA/SEA topic	Overall impact	Comments
Economic growth		and district centres to be able to respond quickly to changing needs and economic circumstances. The focus on providing for new housing will also help to address a key barrier to economic growth, which is employees' inability to find affordable housing close to where they work in the city. The Local Plan includes measures that seek to secure affordable workspaces and provide local people with skills/training opportunities through Community Employment and Procurement Plans, and this will help to address local barriers to employment and economic growth.

1.7 Minimising negative impacts and maximising positive impacts

1.23 In the preparation of the Oxford Local Plan 2045, informed by the Sustainability Appraisal process, the Council has incorporated a range of mitigation measures to minimise negative impacts and maximise positive ones. There are a number of key policies which form important mitigation for the Local Plan in relation to a number of topics including:

- **Limiting carbon emissions** – **Policy R1** requires all new buildings to be net zero in operation; **Policy R3** strongly supports retro-fitting of existing buildings to reduce their carbon impacts; **Policy R2** strengthens requirements for addressing embodied carbon in construction.
- **Traffic and air pollution –** Policies within **Chapter 7**, seek to promote walking/cycling/wheeling and improved access to public transport. Additionally, **Policy R4** sets out various requirements to address air quality impacts.
- **Water – Policy R5** sets requirements meeting water use limits and incorporating other water conservation methods, as well as ensuring no adverse impacts on water quality. Also supported by policies such as preserving amenity and environmental health from release of pollutants (**Policy R8**), additional protections for sensitive ecological sites (**Policy G6**), requirements for ecological buffers (**Policy G2**), and greening on developments (**Policies G2, G3**).
- **Green infrastructure and biodiversity – Policy G1** protects a network of green spaces, including national and local designated ecological sites. Additional protections related to designated ecological sites is assigned through **Policy G6**. Strong requirements in relation to providing new green features (**Policies G2 and G3**) as well as requirements for onsite ecological enhancements (**Policy G5**).

- **Infrastructure and services –**The Infrastructure Delivery Plan identifies the key infrastructure needs in the city and the Local Plan includes a strategic policy (**Policy S3**) which aims to ensure that essential infrastructure needs to facilitate new development are provided for and is important for helping to ensure the plans proposals

1.24 Additionally, the Council has undertaken individual site assessments for site allocations using an adapted version of the Sustainability Appraisal framework to appraise the sites for likely significant effects. Where potential adverse effects of development on the allocations has been identified, the Local Plan's site allocation policies (as set out in Chapter 8 of the plan) incorporate mitigation measures to minimise or obviate those impacts. These measures typically cross refer to key policies such as those highlighted above, where there are site specific considerations that need to be taken into account in mitigating for any impact.

1.8 Monitoring the Local Plan's impacts

1.25 The social, environmental and economic impacts of the Local Plan will be monitored and Table 1.8 sets out the proposed monitoring framework. The impacts of the plan will be monitored every year and some wider sustainability outcomes will be monitored every three years.

Table 1.8: Proposed monitoring framework.

SA/SEA topic	Monitoring of Local Plan 2045 outcomes (every year)	Monitoring of sustainability outcomes (every 3 years)
1. Carbon emissions	Contributions secured towards and proportion spent from energy offset fund (assumes that all other developments are net zero carbon)	Change in per capita CO2 emissions
2. Resilience to climate change	Applications permitted against Environment Agency flood risk advice	Change in no. homes in flood zone 3
3. Efficient use of land & 7. Green infrastructure and leisure	Applications permitted on protected green space	
4. Local housing needs	Net housing completions	Change in population / households
5. Inequalities	Net affordable housing completions	Changes in inequalities according to indices of Multiple Deprivation
6. Services, facilities and infrastructure	Applications permitted for new community spaces, cultural venues and visitor attractions	Significant new community assets
8. Traffic and air pollution	Air quality progress: NOx, PM10, PM2.5	Modal split of journey in Oxford

9. Water		Changes in quality of watercourses according to WFD classifications for chemical quality and biological quality.
10. Biodiversity	Biodiversity net gain being delivered in the city.	Condition of SSSIs, integrity of SAC, condition of local wildlifes sites.
11. Urban design and heritage	Applications permitted that result in the loss of listed buildings, registered parks and gardens, scheduled monuments	Change in no. heritage assets at risk
12. Economic growth	Net gain / loss of employment floorspace (sqm)	% employment / unemployment in the city

1.9 Next steps

1.26 The Regulation 19 Oxford Local Plan 2045 and this Regulation 19 Sustainability Appraisal report will be consulted on during the Regulation 19 consultation beginning 30th January 2026. The Local Plan will be submitted for examination later in 2026, and it is expected to be adopted in 2027.

2. Introduction

2.1 This Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) report accompanies the Regulation 19 consultation on the proposed Oxford Local Plan 2045. This chapter gives a high-level introduction to the city of Oxford; discusses the Oxford Local Plan 2045, as well as the requirements of SA and SEA, and then sets out the structure of the rest of the report.

2.1 Background to Oxford City

2.2 Oxford City Council is a district council at the heart of Oxfordshire. It has a total area of about 46 km^2 (17.6 miles^2), parts of which are very densely developed. The built-up area of the city extends to the administrative boundary around much of the eastern half of Oxford, but the river corridors of the Thames and Cherwell penetrate as extensive green wedges into the heart of the city. This uneven distribution of urban and rural landscapes gives Oxford a distinct physical form, with much of the residential population concentrated to the east of the city centre (Figure 2.1).

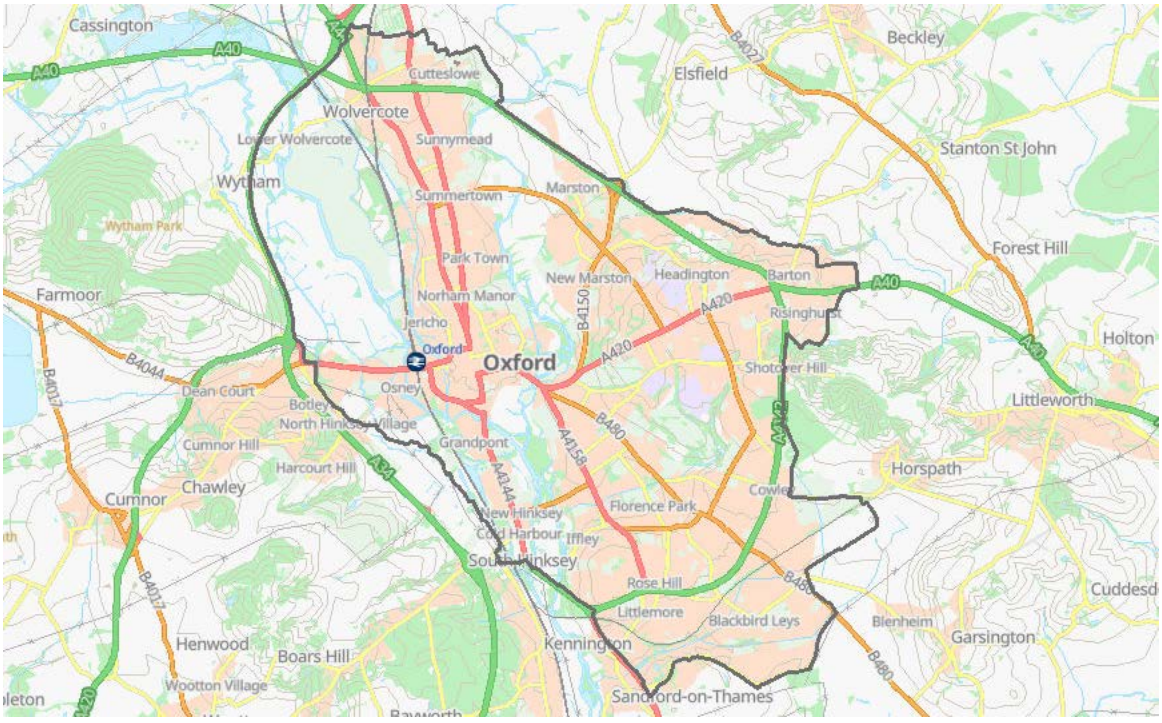


Figure 2.1: Map of Oxford including administrative boundaries of the City Council (© Crown Copyright and database right 2025. Ordnance Survey AC0000808820.)

2.3 Oxford's population is approximately 166,034 according to the Office for National Statistics (Mid-year population estimates, July 2025). The 2021 census estimated that one-third of the population is aged between 18 and 29, more than double the national average.

Oxford is home to 34,945 students, and 4,885 businesses providing 131,000 jobs. There is a high level of in-commuting in the city with the 2021 census recording that of the 57,315 commuters working in Oxford, 28,342 were from outside the city (*although the 2021 census data is likely to have been influenced by the Covid-19 lockdown measures including requirement to stay at home where possible*).

2.4 Oxford is a compact city with a unique and world-renowned built heritage which draws many visitors each year. Its original Saxon street pattern and some of the earliest buildings and monuments still survive. Around 27% of Oxford is within the Green Belt which is an important contributor to the city's historic setting and, unusually, not only constrains development in the outer cordon of the city, but also through the city's heart. Oxford sits at the confluence of the Thames and Cherwell rivers and is quite flat, so it is prone to flooding from a range of sources. The rivers form an intrinsic part of the unique environment of the city and promote tourism and a range of important water-based sports and social activities in the city. The historic city parks and nature conservation areas create pockets and corridors of green within the administrative boundary; several have national and international nature conservation designations, further constraining development, and a number of green spaces also contribute to the historic character of the city.

2.5 Oxford is one of the most unaffordable places to live in the country. In recent years, Oxford has experienced a booming housing market with rising house prices. This has led to open market housing becoming expensive and difficult to obtain. It has also limited the supply of affordable housing, and there is now a huge need for affordable housing. There are severe pressures on the housing stock, with concentrations of Houses in Multiple Occupation, homeless and vulnerable people, and areas of deprivation with relatively high crime rates, health deprivation and poor educational achievement.

2.6 Oxford has remained economically very successful despite the global recession of the 2000s, Brexit and the Covid pandemic. The government sees Oxford as playing a key role within the 'Pan-Regional Partnership' between Oxford and Cambridge, with high future housing and economic growth.

2.2 The Oxford Local Plan 2045

2.7 The Oxford Local Plan 2045 carries forward and updates policies set in the Oxford Local Plan 2036. Its preparation has built upon the considerable amount of resource and effort that went into the preparation of the withdrawn Local Plan 2040, whilst taking opportunities to revisit and reappraise the policy framework supported through further rounds of consultation and engagement with various stakeholders.

2.8 Whilst earlier stages of consultation had envisioned the new Local Plan setting out a vision for the city to 2042, as was the case for the early engagement consultation of spring 2025 and the Regulation 18 consultation of summer 2025, the Regulation 19 consultation document now establishes the Plan period running through to 2045. This Regulation 19 Sustainability Appraisal report has been prepared in light of this updated context, including reviewing and revising where necessary the content previously published for consultation as part of the Interim Regulation 18 Sustainability Appraisal report (which remains available in the evidence base).

2.9 The Oxford Local Plan 2045 vision is as follows:

In 2045 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare.

Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper.

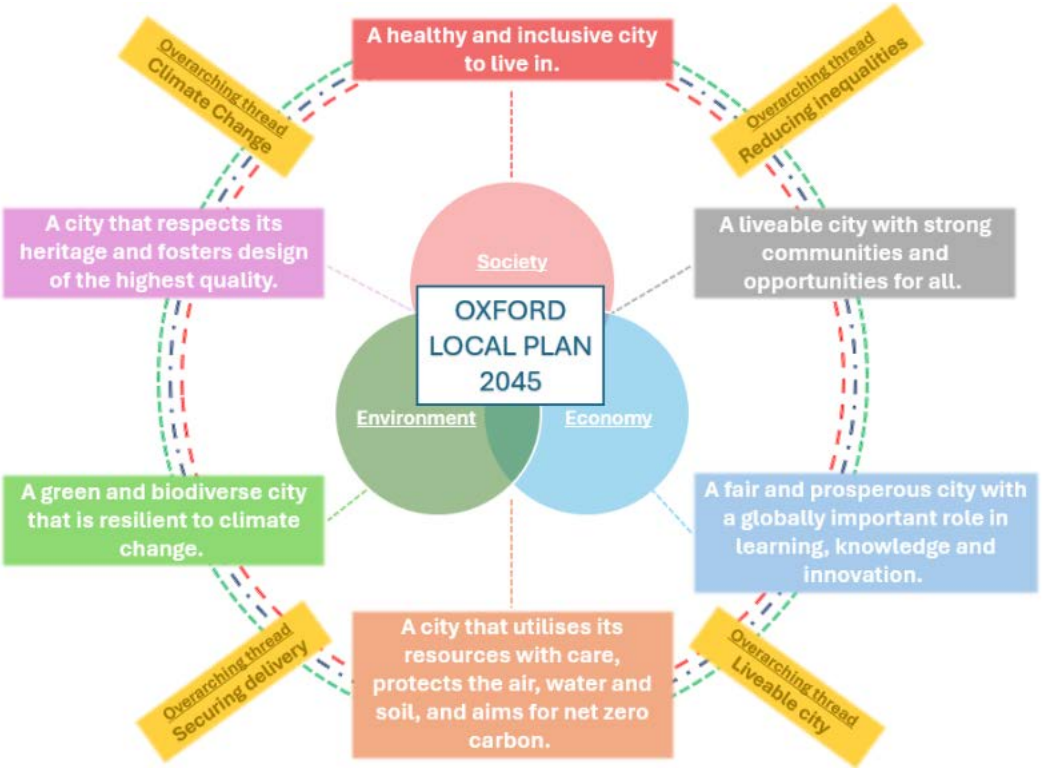
The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

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.

2.10 The vision is underpinned by six themes that are adapted from the three pillars of sustainability and their interconnections, as is illustrated in Figure 2.2. There are various specific objectives for the city which sit under each of these themes and these are discussed further in Chapter 4. The Plan also includes several overarching threads which interconnect throughout the document and across the six themes – these are: addressing climate change; reducing inequalities; ensuring a liveable city; and securing delivery.

Figure 2.2: The Local Plan's themes and overarching threads which interweave between them.



2.11 The Local Plan allocates sites for housing and employment. It also sets policies for the management of development in the city including: the conservation and enhancement of the historic and natural environment, biodiversity; guiding the quality of urban design; achieving the city's net zero carbon targets and flood risk management. The Local Plan will be used in determining planning applications and helping guide investment decisions across the city alongside other key documents such as neighbourhood plans and Supplementary Planning Documents.

2.12 The range of policies within the Local Plan, excluding those relating to site allocations and areas of focus, are set out in Table 2.1.

Table 2.1: The policies of the Oxford Local Plan 2045, excluding Areas of Focus and site allocations.

Ref	Policy title
S1	Spatial Strategy and Presumption in Favour of Sustainable Development
S2	Design Code and Guidance
S3	Infrastructure Delivery in New Development
S4	Plan Viability
H1	Housing Requirement
H2	Delivering Affordable Homes
H3	Affordable Housing Contributions from Other Development Types
H4	Employer-Linked Affordable Housing
H5	Mix Of Dwelling Sizes (Number Of Bedrooms)

H6	Development Involving Loss Of Dwellings
H7	Houses In Multiple Occupation
H8	Location Of New Student Accommodation
H9	Linking New Academic Facilities With The Adequate Provision Of Student Accommodation
H10	Homes For Travelling Communities
H11	Homes For Boat Dwellers
H12	Older Persons And Other Specialist Accommodation
H13	Self-Build & Custom Housebuilding
H14	Boarding School Accommodation
E1	Employment Strategy
E2	Warehousing, Storage And Distribution Uses
E3	Community Employment And Procurement Plans
E4	Affordable Workspaces
E5	Hotel And Short Stay Accommodation
G1	Protection Of Green Infrastructure
G2	Enhancement And Provision of New Green And Blue Features
G3	Provision Of New Green And Blue Features – Urban Greening Factor
G4	Delivering Mandatory Net Gains In Biodiversity
G5	Delivering Onsite Ecological Enhancements
G6	Protecting Oxford's Biodiversity Including The Ecological Network
G7	Flood Risk And Flood Risk Assessments (FRAs)
G8	Sustainable Drainage Systems (SuDS)
G9	Resilient Design And Construction
R1	Net Zero Buildings In Operation
R2	Embodied Carbon
R3	Retro-Fitting Existing Buildings
R4	Air Quality Assessments And Standards
R5	Water Resources And Quality
R6	Soil Quality
R7	Land Contamination
R8	Amenity And Environmental Health Impacts Of Development
HD1	Principles Of High-Quality Design
HD2	Making Efficient Use Of Land
HD3	Designated Heritage Assets
HD4	Non-Designated Heritage Assets
HD5	Archaeology
HD6	Views And Building Heights
HD7	Health Impact Assessment
HD8	Privacy, Daylight And Sunlight
HD9	Internal Space Standards For Residential Development
HD10	Outdoor Amenity Space

HD11	Accessible And Adaptable Homes
HD12	Bin And Bike Stores And External Servicing Features
C1	City, District And Local Centres
C2	Maintaining Vibrant Centres
C3	Protection, Alteration And Provision Of Local Community Facilities
C4	Protection, Alteration And Provision Of Learning And Non-Residential Institutions
C5	Protection, Alteration And Provision Of Cultural And Social Venues And Visitor Attractions
C6	Transport Assessments, Travel Plans And Service And Delivery Plans
C7	Bicycle And Powered Two Wheelers Parking Design Standards
C8	Motor Vehicle Parking Design Standards
I1	Digital Infrastructure To Support New Development
I2	Safeguarding Land For Infrastructure

2.3 Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

2.13 The Environmental Assessment of Plans and Programmes Regulations 2004, SI No. 1633 (hereafter the "SEA Regulations") is the governing legislation in England and Wales that manages the Strategic Environmental Assessment (SEA) process. While the SEA legislation focuses on assessing environmental effects, this assessment process is widened to include an analysis of social and economic effects through the legal requirement to undertake a Sustainability Appraisal (SA) as set out in Section 19 of the Planning and Compulsory Purchase Act 2004. According to the Planning Practice Guidance (PPG) section on Strategic environmental assessment and sustainability appraisal, "Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation.

2.14 The SEA Regulations state that SEA must assess the likely significant effects of the plan or programme on the environment, namely:

- Biodiversity
- Population
- Human health
- Fauna
- Flora
- Soil
- Water
- Air
- Climatic factors
- Material assets
- Cultural heritage, including architectural and archaeological heritage
- Landscape
- The inter-relationship between the above

2.15 There are various requirements of the SEA Regulations and Table 2.2 highlights these as well as where they are covered in this SA/SEA for the Oxford Local Plan 2045.

Table 2.2: Requirements of the SEA Regulations and where they are covered in the SA/SEA for the Oxford Local Plan 2045

Requirements of the SEA Regulations	**Where covered**
a) an outline of the contents, main objectives of the plan or programme…	Chapter 2 of this report
… and relationship with other plans or programmes	Chapter 3 of this report, and in individual Background Papers.
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 of this report and in individual Background Papers.
c) the environmental characteristics of the areas likely to be affected	In individual site assessment forms and summarised in chapter 6.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the Habitat Regulations;	In individual Background Papers and summarized in chapter 3 of this report.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	In individual Background Papers.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects);	Chapters 4, 5 and 6 of this report.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 7 of this report
h) An outline of the reasons for selecting the alternatives dealt with…	Chapter 5 of this report
… and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 of this report.
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Chapter 8 of this report.
j) a non-technical summary of the information provided under the above headings.	Chapter 1 of this report.

Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4)	A summary of feedback received on the early draft of the scoping is included in Appendix A and discussed in Chapter 3/Section 3.5.
authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	A summary of the feedback received on the interim SA published for Reg 18 is included in Chapter 3/Section 3.5.
other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7)	Not applicable
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10)	Will be carried out upon plan adoption
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Will be carried out from after plan adoption
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	Throughout the process

2.16 Sustainability Appraisal is an iterative process to assist in the development of a Local Plan. It is used to appraise emerging options against the three pillars of sustainability; the social, environmental and economic dimensions. It assists in selecting the options deemed to be the most sustainable for the area, and in fine-tuning the policies in the Local Plan. Ultimately, the SA documents 'the story' of the Local Plan's development.

2.17 There are different requirements for undertaking an SA compared to those for SEA; the requirements for undertaking SA are outlined in Table 2.3 below. This SA/SEA report fulfils the legal requirements for both SA and SEA. Where reference is made within this

document to Sustainability Appraisal/SA, it also implies (where appropriate) Strategic Environmental Assessment. The Council has consulted on two early versions of this Sustainability Appraisal as it has emerged in advance of this Regulation 19 version, details of these are set out in the Table below, but in summary:

- An early draft of the scoping report was shared in advance of Regulation 18 consultation with the Environment Agency, Natural England and Historic England to confirm the scope of the Sustainability Appraisal (February 2025). Feedback was incorporated into the subsequent versions.
- An Interim Sustainability Appraisal report, including an updated scoping report, appraisal of options/alternatives for the Local Plan, and early whole plan appraisal was published as part of the Regulation 18 First Draft (Preferred Options) Local Plan consultation (June/July 2025).

Table 2.3: The Sustainability Appraisal (SA) process and the stages of Local Plan 2045 preparation

Stages of the Sustainability Appraisal process	**Relevant consultation**
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft of scoping report to agree scope (Feb-March 2025) **Complete** Updated version of scoping report published as part of Interim SA Report (Part 1) for Summer 2025 Reg 18 consultation **Complete**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as part of the Interim SA Report (Part 2) for Summer 2025 Reg 18 consultation **Complete**
Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects Task B5: Propose measures to monitor significant effects of implementing the Local Plan *Stage C: Prepare the SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Published as part of this Regulation 19 SA report - including updated information related to earlier stages. **Current stage**

Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

** The Environment Agency, Historic England and Natural England*.

2.18 The colour coding system as set out in Table 2.4 will be used throughout this SA/SEA. It is intended to score whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 2.4: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	++
Positive impacts (compared to the current situation)	+
Neutral / none	0
Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation	--
Unclear	?
Depends upon implementation	I

2.4 Habitat Regulations Assessment

2.19 Oxford is home to part of the Oxford Meadows Special Area of Conservation (SAC), which is a site of international nature conservation importance because of its lowland hay meadows and creeping marshwort (Apium repens). The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. Port Meadow is the largest of only two known naturally occurring sites in the UK for creeping marshwort.

2.20 A Habitat Regulations Assessment (HRA) is a legal requirement to test if a plan or project proposal could have a significant impact on the conservation objectives of designated sites such as the SAC. In the Council's work on the Oxford Local Plan 2036, and on the withdrawn Local Plan 2040, the Council has produced Habitat Regulations Assessments and maintained regular engagement with Natural England throughout. This

work previously identified that potential impacts on air quality, recreational disturbance, and changes to local hydrology/ water quality are all issues which require assessment through the Habitat Regulations Assessment process.

2.21 The Council has published a Habitat Regulations Assessment (comprising of an updated screening and Appropriate Assessment) for the Regulation 19 consultation. This takes into account ongoing engagement with Natural England, including their feedback on the screening report published at Regulation 18.

2.22 The assessment currently concludes that the Oxford Local Plan 2045 will not affect the integrity of the Oxford Meadows SAC through air quality impacts (either 'alone' or 'in-combination'). With the suite of mitigation measures proposed through the Stage 2 Appropriate Assessment, it also concludes that the Local Plan will not affect the integrity of the Oxford Meadows SAC through recreational (dog fouling) impacts, impacts on water levels or quality (either 'alone' or 'in-combination').

2.5 Health Impact Assessment

2.23 Whilst there are no distinct legislative requirements to do so, the Council has also undertaken a separate Health Impact Assessment on the Local Plan. This reflects the reality that planning and the built environment can have a significant role to play in shaping healthier environments (or hindering them) for people, which is particularly pertinent to Oxford, being a city characterised by health inequalities across its population. This separate form of assessment is a valuable way of helping to identify the key positive and negative health impacts that could arise from proposed policies in the new Local Plan.

2.24 A scoping study was previously undertaken to inform the Regulation 18 stage of the Local Plan's preparation and was published as part of that consultation for feedback. The Council has produced a further assessment which reviews the proposals of the Regulation 19 Submission Draft Local Plan in the context of health and wellbeing impacts and this is available separately as part of the consultation.

2.6 Difficulties in compiling the SA/SEA

2.25 There were no significant difficulties encountered in compiling this report. Where the interim report published previously encountered some data gaps due to work still being prepared, the previous analysis has now been reviewed afresh and updated where necessary.

2.7 Structure of this report

2.26 This report has been prepared by Oxford City Council. It comprises an updated version of 'Stage A' and elements of 'Stage B' of the Sustainability Appraisal process (as set out in Table 2.3 earlier), as were first published in the summer of 2025, during the Reg 18 consultation, as well as the remainder of Stage B. The following chapters of the report are structured as follows:

- Chapter 3 – an updated version of the scoping report (Stage A1 – A5)
- Chapter 4 - an appraisal of the Local Plan vision and themes/objectives (Stage B1)
- Chapter 5 – presents and appraises the alternatives to the Local Plan (Stage B2)
- Chapter 6 – appraises the Local Plan's policies and site allocations (Stage B3)
- Chapter 7 – discusses mitigation measures to minimise the Local Plan's negative impacts and maximise its positive impacts (Stage B4)
- Chapter 8 – sets out a monitoring framework for the Local Plan (Stage B5)
- Chapter 9 – Discusses next steps.

2.27 This Sustainability Appraisal report, particularly the scoping stages and identification of alternatives, is supported by more detailed analysis which is presented across a number of the supporting Background Papers which expand on key information of relevance to the various topics they address. Previous iterations of these were published as part of the Regulation 18 consultation and similarly supported the Interim Sustainability Appraisal report at that stage also. Table 2.5 lists these papers, which can also be accessed via the evidence base online, as well as directly via the hyperlinks, and shows how they relate to the Sustainability Appraisal objectives which will be discussed in Chapter 3.

Table 2.5: Background papers and SA objectives/SEA themes

Relevant background paper(s)	**SA objective**	**SEA Themes**
008 Carbon reduction and climate resilient design 012 Transport	1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040	Climatic Factors, Air
008 Carbon reduction and climate resilient design 007 Flood risk, drainage and SUDS 010 Health and Wellbeing	2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	Water, Climatic Factors
006 Green belt 009 Natural Resources	3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	Soil, Material Assets, Biodiversity

001 Housing need, requirement and mix 002 Affordable housing 003 Specialist housing	4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	Material Assets, Population, Human Health
010 Health and Wellbeing	5. To reduce poverty, social exclusion, and health **inequalities**.	Population, Human Health, Material Assets
013 Livable city 014 Infrastructure	6. To provide accessible essential **services and facilities**.	Material Assets, Human Health
005a Green infrastructure 005b Biodiversity	7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	Landscape, Biodiversity, Human Health,
012 Transport 009 Natural Resources	8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	Air, Climatic Factors
009 Natural resources	9. To achieve **water** quality targets and manage water resources.	Water, Biodiversity
005a Green Infrastructure 005b Biodiversity	10. To conserve and enhance Oxford's **biodiversity**.	Flora, fauna, biodiversity
011 Urban design, placemaking, heritage and archaeology	11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	Cultural Heritage, Landscape
004 Employment and inclusive economy	12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	Population, Material Assets

3. Updated Sustainability Appraisal scoping

3.1 This chapter presents the SA scoping work, a version of which was initially presented in the interim SA report that informed the Regulation 18 stage of the Local Plan's production. The chapter incorporates updates and refinements to that previous scoping work where appropriate, reflecting the more advanced point in the Local Plan's production and any subsequent changes in context including:

- Any additional considerations arising from the changing context of the Local Plan's production (e.g. updated Local Plan base and end dates; further detail in relation to the Local Plan's proposals and policies which have developed since Reg 18).
- Relevant feedback from the Regulation 18 consultation.
- Any other relevant changes to national or local context that have arisen since the interim SA.

3.1 Policy context (Sustainability Appraisal Task A1)

3.2 The Oxford Local Plan 2045 is influenced by a range of policies, plans, programmes and sustainability objectives. The key policies, plans and programmes that affect the entire plan are discussed below. Additional policies/plans/programmes that affect individual topic areas such as air quality and deprivation are discussed in the Background Papers which support the SA (as set out in Table 2.5).

3.1.1 National context

Levelling Up and Regeneration Act 2023

3.3 This Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes which are intended to boost development and speed up the planning process. Many of the changes provided for in the legislation are dependent on subsequent regulations before they would come into effect and detail as to how or when they will come into place specifically is limited. The various changes that the Act lays the groundwork for include:

- Greater digitisation of planning documents
- SA/SEA replaced by "environmental outcomes reports"
- Community Infrastructure Levy replaced by a new national infrastructure levy
- Development of a common framework of National Development Management Policies (including on a national model design code), and commensurate focusing of Local Plans on locally specific matters
- Repeal of the Duty to Cooperate

- Speeding up of the plan-making process
- Removal of the requirement for a rolling five-year supply of housing land where the Local Plan is up to date.

Environment Act 2021

3.4 This Act was signed into law in November 2021 and assigned government a range of new powers to set binding environmental targets for issues such as air quality, water, biodiversity, and waste reduction. From February 2024 (and April 2024 for small sites), it required the majority of new planning applications to deliver at least 10% biodiversity net gain, based on the DEFRA Biodiversity Metric. The Act also set out requirements for the creation of Local Nature Recovery Strategies (LNRSs) to cover the entire country, discussed further below.

Climate Change Act 2008

3.5 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels). Under the Act, the government is required to set interim reduction targets via carbon budgets, most recently the sixth carbon budget was agreed, whilst the seventh is expected to be set in 2025.

National Planning Policy Framework (NPPF) and associated guidance

3.6 The NPPF sets out the Government's planning policies for England and how these are to be applied and was most recently updated in December of 2024 (with minor revisions in early 2025). The NPPF addresses various topics that Local Plans should cover, including planning for housing, employment and protection of the environment (dealing with matters such as climate change, flood risk, biodiversity, high quality design and the historic environment). The various topic-specific background papers that inform this SA provide detailed summaries on the relevant aspects of the NPPF for each topic. A consultation was published in December 2025 on an updated NPPF and remains open at time of writing.

3.7 The NPPF is supported by an online National Planning Practice Guide and the National Design Guide of October 2019 which provides additional guidance on various topics. Again, where relevant, the supporting background papers expand on the relevant detail contained in these resources for each topic.

The Localism Act 2011

3.8 Introduced the right for communities to shape development in their areas through the production of Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders. Currently Oxford has five designated Neighbourhood Forums: Headington, Littlemore, Summertown/St. Margaret's, Wolvercote and Blackbird Leys. The Headington and Summertown/St. Margaret's Neighbourhood Plans were 'made' in July 2017 and April 2019 respectively, whilst the Wolvercote Neighbourhood Plan was 'made' in June 2021. The Littlemore Neighbourhood Plan was subject to examination in 2025 with the examiner recommending that the Plan could proceed to referendum subject to a number of modifications.

3.1.2 Regional context

Oxford-Cambridge Growth Corridor and Oxford Growth Commission

3.9 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxfordshire's Strategic Economic Plan and Action Plan, 2023/2024

3.10 The Strategic Economic Plan (SEP), published in 2023, updates and replaces Oxfordshire's previous economic strategies and is supported by an accompanying Action Plan (2024). Informed by a county-wide conversation, it provides a post-pandemic statement of economic priorities for Oxfordshire. The SEP charts a positive economic future for the county, and sets out a strategy to 2033 and includes four key objectives which the SEP will seek to advance, working in concert with other strategic processes across and beyond Oxfordshire, these are to:

- Enable Oxfordshire's businesses to thrive and encourage pervasive innovation.
- Widen access to current opportunities and equip people and places as jobs change over the next decade.
- Secure resilient infrastructure for planned growth, consistent with Oxfordshire's commitment to net zero carbon by 2050.
- Ensure that Oxfordshire's places are sustainable and inclusive, and that local communities flourish.

Oxfordshire Local Transport and Connectivity Plan (LTCP), 2022

3.11 The Local Transport and Connectivity Plan, adopted in July 2022, is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents. The LTCP is supported by a number of strategies and plans which are relevant to Oxford—these are detailed further in the Transport Background Paper.

Central Oxfordshire Travel Plan, 2023

3.12 The Central Oxfordshire Travel Plan COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors. The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets.

3.13 For Oxford these include the expansion of the Zero Emission Zone; strategic traffic filters to reduce traffic levels in Oxford; a workplace parking levy; improving priority and safety of sustainable modes in the city and introduction of a Central Oxfordshire Movement and Place Framework (a joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration).

East-west Rail link

3.14 In December 2022, England's Economic Heartland published 'connectivity studies' for an East-West rail link from Oxford to Milton Keynes and Cambridge; rail links from Oxford to Northampton, Wellingborough and Peterborough; and other connectivity improvements. Upgrades in relation to the East-West rail route are ongoing with the latter stages still in the planning stage. A recent non-statutory consultation which included discussion around improvements to Oxford Station and the rail network in order to facilitate the delivery of East West Rail from Cambridge to Oxford closed in January of 2025.

Oxfordshire Minerals and Waste Core Strategy, 2017

3.15 Part 1 (the Core Strategy) was adopted in September 2017 and sets out the vision, objectives, spatial planning strategy and policies for meeting development requirements for the supply of minerals and the management of waste in Oxfordshire over the period to

2031. A Part 2 that would address site allocations was originally intended to follow, however, this is no longer being pursued.

3.16 An updated development scheme published in July 2025 sets out that the intention of the county is to prepare a new Minerals and Waste Plan under the new plan-making system proposed by the Levelling Up and Regeneration Act 2023, once it is brought into effect. A review of the situation will take place in six months if the secondary legislation of the Act has not yet come forward. At present, there is currently no timetable for a new Minerals and Waste Plan's production.

Oxfordshire Local Nature Recovery Strategy

3.17 The Environment Act set out requirements for the creation of Local Nature Recovery Strategies (LNRSs) to cover the entire country. LNRSs are intended to identify important areas for biodiversity as well as opportunity areas for its enhancement. In November 2025, Oxfordshire County Council published the LNRS which covers the county, including the city of Oxford.

3.1.3 Local context

Oxford City Council Our Strategy (2024-2028)

3.18 The Council's ambition is for Oxford to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. We will nurture strong, inclusive communities and be a welcoming and supportive place for people from all backgrounds to work, live and visit. As part of the strategy, the Council has identified five priorities:

- Good, affordable homes
- Strong, fair economy
- Thriving communities
- Zero carbon Oxford
- A well-run council

Oxford's Economic Strategy (2022-2032)

3.19 This local strategy seeks to establish a new standard for economic inclusion in the city, underpinned by an impactful and purposeful contribution to the UK and global economy. It also seeks to rapidly address the environmental impacts of economic activity and harness the opportunities of a new net zero carbon economy.

Oxford Climate Emergency declaration and Zero Carbon Action Plan

3.20 In January 2019, Oxford City Council declared a climate emergency. Subsequently a number of organisations across the city came together to agree a net zero carbon target of 2040, ten years in advance of the national net zero target date. In March 2021, the various stakeholders in the city who comprise the Zero Carbon Oxford Partnership (ZCOP), and including the Council, published an Action Plan and Roadmap for bringing about a net zero carbon city by 2040, or earlier. The document outlines key milestones and actions which need to be taken in different sectors from 2020 to 2050 including in relation to planning and design of the built environment.

3.21 The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.

3.1.4 Other Key Plans, Programmes and Environmental Objectives

3.22 First originating from the European Union, there are several pieces of environmental legislation influencing planning policy in the UK that have subsequently been transposed into UK law. These include:

- The Habitats Directive (92/43/EEC) which were transposed into the Conservation of Species and Habitats Regulations 2017 (amended in 2019),
- The Air Quality Directive (2008/50/EC) which is transposed into the Air Quality Standards Regulations 2010
- The Water Framework Directive (2000/60/EC) which is transposed into the Water Environment Regulations (Water Framework Directive) 2017.

3.2 Sustainability context (Sustainability Appraisal Task A2)

3.23 In the absence of a new Oxford Local Plan 2045, the currently adopted Oxford Local Plan 2036 would continue. It is important to understand the current sustainability context for the city and how this could change in future under this scenario before we can consider the impacts of taking forward any new Local Plan and this is discussed further in the following section.

3.2.1 Current situation and likely future without a new Local Plan

3.24 Table 3.1 presents an analysis, supported by the assessments presented within the supporting Background Papers, which summarises the current situation and the likely situation if the current Local Plan 2036 continued but no new Local Plan was prepared. It helps to inform the baseline from which to assess the impacts of the new Oxford Local Plan 2045 as it is prepared.

Table 3.1: Current situation and likely future without the plan

SA topic	Current situation	Likely future without plan	Summary findings
1.Carbon emissions	-	-	Per capita carbon emissions in Oxford show a steady decline (more than 40% since 2005), principally in line with decarbonisation of the national grid which is expected to continue, though pace is uncertain. Despite overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. National building standards for new development are improving but not to net zero standards and ignore other elements like embodied carbon/energy. Whilst the Local Plan can set standards for carbon reduction in new buildings (and the existing Plan does this), it has limited powers in other respects, for instance, driving the retro-fit of existing homes (e.g. via energy efficiency measures). Greater energy efficiency and renewable energy requirements can also conflict with other priorities, such as providing affordable homes owing to viability issues. Regardless of new development, there will be an ongoing need for significant retro-fitting of existing development, and behaviour change as well as enabling the shift away from reliance on fossil fuels at various scales. The city's Net Zero Carbon Action Plan identifies the key steps/milestones that need to be met to secure net zero by 2040 and the Zero Carbon Oxfordshire Partnership aims to drive this through various initiatives (Local Plan is only one part of the response).
2.Resilience to climate change	--	-	A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. This risk is likely to increase with climate change. A flood alleviation scheme (OFAS) is proposed for the west side of Oxford, although this will not mitigate flood risk everywhere. Given constraints on development in Oxford, there could be increased pressure to locate development in areas of higher flood risk or upon areas of existing flood storage. Local Plan 2036 has strong policies on flood risk, as does NPPF, but residual risk can remain an issue for new development in at risk areas. Oxfordshire County Council has undertaken a Climate Risk assessment for Oxfordshire: alongside flooding it identifies overheating as an increasing risk, particularly if future global climate change targets are missed. Updated national building standards have incorporated limited requirements to consider overheating in new buildings but resilience building to this risk, as well as flooding from various sources, will need to be achieved through a variety of responses: Local Plan policies are one tool in the longer term, but other actions will also be needed.
3.Efficient use of land	0	0	Increased housing pressure means that there will be even more pressure on undeveloped land including green spaces which are important for

			sustainable communities and biodiversity. Without a new plan, housing may be developed in less sustainable locations. Without policies to prioritise delivery of new homes, many sites are far more likely to come forward for commercial uses (in less suitable locations). Green belt runs through the city, following the lines of the rivers. The Council has undertaken green belt assessment to identify whether any sites would be suitable for allocation in the Local Plan and this has informed the plan making process. Development density and protection of undeveloped land have been good to date. Protection of undeveloped land should have supported the protection of soil in parts of the city, although it is likely that soil quality in other areas could be impacted by urbanisation. The higher costs associated with dealing with any remaining contaminated sites could affect viability and increase pressure to develop greenfield sites. Oxford has a number of locations with peat-rich soil deposits which are particularly valuable as important storage for carbon (carbon sinks), managing/storing water, and also for retaining archaeological deposits. Historic development has likely removed some wider deposits, and there are also potentially unmapped/unknown deposits still present in areas. Current Plan protects some of the key areas of known deposits (as protected open space), but there is potential for additional losses of unrecorded deposits to development in future without additional mitigation.
4.Local housing needs Need and supply	--	--	The government's proposed standard method (published December 2024) sets annual housing need is set at 1,087 per annum (21,740 for the 20 year plan period). The Strategic Housing Land Availability Assessment indicates that there is not enough capacity within Oxford to meet all of the housing need. Some of Oxford's housing needs may therefore need to be met outside the city. Without additional large-scale development sites, the proportion of homes delivered through small infill sites is likely to increase, and could increase pressure on the existing infrastructure owing to the incremental nature of these proposals, without them delivering new on-site infrastructure. There is also limited opportunity to deliver affordable housing from these smaller developments.
Affordable housing	--	--	House prices in Oxford are already very high, and future prices are likely to continue to rise more quickly than average salaries. Housing to rent on the open market is also unaffordable to a significant proportion of people. So, delivering affordable housing is also a priority for the Plan, particularly for those in greatest levels of need (social rent homes). The annual provision of affordable housing has been increasing as a result of new development and the city council's own house building and delivery programme. However, national policy provides challenges, for example, reducing the number of sites from which contributions can be sought towards affordable housing to those of 10 or more units, and allowing affordable housing models which are still not affordable in the Oxford context.

Students and student accommodation	**0**	**0**	The existing Local Plan sets a threshold on student numbers living outside of university owned or managed accommodation to reduce the loss of family homes, and to manage competition for residential sites.
5.Inequalities and health Inequality	**-**	**--**	Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health. These are being exacerbated by the cost of living crisis. Continued action needs to be taken to address these inequalities to enable all parts of Oxford's communities to experience a good quality of life. For example, the health of Oxford's residents is generally good, but there is great variation: for instance, men in wealthier parts of the city live more than 13 years longer than men in more deprived parts of the city. This disparity needs to be reduced. Inequalities are likely to exacerbate the future risks to health and wellbeing caused by climate change, particularly overheating and flooding. Oxford is already at higher risk to overheating because of the level of urbanisation compared with other parts of the county and this will continue in future according to 2050 projections without appropriate resilience measures.
General health	**+**	**+**	Despite more localised inequalities, Oxford residents' general health is good and the higher-than-average levels of activity and healthy weight need to be maintained and increased. The Local Plan can help to address wellbeing and mental health by improving housing quality, access to open spaces and building communities. There is some national research that indicates national picture of population health is deteriorating, although consequences for Oxford's population specifically are unclear. See also analysis against 'inequality' above.
Health and housing	**-**	**--**	Beyond the Local Plan, there are plans for improving the existing areas of regeneration in the city, such as Blackbird Leys and West End. Physical regeneration interventions, however, need to be supported with a package of social, economic and environmental measures to ensure the maximum wider benefits are delivered. See also analysis against 'inequality' above.
6.Services, facilities and infrastructure Community facilities	**0**	**-**	Availability of services and facilities plays a key role in quality of life and Oxford's compact nature means there are many areas which benefit from good access to daily needs, however this is not universal across city. The pandemic highlighted the value people put on facilities in their local areas. With an increase in population, it will become even more important to protect and enhance these facilities, and ensure that they are easy to access by walking, cycling and public transport. Economic shocks like the pandemic and other factors including rising costs of energy and living in general continue to put pressure on services, community and cultural facilities however. Changes to use class order such as the introduction of use class E make it harder to protect particular services/facilities through local planning policy.
'Grey' infrastructure	**-**	**-**	There are some known utilities issues in the city, including capacity concerns with the wastewater treatment plant and potential challenges around energy supply as the city moves towards net zero carbon.

			Transport is covered under 8. (Traffic and air pollution). Water is covered further under 9. (Water). The improvements needed to address many of the grey infrastructure issues are somewhat outside of the Local Plan's control. They rely upon investment and infrastructure upgrades by others with primary responsibility for the infrastructure, such as the utilities providers, with the Council acting in a enabling/supporting role helping to ensure plans are appropriate for scales of growth expected.
Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
7.Green infrastructure and leisure	++	+	Oxford has a wide range of green spaces which are generally of good quality although unevenly distributed. However, as Oxford's population increases, there will be more demand for outdoor sports and recreation, and increasing pressure on Oxford's green spaces. Limited development opportunities are likely to mean an ongoing demand for infill development making use of garden spaces and reducing local green infrastructure features. It is unlikely that new large public open spaces will be created with or without a Plan, although smaller spaces could be, and existing open spaces can be enhanced. In addition, any green space (unless it can be show to be surplus) lost to development has to be replaced elsewhere in the city. Green spaces will need to respond to climate change, providing long term flood protection and adaptable habitats, as well as other to impacts from surrounding urbanisation like pollution (e.g. water, air).
8.Traffic and air pollution Air quality	-	+	All of Oxford is an Air Quality Management Area for NO2, and there are air quality 'hot spots' at various major road junctions. Most of the city's air pollution comes from the transport sector according to the most recent source apportionment studies. Since the launch of the city's Air Quality Action Plan, good progress in terms of reductions in NO2 levels have been recorded although there is still work to be done. The Oxfordshire authorities are focusing on active travel, improving walking and cycling infrastructure and public transport, and restricting cars e.g. through low traffic neighbourhoods, traffic filters, work place parking levy, extending the area of the zero emission zones and supporting the introduction of non ICE bus fleets. These actions should potentially benefit air quality as well as congestion. The national phasing out of petrol/diesel cars will help to improve air quality.
Traffic levels and congestion	--	-	Congestion on Oxford's main roads is endemic even though Oxford has very good bus services and higher levels of cycling and public transport use than many comparable cities. With the population and job growth envisaged for Oxfordshire, a continuation of existing levels of car use would threaten to over-burden the transport network. Various measures are planned or in progress to tackle combined issues of congestion and poor air quality, see also the analysis above against 'air quality'.
9.Water Water resources	-	--	Oxford is in an area of serious water stress and the current Local Plan sets water use limits on new development in line with Building regs for this reason. Water resources are currently adequate but may not be by

			2045 due to challenges like climate change and increased demand for water from a growing population. Beyond any Local Plan, Thames Water have various interventions planned as part of a strategy covering the next 50 years to address water supply deficits through their Water Resources Management Plan (2024), including proposing a large new reservoir at Abingdon. There are various ecological sites in the city which are sensitive to changes in hydrology (water flows and water quality). The Local Plan 2036 sets policies which ensure development considers and addresses potential impacts and these would remain relevant in the absence of a new Plan.
Water quality	-	**?**	Water quality in the Thames catchment is moderate or poor in certain watercourses. Some of the causes of this are outside of Local Plan influence (e.g. agricultural practices and invasive species). Other causes have a more direct relationship to development, for instance, run-off from increased development could worsen this. The extant Local Plan cover city to 2036 and includes policies that help address water quality such as SuDS to address run off. Addressing existing capacity problems at the wastewater treatment plant which serves housing in the city is considered to be the key intervention needed to support improvements in water quality. Thames Water are in the process of implementing an upgrade scheme which should address capacity concerns for the Sewage Treatment Works, and as this come online in future, the situation is likely to improve for water quality in the city.
10.Biodiversity	**-**	**0**	Biodiversity is plummeting worldwide including in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally (irrespective of the Local Plan) and superseding existing biodiversity net gain policy in Local Plan 2036. The County Council has published a Local Nature Recovery Strategy which identifies a range of enhancement opportunities across the city but these are reliant on willing landowners/investment. Wider challenges such as climate change, invasive species and pollution (e.g. air, water) are likely to continue to put pressure on biodiversity more broadly.
Nature conservation areas	**+**	**0**	Nature conservation areas such as Oxford Meadows SAC are currently relatively well protected, and policies in the extant Plan protect all green spaces identified as being of high biodiversity value at a local, regional or national level. This would remain the case to 2036, after which national policy would apply. Designated sites like the SAC and SSSIs benefit from national protection, however the absence of a new local plan after 2036 could reduce protection for local sites (although many may benefit from other tangential protections e.g. Green belt).
11.Urban design and historic environment	**++**	**+**	Oxford has a high-quality landscape and historic environment. Various national protections for designated historic assets (e.g. listed buildings) and non-designated local assets will continue under current Local Plan. High levels of development and tourism continue to put a strain on natural and historic sites and Oxford's landscape and townscape.
12.Employment and economy Employment	**++**	**++**	Oxford has a very strong economy, with high employment, low unemployment and high Gross Value Added. Oxford is a fast growing, innovative city that delivers significant economic growth. There is strong

			demand for research and development uses, which needs to be supported as a key sector of Oxford's economy and a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges.
Unemployment	++	++	Future employment growth in Oxford is likely to be in high-skill sectors: without appropriate skills and training, these jobs will not be accessible to local people. Also, see analysis against 'employment' above.
Education, skills and employability/ training	+	?	Oxford Economic Strategy includes a vision to deliver a more 'inclusive economy.' The city includes areas amongst the most deprived in UK. Oxford's population overall is highly skilled, but there are parts of the city where the local population is classified within the 10% most deprived for educational skills and training in the country. State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages. Skills mismatches increase in-commuting, exacerbating congestion problems. Greater opportunities for start-ups and SMEs are important for Oxford's economy to fully function, and diverse job opportunities are needed, otherwise an 'inclusive economy' will not be realised.
Regeneration and economic revival	0	0	It is unlikely that significant new employment sites will be identified in Oxford: the focus at present is on the redevelopment, intensification and renewal of existing sites. Ensuring the right balance of employment and housing growth supported by infrastructure is fundamental to ensuring sustainable growth in Oxford. It is important to ensure that the capacity for housing in the city is delivered including on employment sites. Oxford's housing shortage and its affordability cause problems for businesses and key sectors in both recruiting and retaining staff.

3.25 Even without the Oxford Local Plan 2045, the analysis in Table 3.1 indicates that there will be some improvements in performance against certain sustainability indicators for the city in future due to factors outside of the Local Plan's direct influence such as national legislation and shifting technologies on the market. For example, the Biodiversity Net Gain requirements of the Environment Act, alongside the opportunities identified in the Local Nature Recovery Strategy, may help to support new spaces for flora and fauna. Tightened building regulations bringing about improvements in energy efficiency and the ongoing decarbonisation of grid energy will go some way to reducing carbon emissions. Meanwhile, the policies of the Local Plan 2036 will remain in effect, securing various sustainability benefits from new development coming forward in the intervening period.

3.26 There will likely also be reductions in the performance of the city against some sustainability indicators without a new Local Plan, such as increasing pressures on land including green spaces or areas of flood storage, as well as pressure from new development on the setting of existing assets like historic buildings which contribute to the character of the city. The impacts of climate change are a factor which will have various effects such as increased stress on water resources, and increasing health risks from hotter summers. Whilst the city's economy is buoyant and expected to continue to

generate employment opportunities, there is a risk that those with less skills or experience could be left behind where these opportunities are skewed towards higher skilled sectors; meanwhile, uncertainty and cost of living challenges could impact upon provision of services and other facilities for local residents.

3.27 The Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development which now allow, for instance, offices to be turned into housing. It also preceded the creation of the new Oxford Growth Commission as part of the government's new plans for the Oxford-Cambridge Growth Corridor; the city's declaration of a climate emergency and subsequent signing of a net zero carbon target of 2040. Meanwhile, there are ongoing challenges such as the continued housing crisis, the changing picture of retail, and impacts of pollution on the environment from various activities which have not been resolved. A new Local Plan offers the opportunity to respond to these changes and ongoing challenges.

3.2.2 Existing problems at areas of particular environmental importance

3.28 Also of relevance to the current sustainability context of the city, the SEA process requires an analysis of existing problems at areas of particular environmental importance, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). SPAs and SACs are internationally important nature conservation sites designated for, respectively, birds and habitats/species. This section also discusses the city's Sites of Special Scientific Importance which are nationally designated areas of importance in the city.

3.29 Whilst there are no SPAs in or near Oxford, there are three SACs within 20km of Oxford:

Oxford Meadows SAC - is a 267ha site, part of which lies within the city boundary. It is designated because of its lowland hay meadow and creeping marshwort *Apium repens*. In December 2015, the last year of analysis of Oxford Meadows, it had excellent overall ('global') value for its hay meadow and creeping marshwort. However, it is highly threatened by human induced changes in hydraulic conditions, pollution to surface water and invasive non-native species. Previous HRA work and discussions with Natural England have also flagged concerns about air quality impacts arising from traffic emissions and recreational disturbance.

Cothill Fen SAC - is a 43ha site located 7km from the city boundary. It is designated for its lowland valley mire, which contains one of the largest surviving examples of alkaline fen vegetation in central England. In December 2015, the last

year of analysis of Cothill Fen, the alkaline fens were of good overall ('global') value, and the alluvial forests were of significant overall ('global') value. The SAC is highly threatened by pollution to groundwater and human-induced change in hydraulic conditions.

Little Wittenham SAC - is a 69ha site located 19km from the city boundary. It is designated because it contains one of the best-studied great crested newt sites in the UK. In December 2015, the last year of analysis of Little Wittenham, the great crested newt population was assessed as being of good overall ('global') value, but it is highly threatened by non-native invasive species.

3.30 Additionally, Oxford also has a number of Sites of Special Scientific Importance (SSSIs) as is shown at Table 3.2 and Figure 3.1. Of those SSSIs within, or partially within the city, they are of varying condition, with the majority being in favourable condition, but two in unfavourable condition (Hook Meadow and the Trap Grounds SSSI, and Littlemore Railway Cutting SSSI) and three in partial unfavourable condition (Brasenose Wood and Shotover Hill SSSI, Iffley Meadows SSSI, and Lye Valley SSSI). The information on SSSI condition is normally 5-10 years old, so their condition may have changed since it was assessed. The table includes links to the summary information for each site on Natural England's Designated Sites viewer website.

Figure 3.1: Locations of Sites of Special Scientific Interest (SSSIs) within and around Oxford and their condition, (source: DEFRA MAGIC website)

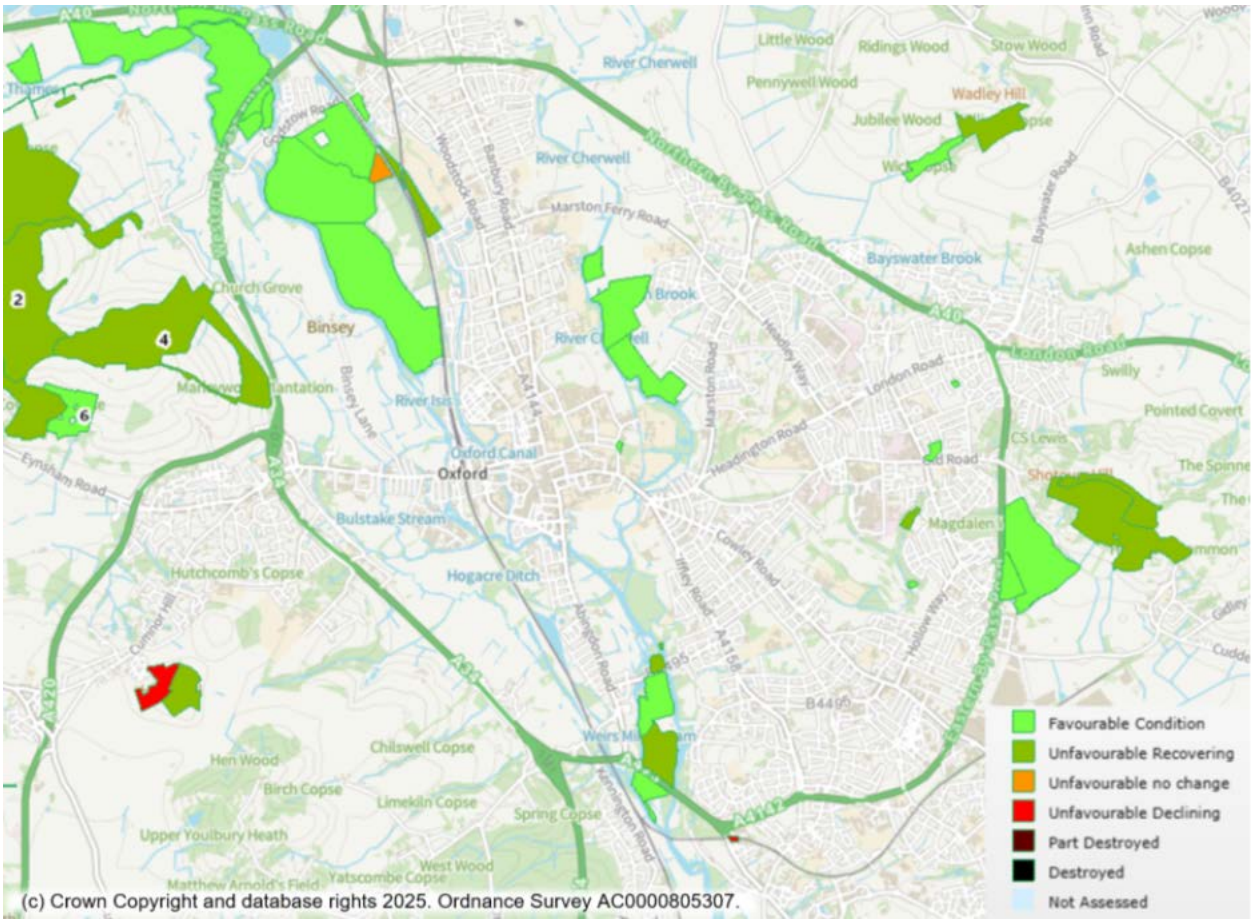


Table 3.2: Additional details relating to Sites of Special Scientific Interest (SSSIs) within Oxford or nearby

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering
Littlemore Railway Cutting (Geological SSSI)	0.50ha	Yes	100.00% Unfavourable – no change
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering

Magdalen Grove (Geological SSSI)	0.43ha	Yes	100.00% Favourable
Magdalen Quarry (Geological SSSI)	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable
Pixey and Yarnton Meads	86.38ha	Partially *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Rock Edge (Geological SSSI)	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

3.31 As can be seen above, the areas of particular environmental importance in and around the city are in varying condition and subject to various ongoing threats. Some of these threats can be more directly influenced by the Local Plan and the planning system than others.

3.3 Identify key sustainability issues and problems (Sustainability Appraisal Task A3)

3.32 The policy context of Task A1 and sustainability context of Task A2, as was presented in the previous sections and accompanying Background Papers, identified a range of issues and problems of relevance to the development of the Oxford Local Plan 2045. This section now takes forward and identifies the key sustainability issues and problems that the Council will need to be aware of and respond to where possible in line with Task A3 of the SA process. It is an important step in helping to narrow down the focus of the Local Plan 2045 as well as the accompanying SA/SEA process informing the Plan's development.

3.33 Table 3.3 draws together the key issues and problems which were highlighted in the previous sections and the background papers that support the SA.

Table 3.3: Key sustainability issues and problems for the Oxford Local Plan 2045

SA objective	Sustainability issues and problems
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Oxford is still very far away from achieving its 2040 target of net zero emissions and Local Plan cannot deliver it alone. • Retrofitting existing developments will be a significant challenge but critical to helping meet local and national net zero targets. • New development must not further contribute to climate change or the existing retro-fit burden in the city. • Policy needs to target energy efficiency and embed the energy hierarchy into the design of new buildings (fabric first, reducing energy use, mitigating remaining emissions). • Embodied carbon is an ongoing challenge to be addressed as part of the construction process although it is a complex and multi-faceted issue. • There is potential for supporting more renewable energy generation across city through greater uptake of micro-renewables in new development and on existing rooftops, although capacity elsewhere (e.g. for larger installations) is uncertain due to the many constraints on land.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. The Oxford Flood Alleviation Scheme is expected to reduce flood risk for a number of existing properties and infrastructure. • There will be residual risks of flooding after applying the sequential approach to locating development and incorporating defence measures. • Overheating is a prominent and increasing risk in the city, particularly more urban areas. Overheating risk is exacerbated in areas with reduced green infrastructure as well as higher levels of deprivation or poor quality buildings. • The Local Plan 2045 will need to take long term flood risk and overheating into account, including the impacts of climate change and how this could change the pattern and severity of these risks in the city. • New development should not exacerbate flood risk or overheating, such as through excessive use of hard

	surfaces increasing surface run off into sewers, or exacerbating the urban heat island effect. • There are links between flooding/overheating and human health (physical and mental), particularly in areas of the city that are most deprived or highly urbanised/lacking in green infrastructure.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• The plan must aim to use suitable brownfield sites and other underutilised land as a preferred option for development. • An increase in minimum housing density should be considered where a sufficient level of infrastructure is present. • Prioritising brownfield land for development may reduce opportunities to repurpose the sites for public amenity or as green infrastructure with a focus on ecological/biodiversity functions. • The cost of developing contaminated sites is likely to be higher than developing elsewhere. In turn, these higher costs increase pressure to develop greenfield sites. • Soils are at risk from pollution arising from new development as well as degradation from development/construction processes, this includes limited carbon-rich peat reserves that have already been degraded by historic development in the city. • The City Council should only release land from the Green Belt or alter the boundary where exceptional circumstances are fully evidenced and justified. • The plan should consider a more comprehensive approach to Oxford's Green Belt and whether any part of it is now designated as 'grey belt' as defined in the updated NPPF (December 2024).
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing costs in Oxford are very high, land available for housing is very limited, and affordable housing has historically been difficult to provide. • Oxford has limited capacity to deliver new homes within its boundary and has been unable to meet housing need in full without support from neighbouring authorities. • A continued reliance on smaller sites is likely to increase pressure on existing infrastructure. • The type of affordable housing delivered in Oxford is likely to be impacted upon by changes made through national policy, i.e., requirements for First Homes. • The Plan should assess and respond to the need for student housing: The links between provision of student housing and other types of housing should be considered when developing policies.

	• The potential implications of student housing in different locations, for students, neighbourhoods and in terms of delivering sufficient housing of the right type should be considered.
5. To reduce poverty, social exclusion, and health **inequalities**.	• Oxford has high levels of health inequalities across the city. • Covid and the ongoing cost of living crisis have exacerbated inequalities and harmed health for many. • Oxford's higher-than-average levels of activity and lower-than-average levels of obesity need to be maintained and improved. • The Local Plan can help to improve mental health and wellbeing through, for instance, improving quality of housing, improving access to open spaces, and focusing on building communities, particularly learning from the coronavirus pandemic. • Climate resilience measures will be essential for reducing impacts on health and wellbeing as the city moves towards a net zero future, particularly for the most vulnerable communities.
6. To provide accessible essential **services and facilities**.	• Economic shocks impacting cost of living and generating higher energy prices is likely putting strain on community and cultural facilities. Protection of facilities may become more difficult, given changes to government policy on permitted development. • With high pressure for housing, it will be important to make a case for the importance of the facilities that support this housing. The plan will need to meet the infrastructure needs of additional development in the city over the Local Plan period. • New infrastructure must address the climate emergency (low carbon, climate resilient). Natural solutions will be important in ensuring the resilience of infrastructure. • Infrastructure needs to help people to live healthy, active lives (e.g. walking/cycling, GP surgeries). • The city generally and its infrastructure should be adaptable to future changes in technology. • The retail and service sector plays a crucial role in Oxford's economy, providing job and leisure opportunities to local people. The city must offer a diverse range of retail uses and services, ideally in accessible locations.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• Unequal access to, and distribution of, green infrastructure across the city exacerbate wider health inequalities. There are priority areas which would benefit particularly from increased greening.

	• Infill development within the city, particularly on garden land, can reduce green infrastructure coverage which would otherwise provide natural benefits like water storage and habitat for wildlife. • Increased recreational pressure arising from population growth and visitors to the city puts pressure on open spaces, including playing pitches, which are important for health and wellbeing of residents, particularly those without gardens. • Climate change and impacts from development such as on water quality (e.g. run-off from roads etc.) puts pressure on existing green infrastructure and biodiversity. • Very limited opportunities to create large areas of new public open space.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Although Oxford is known for its high levels of walking, cycling and public transport use, Oxford's roads are still congested, with high levels of commuting by car. • All of Oxford is an Air Quality Management Area because of NOx, which mostly comes from vehicles. Tackling emissions from domestic and nondomestic sources is likely to improve air quality. • Past transport policy has focused on carrots: improving facilities for walking, cycling and public transport. However current policy is also to discourage car use, for instance through restricted parking, zero emission zones, and reallocation of some road space to sustainable forms of transport. • Restrictions in car use in the city must be supported via a strong and affordable public transport infrastructure network. • Improvements in electric transport provision and the restriction of cars in the city centre will help to achieve a zero carbon Oxford. The uptake of low/zero emission vehicles should be encouraged, in particular buses and taxis which will continue to need to access the city centre. • Improvements to cycling and walking infrastructure must be inclusive and the benefits shared by all of Oxford's residents. • Improved public transport connections between the city and surrounding areas will improve the integration of settlements throughout Oxfordshire
9. To achieve **water** quality targets and manage water resources.	• Oxford is already in an area of serious water stress. Climate change, particularly incidences of hotter, drier summers may exacerbate water supply issues and create increased water shortages.

	• Increased demand for water is likely to put more pressure on water resources. Additional water efficiency measures will need to be investigated through the plan-making process. • There are known water quality issues in local watercourses arising from a variety of sources. Nutrients from wastewater could further impact these local water bodies. Pollutants can also arise from other sources, like road runoff. This may have knock on implications in terms of the Water Environment Regulations, and the city's ambitions for bathing water status for parts of the River Thames. • Capacity upgrades are needed for the wastewater treatment works that services the city, Thames Water are working on plans to undertake these works but these works are still emerging and will take time to complete. • There are various ecological sites in the city which are sensitive to changes in underlying hydrology that supports these areas (both changes in water flows and water quality), which new development may need to consider depending on location.
10. To conserve and enhance Oxford's **biodiversity**.	• The Oxford Meadows SAC is already negatively affected by air pollution and is threatened by recreational pressure, changes to the hydrological regime as well as invasive species. • Two SSSIs out of the twelve in the city are in unfavourable condition and three are partly in unfavourable condition. • Development pressure on, or near to protected sites could result in direct loss of habitat or species, fragmentation of ecological networks, as well as indirect impacts e.g. from noise, light, air pollution. • Climate change is likely to impact habitats and species distribution. • Off-site areas for biodiversity net gain stemming from development will probably be needed in response to the Environment Act. • The County have published the Local Nature Recovery Strategy, a key requirement arising from the Environment Act. This document identifies opportunity areas for biodiversity enhancement in the city and wider county (including offsite BNG), although there may be other opportunity areas. The LNRS does not assign additional protection nor mandate enhancements itself.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets	• Oxford is a historic city, characterised by an abundance of designated and non-designated heritage assets which form an important part of the city's character.

while respecting local character and context and promoting innovation.	• Potential heritage impacts of new development proposed in the plan should be considered and assessed where necessary, both in terms of any direct physical impacts and impacts on setting. • Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character. • Local design guidance informed by local communities should reflect the special characteristics and needs of different parts of the city. • Green spaces and features should be woven into the urban fabric. • Mitigation of, and adaptation to, climate change will require good design. This is a particular challenge for heritage assets, which will require a Whole Building Approach to any retro-fit measures. • Good design should focus on people within the spaces, how they move, interact and socialise; and should engender feelings of safety and security.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Employment in the city remains high and likely to continue growing; • The city's economic potential is being constrained by a lack of availability of suitable and appropriate housing. Some employers have reported difficulties attracting and retaining staff because of these issues; • It is unlikely that new strategic sites will be identified for employment development. As such, it will be important that sufficient employment floorspace is available throughout the city's network of existing employment sites. This is to help ensure that Oxford can meet any identified employment land needs; • The focus for new employment development in Oxford is likely to continue with an approach of redevelopment (including modernisation and intensification) and renewal of existing sites; • A strategy that enables appropriate levels of employment growth while encouraging the delivery of much-needed housing is key to ensuring that Oxford grows in a sustainable manner; • Employment growth in Oxford is most likely to continue in the key sectors of healthcare and STEM, especially those involving R&D;

	• Without appropriate skills & training, jobs in Oxford's key sectors are unlikely to be accessible to local people; • State schools across Oxford, and particularly in deprived areas of the city, generally under-perform compared to regional and national averages; • Some changes were accelerated by the pandemic. For instance, due to the increase in on-line retail, the make-up of the city and district centres are seeing a shift in their make-up. Once dominated by retail, other uses, such as employment and educational uses are bringing footfall and vitality and these important centres. Examples of non-retail opportunities that are emerging in city centres include co-working spaces, R&D and more; • Ensuring expanded and robust digital infrastructure is available in as many settings as possible to align with the expectations and flexibility of hybrid working. This will enable people to have the opportunity to work or study in numerous locations across the city; • Small scale brownfield development across the city is more likely to put pressure on existing school places and will not in itself provide new school sites.

3.34 Table 3.3 has brought together the key issues and problems identified across the SA scoping work and the accompanying Background Papers. It highlights a range of challenges facing the city in relation to different aspects of sustainability which the new Local Plan will need to try to respond to. The analysis not only helps to frame the vision and objectives for the new Local Plan but also helps in informing the assessment framework that should be utilised to appraise the emerging policy framework and its impacts on the city and wider environment.

3.4 Develop the SA framework (Sustainability Appraisal Task A4)

3.35 An SA/SEA Framework provides a method by which the sustainability effects of a plan can be identified, described, analysed and compared. The analysis undertaken in the previous sections of this report, and fulfilling tasks A1 to A3 of the SA process stage A, helps to formulate the specific SA/SEA Framework that should be used for the Local Plan 2045, ensuring that it is tailored to the local context of Oxford. The development of the Framework is discussed in this section.

3.36 Development of the Oxford Local Plan 2045 will involve two types of decisions:

- on the plan objectives, alternatives and policies (general directions for the plan); and
- on sites (specific locations for development).

3.37 Assessing the impacts of the plan objectives, alternatives and policies involves a more general analysis against an overall framework of SA objectives. Assessing the impacts of sites involves analysing the site's location and future ability to support sustainable development. As such, two different appraisal frameworks have been used, which are discussed in turn in the following sub-sections.

3.4.1 The SA framework for plan objectives, alternatives and policies

3.38 The SA Framework of Table 3.4 consists of SA objectives and issues and is what will be used to assess the impacts of the plan objectives, alternatives and policies. The SA objectives provide a method by which to test whether the Local Plan will yield the best possible outcomes in terms of sustainability—its environmental, social and economic effects. The SA objectives therefore cover a full cross-section of sustainability issues. The objectives and the issues covered have been informed by the analysis undertaken in the previous tasks (particularly the key issues/problems identified under Task A3/Section 3.3).

Table 3.4: SA/SEA framework for plan objectives, alternatives and policies

SA Objective	Issues covered	SEA Themes
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Building standards and energy efficiency • Renewable energy generation • Active travel and public transport • Waste reduction • Sustainable construction practices including addressing embodied carbon	Climatic Factors, Air
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• Flooding • Resilient and adaptable building design and layout • Overheating	Water, Climatic Factors
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• Building densities and layout • Greenfield versus Brownfield land • Green belt and grey belt • General biodiversity and designated sites • Soils including peat reserves. • Land contamination	Soil, Material Assets, Biodiversity
4. To meet **local housing needs** by ensuring that	• Housing numbers • Housing size/mix	Material Assets,

everyone has the opportunity to live in a decent affordable home.	• Affordable housing • Specialist accommodation (e.g. care homes, gypsies/travelers) • Student accommodation	Population, Human Health
5. To reduce poverty, social exclusion, and health **inequalities**.	• Regeneration • Geographical spread of new development • Accessibility for areas of deprivation • Availability of services/infrastructure in areas of deprivation • Improving health and wellbeing and reducing health inequalities	Population, Human Health, Material Assets
6. To provide accessible essential **services and facilities**.	• Daily needs met within a short walk/cycle ride • Thriving city/local centres • Retail/shops provision • Community facilities, health care/GP, schools • Facilities for children/young people inc. play areas • 'Grey' infrastructure e.g. wastewater treatment, transport, energy.	Material Assets, Human Health
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• A network of green and blue infrastructure • Leisure facilities • Playing fields and public open space • Distribution/location as well as quantity of typologies of green infrastructure (inc the above)	Landscape, Biodiversity, Human Health,
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Promoting active travel – walking/cycling etc. • Reducing reliance on the private car • Public transport incl. Train station and branch line • Commuting and housing/jobs balance • Parking • Electric vehicle charging points, zero emission zones • Addressing poor air quality and links to transport	Air, Climatic Factors
9. To achieve **water** quality targets and manage water resources.	• Water use and water resources • Improving water quality and avoiding further deterioration • SUDS, buffers on streams etc.	Water, Biodiversity
10. To conserve and enhance Oxford's **biodiversity**.	• Habitat Regulations Assessment inc. Air quality and recreational disturbance • SAC, SSSIs, local nature designations • Biodiversity more generally (e.g. wildlife friendly measures and habitat features) • Biodiversity Net Gain (BNG)	Flora, fauna, biodiversity

11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	• Designated assets incl. Listed Buildings, scheduled monuments, Registered Parks & Gardens and Conservation areas • Non-designated assets, particularly those of local importance • Archaeology • Setting/curtilage • High quality urban design • View cones • High buildings	Cultural Heritage, Landscape
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Jobs incl. Knowledge-based jobs • Visitor economy • Locations for start-up ventures • Jobs for local unskilled/underskilled residents, apprenticeships • Keeping high streets alive amist changing shopping habits, changes to permitted development etc. • Cultural provision and tourism	Population, Material Assets

3.39 The SEA process requires the Environmental Report to include information on the likely significant effects on a specified list of environmental factors. Table 3.5 shows how the SA Objectives relate to these factors.

Table 3.5: Links between SEA Directive issues and SA objectives

SEA Directive issue	**SA objectives**
Biodiversity	3, 7, 9, 10
Population	4, 5, 12
Human health	4, 5, 6, 7
Flora	10
Fauna	10
Soil	3,
Water	2, 9
Air	1, 8
Climatic factors	1, 2, 8,
Material assets	3, 4, 5, 6, 12
Cultural heritage (including architectural and archaeological heritage)	11
Landscape	7, 11

3.4.2 The SA framework for sites

3.40 More site-specific appraisal criteria will be used to assess the impact of proposed development sites. Many of these relate to the location of the site, which is a key determinant of its sustainability, e.g. how easily would users of the site be able to access a range of facilities (more sustainable)? How close is the site to sensitive environmental areas (less sustainable)?

3.41 The same colour/symbol coding will be used as for policy appraisal (see Table 2.4), however there may be instances where an additional colour/code will be used to score a particular criterion where the ultimate score will depend upon implementation of the particular design of a proposed scheme. The site-specific criteria is listed below under each SA objective.

- **SA objective 1.** To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

  See SA Objective 8 for decision-making criteria.

- **SA objective 2**. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

  Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Table 3.6: Sites sustainability appraisal scoring criteria for SA objective 2

Category	Flood zones
--	Site is partially or wholly in Flood Zone 3b
-	Site is partially or wholly in Flood Zone 3a or Zone 2
0	Site is in Flood Zone 1
Category	**Flooding of land surrounding site for access/ egress**
--	There is no safe access/egress to/from the site
-	Access/egress from the site is over moderate to low hazard land
0	There is safe access/egress from the site – area surrounding site is FZ1

- **SA objective 3.** To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

  Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Table 3.7: Sites sustainability appraisal scoring criteria for SA objective 3

Category	Previously developed land
--	Site is protected open space

-	Site is unprotected open space
0	Site is previously developed land (with buildings in use on site)
+	Site is previously developed land (with vacant buildings on site)
++	Site is previously developed land (cleared)
Category	**Green Belt**
--	Site is on Green Belt land
0	Site is not on Green Belt land

- **SA objective 4.** To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

  Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Table 3.8: Sites sustainability appraisal scoring criteria for SA objective 4

Category	Housing provision
-	Site would decrease the amount of net new housing
0	Site would provide no net new housing
+	Site would provide up to 10 new homes
++	Site would provide more than 10 new homes
I	Depends on implementation
Category	**Affordable Housing provision**
-	Site is allocated for housing but would provide no affordable housing
0	Site is allocated for use other than housing or is not allocated
+	Site provides up to 40% affordable housing
++	Site provides 40% or more than 50% affordable housing
I	Depends on implementation

- **SA objective 5.** To reduce poverty, social exclusion, and health **inequalities**.

  Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Table 3.9: Sites sustainability appraisal scoring criteria for SA objective 5

Category	Regeneration Areas
0	Site is not in or adjacent to a regeneration area
+	Site is adjacent to a regeneration area
++	Site is in a regeneration area

- **SA objective 6.** To provide accessible essential **services and facilities**.

  Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Table 3.10: Sites sustainability appraisal scoring criteria for SA objective 6

Category	Community facilities
-	Allocation leads to a decrease in community facilities
0	Site not allocated for community facilities OR amount of community facilities remain the same due to the allocation
+	Community facilities provided on site
++	Allocation leads to a significant increase in community facilities
I	Depends on implementation

- **SA objective 7.** To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

  Decision-making criteria: Will it increase the provision of public open space?

Table 3.11: Sites sustainability appraisal scoring criteria for SA objective 7

Category	Public open space
-	Allocation leads to a decrease in public open space
0	Site not allocated OR amount of public open space remains the same due to the allocation
+	Site allocated for housing – 10% public open space provided on site
++	Allocation leads to an increase in public open space greater than 10% of the total site area

- **SA objective 8.** To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

  Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Table 3.12: Sites sustainability appraisal scoring criteria for SA objective 8

Category	Sustainable transport links (bus stop)
-	> 400m from a bus stop
+	< 400m from a bus stop
Category	**Sustainable transport links (rail station)**
-	> 1600m from train station

0	1200-1600m from train station
+	800-1200m from train station
++	< 800m from train station
Category	**Primary Schools**
-	>800m from the nearest primary school with spaces
+	<800m from the nearest primary school with spaces
Category	**Secondary Schools**
-	>800m from the nearest secondary school with spaces
+	<800m from the nearest secondary school with spaces
Category	**GP Surgeries**
-	>800m from the nearest GP Surgery
+	<800m from the nearest GP Surgery
Category	**Post office**
-	>800m from the nearest post office
+	<800m from the nearest post office
Category	**Air Quality**
--	Site is within or adjacent to a local air quality monitoring hotspot
-	Site is within an Air Quality Management Area (AQMA)
0	Site is not within an AQMA

- **SA objective 9.** To achieve **water** quality targets and manage water resources.

  Decision-making criteria: Does the site contain, or is it near, a water body?

Table 3.13: Sites sustainability appraisal scoring criteria for SA objective 9

Category	Water
--	Site contains a water body (e.g. lake, pond, stream)
-	Site is within 30m of a water body
0	Site is not within 30m of a water body

- **SA objective 10**. To conserve and enhance Oxford's **biodiversity**.

  Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Table 3.14: Sites sustainability appraisal scoring criteria for SA objective 10

Category	Ecology and Biodiversity
--	Contains an internationally or nationally protected site: Oxford Meadows SAC or SSSI
-	Contains or is adjacent to a locally protected site. Within 100m of a nationally/ internationally designated site. Potential for legally protected species to be present

0	Within 100m of a locally protected site or 200m of an internationally/nationally protected site
+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity
++	Contains no nature conservation designations but has potential for significant nature conservation enhancement

- **SA objective 11.** To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

  Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Table 3.15: Sites sustainability appraisal scoring criteria for SA objective 11

Category	**Archaeology**
--	Site contains a nationally important archaeological site (such as a Scheduled Ancient Monument)
-	Site provides the setting to a nationally important archaeological site OR site has known archaeological sites or potential (e.g. close to 'Sites and Monument' symbol or in local area of archaeological importance)
0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Category	**Conservation Areas & Register of Parks and Gardens (RPG)**
--	Site lies in a conservation area or the site is on the RPG register
-	Site lies on the edge of a conservation area or of a site on the RPG register
0	Site is not in or on the edge of a conservation area or site on the RPG register
Category	**Listed Buildings**
--	Site contains a listed building
-	Site forms the setting of a listed building or contains a locally listed building
0	Site contains no identified historic building constraint
Category	**View Cones**
-	Site lies within a view cone
0	Site lies outside of a view cone
Category	**Historic Core Area**
-	Site lies within the City Council's locally designated Historic Core Area.
0	Site lies outside the City Council's locally designated Historic Core Area.

- **SA objective 12.** To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Table 3.16: Sites sustainability appraisal scoring criteria for SA objective 12

Category	Employment Opportunities in the knowledge-based economy
-	Site would mean loss of jobs or economic floorspace in knowledge-based economy
0	No change in number of jobs/economic floorspace in knowledge-based economy
+	Site would increase number of jobs or economic floorspace in knowledge-based economy
I	Depends on implementation
Category	**Diversifying the economy end employment opportunities**
-	Site would not support diversification of the employment base or provision of affordable workspace
0	No change in employment base or access to affordable workspaces
+	Site would support diversification of the employment base or provide affordable workspace
I	Depends on implementation

3.42 Figure 3.2 summarises the site-specific criteria and shows how these link with the SA objectives of Table 3.4.

Figure 3.2: Site assessment appraisal criteria versus SA objectives

Site assessment criteria	SA objectives											
	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic environment	12. Employment and economy
Flood zone		■										
Flood risk on land surrounding site		■										
Type of land (e.g. PDL, Green Belt)			■									
Housing provision inc. affordable housing				■								
Regeneration area					■							
Provision of community facilities						■						
Provision of public open space							■					
Sustainable transport links: bus stop	■							■				
Sustainable transport links: train station	■							■				
Distance to primary school	■							■				
Distance to secondary school	■							■				
Distance to GP surgery	■							■				
Distance to post office	■							■				
Air quality								■				
Water									■			
Ecology and Biodiversity										■		
Archaeology											■	
Conservation area, RPGs											■	
Listed buildings											■	
View cone											■	
Historic Core Area											■	
Employment opportunities												■

3.5 Previous consultation on the emerging Sustainability Appraisal (Sustainability Appraisal Task A5)

3.43 In advance of its Regulation 18 consultation, the Council sought to make an early version of its scoping study (incorporating Tasks A1 to A4) available for six weeks to the consultation bodies (Historic England, Natural England and the Environment Agency) via email on January 17th 2025 and invited feedback by February 28th 2025. The Interim Reg 18 SA report included summaries of comments received and the Council's responses, including how the scoping work was subsequently updated to reflect the feedback, and this has been reproduced in Appendix A for reference.

3.44 The interim SA report, including the updated scoping study, was published as part of the Regulation 18 consultation (from the 27th June to 8th August 2025). There was no additional specific feedback on the interim SA report from the consultation bodies,

although there was some feedback received from other stakeholders which is summarised in Table 3.17.

Table 3.17: Summary of feedback received on Regulation 18 Interim Sustainability Appraisal

Summary of comments received	Council's response
The assigned scores for housing options, especially for the City Council's preferred Option B, lack clear and transparent justification. Not evident why Option B consistently receives more positive scores than Options A or C in numerous instances. Appears to be based on incomplete assessment without considering the full sustainability impacts of unmet housing. The sustainability impacts of cross-boundary housing provision do not disappear at the border; they are displaced. These distributed impacts, particularly those associated with Option B's reliance on external provision, could be worse than those of Options A or C. For example, accommodating development across more dispersed areas, potentially distant from Oxford's public transport routes, is highly likely to lead to increased car dependency and significantly higher carbon emissions due to longer commuting distances.	The detailed commentary for the scoring of the option set was included in the appendix to the Reg 18 report, as it is in this Reg 19 SA report (see Appendix B). We have reviewed the scoring in light of these comments, and remain of the view that these represent a valid assessment of the sustainability impacts of the different options. While the assessment of cross boundary impacts does represent a part of the SA/ SEA process, when assessing the sustainability impacts of the plan, it is important that the core assessment focuses on the impacts of the strategy within the local authority administrative area. Any assessment of the cross-boundary implications of delivering homes outside of Oxford's administrative boundary would depend on where these homes would be delivered – this is not something that is within the City Council's procedural jurisdiction. The location of the new homes delivered outside city boundary (including those to meet Oxford's unmet housing need), is a matter for each partner authority to engage with in the production of their own plans. Nevertheless, we have sought to ensure that some commentary on potential cross-boundary implications is incorporated where relevant in the updated report.
The testing under SA Objective 3 focuses primarily on judgements related to densities and the loss of green space. However, it fails to explicitly evaluate the impact of the options on the Green Belt, despite the Green Belt being directly mentioned within the scope of SA Objective 3 itself. This is a significant omission.	We will look to ensure that the findings of the Green Belt assessment are incorporated into the SA report for transparency.
SA Objective 7's conclusions are based on the identical impacts of density and green spaces already assessed under SA Objective 3. This is unnecessary duplication of testing and analysis, which raises questions about the thoroughness and efficiency of the SA process. A robust and unbiased re-evaluation of the housing options should be undertaken.	The SA Framework provides the key SA indicators that are considered for each SA objective. There is naturally some cross over between the two objectives, but they are treated differently as each has a different scope/focus.
Oxford Wastewater Treatment Work is mentioned in the Sustainability Appraisal as important infrastructure. This is located within South Oxfordshire and facilitated by the adopted and emerging Plans of South Oxfordshire, but	Noted – Thames Water are leading on this project and they will be involving partners as appropriate.

South Oxfordshire District Council isn't mentioned as a partner to work with.	
Care needed not to make things too bureaucratic when it comes to housing development. The crisis is acute and builders should not be deterred from delivering.	The Sustainability Appraisal process is a tool that helps to inform the development of the Local Plan. It does not, in of itself, create any additional burden for developers when they come to making an application.
It seems quite thorough	Comment noted.
Needs more focus on Oxford to be green, blue, clean air, low car, big on public transport, litter free, with penalties for cars parked on curbs. Other similar comments including need for more community gardens with edible plants and food forests, as well as even greener developments (more trees for shade) and more solar panels on buildings.	The Sustainability Appraisal framework addresses these various considerations across several of its objectives (e.g. Objective 7 Green Infrastructure; Objective 8 Traffic and Air Pollution). As set out above, the SA's role is to help inform the development of the Local Plan, which in of itself has various policies across Chapter 4 and 7 which address different aspects of this comment where appropriate.
The sustainability appraisal has taken consideration on environmental conservation and health but is lacking educational inputs. These should cover diversity and inclusion, British culture, political systems, institutions, laws, community concepts, religions, ethnicities and local history regardless of where residents are from.	We will look to draw these considerations into the relevant underlying background papers where they are not already mentioned and where this would be of relevance to the Local Plan.
Sustainability appraisal is lacking proposals for making public transport viable and attractive.	The Sustainability Appraisal helps to inform the development of the Local Plan. The Local Plan includes a range of policies intended to support access to public transport.
A couple of comments flagging concern that report does not take sustainability seriously and that there is too much focus on growth without due concern for climate change, protecting environment, the health/needs of local residents.	A key role of the Local Plan, which the Sustainability Appraisal helps inform, is about guiding growth to happen in the right way for the city. Nevertheless, the Sustainability Appraisal framework which is used throughout the report includes objectives that address all three pillars of sustainability (the environmental, social and economic).
Comments on sustainability appraisal scores for particular sites in their interim site assessment forms.	The Council will be reviewing the sustainability appraisal scores for all the sites being taken forward to Regulation 19 and updated forms will be published alongside this report. Scores will be updated where appropriate.

4. Developing and testing the Local Plan vision, themes and objectives (Sustainability Appraisal Task B1)

4.1 Developing the Local Plan vision, themes and objectives

4.1 The Regulation 18 consultation included a vision for the city which was guiding the new Local Plan which had first emerged during the development of the withdrawn Local Plan 2040. Whilst it had already been subject to public engagement and feedback throughout the Local Plan 2040's preparation, it had been reviewed and modified in light of the scoping undertaken to inform the early work in developing the new Local Plan in 2025. Since that Regulation 18 consultation, the vision has been further reviewed and subject to a minor update to reflect the extended Local Plan period to 2045, but the Council proposes that this remains a strong and relevant guide for the new Local Plan's development. It is as follows:

In 2045 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare.

Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper.

The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

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.

4.2 The vision for the Local Plan 2045 is underpinned by six themes which also emerged through the Local Plan 2040's early development. These six themes were adapted from the three pillars of sustainable development (Society, Environment and Economy) and the intersects between them.

4.3 In turn, each of the six themes are supported by a grouping of more specific Local Plan objectives. These objectives add greater detail to how the Local Plan will seek to deliver upon the themes and overarching vision, and more specifically respond to the

particular sustainability issues, as well as local, regional and national priorities which were captured earlier in the report (see chapter 3).

4.4 In practice, there is overlap between the themes and the objectives, and these could ultimately be grouped in a variety of ways. Indeed, the specific objectives can be integral to multiple themes, and conversely, the themes are influenced by multiple objectives.

4.5 As with the vision, the Council has kept the scope of the themes and objectives under review throughout its work on the Local Plan 2045. This was important for determining whether these remained relevant or whether contextual changes since they had first been prepared, or following the summer 2025 Regulation 18 consultation, suggested amendments were needed. Whilst the six themes were considered to remain an effective and relevant framework through which to structure the new Local Plan, various modifications have been made to the underlying objectives since they were first conceived during Local Plan 2040's development. The six themes and the objectives of the Local Plan 2045 are presented in Table 4.1.

Table 4.1: The six Local Plan 2045 themes and underlying objectives

Local Plan 2045 theme	**Underlying Local Plan objectives** ***The Oxford Local Plan 2045 will...***
A healthy and inclusive city to live in.	• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
A green and biodiverse city that is resilient to climate change.	• Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city.

	• Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
A liveable city with strong communities and opportunities for all.	• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. • Demonstrate we value diversity whilst fostering greater inclusivity within our communities. • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.
A city that respects its heritage and fosters design of the highest quality.	• Ensure well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage. • Curate a built environment that supports and enables people to be physically and mentally healthy.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	• Ensure Oxford is ready for a net zero carbon future. • Ensure our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • Ensure the city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.

4.2 Testing the Local Plan themes and objectives

4.6 The six themes, including the underlying objectives that comprise them, are central to achieving the overall vision. As such, these have been assessed against the twelve Sustainability Appraisal objectives to identify where there is potential for positive/negative/neutral or uncertain impact and the results of that assessment are presented in Table 4.2.

Table 4.2: Appraisal of Local Plan 2045 themes against SA Objectives

Local Plan 2045 themes	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic environment	12. Employment and economy
A healthy and inclusive city to live in.	-	0	0	++	+	?	0	+/-	-	0	0	+?
A green and biodiverse city that is resilient to climate change.	0	++	+	-	+	+	++	0	+	++	0	+/-
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	-	0	0	-?	+	0	0	-	0	0	0	++
A liveable city with strong communities and opportunities for all.	+	0	+	0	+?	++	0	+	0	0	0	+
A city that respects its heritage and fosters design of the highest quality.	+/-	+/-	0	-	+?	0	+?	0	0	+?	++	+/-
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	++	0	?	0	+?	0	0	+	+	+	+/-	0

4.7 The assessment as set out in Table 4.2 identifies that, taken as a whole, the six themes address each of the 12 SA objectives with varying degrees of impact. There are a significant number of areas where the six themes represent positive or significant positive impacts in relation to the SA objectives and suggests that they are generally compatible. There are, however, elements of each of the themes which represent negative impacts with the SA objectives, or else less certain impacts and potentially suggest conflicts which may need to be managed. The rationale for the negative or uncertain scores is discussed in Table 4.3, this is followed by a short commentary on what the impacts mean for developing the Local Plan.

Table 4.3: Rationale for negative or uncertain scoring of Local Plan 2045 themes/objectives against the 12 Sustainability Appraisal criteria as were presented in previous table.

A healthy and inclusive city to live in	• Negative impacts identified against SA criteria 1 and 9, because new housing required to help meet identified needs will represent additional carbon emissions and water demands, though this could be mitigated to some degree with appropriate design standards. • Some positive impacts for criterion 8 where new housing can reduce commuting for Oxford employees currently forced to live further afield, however, more residents could increase local congestion resulting in negatives. • Uncertain positive impact against criterion 12, as new housing may improve employers ability to retain staff, however, depends on implementation. • Uncertain impact against criterion 6, new housing may help residents locate closer to services, improving access, however, it may also increase pressure on existing services unless commensurate contributions are secured to mitigate these pressures, impact is less clear and depends on implementation again.
A green and biodiverse city that is resilient to climate change	• Some negative impact against criterion 4 because the additional constraints presented by protecting green networks is likely to reduce availability of sites for housing and could reduce capacity of sites in terms of amount of housing delivered. • Some positive and some negative impacts for criterion 12, in that incorporating green infrastructure and generally making space for nature can help to boost market values of various uses and may make city more attractive to employers, however, additional constraints presented by protecting green networks could reduce ability of employers to expand.
A fair and prosperous city with a globally important role in learning, knowledge and innovation	• Negative impact identified against SA criteria 1 and 8, because new employment in the city, without commensurate housing could lead to increased numbers of commuters into the city with associated carbon emissions (at least in short term until fossil fuel vehicles are phased out). Additional employment growth, particularly high energy demand uses, will likely have additional associated carbon emissions (e.g. if energy demand is not sourced renewably), though again this could be mitigated somewhat with appropriate design standards. • Uncertain negative impact against criterion 4, if additional employment generates more staff needing housing in the city, though depends on where staff are coming from (they may already be local).
A liveable city with strong communities and opportunities for all	• Uncertain positive impact against criterion 5, if improvements in accessibility to services and other facilities across the city can be secured, then this may help to reduce various health and economic inequalities amongst Oxford's communities, although it is highly dependent on how various policies and DM decisions are ultimately implemented.
A city that respects its	• Some positive and some negative impacts for criteria 1 and 2, in that high-quality design could help to secure reductions in carbon emissions and

heritage and fosters design of the highest quality	deliver climate adaptation. However, sensitivities around heritage assets may limit scope of the actions that can be taken in new development if it could impact these, or it may mean existing emissions/ climate vulnerabilities affecting heritage assets remain locked in. • Protecting existing heritage assets may help to preserve Oxford's special qualities which draw tourists yearly and support economy, however, heritage constraints may reduce scope of employment uses to expand, thus positive and negative impacts under criterion 12 also. • Uncertain positive impacts for criteria 5, 7 and 10, because high quality design could mean ensuring new development is designed to support health and wellbeing of occupants, and also respects existing green features/biodiversity or brings forward enhancements/net gains as part of design, but depends upon implementation. • Likely to be some negative impact for criterion 4 where existing heritage constraints might reduce capability to maximise capacity of sites for new housing.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon	• Some positive and some negative impacts for criterion 11, whereby net zero standards and need to mitigate impacts on wider environment from new development could drive more efficient design and higher quality development overall, however, some net zero design measures may not be compatible with existing traditional buildings or protected heritage assets, also the improved performance of buildings may reduce scope of design (functionality prioritised over beauty). • Uncertain positive impacts for criterion 5 because net zero design could help to reduce risks of occupants being exposed to fuel poverty, high energy bills, thus improving economic resilience. • Uncertain impact for criterion 3, whereby improved practices around use of soils might secure some positives on previously degraded soils, but often this will represent purely mitigation of impacts to stop further degradation, so unclear.

4.8 Of course, the six themes will work together as a whole, and identified positive or negative impacts in Table 4.2 do not consider the potential counterbalance in impacts that can occur under other themes. Areas of negative impact, as discussed in more detail above, do help to highlight areas where particular care will need to be taken around whether mitigation is needed. Equally, positive impacts identified can be considered as opportunities that the Council should seek to preserve.

4.9 The benefit of the testing is in helping to understand where there is potential for impacts that should be avoided or mitigated, if necessary, that may need to be explored further through the detail of the Local plan strategy and its policies, as is explored further in the next chapters.

5. Exploring options for the emerging Local Plan 2045 (Sustainability Appraisal Tasks B2 and B3)

5.1 Developing the growth strategy for Local Plan 2045

5.1 There is more than one way of trying to meet the needs of residents, workers and visitors to Oxford and achieving the various objectives that have been identified for the new Local Plan. Oxford is a constrained city and there is insufficient land to meet all of the city's development needs within its boundary, but from this starting point there are a range of alternative approaches to explore. At the heart of this is a need to explore ways of balancing housing and wider development needs with objectives which could constrain growth, including relating to protecting and enhancing Oxford's sensitive environment and many heritage assets.

5.1.1 Identifying reasonable alternatives for the Local Plan growth strategy

5.2 Responding to key sustainability issues affecting the city, the Council considered a number of potential growth strategy options (collectively 'alternatives') for the Oxford Local Plan 2045. These were initially consulted on as part of the Regulation 18 consultation in June/July 2025, including the preferred growth strategy (which is referred to for the purposes of this report as the 'chosen growth strategy').

5.3 The Local Plan's chosen growth strategy involves striking a balance between providing for housing and employment land / floorspace (henceforth floorspace) needs whilst also delivering on wider plan objectives. The primary focus under the chosen growth strategy is planning for new homes, responding to the significant pressure in the city for improving access to housing and addressing ongoing affordability issues. The government's standard method identifies the housing need for the city. However, the constrained nature of the city means that a capacity-based requirement is being planned for, i.e. the requirement is below Oxford's identified need.

5.4 This shortfall could be met by neighbouring local authorities, but there are risks and uncertainties with any such strategy, such that there was a need to explore higher growth options with a view to ensuring that the Council has left 'no stone unturned'.

5.5 With regards to employment floorspace, under the chosen growth strategy employment needs would be provided for almost in full, responding to the city's strong performing economy, particularly through a focus on intensifying and modernising key employment sites; however, some specific needs may not be met because land is prioritised for accommodating housing need. There is clearly market demand (as distinct

from established need) to deliver a considerable further boost to employment floorspace, at least in the short term; however, on the other hand, a lack of available housing for workers is a key barrier to the city's economic growth.

5.6 It is recognised that there is an argument to be made for boosting employment floorspace supply (over-and-above what would be planned for under the chosen growth strategy), such that this was also something to explore further through appraisal of (and consultation on) growth strategy alternatives.

5.7 In summary, in addition to appraising and consulting on the merits of the chosen growth strategy, there was a need to explore alternatives involving a boost to housing and/or employment.

Defining the alternatives in detail

5.8 Beginning with the chosen growth strategy which, as discussed, involves striking a careful balance, there is a need to distinguish between choices made at two spatial scales:

- City-wide – striking a balance means: A) supporting redevelopment of all available brownfield sites; and B) taking forward select greenfield sites, whilst also protecting a strong hierarchy of green and blue spaces that perform important functions like making space for biodiversity, flood resilience and physical/mental health.
- Site level – striking a balance means maximising capacity / development yields whilst also accommodating other features intrinsic to sustainable, healthy and well-designed places – like appropriate greening, open space, measures supporting active travel – and designing with onsite or nearby heritage and environmental assets in mind.

5.9 With regards to boosting supply, this might be achieved broadly by: A) boosting capacities at brownfield sites; or B) boosting greenfield supply from additional sites (though it should be noted that there is a very limited supply of additional greenfield sites without intrinsic constraints like flood plain, or national designation) and/or supporting increased capacities at greenfield sites.

5.10 As such, there are three broad alternatives:

1. The chosen growth strategy (striking a balance)
2. Boost brownfield supply (boost site capacities)
3. Boost greenfield supply (boost sites and/or site capacities)

5.11 With regards to (2) and (3), the aim would be to provide more fully for development needs and drive greater quantums/densities of development across available sites whilst reducing alignment with wider plan objectives. This could be achieved by:

- Minimising any locally set policy requirements that could restrict development capacity on sites, including expectations around environmental enhancements.
- Protecting only the open spaces that have intrinsic constraints on development, such as areas of flood plain, or nationally designated ecological or heritage sites, and limiting consideration of wider benefits that many of other spaces provide.

5.12 However, it is important to be clear that the above would only be within reason - significant negative environmental effects would need to continue to be avoided/mitigated. There will also be intrinsic constraints such as flood risk, nationally designated biodiversity and heritage, which make development in certain locations inappropriate.

5.13 Finally, there is the question of policy support for housing versus employment.

5.14 The chosen growth strategy, as discussed, can be described as an approach that is weighted towards supporting homes, which in practice means intervening to curb very high current market demand for employment floorspace, but there is also a need to consider the alternative of reduced policy support for housing / increased flexibility for employment.

5.15 What this means in practice is either:

- Prioritising housing – policy emphasis on bringing forward new housing sites and additional housing on existing sites; and resisting any net loss of housing and encouraging alternative uses to convert to (or incorporate an element of) housing where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then, seeking to meet employment land / floorspace needs through policies which focus primarily on protecting and intensifying only key existing employment sites.
- Prioritising employment – policy emphasis on driving the intensification and expansion of existing employment sites or delivering new employment sites; and resisting the net loss of employment floorspace and setting policies for the protection of a range of employment sites (sites of national, regional and local importance); also encouraging alternative uses (not residential) to convert to uses that can deliver more employment where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then seeking to provide for housing need through policies which focus on bringing forward new housing sites and additional housing on existing sites.

5.16 The above rationale led to six reasonable alternative growth strategy options consulted on at Regulation 18 stage , as are illustrated in the matrix in Table 5.1.

Table 5.1: Growth strategy alternatives considered for the Oxford Local Plan 2045.

	Balanced development	**Boost brownfield supply**	**Boost greenfield supply**
Prioritise housing	Option 1a (The chosen growth strategy)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

5.1.2 Reviewing the reasonable alternatives for the Local Plan Growth Strategy

5.17 The six growth strategy alternatives, including the chosen strategy, were consulted on at Regulation 18. Feedback to the consultation did not identify any significant omissions in relation to other distinct alternatives that should have been considered.

5.18 However, the context of the Local Plan's development has continued to evolve since the Regulation 18. For example:

- There has been an update to the Local Plan period (now covering the period 2025-2045), as discussed in Section 2, with consequential updates to the housing and employment evidence base to align.
- The Council has also continued to develop the Local Plan, including preparing site allocation policies (not subject to consultation previously), as well as developing further its wider evidence base.
- A range of feedback was provided more broadly on the Local Plan in response to the Regulation 18 consultation, a recurring theme being the importance of protecting green space (see the Regulation 18 consultation report).

5.19 This evolving context necessitates revisiting the growth strategy alternatives to ensure that they remain robust and appropriate.

5.20 Whilst the update to the Local Plan period was necessary for various technical reasons, the impact on the strategy principally relates to the growth that needs to be planned for, including for housing and employment. Key updates show very little change for the 2025-2045 period as compared to the previous 2022-2042 period. The housing need is still 21,740, applying the standard method over 20 years. Employment need has not

changed much and is still at the level that it is likely can be met within existing and pipeline sites.

5.21 The Council has sought to comprehensively explore the capacity of all of the proposed site allocations for Regulation 19. Alongside the capacity assessments, the Council has undertaken site specific sustainability appraisals (as discussed further in Chapter 6) to identify key sustainability impacts. The housing capacity has been updated, including after a new call for sites, but the capacity has not changed much and at 9,267 over the Plan period is still significantly below supply.

5.22 Another avenue of additional technical work has explored the matter of Green Belt, with updates to National Policy setting out the importance of the Council reviewing its green belt for availability for housing. A green belt assessment has been undertaken, with a number of sites identified for assessment. However, regardless of the performance of Green Belt parcels against the purposes of Green Belt, the Green Belt in and of itself has not been treated as a constraint. Parcels of the Green Belt were then considered for development potential in accordance with the chosen growth strategy of the Plan and its other objectives. Ultimately, one additional site allocation has been identified as suitable for allocation.

5.23 A recurring theme in the Regulation 18 consultation was a push for the Local Plan to protect remaining green space from development. Protecting green infrastructure for its range of multi-functional benefits is a key objective of the Local Plan, however, the city also has an outstanding need for housing, and reliance on brownfield sites alone to provide for this need would be insufficient. The chosen growth strategy, which seeks a balanced approach to growth that protects a strong hierarchy of green spaces, whilst allowing some to come forward for development in recognition of the city's high housing need, is considered to align with the feedback.

5.24 In light of the updated SHLAA work which confirms that the Council remains unable to meet its identified housing need, it is important that a thorough approach has been taken to identifying additional land for housing in Oxford. It was considered important therefore to further consider the plan's approach to green infrastructure protection and whether an alternative approach may provide additional potential homes in the city. To that end, the Council has undertaken some further appraisal work of options for the protection of green infrastructure – this is discussed in detail in later in Chapter 5 (Section 5.2). The findings of this additional appraisal work, however, did not identify significant variation in impacts for housing provision between the options.

5.25 In summary, whilst it was important to revisit the alternatives through the additional work post-Regulation 18, this has not led to any additional distinct reasonable alternatives for the Local Plan Growth Strategy being identified. The appraisal of the alternatives as set out in the following section has been reviewed in light of the above, although this has not resulted in material changes to scoring.

5.1.3 Testing the growth strategy alternatives

5.26 In order to explore the potential impacts arising from the growth strategy alternatives, these have been appraised against the 12 Sustainability Appraisal criteria using the same scoring mechanism as is used elsewhere in this report (see Table 2.4).

5.27 The detailed appraisal is set out in Table 5.2, followed by a concluding discussion.

Table 5.2: Detailed appraisal results for Local Plan growth strategy alternatives, including commentary explaining rationale.

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
1. Carbon emissions	-	--	-	--	--	--	• Assume negative impact in terms of emissions under all scenarios because more development is likely to equate to more emissions. • Option 2a will result in more housing than option 1a/1b, however, may reduce in-commuting as more employees able to live closer to work. • Options 1b, 2b and 3b will result in more employment generated without commensurate housing and therefore more commuters into city, with associated additional transport emissions. • Option 3a could reduce commuting levels, but also brings in additional housing development than other options so similar level of impact to 3b and 2b.
2. Resilience to climate change	+	+	+/-	+/-	--	--	• Option 1a and 1b allow protection of a range of green spaces that help with reducing overheating and flood risk. They would also allow a balanced approach to the design of sites, fully utilising capacity for development, whilst also providing for range of greening and open space that helps resilience. • Option 2a and 2b would seek to fully maximise already developed sites, potentially able to protect a similar network of green spaces as under options 1a/1b. However, the minimal local standards that would facilitate maximising sheer quantity of development could reduce ability to deliver resilience measures like greening onsite. • Options 3a and 3b would potentially see development across a range of green spaces, impacting local resilience. Whilst the most high-risk spaces for flooding (e.g. floodplain) would not be developed, thus retaining some resilience, other spaces that still provide important resilience (e.g. slowing water run off and storing water, as well as urban cooling), could be lost.
3. Efficient use of land	+	+	+/-	+/-	--	--	• Options 1a and 1b perform best as development would be required to maximise capacity of sites whilst also delivering upon wider LP objectives,

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							coupled with protection of a network of greenfield sites and steering development to brownfield spaces first (though not ruling out lower quality green sites). • Option 3a and 3b are considered least efficient because of potential for loss of a range of green spaces including more valuable green spaces in the city. It is likely that more development of green sites will harm more areas of soil which have not already been impacted by development (another consideration under this objective). More potential greenfield sites for development could also reduce the pressure to maximise the efficient use of brownfield sites first. A push to maximise quantums of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which could impact efficiency in terms of meeting all objectives. • Options 2a and 2b are likely to have some positives and negatives. Though some greenfield sites would still be allocated under these scenarios, these options would encourage the maximising of previously developed sites in the city which is considered to be a very efficient use of land. However, as with options 3a and 3b above, there is potential that in the drive for maximising the quantums/density of development on brownfield sites at the cost of securing other measures on these sites, such as additional greening, open space, would lead to less efficient developments in the round. • A contrary view would be that option 2a and 2b are most efficient for delivering highest densities of development on brownfield sites in the city whilst protecting greenfield land, so these could be scored higher if a view of efficiency was more solely focused just on this element of the issues covered under this criterion.
4. Local housing needs	+	+/-	+	-	++	-	• All options will provide some level of additional housing having a positive impact, though the housing focus of options 1a, 2a and 3a will have greater

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							positive impact and are likely to support greater provision for meeting housing needs of various groups (e.g. need for affordable housing). • Options 2a and 3a would each go further towards meeting a greater proportion of housing needs than 1a because they would seek to drive greater quantums/capacity of development whilst reducing other provisions on site (though still unlikely to meet need in full). Option 2a is not considered significant positive, as even maxing out development capacity on sites is unlikely to have potential to contribute any significant additional housing capacity as the sites are already quite constrained, although it would likely be somewhat higher than option 1a. • Option 1b, 2b and 3b would provide some housing, but the focus on delivering to meet employment need first is likely to then exacerbate existing housing need (generating more jobs and more people needing to places to live). This indicates a score that reflects some positives and negatives for option 1b. • Option 2b and 3b would also provide some housing, though the focus of using the additional capacity unlocked on brownfield (as under 2b) or greenfield sites (as under 3b) would firstly be for employment. Overall, the potentially greater levels of employment generated in the city under these options would exacerbate housing need further and outweigh positives, leading to minor negative impacts (compared to 1b).
5. Inequalities	**?**	**?**	**?**	**?**	**?**	**?**	• The impact of the options on inequalities will depend heavily on implementation and is difficult to score at this level. It is likely that all options will make some contribution to elements of inequality, however, such as access to affordable housing or access to jobs skills. Specific impacts will depend on how particular applications come forward.
6. Services and facilities	**+/-**	**+**	**+/-**	**+**	**-**	**-**	• More housing, particularly on brownfield sites, under options 1a and 2a will mean more people can live in accessible locations that allow them to reach various daily needs via active travel. However, additional residents could

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							put strain on existing services if these are not enhanced or added to, or if existing facilities are allowed to be lost. • Additional growth in employment uses under option 1b, 2b and 3b could include uses that provide for daily needs of the local population which may therefore improve access—this will be slightly more positive under the brownfield focused options than greenfield, which could see some of these uses located in less accessible locations too (so may depend on implementation somewhat). The reduced population growth under these scenarios would still include some additional pressure, however, but less so than under housing focused scenarios. • Greenfield sites in the city are less likely to be located in accessible locations, though some areas will be more accessible than others. When this is combined with the more significant population growth associated with more housing accommodated across greenfield sites, this leads to a more negative impact under option 3a. The same accessibility concerns would impact the greenfield sites if employment instead came forward (as under option 3b) and could also mean employment generated away from existing employment clusters, although additional pressure on existing services from new housing may be reduced compared with scenario 3a. • There is, however, an element of uncertainty to these scores as it should be acknowledged that any viable sites may be able to deliver additional public benefits, including new community infrastructure.
7. Green infrastructure, leisure and recreation	**+**	**+**	**+/-**	**+/-**	**--**	**--**	• Options 1a and 1b have some positive benefits. The balanced approach to requiring development to maximise quantums/density whilst also delivering upon wider LP objectives will allow for development to incorporate a range of new green features (or protect existing features). This is coupled with protection of a network of greenfield sites (though not ruling out lower quality green sites) across the city which will contribute to a strong GI network.

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							• Options 2a and 2b are unlikely to be able to secure as significant benefits on brownfield sites because they would sacrifice additional local standards for environmental enhancements like greening and open space in order to maximise development quantums/density. However, they would still allow for protection of a network of green infrastructure across the city (though some lower quality greenfield sites would be allocated). • Options 3a and 3b will be significantly negative because of potential for loss of a range of green spaces including more valuable green spaces in the city. A push to maximise quantums of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which leads to less efficient developments too.
8. Traffic and associated air pollution	**+/-**	**-**	**+/-**	**-**	**-**	**--**	• Under all options, it is assumed that air quality impacts will continue to reduce as vehicles shift away from fossil fuel burning, and wider county measures such as LTNs, expansion of the Zero Emissions Zone and electric bus fleet introduction take affect. However, emissions impacts will continue to some degree, particularly in earlier years of the Plan. • Option 1a, 2a and 3a would help to reduce the imbalance between those working in Oxford but being forced to live further afield and having to commute in for work, by providing more housing in the city (increasing levels for 2a and 3a). • However, under the same options, the associated increases in population associated with greater levels of housing could bring additional vehicles into the city (meaning some negative impact). Though private vehicle ownership may be tempered by reduced levels of parking provision that would be necessitated by low parking requirements, but also because maximising density of development of sites will mean trade off with space for parking. • Additionally, under option 3a, some of the greenfield housing sites coming forward for development are likely to be in less easily accessible locations

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							which may increase reliance on private vehicle ownership (pushing this option into predominantly a negative impact score). However, this negative might be reduced where there is a major focus on greenfield sites that can deliver sustainable transport improvements. • Options that focus on boosting employment/economic growth risk further exacerbating the imbalanced commuting patterns in the city, particularly where job creation is not matched with housing provision. The result is likely to mean more people travelling into city, some via private vehicles. This is likely to result in negative impacts under options 1b and 2b, and more significant negatives under 3b, due to it enabling greater expansion of employment floorspace as well as new sites in less accessible locations (including away from existing employment clusters).
9. Water	**+/-**	**+/-**	**-**	**-**	**--**	**-**	• For water, there is a need to consider both water resources/supply and water quality including impacts on wastewater infrastructure (although a scheme has been agreed with Thames Water to bring upgrades to the local wastewater treatment works to address existing capacity concerns and unlock future growth). • Options 1a and 1b would both generate housing, (more so under option 1a), and this will increase demand for water, as well as pressure on wastewater infrastructure. However, there will be greater opportunities to mitigate impacts from development on water quality because of the more balanced approach to design on sites. Some development capacity is afforded to environmental improvements like greening, open space, SUDs and buffers along watercourses. • Maximising the development quantums on brownfield sites not only increases amount of housing that can be delivered (with additional demands on water resources and wastewater treatment), but also minimises the environmental features that can mitigate impacts on water quality, leading to negative impacts under options 2a and 2b (2a is likely

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							slightly more negative than 2b in terms of impact on water resources/wastewater). • Option 3a and 3b have similar impacts as options 2a and 2b, however, the more expansive loss of greenfield sites across the city will have greater impacts on the water environment. For example, more urbanisation and loss of natural surface cover could exacerbate surface water run-off, leading to flooding and additional pollutants running into watercourses, though this may be mitigated somewhat depending on how SUDs are applied. However, the impact under 3a is more significant due to the additional amounts of housing that would come forward, with associated demands on water resources/wastewater.
10. Biodiversity	**0**	**0**	**0**	**0**	**-**	**-**	• Outside of the Local Plan's control, under all options, development will be expected to deliver the mandatory 10% Biodiversity Net Gain associated with the Environment Act, so there should generally be positive impacts in terms of habitat creation. However, the nature of many sites in Oxford is that BNG is likely to need to be delivered offsite. • The loss of greenfield sites under scenarios 3a and 3b is likely to lead to some additional fragmentation of habitats and wildlife corridors. On the assumption that some BNG will need to be delivered offsite, the limited opportunities to deliver locally in the wider city could be reduced further if greenfield sites are taken forward for development, meaning that this could be pushed further outside of Oxford. Allowing more development of greenfield sites would have additional negative impacts if this extended to local designated sites, although it is assumed national designations (e.g. SAC and SSSIs) would still be protected as minimum. • Options 1a, 1b, 2a, and 2b would likely lead to a neutral impact. They would retain a broader network of greenfield sites which would include national and local designated sites and would help to maintain wildlife corridors/linkages across the city. Options 1a and 1b would, however, also allow for incorporating space for greening and other non-habitat ecological

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							enhancements (e.g. features not recognised by the DEFRA BNG metric's habitat focus). This means that spaces for biodiversity could be incorporated onsite, to the benefit of species including priority species, even if onsite BNG is not feasible. It is uncertain whether this would push the options into a positive impact or maintain neutral impact, however.
11. Good urban design / the historic environment	+	+	--	--	--	--	• Good urban design requires a balancing of various requirements on a development, not just the maximising of density. As such, options 1a and 1b would have positive impacts because of the balanced approach they would push for. These options would also allow for incorporating policies that guide design towards sufficiently mitigating harm (and ideally enhancing the setting of) various local and national designated (and non-designated) heritage assets. • Options 2a/2b, and 3a/3b which focus on maximising density on brownfield or greenfield sites, could have significant negative impacts for design as they forgo other design considerations in order to maximise sheer quantums of development/density of development on these sites. • In addition, for options 2a/2b/3a/3c, the minimised local standards necessary to reduce constraints on development quantums/density would likely reduce the ability to influence design with respect to local context, such as the wealth of historic assets in the city. Equally, many brownfield sites are clustered closest to the city's dense array of heritage assets, meanwhile, some of the only greenfield sites that could feasibly be explored under options 3a/3b (and that have not otherwise been ruled out for other reasons like floodplain or ecology), make an important contribution to Oxford's historic setting and townscape. Thus, additional development under these scenarios is considered to have potential for significant negative impacts on heritage in the city.

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
12. Economic growth	+	+	+	++	+	++	• All options are considered to have some level of positive impact for the economy in Oxford, though options 2a and 3a would bring more significant positive impact. • Housing delivery is a key barrier to economic growth as businesses struggle to retain or attract staff due to inability to access affordable housing nearby, thus the housing focus scenarios would have some positive impact for economic growth in this way. • Option 1b, 2b and 3b are focused on employment/economic growth. These will ensure a wide network of protected sites are protected from loss of employment uses including locally, regionally and nationally important sites, even if these sites are not currently performing. • Options 2b and 3b will more easily facilitate increases in employment floorspace by allowing existing sites to expand/intensify fully and allow new sites to come forward, particularly under option 3b which would allow development on more greenfield sites. • Regardless of the option taken, there will likely continue to be competition from high value employment uses which could push out lower value employment and reduce access to affordable workspaces and lower skilled jobs.

5.1.3 Findings from the testing of growth strategy alternatives

5.28 Table 5.3 presents a summary of the appraisal scoring for each of the six growth strategy alternatives as was detailed in the previous section.

Table 5.3: Summary of appraisal results for Local Plan growth strategy alternatives

SA Objective	Option 1A	Option 1B	Option 2A	Option 2B	Option 3A	Option 3B
1. Carbon emissions	-	--	-	--	--	--
2. Resilience to climate change	+	+	+/-	+/-	--	--
3. Efficient use of land	+	+	+/-	+/-	--	--
4. Local housing needs	+	+/-	+	-	++	-
5. Inequalities	?	?	?	?	?	?
6. Services and facilities	+/-	+	+/-	+	-	-
7. Green infrastructure, leisure and recreation	+	+	+/-	+/-	--	--
8. Traffic and associated air pollution	+/-	-	+/-	-	-	--
9. Water	+/-	+/-	-	-	--	-
10. Biodiversity	0	0	0	0	-	-
11. Good urban design / the historic environment	+	+	--	--	--	--
12. Economic growth	+	+	+	++	+	++

5.29 The Council's chosen growth strategy (Option 1a), the balanced approach to growth with a housing focus, is clearly shown to perform well, in that it is associated with comfortably the most positives and fewest negatives. It is recognised that there is also a case to be made for options 2b, 3a and 3b from either a housing (option 3a) or an economic growth perspective (options 2b and 3b), but these benefits come at a considerable cost in terms of wider sustainability objectives.

5.30 As was initially set out in the interim Sustainability Appraisal, and following the Regulation 18 consultation for which these appraisals were first published, the Council remains of the view that option 1a represents sustainable development on balance. As

part of this, it is important to be clear that option 1a would provide significantly for housing delivery, thereby contributing strongly to meeting locally arising needs (but still likely generating unmet needs) and would make a positive contribution to economic growth, specifically by protecting key employment sites and enabling their intensification/modernization whilst also contributing new housing to reduce barriers for employees wanting to live closer to where they work. It would also allow a strong framework to be set out for protecting and enhancing the wider environment and securing various benefits for the health and wellbeing of the city's residents and visitors.

5.2 Developing Local Plan policy approaches

5.31 This sub-section of the Sustainability Appraisal discusses the development of specific policies within the Local Plan 2045 as are set out in the Regulation 19 consultation, including how alternative options were considered where relevant.

5.2.1 Identifying options for policies and considering sustainability impacts

5.32 The summer 2025 Regulation 18 first draft Local Plan consultation included a number of preferred options for policies and a first draft of what these policies could look like. For each of the preferred policy approaches, the Council had also often identified alternative approaches that could be taken and these were presented within tables of 'options sets' in the relevant supporting background papers that accompanied that consultation (these are also included in the appendices of the updated versions published for Regulation 19).

5.33 In developing these options sets, the Council had also considered the implications of each policy option and presented a summary of these alongside the potential policy options, including:

- potential positive consequences that taking the option forward would secure for the city,
- negative or neutral consequences of the option, such as where these would conflict with local priorities, or where they could cause other challenges.

5.34 As part of weighing up the different options that could be taken during this 'optioneering' process, the Council sought to ensure that choices about each preferred approach had also been considered with regard to its sustainability implications at a high-level—with reference to the 12 SA objectives as a framework to guide officers' thinking. This has helped to ensure that sustainability considerations have been intrinsic to the process of identifying a preferred approach. A summary of these high-level screenings

undertaken for each option set was also presented alongside the tables of options sets within the relevant background papers.

5.35 This high-level sustainability screening helped to identify where particular options and alternatives for a policy approach have likely significant effects against any of the SA objectives. Where potential for significant sustainability impacts were identified, it was determined that these options sets should be 'scoped in' for Sustainability Appraisal with a full assessment of their potential impacts against the 12 SA objectives, which is documented later in this report.

5.36 Table 5.5 identifies all of the options sets considered in preparing the Local Plan and which of the background papers these are presented in (alongside their high-level sustainability screening). The Table also identifies which policies were scoped in for testing through the Sustainability Appraisal, following the high-level screening (coloured blue and flagged in column three).

Table 5.5: Results of high-level SA screening of policy options sets including options sets that have been 'screened in' for detailed appraisal

Regulation 18 policy options sets	**Applicable background paper where each options set is presented**	**Detailed appraisal needed?**
001a: Housing requirement for the plan period	001 Housing need, requirement and mix	Yes
001b: Mix of housing sizes (no. bedrooms)	001 Housing need, requirement and mix	No
001c: Loss of dwellings	001 Housing need, requirement and mix	No
002a: Affordable housing – Overall requirement	002 Affordable housing	No
002b: Affordable housing: financial contributions for new student accommodation…	002 Affordable housing	No
002c: Affordable housing: financial contributions from self-contained older-persons accommodation	002 Affordable housing	No
002d: Affordable housing: financial contributions from commercial development	002 Affordable housing	No
002e: Employer-linked affordable housing	002 Affordable housing	Yes
003a: House of Multiple Occupation (HMOs)	003 Specialist housing including student accommodation, self-build, older persons	Yes
003b: Location of new student accommodation	003 Specialist housing including student accommodation, self-build, older persons	Yes
003c: Ensuring there is enough student accommodation to meet needs	003 Specialist housing including student accommodation, self-build, older persons	No
003d: Homes for travelling communities	003 Specialist housing including student accommodation, self-build, older persons	No
003e: Homes for boat dwellers	003 Specialist housing including student accommodation, self-build, older persons	No

003f: Elderly persons' accommodation and other specialist housing needs	003 Specialist housing including student accommodation, self-build, older persons	No
003g: Self-build and custom house building options	003 Specialist housing including student accommodation, self-build, older persons	No
003h: Community-led housing	003 Specialist housing including student accommodation, self-build, older persons	No
003i: Boarding school accommodation	003 Specialist housing including student accommodation, self-build, older persons	No
004a-1: Employment strategy	004 Employment and inclusive economy	No
004a-2: Making Best Use of Existing Employment Sites	004 Employment and inclusive economy	No
004a-3: Allowing housing on existing employment sites	004 Employment and inclusive economy	No
004a-4: Location of new employment uses	004 Employment and inclusive economy	No
004b: Warehousing and storage uses	004 Employment and inclusive economy	No
004c: Community Employment and Procurement Plans	004 Employment and inclusive economy	No
004d: Affordable Workspaces	004 Employment and inclusive economy	No
004e-1: Short-stay accommodation (hotels and guest-houses) (New Accommodation)	004 Employment and inclusive economy	No
004e-2: Short-stay accommodation (hotels and guest-houses) (Existing Accommodation)	004 Employment and inclusive economy	No
005a: Protection of GI network and green features	005 Green Infrastructure and biodiversity	No
005b: Provision of new GI features	005 Green Infrastructure and biodiversity	No
005c: Provision of new GI features – Urban Greening Factor	005 Green Infrastructure and biodiversity	No
005d: Delivering mandatory net gains in biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005e: Protecting and enhancing onsite biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005f: Protecting Oxford's ecological network	005 Green Infrastructure and biodiversity	No
007a: Flood risk and Flood Risk Assessments (FRAs)	007 Flood risk, drainage and SuDS	No
007b: Sustainable Drainage Systems (SuDS)	007 Flood risk, drainage and SuDS	No
008a: Net zero buildings in operation	008 Carbon reduction and climate resilient design	No
008b: Embodied carbon	008 Carbon reduction and climate resilient design	No
008c: Retrofitting existing buildings including heritage assets	008 Carbon reduction and climate resilient design	Yes
008d: Resilient design and construction	008 Carbon reduction and climate resilient design	No
009a: Air Quality Assessments and standards	009 Natural resources	No
009b: Water resources and quality	009 Natural resources	No
009c: Soil quality	009 Natural resources	No
009d: Contaminated land	009 Natural resources	No
009e: Amenity and environmental health impacts of development options	009 Natural resources	No

010a: Healthy Design/Health Impact Assessments (HIAs)	010 Health and wellbeing	No
010b: Privacy, daylight and sunlight	010 Health and wellbeing	No
010c: Internal space standards for residential developments	010 Health and wellbeing	No
010d: Outdoor amenity space	010 Health and wellbeing	No
010e: Accessible and adaptable homes	010 Health and wellbeing	No
011a: Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011b: Non-Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011c: Archaeology	011 Urban design, placemaking, heritage and archaeology	No
011d: Principles of high-quality design of buildings	011 Urban design, placemaking, heritage and archaeology	No
011e: Efficient use of land	011 Urban design, placemaking, heritage and archaeology	No
011f: View Cones and High Buildings	011 Urban design, placemaking, heritage and archaeology	No
011g: Bin and Bike Stores and external servicing features	011 Urban design, placemaking, heritage and archaeology	No
012a: Transport assessments, travel plans and servicing and delivery plans	012 Transport	No
012b: Bicycle parking design standards	012 Transport	No
012c: Motorcycle and Powered Two Wheelers Parking Design Standards	012 Transport	No
012d: Motor vehicle parking design standards	012 Transport	Yes
012e: Electric Vehicle Charging	012 Transport	No
013a: Focusing town centre uses in existing centres	013 Livable city - including retail	No
013b: Maintaining vibrant centres	013 Livable city - including retail	No
013c: Protection and alteration of existing local community facilities	013 Livable city - including retail	No
013d: Provision of new local community facilities	013 Livable city - including retail	No
013e: Protection and alteration of learning and non-residential institutions	013 Livable city - including retail	No
013f: Provision of new learning and non-residential institutions	013 Livable city - including retail	No
013g: Protecting cultural, social and visitor attractions	013 Livable city - including retail	No
013h: Provision of new cultural, social and visitor attractions	013 Livable city - including retail	No
014a: Infrastructure considerations in new development	014 Infrastructure	No
014b: Digital Infrastructure	014 Infrastructure	No
014c: Safeguarding Land (new policy incorporated post-Regulation 18 stage)	014 Infrastructure	No

5.2.2 Targeted Sustainability Appraisal for scoped in policy options sets

5.37 As set out in Table 5.5 in the previous section, a limited number of policy options sets for the Local Plan have been taken forward for further testing through the Sustainability Appraisal process because it was determined that the options (or some of the options considered) were likely to result in significant effects against one or more of the SA objectives. Scoping them in for a full appraisal has allowed the Council to explore each option's potential for impacts against the 12 SA objectives in greater depth and to factor this into the decision about the preferred approach. The list of the 'scoped in' options sets is as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

5.38 The following tables set out the results of the detailed Sustainability Appraisal testing undertaken for these scoped in policy options sets, more detailed versions of the tables with additional commentary that explains the rationale for scoring are included in Appendix B. Options considered for each policy are set out in columns and scored against each of the twelve SA objectives which form the SA framework using the same scoring methodology used elsewhere in this report.

5.39 Testing these 'scoped in' options sets in this way helps to identify which options perform most positively against the sustainability objectives and where the Local Plan may need to incorporate mitigations to avoid negative impacts. It should be noted that there is no obligation to take forward the option with the most positive (or fewest negative) sustainability impacts—there may also be additional important considerations that need to inform the preferred approach—however, the findings help to more fully understand the potential for significant impacts arising from particular options and thus form an important factor in determining the preferred approach. After each table, the preferred option taken forward in the Local Plan is set out with a rationale for why.

<u>Policy Options set 001a: Housing requirement for the plan period</u>

5.40 Three policy options were considered, as discussed in detail in Background Paper 001. The options have been revisited and updated for this Regulation 19 Sustainability Appraisal to reflect the revised Local Plan period and updated capacity assessment work from the Strategic Housing Land Availability Assessment. The options are as follows:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2025-2045).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.9,267 dwellings over the Plan period 2025-2045).
- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

5.41 There is some overlap in testing of this option set with the testing undertaken for the growth strategy alternatives as set out in Section 5.1, particularly where they related to having a focus on housing. Whilst that appraisal has helped inform this testing as there are considerations that overlap, this option set specifically considers (at a high-level) different approaches to setting the housing requirement in the Local Plan and the impacts that could arise, thus the appraisal does differ.

Table 5.6: Appraisal of options set 001a

SA Objective	Option A	Option B	Option C
1. Carbon emissions	--	-	--
2. Resilience to climate change	--	0	--
3. Efficient use of land	?	?	?
4. Local housing needs	++	+	++
5. Inequalities	?	?	?
6. Services and facilities	?	?	?
7. Green infrastructure, leisure and recreation	-	0	-
8. Traffic and associated air pollution	-?	+/-?	-?
9. Water	--	+/-	--
10. Biodiversity	-?	0	-?
11. Good urban design / the historic environment	--	0	--
12. Economic growth	+/++	+	++

5.42 The option taken forward in the Local Plan is **Option B**, which is to base the housing requirement on the housing capacity (*see Background Paper 001 for more detail*). This was to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would mean that pressure would be placed on other policies aiming to meet the Plan' strategy.

5.43 The option was found to be better performing in the balance of positive and negative impacts against the sustainability objectives than the other options. Whilst it is acknowledged that the other options could have greater positive impacts in relation to delivering housing and economic growth, they also come at greater cost in terms of significant negative impacts against other sustainability objectives. Nevertheless, some mitigation would likely be needed to address negative impacts against SA objectives 1 (carbon emissions), 8 (traffic/air pollution) and 9 (water).

Policy Options set 002e: Employer-linked affordable housing

5.44 Policy options that were considered, as discussed in detail in Background Paper 002, are as follows:

- **Option a**: On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b**: Do not include an employer linked housing policy.

Table 5.7: Appraisal of options set 002e

SA Objective	Option A	Option B
1. Carbon emissions	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**
3. Efficient use of land	**+**	**0**
4. Local housing needs	**++**	**0**
5. Inequalities	**+**	**0**
6. Services and facilities	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**0**

9. Water	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**
11. Good urban design / the historic environment	**N/A**	**N/A**
12. Economic growth	**++**	**0**

5.45 The option taken forward in the Local Plan is **Option A**, which allows, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level, as agreed with the local authority (*see Background Paper 002 for more detail*). The option also had a greater number of positive impacts against the sustainability objectives than the other option tested.

5.46 The list of specified sites reflects willing landowners and sites that would otherwise not be available for residential uses, if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

Policy Options set 003a: Houses in Multiple Occupation (HMOs)

5.47 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a**: Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b**: Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c**: Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.
- **Option d**: Do not have any restriction on HMOs.

5.48 Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option a, c or d.

Table 5.8: Appraisal of options set 003a

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**N/A**	**N/A**	**N/A**	**N/A**

2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**+**	**+**	**+**	**+**
4. Local housing needs	**+/-**	**+/-**	**+/-**	**-**
5. Inequalities	**0**	**+?**	**0**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**N/A**	**N/A**	**N/A**	**N/A**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**0**	**+/-?**	**-?**	**-**
12. Economic growth	**N/A**	**N/A**	**N/A**	**N/A**

5.49 The option taken forward in the Local Plan is **Option A**, which will provide an opportunity for HMOs to come forward to meet needs in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing (s*ee Background Paper 003 for more detail*). It was also generally the better performing option in terms of impacts against the SA objectives according to SA testing, compared with its alternatives (options C and D).

5.50 Option B might potentially have additional positive impacts, but this is an additional element that could be combined with the other options and addresses requirements for purpose-built HMOs. It is not part of the preferred approach because of its potential impacts in competing with delivering housing that meets greater needs (such as social rented housing).

<u>Policy Options set 003b: Location of new student accommodation</u>

5.51 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a**: Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student

accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.

- **Option b**: Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.
- **Option c**: Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d**: Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

5.52 The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use which was considered to be the area where there could be significant effects that needed to be investigated further.

Table 5.9: Appraisal of options set 003b

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**N/A**	**N/A**	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**0**	**0**	**0**	**?**
4. Local housing needs	**+/-**	**+/-**	**+/-**	**+/-**
5. Inequalities	**N/A**	**N/A**	**N/A**	**N/A**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**+**	**-**	**+**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**+**	**-**	**?**	**+**
12. Economic growth	**N/A**	**N/A**	**N/A**	**N/A**

5.53 The approach taken forward in the Local Plan is a combination of **Options A**, **E and F** (s*ee Background Paper 003 for more detail*). This approach recognises that there may be additional sites, beyond existing campus/student accommodation sites, which are particularly suited to this type of accommodation, potentially more so than general market housing, and should help to achieve the high densities that these locations provide the opportunity for. It also includes a proposed approach for managing impacts from students.

Policy Options set 008c: Retrofitting existing buildings including heritage assets

5.54 Policy options that were considered, as discussed in detail in Background Paper 008, are as follows:

- **Option a**: Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b**: In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c**: In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d**: Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

5.55 For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting key

principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

Table 5.10: Appraisal of options set 008c

SA Objective	Option A	Option B/C	Option D
1. Carbon emissions	**+**	**+**	**0**
2. Resilience to climate change	**+**	**+**	**0**
3. Efficient use of land	**N/A**	**N/A**	**N/A**
4. Local housing needs	**N/A**	**N/A**	**N/A**
5. Inequalities	**+**	**+**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**+**	**0**
9. Water	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**0**	**-?**	**0**
12. Economic growth	**N/A**	**N/A**	**N/A**

5.56 The approach taken forward in the Local Plan is a combination of **Option A and B**. This establishes clear support for retro-fitting projects that help deliver benefits in relation to mitigating/adapting to climate change and provides additional support to applicants in relation to designing proposals impacting sensitive traditional buildings/heritage assets (*see Background Paper 008 for more detail*).

5.57 The combination of these options secures greater positive impacts against the SA objectives, though potential negative impact against SA objective 11 should be mitigated through wording of policy to ensure clear requirements for applications impacting historic/traditional buildings.

<u>Policy Options set 012d: Motor vehicle parking design standard</u>

5.58 Policy options that were considered, as discussed in detail in Background Paper 012, are as follows:

- **Option a**: Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b**: Adopt parking standards for residential developments
- **Option c**: Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.
- **Option d**: Adopt parking standards for non-residential developments

Table 5.11: Appraisal of options set 012d

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**+**	**-**	**+**	**+/-?**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**+**	**-**	**+**	**+/-?**
4. Local housing needs	**+/-**	**0**	**0**	**0**
5. Inequalities	**-?**	**0**	**0**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**-**	**+**	**+/-?**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**+**	**-**	**+**	**+/-?**
12. Economic growth	**0**	**0**	**+/-?**	**0**

5.59 The approach taken forward in the Local Plan is a combination of **Options A**, **B and C** (*see Background Paper 012 for more detail*). This approach pushes for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to

public transport, but accepts that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability.

5.60 In terms of effects against the SA objectives, the options have varying impact. Seeking low car where possible which will help to maximise positive sustainability impacts, but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward.

5.2.3 Additional policies work post-Regulation 18

5.61 Consultation feedback on the interim Sustainability Appraisal report published as part of the Regulation 18 consultation did not identify any significant omissions in terms of policy options sets that should have been 'scoped in' for detailed assessment due to likely significant effects in addition to those identified in the previous sections. There were some specific comments in relation to the appraisal of options for the Housing Requirement policy, as are detailed in Section 3.5 along with the Council's responses.

5.62 The main Regulation 18 Consultation Report documents all of the key feedback received on the draft policies that were consulted on and the alternative options that the Council identified. The consultation report identifies where changes have been made to the proposed approaches as a result, including changes to policy wording. An additional policy has been incorporated into the Regulation 19 Local Plan which addresses the safeguarding of land for a couple of key infrastructure projects (Policy I2). Options for this policy were considered following feedback from the Regulation 18 consultation.

5.63 For clarity, it should be noted that there have also been changes to the presentation of some policy requirements in the preparation of the Regulation 19 draft compared with the drafts of policies consulted on at Regulation 18 stage. Principally, this relates to the consolidation of requirements set out in individual draft policies at Regulation 18 addressing protections of various types of designated heritage asset (e.g. Conservation Areas, Listed Buildings, Registered Parks and Gardens, Scheduled Monuments) into one overarching Designated Heritage Assets policy (Policy HD3). The options previously considered and consulted on relating to these requirements remain relevant.

<u>Additional appraisal of options for protection of the green infrastructure network</u>

5.64 The Initial Sustainability Appraisal Screening of Options Sets undertaken to inform the Regulation 18 consultation (summer 2025) did not consider a detailed appraisal was required for option set 005a which related to protection of green infrastructure and green features. This was because (as drafted) the proposed option set resulted in generally

neutral, or positive impacts, the extent of which were considered to depend largely on implementation.

5.65 Following the Regulation 18 consultation, various comments were received on Policy G1, and the Local Plan's approach more generally to green space protection from a wide range of organisations and individuals. Following the analysis of the representations, and as additional work was carried out to refine the growth strategy alternatives between the statutory consultation stages, a full appraisal of a selection of some of the options consulted upon at the Regulation 18 consultation stage was considered to be beneficial. This is because the extent of protection within the green infrastructure network potentially affects the underlying context to the plan's strategy.

5.66 The initial set of options as presented in the background paper (005a Green Infrastructure) covered a range of approaches to protecting green spaces as well as other features like trees. These are reproduced in this report's Appendix B. The Council has considered what an alternative approach to protecting a hierarchy of green spaces would look like. This involved appraising updated versions of two of the previously identified options (as presented in the aforementioned background paper) for further appraisal.

5.67 These two options focus on either protecting a selection of spaces completely from development for their in-situ benefits, (Core GI), or extending the hierarchy of protection further to include an additional set of spaces which would be protected unless loss or harm from development can be sufficiently mitigated (Supporting GI). The options can be summarised as follows:

- **Option a* -** Protect a limited network of green spaces from any and all development through local policy (core GI). Allow remaining green spaces to be developed in line with national policy.
- **Option b* -** Protect a limited network of green spaces from any and all development through local policy (core GI) AND protect a broader network of green spaces from development through local policy but permit their development if the harm/loss can be mitigated through like-for-like reprovision (supporting GI). Allow remaining green spaces to be developed in line with national policy. <u>This (option b*) represents the draft policy approach consulted on at Regulation 18.</u>

*It is assumed under both options that land with intrinsic constraints e.g. flood zone 3b, national ecological/heritage designations would be protected regardless.

Table 5.12: Appraisal of options for green infrastructure network protection, adapted from the Regulation 18 options set 005a

SA Objective	Option A*	Option B*
1. Carbon emissions	0	0
2. Resilience to climate change	-	0
3. Efficient use of land	-	+/-
4. Local housing needs	+	+
5. Inequalities	+/-	0
6. Services and facilities	0	0
7. Green infrastructure, leisure and recreation	+/-	+
8. Traffic and associated air pollution	0	0
9. Water	-	0
10. Biodiversity	+/-	+
11. Good urban design / the historic environment	?	0
12. Economic growth	0	0

5.68 As the Regulation 18. options screening did not identify likely significant effects for this option set, the main driver of this new options appraisal focused on whether there would be likely significant effects on SA Framework Objective 4 – Housing. A full SA has been undertaken, however, which looks across the whole framework as is shown in the table above.

5.69 The SA of these option sets identified that both option sets would result in a minor positive effect on housing delivery and when the two options were considered side-by-side, the SA concluded that there would be a marginal difference in housing delivery. However, Option b* (the Reg. 18 approach) was considered to deliver more environmental and social benefits than the more limited GI protection provided through Option a*. On balance, therefore, this scored more highly against the SA Framework Criteria and accordingly has been selected as the policy approach to carry forward within the Regulation 19 version of the plan.

5.3 Developing Local Plan site allocations

5.70 This section discusses the process undertaken for developing site allocations for the Local Plan. The process is discussed in greater detail in Background Paper 015.

5.71 Chapter 8 of the Oxford Local Plan 2045 sets out policies for Areas of Focus and site allocations. Site allocations are policies specific to a site and set out the types of land use, or mix of uses, which would be acceptable on that site, or protects the site for certain types of development in line with the overall plan strategy. Areas of focus are broader areas where changes are anticipated over the Plan period resulting from new development, and the policy for each Area of Focus sets out key development principles specific to that area.

5.3.1 Identifying potential development sites in the city

5.72 In relation to developing housing allocations—the long-standing need for housing means that the Council applies a 'no stone left unturned' approach when identifying land that might be suitable for accommodating future housing in the city. Potential residential or mixed-use development sites for allocation through the Oxford Local Plan 2045 have been identified from a range of sources, which have then fed into the Strategic Housing Land Availability Assessment (SHLAA), including:

- Previously allocated sites in the Oxford Local Plan 2036 and any additional sites that were being considered in the Oxford Local Plan 2040;
- Further sites submitted to the Oxford Local Plan 2040 examination;
- Sites in historic planning policy documents such as the West End Area Action Plan and Sites and Housing Plan;
- Call for sites inviting landowners and others to nominate sites;
- Reviewing ongoing suitability of employment sites;
- Green spaces;
- Commitments (sites with planning permission or Prior Approval for housing);
- Sites refused planning permission or with expired planning permission or at pre-app, which are potentially suitable for development;
- Desk-based map survey.

5.73 In relation to employment allocations—the Council has also been reviewing employment land needs and assessing sites across the city as part of its Employment Land Needs Assessment (ELNA). This helped to identify sites to be allocated to be protected for employment development, as well as to update the Council's understanding of existing employment uses that should be protected through employment-related policies. Equally

it helped to identify sites which could help deliver some homes. The approach to employment sites is discussed in further detail in Background Paper 004.

5.74 Using these sources, a large initial pool of potential sites for development was identified, including housing sites and employment sites as well as some mixed-use sites. The list of initial sites are then subject to different types of assessment and refinement through the SHLAA and ELNA processes in order to identify those that the Council considers reasonable and deliverable.

5.3.2 Testing and refining site allocation for the Local Plan 2045

5.75 Many of the sites initially identified from the various sources informing the SHLAA and ELNA workstreams were not ultimately suitable for allocations in the Oxford Local Plan 2045 for various reasons. For example, the presence of intrinsic environmental constraints such as national ecological designations (e.g. the SAC and SSSIs), or undeveloped land within the flood plain (greenfield flood zone 3b) may make development ultimately unsuitable. Some sites were too small to warrant a specific allocation in the Local Plan. Other sites were not considered to be deliverable, that is whether a landowner has intent or willingness to bring forward the site for development.

5.76 As with previous Local Plans undertaken for Oxford, the Sustainability Appraisal process has been integrated into the site assessment/refinement process. This allows officers to streamline the procedure such that a single assessment can be carried out for each of the potential sites whilst also ensuring that sustainability considerations are intrinsic to developing site allocations.

5.77 All sites that pass through the initial tests as part of the SHLAA/ELNA workstreams and are considered to have potential for allocation, are subject to more in-depth appraisal using the SA framework and its site-specific criteria as was outlined in Section 3.4. Incorporating the work of the SHLAA and ELNA, alongside that of the Sustainability Appraisal, demonstrates that potential site allocations for the Local Plan 2045 have gone through a multi-stage process, as outlined in Table 5.13. The criteria applied in the SHLAA and ELNA assessments are explained in more detail in those studies.

Table 5.13: The multi-stage process of site assessment informing potential allocations for the Oxford Local Plan 2045

Stage 1a: Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints. Undertaken as part of the SHLAA*.
First stage of assessment undertaken through the SHLAA considered conflicts with national policy or insurmountable environmental/physical constraints. Sites were then taken forward for further consideration as allocations for development at Stage 1a unless they were: • A Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI);

• Greenfield in flood zone 3b; • Less than 0.25 hectares in area OR site does not have capacity to deliver 10+ net gain dwellings**; • Already at an advanced stage in the planning process (i.e. development has commenced). *Although it should be noted that in some instances sites are still taken forward for further consideration even if one of the above applies*.
Stage 1b: Assessment against additional deliverability considerations. Undertaken as part of the SHLAA*.
All sites that had passed the Stage 1a assessment are considered at Stage 1b in terms of deliverability as part of the SHLAA process. Sites were then taken forward for further consideration as allocations for development unless: • They were extremely unlikely to become available during the plan period; • The landowner had indicated they have no intention to develop; • There was serious conflict with the National Planning Policy Framework/Oxford Local Plan Preferred Options strategy and no mitigation was possible.
Stage 2: Assessment against the SA/SEA objectives.
All sites that had passed the Stage 1a/1b assessment process were then considered against the SA/SEA objectives. Sites were scored accordingly based upon any identified positive/negative impacts against the twelve Sustainability Appraisal framework criteria.
* *The Methodology section in the Strategic Housing Land Availability Assessment (SHLAA) can be referenced for further details*. ** *Sites can still come forward during the Local Plan period as windfall development without the need for allocation*.

5.78 The first stages (1a and 1b) of filtering in the above Table are carried out across the SHLAA and ELNA workstreams. The sites that pass Stage 1 of the assessment process are assumed to be deliverable at a high-level - that is, they do not have insurmountable barriers to allocation. Those sites have then been subject to Sustainability Appraisal as part of stage 2. For sites that have passed onto Stage 2, an individual Site Assessment form has been completed, which documents the Sustainability Appraisal findings alongside the results from the assessment at Stage 1a and 1b for completeness, and these can be referenced in the consultation evidence base.

5.79 The site sustainability appraisal process helps to identify potential sustainability impacts that could arise from taking forward an allocation, based on an initial desktop review of each site's context using the site-specific scoring framework as set out in Section 3.4.2 of chapter 3. The scoring documents where development on a potential site can positively support the 12 sustainability objectives, and also helps to identify where potential negative impacts/conflicts could occur that may need to be mitigated. These mitigations would come in the form of specific requirements set out within the allocation policy (e.g. policy wording that directs applicants to incorporate buffers alongside nearby

watercourses where present; or to ensure potential impacts upon sensitive ecological sites nearby are appropriately avoided).

5.80 For the proposed site allocations identified at Regulation 18 stage, an interim site assessment incorporating SA appraisal was published for each site. As allocation policies had not been prepared for the sites at that stage, the scoring completed was subject to further work in places (e.g. the sites were scored as 'depends upon implementation' against a number of criteria). For sites carried forward to Regulation 19, the site assessment forms have subsequently been reviewed and updated to reflect the detail of the allocations and/or where information had subsequently changed, as is discussed further below.

5.3.3 Additional sites work post-Regulation 18

5.81 Following the Regulation 18 consultation, the sites being considered for site allocations were subject to further and more in-depth assessment and refinement to inform the detail of their allocation. This also took into account responses from the consultation (including any new or amended sites submitted), updates to the evidence base, and further engagement with landowners and with statutory bodies.

5.82 This additional work was often iterative and sometimes resulted in adjustments to the site allocations compared with what was consulted on at Regulation 18, for example red line boundaries being adjusted. It also helped to inform key principles for the site allocation policy and potential mitigation requirements being identified. The process is summarised in a Site Capacity Assessment form which has been completed and published for each site (note these forms are separate to the site assessments incorporating site-specific sustainability appraisal discussed earlier).

5.83 Furthermore, subsequent to the Regulation 18 consultation, the time period of the Plan was reviewed and was adjusted from 2022-2042 to 2025-2045. In response to this, some of the evidence base which had informed site allocations needed to be refreshed to reflect the new timescales, and an additional Call for Sites was also undertaken in October 2025. Landowners of site allocations were also contacted to see if they had any additional sites, whilst planning records were reviewed to identify any additional sites which could be tested for allocations, and the Green Belt assessment study had reached a stage where Green Belt and Grey Belt sites could be identified for assessment for allocations.

5.84 The additional workstreams above resulted in some new sites being introduced to the assessment process at this point, subsequent to Regulation 18. These new sites were put through the same process described earlier in Table 5.13 to filter them for their appropriateness for allocation.

5.85 Alongside new sites identified following the Regulation 18 consultation, there were a number of sites previously consulted on as proposed allocations which have not been carried forward as allocations in the Regulation 19 Local Plan for various reasons, these are detailed in Table 5.14 along with the reasoning for why.

Table 5.14: Potential site allocations identified at Regulation 18 stage which have not been carried forward to allocation at Regulation 19 stage and reason for why.

SHLAA ref	**Site name**	**Reason for site not being taken forward to allocation in Oxford Local Plan 2045 Regulation 19 document.**
62	University of Oxford Science Area and Keble Road Triangle	Does not need allocation- infill and alterations withing same type of use are expected and these can be sufficiently managed by the principles in the Area of Focus policy that covers this area.
111	Oxford Stadium (greyhound stadium)	Landowner interest in housing across the whole site, which would not come forward without loss of existing community use on the site.
173	Bayards Hill Primary School Part Playing Fields	No evidence site could come forward without unacceptable loss of playing field.
440	1 Pullens Lane	It is expected to be developed within the Local Plan time period but unlikely to deliver 10+
467	Edge of Playing Fields, Oxford Academy	No evidence site could come forward without unacceptable loss of playing field.
579	ROQ Site	Does not need allocation- infill and alterations withing same type of use are expected and these can be sufficiently managed by the principles in the Area of Focus policy that covers this area.
43	Old Road Campus	No significant change expected- does not need allocation
665 (inc 639)	Oriel College Sports Ground, Bartlemas and former Bowling Green	Partially carried forward as East Oxford Bowls Club to Reg 19. Significant heritage concerns (and playing pitch) on remaining section.
657	Clarendon Centre	Construction commenced
658	Barton 3b (Land to the rear of Harolde Close)	Biodiversity (potential priority species) and significant uncertaintly could mitigate for loss and delivery more than 10 homes.
660	2 Harberton Mead	Site is suitable but unlikely to deliver net gain of 10+

5.86 The final list of proposed allocations have also been reviewed against the site specific SA criteria again to assess any potential sustainability impacts arising from development on these sites. As discussed earlier, where interim assessments were already completed, these have been updated to take into account the latest evidence base, the specific detail of the proposed allocation policy wording as well as any other

relevant context (e.g the other local plan policies). The scoring has helped to inform any necessary mitigation measures in the site allocation wording that would be needed to avoid significant negative sustainability effects. This is discussed further in Chapter 6 (Whole Plan Appraisal) and Chapter 7 (Mitigating the Local Plan's impacts).

6. Whole Plan Appraisal – predicting impacts of the Local Plan's policies and allocations (Task B3)

6.1 This chapter assesses the impacts of the Oxford Local Plan 2045 policies and allocated sites. Section 6.1 assesses the sustainability impacts of the Local Plan's policies; Section 6.2 assesses the sustainability impacts of the allocated sites; and Section 6.3 discusses the overall impacts of the Local Plan.

6.1 Predicting the impacts of the Local Plan's policies

6.2 Table 6.1 summarises the impacts of the Local Plan's policies, using the SA/SEA framework of Table 2.4.

Table 6.1: Appraisal of impacts for Local Plan 2045 policies.

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
S1: Spatial Strategy and Presumption in Favour of Sustainable Development	+	0	?	?	0	+	0	+	0	0	0	?
S2: Design Code and Guidance	0	0	0	0	0	0	0	0	0	0	++	0
S3: Infrastructure Delivery in New Development	+	0	0	+?	0	+	0	+	0	0	0	+?
S4: Plan Viability	-?	0	0	+/-	0	0	0	-?	0	0	0	+
H1: Housing Requirement	-	0	0	+	+?	-	0	+/-	-	0	0	+
H2: Delivering Affordable Homes	0	0	0	+	+	0	0	0	0	0	0	+
H3: Affordable Housing Contributions from Other Development Types	0	0	0	+/-	+	0	0	0	0	0	0	+/-
H4: Employer-Linked Affordable Housing	+/-	0	+?	+	+	0	0	+	-	0	0	+
H5: Mix Of Dwelling Sizes (Number Of Bedrooms)	0	0	+/-	+	0	0	0	0	0	0	0	0
H6: Development Involving Loss Of Dwellings	0	0	0	0	?	+?	0	0	0	0	0	0
H7: Houses In Multiple Occupation	0	0	+	+	+	0	0	?	0	0	0	0

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
H8: Location Of New Student Accommodation	0	0	0	+/-	0	0	0	0	0	0	0	+/-
H9: Linking New Academic Facilities With The Adequate Provision Of Student Accommodation	0	0	0	+	0	0	0	0	0	0	0	?
H10: Homes For Travelling Communities	0	0	0	+	+	0	0	0	0	0	0	0
H11: Homes For Boat Dwellers	0	0	0	0	0	0	0	0	0	0	0	0
H12: Older Persons And Other Specialist Accommodation	0	0	0	+	+	0	0	0	0	0	0	0
H13 Self-Build & Custom Housebuilding	0	0	-/0	+	0	0	0	0	0	0	0	0
H14: Boarding School Accommodation	+/0	0	0	0	0	+/0	0	+/0	0	0	0	-/0
E1: Employment Strategy	+?	0	++	+?	?	0	0	+?	0	0	0	+
E2: Warehousing, Storage And Distribution Uses	+/-	0	+?	0	0	0	0	+/-	0	0	0	+/- ?
E3: Community Employment And Procurement Plans	0	0	0	0	+	0	0	0	0	0	0	+
E4: Affordable Workspaces	0	0	-?	0	+	0	0	0	0	0	0	+
E5: Hotel And Short Stay Accommodation	+/- ?	0	0	+	0	0	0	+/- ?	0	0	0	+/- ?
G1: Protection Of Green Infrastructure	0	0	+	+	0	0	0	0	0	0	0	0
G2: Enhancement And Provision of New Green And Blue Features	0	+	-	+/-	0	0	++	0	+/0	+	+	+/-
G3: Provision Of New Green And Blue Features – Urban Greening Factor	0	+	-	+/-	0	0	+	0	+/0	+	+	+/-
G4: Delivering Mandatory Net Gains In Biodiversity	0	0	0	0	0	0	0	0	0	+	0	0
G5: Delivering Onsite Ecological Enhancements	0	0	0	0	0	0	0	0	0	++	0	0
G6: Protecting Oxford's Biodiversity Including The Ecological Network	0	0	-?	0	0	0	+/0	0	0	+/0	0	0
G7: Flood Risk And Flood Risk Assessments (FRAs)	0	+	0	0	0	0	0	0	0	0	0	0

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
G8: Sustainable Drainage Systems (SuDS)	0	+	0	0	0	0	+	0	+	+?	0	0
G9: Resilient Design And Construction	-?	++	0	0	+	0	0	0	+	0	+	0
R1: Net Zero Buildings In Operation	++	+?	+/-	0	+	0	0	+	0	0	+/-	0
R2: Embodied Carbon	+	0	0	0	0	0	0	0	0	0	?	0
R3: Retro-Fitting Existing Buildings	+	+	0	0	+?	0	0	0	0	0	0	0
R4: Air Quality Assessments And Standards	0	0	0	0	+	0	0	+	0	0	0	0
R5: Water Resources And Quality	0	+	0	0	0	0	0	0	+	+	0	0
R6: Soil Quality	0	0	+/-	0	0	0	0	0	0	0	0	0
R7: Land Contamination	0	0	+	0	+	0	0	0	0	0	0	0
R8: Amenity And Environmental Health Impacts Of Development	0	0	+/-	+/-	+	0	0	0	0	0	0	+/-
HD1: Principles Of High-Quality Design	0	0	0	0	0	0	0	0	0	0	+	0
HD2: Making Efficient Use Of Land	+?	0	++	+	0	0	0	+?	0	0	+/-	0
HD3: Designated Heritage Assets	0	0	-?	-?	0	0	0	0	0	0	+/0	+/- ?
HD4: Non-Designated Heritage Assets	0	0	-?	-?	0	0	0	0	0	0	0	+/- ?
HD5: Archaeology	0	0	-?	-?	0	0	0	0	0	0	0	+/- ?
HD6: Views And Building Heights	0	0	-?	-?	0	0	0	0	0	0	0	-?
HD7: Health Impact Assessment	0	0	0	0	+	0	0	0	0	0	+?	0
HD8: Privacy, Daylight And Sunlight	0	0	-?	+/-	+/-	0	0	0	0	0	+?	0
HD9: Internal Space Standards For Residential Development	0	0	-	+/-	+/-	0	0	0	0	0	+?	0
HD10: Outdoor Amenity Space	0	0	-	+/-	+/-	0	0	0	0	0	+?	0
HD11: Accessible And Adaptable Homes	0	0	-?	+/-	+/-	0	0	0	0	0	+?	0
HD12: Bin And Bike Stores And External Servicing Features	+	0	0	0	0	0	0	+	0	0	+?	0
C1: City, District And Local Centres	+	0	+	0	0	++	0	+	0	0	0	+

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
C2: Maintaining Vibrant Centres	+	0	+	?	0	++	0	+	0	0	+	+
C3: Protection, Alteration And Provision Of Local Community Facilities	0	0	0	0	0	+	0	0	0	0	0	0
C4: Protection, Alteration And Provision Of Learning And Non-Residential Institutions	0	0	0	0	0	+	0	0	0	0	0	0
C5: Protection, Alteration And Provision Of Cultural And Social Venues And Visitor Attractions	0	0	0	0	0	+	0	0	0	0	0	+
C6: Transport Assessments, Travel Plans And Service And Delivery Plans	+	0	0	0	+	0	0	+	0	0	0	0
C7: Bicycle And Powered Two Wheelers Parking Design Standards	+	0	-?	+/-	+?	0	0	+	0	0	0	0
C8: Motor Vehicle Parking Design Standards	+/-	0	+	+	+/-	0	0	+/-	0	0	0	+/- ?
I1 Digital Infrastructure To Support New Development	-?	0	0	0	+	+	0	0	0	0	0	+
I2 Safeguarding Land for Infrastructure	0	+?	+/-	0	0	+?	0	0	0	0	0	0

6.3 As set out in the table, the impacts of the individual policies in the Local Plan vary depending on their focus, however, the Plan needs to be read as a whole, and there is limited value in reading into the impacts of any one policy in isolation. Where policies relate to requirements for growth, such as housing, they positively support related SA objectives, such as providing for local housing need, but have potential to impact aspects of the environmental objectives more negatively such as water or carbon. Meanwhile, policies primarily focussed on mitigating impacts of development, such as net zero carbon and water quality policies, as well as protection for the historic environment, naturally lead to positive impacts against related SA criteria, whilst having neutral impacts in other areas. The benefit of the testing does help to inform the whole plan appraisal later in this chapter and will be drawn upon further there.

6.2 Predicting the impacts of the Local Plan's site allocations

6.4 Table 6.2 details the impacts of the 53 site allocations contained in chapter 8 of the Oxford Local Plan 2045. The table summarises the detailed individual assessments undertaken for each site, using the adapted SA framework for sites (as set out in Section 3.4.2). The full assessments for each site are also available separately as part of Appendix C.

Table 6.2: Appraisal of impacts for Local Plan 2045 site allocations.

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPN1	0	0	0	0	++	I	0	I	+	+	-	-	+	+	-	-	0	+	-	0	-	0	0	0	I
SPN2	0	0	+	0	++	+	0	0	0	+	-	+	-	-	+	-	0	+	0	0	0	0	0	0	0
SPN3	0	0	-	0	++	+	0	+	++	+	-	-	-	-	-	-	--	+	0	-	0	0	0	+	+
SPN4	0	0	-	0	++	+	0	0	+	+	+	-	-	-	-	-	0	+	-	0	0	0	0	0	0
SPN5	0	0	-	0	++	+	0	0	+	-	-	-	-	-	-	-	0	+	0	0	0	0	0	0	0
SPN6	0	0	0	0	0	0	0	I	I	+	-	-	-	-	-	-	-	+	I	0	0	0	0	++	+
SPS1	-	-	+	0	++	+	0	0	0	+	-	+	+	-	-	-	0	-	0	0	0	0	0	0	0
SPS2	0	0	0	0	I	I	0	0	0	+	-	+	-	+	-	-	-	+	-	-	-	0	0	+	+
SPS3	--	-	-	0	++	+	0	0	-	+	-	+	-	+	-	-	-	+	0	0	0	0	0	0	0
SPS4	--	-	0	0	++	+	0	0	+	+	-	+	-	+	-	-	-	+	0	0	0	-	0	0	0
SPS5	0	0	0	0	++	I	0	0	0	+	-	+	-	+	-	-	0	+	0	-	0	0	0	0	0
SPS6	0	0	-	0	++	+	+	0	+	+	-	+	-	+	+	-	0	0	-	-	0	0	0	0	0
SPS7	--	0	0	0	++	+	++	I	+	+	I	-	-	+	-	-	-	+	-	0	-	0	0	+	+
SPS8	--	0	-	0	++	+	0	0	0	-	-	-	-	-	-	-	-	-	-	--	-	-	0	0	0
SPS9	0	0	0	0	I	I	+	0	0	+	-	-	-	-	-	-	--	0	-	0	0	0	0	0	0
SPS10	0	0	0	0	I	I	0	0	0	+	-	-	-	-	-	-	-	+	-	0	0	0	0	I	I
SPS11	--	-	0	0	++	+	+	I	+	-	I	-	-	-	-	-	-	+	-	0	0	0	0	0	0
SPS12	--	0	0	0	I	I	++	0	+	-	-	-	-	-	-	-	--	-	-	0	0	0	0	+	+
SPS13	--	0	0	0	0	0	++	I	+	+	I	-	-	-	-	-	-	+	--	0	--	0	0	+	+
SPS14	?	0	-	0	++	+	0	0	+	+	-	-	-	-	-	-	-	0	-	0	0	0	0	0	0
SPS15	0	0	-	0	++	+	0	I	-	+	-	+	-	-	-	-	0	+	-	0	0	0	0	0	0
SPS16	0	0	0	0	++	+	0	0	I	+	-	+	-	+	+	-	0	+	-	-	-	0	0	0	I
SPS17	0	0	0	0	I	I	0	0	0	+	-	-	-	-	-	-	-	+	-	0	0	0	0	+	+
SPE1	0	0	0	0	I	I	0	I	I	+	-	-	+	-	-	-	-	-	-	0	0	0	0	I	I
SPE2	0	0	+	0	++	+	0	0	0	+	-	-	-	+	-	-	0	+	0	-	-	-	0	0	0

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPE3	0	0	0	0	++	I	0	I	I	+	-	+	-	-	+	-	0	+	-	--	-	-	0	I	I
SPE4	0	0	-	0	++	I	0	I	I	+	-	-	+	+	+	-	0	+	-	-	-	-	0	0	0
SPE5	0	0	0	0	I	I	0	0	0	+	-	+	-	+	-	-	--	+	-	--	--	0	0	0	0
SPE6	-	0	-	0	++	+	0	0	+	+	-	+	-	-	+	-	-	0	0	--	-	-	0	0	0
SPE7	0	0	-	0	++	I	0	I	I	+	-	-	+	+	+	-	0	+	-	-	-	-	0	0	0
SPE8	0	0	0	0	I	I	0	0	0	+	-	+	-	+	-	-	0	+	-	0	0	-	0	0	0
SPE9	0	0	0	--	++	+	0	0	+	+	-	-	-	-	-	-	0	+	0	__	0	0	0	0	0
SPE10	0	0	0	0	0	0	0	0	0	+	-	+	+	-	+	-	0	0	-	0	0	0	0	I	I
SPE11	0	0	0	0	I	I	0	I	I	+	-	+	-	-	-	-	-	-	0	-	0	0	0	I	0
SPE12	0	0	0	0	++	I	0	-	0	+	-	+	-	+	+	-	0	+	0	0	0	-	0	0	0
SPE13	0	0	0	0	++	0	0	0	0	-	-	-	-	+	-	-	0	+	-	--	--	0	0	0	0
SPE14	0	0	-	0	++	I	0	0	+	-	-	-	-	+	-	-	--	+		--	--	0	0	0	0
SPE15	0	0	0	0	I	I	0	0	-	+	-	-	-	+	-	-	0	0	-	0	0	0	0	I	0
SPE16	0	0	0	0	++	+	0	-	+	+	-	-	-	-	+	-	-	-	0	0	0	0	0	0	0
SPE17	0	0	+	0	I	I	0	I	0	+	-	+	-	+	+	-	0	0	0	0	0	-	0	0	0
SPE18	0	0	0	0	I	I	0	I	I	+	-	-	+	-	-	-	0	-	-	-	--	0	0	I	I
SPCW1	0	0	0	0	++	0	0	0	0	+	-	+	-	+	+	-	0	-	-	--	--	0	0	0	0
SPCW2	-	-	0	0	++	+	0	0	0	+	+	+	-	+	-	-	-	0	-	-	0	-	-	0	0
SPCW3	--	-	+	0	I	I	0	+	+	-	+	+	-	+	+	-	-	-	0	--	--	0	-	0	0
SPCW4	-	0	0	0	++	I	0	0	0	+	0	-	-	+	+	-	-	+	-	--	-	0	-	0	0
SPCW5	0	0	0	0	++	I	0	0	0	-	-	-	-	-	-	-	0	+	-	--	-	0	-	0	0
SPCW6	-	0	-	0	++	I	0	0	0	+	-	-	-	-	-	-	-	-	-	--	-	-	-	0	0
SPCW7	--	-	0	0	++	I	0	0	I	+	++	-	-	+	+	-	-	0	-	-	-	0	-	+	+
SPCW7	-	0/-	0	0	++	I	0	0	I	+	++	-	-	+	+	-	-	0	-	--	-	0	-	+	+
SPCW7	-	-	0	0	++	I	0	0	0	+	++	+	-	+	-	-	0	+	-	--	-	0	-	I	I
SPCW8	--	--	0	0	I	I	0	+	+	-	+	+	-	-	-	-	-	+	-	-	-	-	-	+	I
SPCW9	-	-	0	0	++	I	0	0	I	+	++	+	-	+	-	-	0	+	-	-	-	0	-	I	I
SPCW10	--	-	0	0	++	I	0	0	++	-	+	-	-	-	-	-	-	+	-	0	0	-	-	+	+
SPCW11	-	-	0	0	++	I	++	I/0	0	+	++	-	-	-	+	-	0	+	-	--	0	0	-	I	I

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPCW12	0	0	0	0	+ +	I	0	0	0	+	+	+	-	+	+	-	0	+	-	--	-	0	-	I	0

6.5 The appraisal of the site allocations indicates that the sites are associated with a mixture of positive and negative impacts against the Sustainability Appraisal Framework. Where potential for negative (-) or significant negative (--) impacts has been identified, this suggests the potential need for mitigation and the approach to handling this through the Local Plan is discussed further in Chapter 7.

6.6 It should be noted that the Local Plan also includes five 'Area of Focus' policies which are not included in the above table which cover the following areas:

- Northern Edge Of Oxford Area Of Focus
- Cowley Branch Line, Littlemore And The Leys Area Of Focus
- Marston Road And Old Road Areas Of Focus
- University Areas North Of The City Centre Area Of Focus
- West End And Botley Road Area Of Focus

6.7 The Area of Focus policies cover areas in the city which are expected to go through changes over the plan period resulting from new development and where the Local Plan seeks to set out particular considerations in relation to urban design, the wider environment, movement and key infrastructure that might be needed. These areas are not development sites as such, so the criteria for individual site appraisal cannot be applied.

6.8 Because of the size of the areas there is a lot of variation within them as to what the scores would be, so detailed sites appraisal would not be meaningful. The Area of Focus policies also set out how the general policies of the plan can be met in a coordinated way across these areas. The policies therefore cover a broader array of considerations than the policies discussed in Table 6.1 above. They also do not set specific requirements for what development should come forward in the same way as a site allocation (as addressed in Table 6.2), and are not site allocations themselves, but reflect areas where there are several site allocations. They are therefore not expected to give rise to significant effects.

6.3 Overall and cumulative impacts of the Local Plan 2045

6.9 An interim whole plan appraisal was previously presented within the Reg 18 Interim Sustainability Appraisal (in Part two of that report) that considered the emerging proposals for the Local Plan as set out in the Regulation 18 consultation. This factored in preferred approaches and initial drafts of policies (absent of supporting text), but was limited in detail in relation to site allocations (as that consultation presented only a list of sites and high-level detail on expected uses for the sites but no specific policies).

6.10 Table 6.3 shows the updated whole plan appraisal which takes into account the Regulation 19 Local Plan, and draws upon the appraisals of the policies and the site allocations discussed earlier in this chapter. It also draws on relevant context from earlier in the report, including what is summarised in the scoping chapter (Chapter 3).

6.11 As well as the expected overall impacts of the Oxford Local Plan 2045 policies and site allocations; the table also touches upon the expected cumulative impacts of the Local Plan plus other relevant plans, projects and existing trends against each of the SA objectives. This is because Oxford is not an isolated island and the impact of the Local Plan can often be expected to differ when impacts of other plans, projects and trends are taken into account. It should be noted, however, that an assessment of cumulative impact is inherently more uncertain.

Table 6.3: Whole Plan appraisal including expected overall impacts of the Oxford Local Plan 2045 and cumulative impacts with other plans, projects and trends.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
1.Carbon emissions	+/-	+/-	• The chosen growth strategy (as with the alternatives) is likely to have a negative impact for carbon emissions due to the additional growth it supports. Whilst it seeks to follow a balanced approach to distributing growth that favours use of brownfield land, the additional growth, including 9,267 of new homes to 2045, would have emissions associated with construction and operation unless these are mitigated. • The Local Plan includes policies focused on directly mitigating the impacts of carbon emissions from new development and supporting reductions in existing buildings, which will support meeting local and national net zero carbon targets. Primarily, the Local Plan seeks to ensure new buildings are net zero in operation, in order to mitigate emissions related with buildings once they are built, and also seeks to boost levels of renewable energy generation (R1). The plan includes policies that seek to reduce embodied carbon impacts (R2), although without imposing strict limits on embodied carbon, the benefit will vary across applications and will not neutralise all construction related emissions. The Local Plan also provides explicit support for applicants to undertake retrofit of existing buildings where this will have benefits for climate (R3), although this relies on occupants coming forward to undertake such projects. • There will be other indirect benefits from elements of the Local Plan as it seeks to ensure people are supported in living lifestyles that have lower carbon impacts with policies which support access to their daily needs within local/district centres that can be accessed by walking, cycling and public transport (C1 and C2). There are also policies which set requirements for transport assessment which prioritise walking/cycling (C6), limit new car parking and set guidance for EV charging (C8), and requirements for bike parking and storage in new development (HD12, C7). • **Cumulatively** with other policies, for instance, the national push towards phasing out petrol/diesel engines in favour of electric vehicles and decarbonising the national energy grid, carbon emissions are likely to go down, although not at the speed needed to achieve a net-zero carbon by the city's 2040 target. There is likely to be some level of additional emissions related to construction due to wider growth across the county for the foreseeable future.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
2.Resilience to climate change	+/-	+	• The chosen growth strategy seeks to protect a strong network of green spaces for their various benefits including flood storage, slowing run off and promoting cooling. It will help to ensure space for development is balanced with space for resilience features like greening and SUDs as part of development sites. This will strongly support resilience to climate change. • However, the addition of 9,267 new homes will necessitate some loss of green spaces or other green features along with benefits they can provide and this would come at the cost of resilience. Table 6.2 identifies that eleven of the site allocations are located partially or wholly within Flood Zone 3b, another nine sites are located partially or wholly within Flood Zones 3a or 2. Mitigation requirements for these sites are discussed further in Chapter 7 of this report. • Despite the above, the Plan sets a strong framework for development to address flood risk (G7) and to include Sustainable Drainage Systems (SuDS) (G8), to mitigate impacts of current and future exposure to flood risk. Policies which protect green infrastructure (G1) and set standards for provision of new green features (G2 and G3) will have a range of benefits for resilience and would seek to ensure losses in GI are mitigated through reprovision in most circumstances. Proposals are also required to directly consider future climate change and set out how design has sought to mitigate risks (G9) which includes addressing risks of overheating. • Other policies will have indirect benefits in terms of resilience building, including requirements for energy efficiency and good fabric performance (R1), and for using water prudently (R5). • In terms of **cumulative** impact, the climate will continue to change due to ongoing emissions and the long lifetime of the emissions already in the atmosphere. This will bring new risks which means that levels of resilience are in an ever-changing state. Development upstream of Oxford is likely to increase runoff, leading to increased flooding in Oxford, however, the Oxford Flood Alleviation Scheme, expected to be in operation by 2030, will reduce the risk of flooding from the River Thames for many properties in Oxford. There are planned improvements for meeting water supplies as WRMPs take effect which should support future needs, but the strain on supplies will worsen with additional growth and will need additional interventions in future.
3.Efficient use of land	+/-	+/-	• The chosen growth strategy promotes efficient use of land through a brownfield first approach, seeking to maximise capacity of sites whilst meeting other sustainability objectives. The strategy does allow for the loss of some green spaces as brownfield land alone will not be able to meet needs, but would be steering development to the lower quality green spaces in the first instance.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			• Efficient use of land is promoted through various policies, principally through the density requirements and other considerations of making efficient use of land (HD2). Other policies seek to limit new car parking (C8), require applicants to remediate land so as to bring previously contaminated sites back into use (R7), and guide particular uses to local/district/city centre(s) (C1). • The plan prioritises development sites in the city for housing and aims to provide for 9,267 new homes—a target that has been informed by a detailed assessment of the capacity of all available land in Oxford. Table 6.2 identifies that thirteen of the site allocations are located on open space/greenfield land, one is previously developed land that is located within the Green Belt (SPE9 Marston Paddock Extension). The allocation policies themselves seek to maximise capacity of sites by setting minimum housing numbers that have been informed by site-specific capacity considerations. • In relation to employment land, the plan does not allocate new employment sites, but instead seeks to drive the intensifying and modernizing of employment land (E1). It also allows for an element of housing to come forward on employment sites which also supports efficiency. • It could be argued that the plan's wider environmental requirements in relation to green infrastructure, biodiversity and heritage policies reduce the 'efficiency' of land used for housing. However, efficient use of land more broadly also needs to incorporate sufficient safeguards for the wider environment to ensure the Local Plan delivers sustainable growth. • Overall, whilst there would be some negative impacts on greenfield land as some sites would inevitably be developed to accommodate housing need, there would also be positive impacts in terms of optimising development density and reducing the need to build elsewhere (where potentially higher densities would be less likely and more reliance on cars with associated car parking would be needed). **Cumulatively,** with other Local Plans, again the Local Plan would reduce the amount of undeveloped land across the county, but less than under other alternatives.
4.Local housing needs	+	+	• The chosen growth strategy provides a positive impact for contributing to housing needs by prioritizing housing and seeking to maximise capacity across sites in the city. However, the need for balancing other Local Plan objectives such as protecting and enhancing the natural environment, alongside Oxford's intrinsic constraints on land (e.g. flood plain, national designations) means these needs cannot be met in full.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			• Oxford's housing need as defined by the government standard method is 1,087 homes per year and Policy H1 provides for at least 9,267 new homes across the Plan period (463 homes/year). This will be a positive impact that reduces local housing need, but it means that there will be under-provision which adjacent local authorities would likely need to fill. • The Local Plan has policies which support housing needs of different groups. Policies H2-H4 aim to provide affordable homes, and policies H7-H14 focus on providing specialist accommodation for particular groups including those who need temporary accommodation, students, travelling communities, boat dwellers, older people, and boarding school pupils. • The overall impact of the Local Plan is to positively impact housing need, despite not being able to meet this need in the city in full. The neighbouring authorities in Oxfordshire are all at varying stages of development of their own Local Plans and these contain allocations agreed under the previous round of plan making which accommodate some of Oxford's unmet need to 2036. **Cumulatively**, this will have some positive impact for Local Housing Need.
5.Inequalities	+	I	• The chosen growth strategy is likely to have some indirect impacts on various elements of inequality, such as access to affordable housing or access to jobs, but this will often depend on how development comes forward. • As discussed under objective 4, the plan sets policies for supporting housing needs of various groups including affordable housing, and those with specialist housing needs. There are also design policies which help to ensure the quality of housing is addressed (e.g. wheelchair accessibility, space standards, privacy and daylight). Meanwhile, the Local Plan also includes requirements for affordable workspaces (E4) and employment and procurement plans (E3) which should have some positive impacts in relation to economic inequality. • Additionally, the plan strongly supports protection of green infrastructure and greening of new development which can have a variety of benefits for physical and mental health, as well as walking, cycling and public transport, which should help those without access to a car. Requirements of major developments to undertake Health Impact Assessment should also help to ensure proposals respond to inequalities in the local area. • The overall impact for inequalities should be positive though this is subject to some uncertainty, particularly as many of the benefits above depend on how applications come forward and the Plan's requirements are

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			implemented. The city remains one of the most unaffordable places to live, and the Local Plan is not able to provide for all of its housing need, which would include affordable homes, and this could limit any positive impact. When the Local Plan is looked at alongside wider trends in society, the **cumulative** impact is likely to be negated by a range of national and international drivers which continue to exacerbate the cost of living crisis, entrenching and/or worsening existing inequalities.
6.Services and facilities	**0**	**0**	• The chosen growth strategy's focus on delivering new housing on brownfield sites in the city can help to ensure more people live in areas that have good access to a range of services/facilities. Where greenfield sites are developed, these are likely to have some reduced access, although the majority of the city is generally considered to be accessible. • The new development that is being planned for in the Local Plan has the potential to bring additional pressures for existing services/facilities due to the growth in population this brings with it, and this is true of the additional 9,267 new homes the Local Plan aims to provide for. However, the Local Plan is supported by its Infrastructure Delivery Plan (IDP) and aims to ensure that adequate infrastructure is available including those that are identified in the IDP to support Oxford's housing and employment growth (S3). The Plan also supports the provision of services and facilities in town/district/local centres (C1 and C2), and aims to prevent the loss of community facilities, learning institutions and cultural venues (C3, C4, and C5). • The Local Plan also seeks to support particular infrastructure improvements aimed at ensuring that services and facilities are easily accessible, including the redevelopment of the Oxford train station, work towards a Cowley Branch Line, and other transport works (e.g. traffic filters). • Whilst the additional growth expected to arise from the Local Plan will increase pressures on existing services and facilities, the overall impact and **cumulative** impact with other plans and projects, is expected to be unlikely to significantly change access to services and facilities.
7.Green infrastructure, leisure and recreation	0	0	• Whilst the chosen growth strategy option does allow for some greenfield sites to be developed, it provides for the most beneficial approach to protecting high-quality, multifunctional green infrastructure and allowing for additional greening on development through a balanced approach to developing sites. • Policy G1 defines and protects a Green Infrastructure network made up of a variety of typologies of green space and other features and this includes spaces that are important to leisure and recreation such as parks and

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			pitches as well as other areas like allotments. It will help to ensure existing deficits in access that have been identified across the city will not get worse. Meanwhile, the Local Plan also sets requirements for new provision of green features, including that proposals for major development meet minimum targets according to the Urban Greening Factor and do not result in a reduction in baseline score (G2 and G3). The minimum targets are set fairly conservatively to ensure some provision of green surface cover, whilst recognizing that many sites are constrained and need to deliver a variety of uses onsite. • The framework of the above policies allows for losses of green features in particular circumstances (e.g. on supporting G1 spaces, or where retention is technically unfeasible), but also sets requirements for mitigating these losses including reprovision where necessary which should generally neutralise these. There could be instances where poorer quality green features are lost to new development, particularly on wholly greenfield sites with limited scope for fully retaining the same levels of green surface cover, however, equally, there will be situations where development will bring about an overall increase in greening, e.g. on wholly urbanised sites that need to meet minimum greening targets. • Overall, the policies of the plan will help to ensure minimum levels of greening on new development, and could bring about small levels of enhancement to existing spaces. Equally, the provisions for growth including new housing will result in the loss of some green infrastructure, though the Local Plan policies and specific requirements in the allocations will help to mitigate impacts. The **cumulative** impact alongside other plans and trends is likely to remain similar.
8.Traffic and associated air pollution	**+/ -**	**+**	• The chosen growth strategy is likely to have positive and negative impacts. Prioritising additional housing in the city could help to reduce in-commuting by providing additional housing for workers in the city, but equally, more housing could increase car ownership depending on how this is implemented (e.g. if residents need to rely on a vehicle), including how other elements of the Local Plan's requirements are met (as discussed further below). As some housing need would not be able to be met in the city, there is potential for some additional traffic impacts elsewhere from housing needing to be delivered beyond the city, however, this is highly dependant on where and how this unmet need is incorporated into relevant plans (e.g. proximity to public transport routes). • A key theme running through the Local Plan is liveable communities where people can meet all their daily needs through walking/cycling/wheeling and without relying on private vehicles. The Local Plan has policies which support vibrant local/district centres (C1 and C2). It also has policies that seek to enable people to take up

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			active and sustainable transport options, including requirements for transport assessments which prioritise walking/cycling (C6), limit new car parking and set guidance for EV charging (C8), and require provision for bike parking and storage in new development (HD12, C7). • **Cumulatively**, in terms of air pollution, the impact of private vehicles is likely to continue to reduce in the long term due to various county transport measures (e.g. Low Emission Zone, electrification of bus fleet etc.), and national phasing out of fossil fuel vehicles, (though this trend is longer term).
9.Water	-	--	• The chosen growth strategy will introduce additional demands for water from new housing (as with the alternatives). The balanced approach to development, however, will allow for the best outcomes in terms of mitigating impacts on the sensitive water environment. • The impacts from the Local Plan and cumulatively with other plans needs to be considered in two dimensions: Water resources • The delivery of 9,267 new homes and associated population increase will put additional demands on water resources. The Local Plan includes requirements for new development to limit impacts on water resources through water use limits and other water saving measures (R5) which responds to Oxford's location in a water stressed region. • Overall, the impact of these requirements is unlikely to completely offset the additional demands on water supplies arising from new development. **Cumulatively**, alongside plans for significant additional development of neighbouring authority areas, the impact is likely to worsen, however, this will be mitigated somewhat by the range of water saving interventions being planned for by Thames Water through their Water Resources Management Plan, though there will likely need to be additional interventions towards the end of the plan period. Water quality • Whilst the waterbodies in the city face ongoing water quality challenges due to pollution from a range of sources, the Local Plan most directly impacts this through generating additional pressures on wastewater treatment and increasing levels of run off due to urbanisation. • The Plan sets requirements that seek to ensure development mitigates impacts on water quality where this is directly in the applicants' control (R5). Other policy areas will also have a positive impact, such as by seeking to

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			preserve amenity and environmental health from release of pollutants (R8), and protections for sensitive ecological sites (G6). Additionally, there are protections for watercourses, including requirements for ecological buffers (G2), this will be of relevance to the various sites identified in Table 6.2 as containing or being in close proximity to a watercourse. Collectively, alongside the general approaches to seeking more greening on developments should also support reducing surface water flows (G2, G3), these should help to neutralise direct negative impacts on water quality. • On wastewater treatment capacity and associated infrastructure, which is a key factor in mitigating additional wastewater treatment pressures from new development, additional housing will increase demands on wastewater treatment infrastructure. The Local Plan seeks to ensure new development is supported by investment in infrastructure where needed to support this growth (S3). Thames Water are already in the process of upgrading the Oxford Wastewater Treatment Works. The sequence of planned upgrades is expected to allow capacity for the development of new homes in and around Oxford and is an important solution for helping to mitigate water quality impacts from future growth. **Cumulatively**, these upgrades alongside the Local Plan's requirements should ensure a neutral impact for water quality.
10.Biodiversity	**+/-**	**+/-**	• The balanced approach to growth in the chosen growth strategy allows for protection of a network of green and blue spaces and also allows onsite capacity to be balanced with other objectives such as incorporating open space and greening which can support biodiversity, although it does allow for some loss of green spaces. • The Local Plan's chapter 4 supports biodiversity through a number of policies. Principally, those that relate to protection of biodiversity, including designated sites and ecological features elsewhere (G6) as well as policies for net gain and onsite biodiversity features (G4 and G5). The policies for protection and enhancement of green infrastructure (G1-G3) will also support preserving and making new space for species, particularly as the GI network (G1) is protecting designated sites and sites with informal benefit for biodiversity, including corridors that help species to move across the city. • However, the provision of new homes will involve building on some greenfield sites as recognised earlier, reducing space for biodiversity and potentially impacting species and habitat present there. Table 6.2 identifies that ten site allocations are on or adjacent to designated ecological sites (adjacent to in actuality). Separately, the Council's Source Pathway Receptor Analysis and Habitats Regulations Assessment have also identified

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			potential sites that could have impacts on designated sites. Mitigation requirements for any site allocations that could impact designated sites are discussed further in Chapter 7 of this report. • Indirectly, various policies play a role in protecting the environment from the impacts of this new development including, sustainable drainage systems requirements (G8), air quality (R4), water quality (R5) and Amenity/environmental health (R8). These should help to ensure direct negative impacts like pollution are neutralised. • **Cumulatively**, the impact is also likely to be mixed. Biodiversity is continuing to face a range of challenges nationally which is driving ongoing declines. Adjacent local authorities are also likely to see additional development on greenfield sites which is likely to negatively impact biodiversity. Conversely, the national Biodiversity Net Gain (BNG) requirements necessitate 10% BNG on all new planning permissions (subject to some exemptions) and are intended to bring about improvements for biodiversity nationally. The County has also now finalized and published its Local Nature Recovery Strategy for Oxfordshire which also supports the delivery of improvements for biodiversity by identifying the best opportunities for enhancement, although in the city these opportunities are limited.
11.Good urban design / the historic environment	**+/ -**	**0**	• The chosen growth strategy should avoid the most significant negative impacts to the historic environment (compared to the alternatives). It would also enable the most positive benefit in relation to high-quality design and conserving heritage, on the assumption that this requires a balancing of various types of uses on sites—meeting growth needs whilst ensuring this is sustainable. • The Local Plan's historic environment policies (HD3-HD5) are primarily focused on mitigating harm, protecting Oxford's various heritage assets from the negative impacts that could arise from new development. These will largely ensure no further harm and neutral impacts, although there may be some minor positive impact as they do discuss taking opportunities to enhance these assets in places. Table 6.2 identifies that 16 site allocations are in Conservation Areas; and 8 contain listed buildings, with a number of others lying adjacent to one of these assets and within its wider setting. Again, mitigation requirements for any site allocations that could impact sensitive heritage assets are discussed further in Chapter 7 of this report. • The Local Plan also seeks to promote high quality design in new development, principally through policies S2 and HD1, along with the Design checklist features in the appendix, as well as the other design policies in chapter 6 (HD6-HD12). Other policies in the Plan promote various aspects of high-quality design which could

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			have indirect benefits, such as requirements for green infrastructure (G2 and G3), onsite ecological enhancements (G5), and climate resilience (G9). Conversely, construction in greenfield locations could negatively affect the land/townscape, whilst net zero carbon requirements (R1) and requirements around onsite greening and biodiversity (G3 and G5) will necessitate different approaches to design than in the past so as to support sustainability and overall performance; however, they could also be construed as important elements of high quality design, so impact may be mixed and will depend upon implementation. • The NPPF and National Design Guide already strongly promote heritage protection and good design, and **cumulatively** with the Local Plan, change is likely to be insignificant.
12.Economic growth	+	+	• While the chosen growth strategy focuses on prioritising new sites for housing, it is likely to have a positive effect on economic growth as the employment strategy (Policy E1) creates the conditions for Oxford to meet its identified employment floorspace needs arising to 2045 within the city. • The plan's employment strategy seeks to modernise and intensify existing employment sites, while supporting a flexible approach to land-uses within the city and district centres to be able to respond quickly to changing needs and economic circumstances and encourage a wide range of uses (including housing). Encouraging a range of appropriate uses within the city and district centres supports their vitality and vibrancy which also has a positive effect on economic growth of the local economy. • The plan's employment strategy (Policy E1) also supports the complete loss of the city's poorly performing employment sites to housing and enables an element of housing to come forward on the city's Key Employment Sites (subject to certain criteria being met). • Housing affordability issues coupled with lack of affordable housing are often cited by employers in the city as reasons why they struggle to attract and retain staff. By creating the conditions to enable housing delivery across Oxford is likely to have a positive effect on economic growth by helping to address the affordability-related barriers. • The plan also supports economic diversity by ensuring that larger major development proposals can support the local economy by choosing to source materials locally, providing employment opportunities for local people or by supporting local educational initiatives by submitting a Community Employment and Procurement Plan (Policy E3). This is likely to have positive effect on the local economy and thereby support economic growth as it provides local people with the skills, training and opportunities to find work.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			• The city's strong recent market for commercial research and development (R&D) and flexible laboratory space (and its associated prime rents) has resulted in many SMEs and social enterprises being priced out of the city or struggling to find affordable workspace. This unintended consequence of economic success risks undermining economic diversity in the city, with associated potential likely negative effects (albeit minor). The plan's response is to therefore to provide mitigation (Policy E4) which introduces a process to facilitate delivery of affordable workspaces on certain named sites. It is anticipated that, through the introduction of a flexible policy approach, this will help to overcome the unintended negative consequences of an otherwise successful economy. • Oxford's visitor economy also makes a positive contribution to economic growth, and that encouraging visitors to the city to stay longer and spend more is likely to have a positive impact on the local economy. However, the plan recognises that this should not be at the expense of much-needed housing and supports new hotel and short stay accommodation (Policy E5) at a limited number of sustainable and accessible locations including the city and district centres, and on arterial roads. This provides a balanced approach that supports both the visitor economy and enables much-needed housing to come forward elsewhere. • Oxford's strong employment land supply suggests that there is a healthy demand-driven market supporting key economic sectors relating to R&D and associated flexible-lab enabled uses. • Nevertheless, the overall impact of the plan is expected to be positive for supporting the local economy. **Cumulatively**, whilst macro-economic uncertainties associated with the long-term impacts of Brexit, the on-going war in Ukraine and fluctuating Tariffs from the United States, continue, the long-term economic picture for the city is a positive one. Oxford and Oxfordshire continue to contribute to the national economy, while the city anchors one end of Oxford-Cambridge Growth Corridor, which reinforces a likely longer-term positive effect on economic growth which has been supported by recent government announcements for infrastructure.

6.12 Table 6.4 summarises the main **direct** and **indirect** impacts of the Local Plan.

Table 6.4: Direct and indirect impacts of the Oxford Local Plan 2045.

Direct impact(s)	Indirect impact(s)
• Provision of new housing contributes positively towards identified housing need, including for affordable housing. • Protecting key employment sites whilst promoting their intensification and modernisation will support the local and regional economy. Requirements for affordable workspaces and skills plans should support inclusive economy. • Pushing for higher density development will help ensure more efficient use of land and support delivery of more homes, employment. • More development will result in some loss of greenspace/green infrastructure, but policies seek reprovision neutralising losses. Requirements should drive greener development, particularly brownfield sites, and also help to make additional spaces for biodiversity on sites. • More development will result in more carbon emissions associated with construction. Net zero policy should neutralise carbon associated with operation and bring about additional renewable energy generation. • Additional demands on resources like water supplies and energy, coupled with less demand on other resources like fossil fuels. • Significant environmental impacts including on biodiversity would largely be neutralised through various mitigation requirements built into the policies. • New infrastructure delivered where needed to support new development.	• Population growth associated with more housing will likely increase demands on facilities, as well as impact air quality congestion where this is accompanied by more car ownership, although mitigated somewhat by strong drive for reducing reliance on car ownership. • Capacity based requirement for housing means some need will need to be met beyond Oxford's boundaries, with knock on impacts e.g. numbers travelling into city for work impacting congestion and air quality, loss of greenspace elsewhere etc. • Enabling some shift from employment land to housing will help contribute to housing needs and will also improve accessibility to jobs, reducing barriers to employment and helping support air quality objectives and reducing congestion by allowing employees to live closer to work. • More support for retrofitting of existing buildings should improve energy efficiency and carbon footprint as well as climate resilience. Energy offset fund should support further retro-fitting of existing buildings elsewhere. • Protection and enhancement of green areas, should support health and wellbeing of residents, as well as climate change adaptation. Should also benefit biodiversity in conjunction with other interventions. • Requirements on high-quality design and heritage should protect and improve local townscape as well as setting of heritage assets. • Protection of local/district centres and requirements to support more walking/cycling/wheeling and access to public transport should benefit people's health, air quality and congestion;

6.13 Table 6.5 summarises the expected **short term, temporary** impacts versus the **long term, permanent** impacts of the Local Plan.

Table 6.5: Short term, temporary and long term, permanent impacts of the Local Plan.

Short term, temporary	Long term, permanent
• Largely these relate to impacts arising from construction processes for new development including dust, noise, traffic and other impacts. • Additional air pollution relating to some increase in cars related to population growth although should diminish as fossil fuels are phased out.	• Delivering new homes should help reduce housing need, including for affordable homes, as well as barriers to economic growth. • Some loss of employment land to other uses e.g. housing. Equally, ongoing support for the region's economy; • More sustainable, climate resilient and energy efficient buildings – supporting a reducing carbon footprint and less need to retro-fit. More space for nature and greener developments. • Increased urbanisation and intensification of development leading to some loss of green space (alongside greener development elsewhere). • Additional demands on resources like water and energy. • Reduced levels of inequality though this is also dependent on wider factors (e.g. national economy). • Reduced car traffic and air pollution due to strong support for walking/cycling/wheeling and public transport. • More infrastructure and/or services to meet additional demands generated by population growth.

6.14 The Local Plan will have a range of impacts across the SA objectives. The plan will positively support inequalities, economic growth and local housing need (although the city's capacity means need cannot be met in full). Some impacts are varied, such as on carbon emissions, biodiversity and traffic where the Local Plan's policies make positive contributions through the requirements of its policies (e.g. net zero development, renewable energy generation, ecological enhancements, supporting more people to live closer to work and in accessible locations), whilst being unable to avoid some impacts of new development. The impact on water is expected to be negative, predominantly due to additional demands on water resources arising from population growth, although the Local Plan's policies seek to mitigate this as far as they can.

6.15 Some negative impacts have been reduced where mitigation has been built into the policy framework, this is discussed further in chapter 7. The mitigations built into the Local Plan mean some impacts against the objectives are ultimately neutralised, as is the case under green infrastructure and services/facilities. Some negative impacts are not able to be fully mitigated, as is the case under water and carbon emissions for example, particularly when impacts of other plans, projects and wider trends are taken into account.

7. Mitigating the Local Plan's impacts (Task B4)

7.1 This chapter discusses the necessary mitigation measures required to prevent, reduce and as fully as possible offset any significant adverse effects arising from the new Local Plan. The chapter discusses mitigation measures that have been incorporated into the plan as it has been prepared, as well as how the Sustainability Appraisal process has helped to identify and inform mitigation measures incorporated into the site allocations.

7.1 Mitigating negative impacts and maximising positive impacts of the Local Plan's policies

7.2 The potential for significant adverse effects arising from the Local Plan has been an integral consideration throughout the development of the Local Plan. It is important to note that the policies of the plan need to be read as a whole, and whilst some could have adverse effects in isolation, others play an important role in offsetting these and the Council has generally sought to incorporate various mitigation measures into the policy framework to address these where they have been identified – many of these are also valuable for securing positive impacts from development.

7.3 There are some key policy areas which are included in the plan which seek to address the main adverse effects arising from the plan as follows:

- **Carbon emissions** – Some level of emissions can be expected under any of the growth strategy alternatives considered for the Local Plan. Whilst the chosen growth strategy is one of the options associated with the reduced negative impact, by its nature of delivering lower levels of growth and protecting a wider range of green spaces, it would still have impacts without sufficient mitigation. **Policy R1** is the primary mitigation, seeking to ensure all new buildings are net zero in operation and ensuring no net increase in emissions through their operation by requiring high levels of energy efficiency and matching energy demand through new renewable energy generation. The approach is also supported by **Policy R3** which seeks to strongly support retro-fitting of existing buildings to reduce their carbon impacts.

  Emissions associated with construction are a more complex issue and one that cannot be fully mitigated at present. The Local Plan takes an important step forward through **Policy R2** in strengthening requirements for addressing embodied carbon in construction however, although some level of impact will remain.

- **Traffic and air pollution –** Additional growth is likely to be accompanied by some increase in private vehicle ownership, though equally it can help reduce congestion

in city by allowing people to live closer to work. Whilst cumulative efforts regionally and nationally are expected to bring down emissions related to vehicles over time, some sources of pollutants associated with things like break pads and tyre dust will remain. The Local Plan includes various policies, particularly through **Chapter 7**, that seek to promote walking/cycling/wheeling and improved access to public transport so that people and are important forms of mitigation to help reduce the impacts of growth on problems of congestion and air pollution. Additionally, **Policy R4** sets out various requirements to address air quality impacts.

- **Water –** New development being planned for can impact water quality and water resources without sufficient mitigation. Most directly, the Local Plan includes a specific water resources and quality policy (**Policy R5**) which seeks to ensure impacts are mitigated and sets out various requirements for applicants including meeting water use limits, with other water conservation methods, as well as ensuring no adverse impacts on water quality. This is also supported by a range of other policies such as preserving amenity and environmental health from release of pollutants (**Policy R8**), additional protections for sensitive ecological sites (**Policy G6**), requirements for ecological buffers (**Policy G2**), as well as generally seeking more greening on developments (**Policies G2, G3**).

  These requirements, in combination with upgrades in progress by Thames Water on the wastewater treatment infrastructure should ensure neutral impact on water quality over time. In relation to water resources, they are important for reducing impacts from development as far as is practically possible, although the impacts of the additional demand cannot be fully neutralised without further interventions more broadly across the catchment from other stakeholders.

- **Green infrastructure and biodiversity –** The city is highly constrained and in order to go as far as possible in meeting identified housing needs and meet other Local Plan objectives, some loss of greenfield sites and green infrastructure is inevitable, with associated adverse effects for wildlife and habitats. The Local Plan includes a range of important mitigation measures to neutralise these impacts as far as possible. Principally, a network of core and supporting green spaces is protected through **Policy G1** which includes national and local designated ecological sites. Additional protections related to the particular ecological considerations for designated sites is assigned through **Policy G6**. Whilst **Policy G1** allows development to impact upon supporting spaces, the impacts need to be mitigated for through reprovision to the same standard or higher.

Additionally, the Local Plan includes strong requirements in relation to providing new green features (**Policies G2 and G3**) as well as requirements for onsite ecological enhancements (**Policy G5**)**.** These play an important role in bringing in additional green features, and features that are important for local species which are often already under threat.

- **Infrastructure and services –** The growth that is planned for, including new housing, as well as development of employment sites, will need to be supported by new infrastructure or improvements to existing infrastructure. The Infrastructure Delivery Plan identifies the key infrastructure needs in the city which the Council has identified through engagement with various stakeholders. The Local Plan includes a strategic policy (**Policy S3**) which aims to ensure that essential infrastructure needs to facilitate new development are provided for and is important for helping to ensure the plans proposals do not have adverse impacts related to these needs not being met.

7.2 Mitigating negative site-specific impacts arising from Local Plan site allocations and maximising positives

7.4 Where development on allocated sites is likely to have significant impacts, the Local Plan's site allocation policies (as set out in Chapter 8 of the plan) incorporate mitigation measures to minimise or obviate those impacts, whilst also identifying opportunities to bring about positive impacts. Many of these refer to the plan's development management policies. In other instances, where there are no site-specific considerations that would warrant an explicit cross reference to the development management policies in the allocation itself, they would be expected to nevertheless ensure for mitigation as part of any proposed development where necessary. These include mitigation measures related to:

A. Urban design (HD1 Principles of High-Quality Design)
B. Buffer area around adjacent wildlife site (G6 Protecting Oxford's Biodiversity)
C. Walking, cycling, public transport (various policies in Chapter 7 of Local Plan although generally no explicit cross reference in site allocations unless a site-specific requirement has been identified)
D. Protection of view cone/ Tall buildings (HD6 Views and Building Heights)
E. Protection of archaeology (HD5 Archaeology)
F. Provision/protection of community facilities (C3 Protection, Alteration and Provision of Local Community Facilities)

G. Protection of biodiversity including HRA related (G6 Protecting Oxford's Biodiversity)
H. Green infrastructure requirements (G1 Protection of Green Infrastructure, G3 Provision of New Green & Blue Features – Urban Greening Factor)
I. Compensation re. green belt
J. Conservation area management (HD3 Designated Heritage Assets)
K. Air quality management (R4 Air Quality Assessments and Standards - No explicit cross reference in any site allocation policies).
L. Provision of public open space (G2 Enhancement & Provision of New Green and Blue Infrastructure)
M. Listed building management (HD3 Designated Heritage Assets)
N. Protection of water body / SuDS (G2 Enhancement & Provision of New Green and Blue Infrastructure and/or G8 Sustainable Drainage Systems)
O. Protection from flood risk / sequential approach (G7 Flood Risk and Flood Risk Assessments)

7.5 As part of the SA/SEA process, the individual site assessments, which are summarised at Table 6.2 of this report, were compared to the wording of the site allocation policies in Chapter 8 of the Local Plan. Table 7.1 shows those negative impacts identified as part of the site assessment process (in amber and red, from Table 6.2), and the mitigation measures proposed to address them. This has allowed for a cross-check to ensure that all significant impacts are mitigated.

Table 7.1: Mitigation measures (letters) for negative impacts identified as part of the site assessment process (red and amber in Table 6.2).

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPN1											C	C			C	K			E		M				
SPN2											C		C	C		K									
SPN3			H								C	C	C	C	C	K	N			J					
SPN4			H									C	C	C	C	K			E						
SPN5			H							C	C	C	C	C	C	K			E						
SPN6											C	C	C	C	C	K	N		E						
SPS1	O	O									C			C	C	K		G							

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPS2											C		C		C	K	N		E	J	M				
SPS3	O	O	H						L		C		C		C	K	N								
SPS4	O	O									C		C		C	K	N					D			
SPS5											C		C		C	K				J					
SPS6			H								C		C			K			E	J					
SPS7	O											C	C		C	K	N		E		M				
SPS8	O		H							C	C	C	C	C	C	K	N	G	E	J	M	D			
SPS9											C	C	C	C	C	K	N		E						
SPS10											C	C	C	C	C	K	N		E						
SPS11	O	O								C		C	C	C	C	K	N		E						
SPS12	O									C	C	C	C	C	C	K	N	G	E						
SPS13	O											C	C	C	C	K	N		E		M				
SPS14			H								C	C	C	C	C	K	N		E						
SPS15			H						L		C		C	C	C	K			E						
SPS16											C		C			K			E	J	M				
SPS17											C	C	C	C	C	K	N		E						
SPE1											C	C		C	C	K	N	G	E						
SPE2											C	C	C		C	K				J	M	D			
SPE3											C		C	C		K			E	J	M	D			
SPE4			H								C	C				K			E	J	M	D			
SPE5											C		C		C	K	N		E	J	M				
SPE6	O		H								C		C	C		K	N			J	M	D			
SPE7			H								C	C				K			E	J	M	D			
SPE8											C		C		C	K			E			D			
SPE9				I							C	C	C	C	C	K				J					
SPE10											C			C		K			E						
SPE11											C		C	C	C	K	N	G		J					
SPE12								G			C		C			K						D			
SPE13										C	C	C	C		C	K			E	J	M				
SPE14			H							C	C	C	C		C	K	N			J	M				
SPE15									L		C	C	C		C	K			E						
SPE16								G			C	C	C	C		K	N	G							
SPE17											C		C			K						D			
SPE18											C	C		C	C	K		G	E	J	M				

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPCW 1											C		C			K		G	E	J	M				
SPCW 2	O	O											C		C	K	N		E	J		D	D		
SPCW 3	O	O								C			C			K	N	G		J	M		D		
SPCW 4	O											C	C			K	N		E	J	M		D		
SPCW 5										C	C	C	C	C	C	K			E	J	M		D		
SPCW 6	O		H								C	C	C	C	C	K	N	G	E	J	M	D	D		
SPCW 7	O	O										C	C			K	N		E	J	M		D		
SPCW 7	O	O										C	C			K	N		E	J	M		D		
SPCW 7	O	O											C		C	K			E	J	M		D		
SPCW 8	O	O								C			C	C	C	K	N		E	J	M	D	D		
SPCW 9	O	O											C		C	K			E	J	M		D		
SPCW 10	O	O								C		C	C	C	C	K	N		E			D	D		
SPCW 11	O	O										C	C	C		K			E	J			D		
SPCW 12													C			K			E	J	M		D		

7.6 As part of this cross-checking exercise between the site assessments and the policies, some impacts flagged in the site assessments were identified that had not initially clearly been mitigated in the site allocation policies. The team have subsequently updated the policies to pick up the additional mitigations needed and strengthen their alignment with the analysis of the site assessments. In some instances, the policies have not been amended further where an overarching policy elsewhere in the Local Plan will address the issue without need for an explicit cross-reference in the allocation policy with more site specific guidance. For example:

- Air Quality - The entire city is covered by an Air Quality Management Area, as such all sites were scored as having a potential negative impact for air quality. There are a number of hotspots dispersed across the city generally corresponding with high traffic areas, and the sites were compared with these with none being identified as sufficiently close to necessitate a significant negative impact. Policy R4 sufficiently sets out requirements for development wherever it occurs in the city without need

for site-specific requirements, although some allocations do flag proximity to potential sources of air pollution which would need to be considered.

- Proximity to services (e.g. Bus stop, rail station, primary/secondary school, GP, Post Office) – where lack of access to these services is identified as a potential negative, mitigation in the policies is generally focussed around requiring applicants to consider measures that can support active travel and improve connectivity to services in wider area via walking/cycling/wheeling and/or public transport. The policies within Chapter 7 would also act as important mitigation, though it was not considered necessary to explicitly reference these in all allocations.
- Proximity to a waterbody – the assessment identifies potential negative impacts where a site is in proximity to a water body which is highlighted on a number of sites. Mitigation requirements are already built into the Local Plan through policy G2 which sets requirements for buffers to watercourses which would apply, and separate policies set requirements for mitigating impacts from pollutants (policy R5 and R8), and this was expected to be sufficient in many cases. However, where the specific context of a site indicates particular risks of impact, e.g. because an open watercourse is in close proximity to where development might be expected to come forward within a site, specific wording has been incorporated into the allocation.

7.7 Additionally, separate technical work arising from the Council's Habitat Regulations Assessment (HRA) (which considers whether there would be likely significant effects on "European Sites" within 10km of the city) and Source Pathway Receptor Analysis (SPRA) (which looks at the SSSIs within Oxford), has informed the plan-making process. Where the HRA and SPRA have identified specific mitigation measures (for the HRA this was undertaken as part of a Stage 2 Appropriate Assessment), these mitigation measures have been included within certain specific policies and site allocations.

8. Monitoring the Local Plan's impacts

8.1 The Council undertakes yearly monitoring of key policy areas in the Local Plan 2036, these are published annually on the Authority Monitoring Report webpage. As part of this yearly monitoring, some (but not all) of the indicators proposed in the SA/SEA report for the Local Plan 2036 have also been monitored. The lack of monitoring reflects resource constraints on the Council, and the fact that some underlying data (e.g. on water quality, condition of Sites of Special Scientific Interest, Index of Multiple Deprivation) are collected nationally and only available sporadically.

8.2 Reflecting these realities, the following table (Table 8.1) seeks to propose a realistic and implementable SA/SEA monitoring framework. The first section (columns 1 and 2)

relates to Local Plan outcomes, which would be monitored annually, and would be made available annually in the Authority Monitoring Reports. These indicators relate to the effectiveness of specific plan policies that are particularly important for achieving sustainability outcomes. The second section (columns 3 and 4) relates to more long-term sustainability outcomes that link to some broader environmental standards, these would be monitored every 3 years and would be made available in an SA/SEA appendix to the appropriate Authority Monitoring Reports. They focus on sustainability outcomes that are particularly important to Oxford and also aim to act as a step towards the government's proposed Environmental Outcome Reporting.

8.3 Education and tourism are not proposed for monitoring because their links to sustainability impact of the plan are limited

Table 8.1: Proposed SA/SEA monitoring framework.

SA/SEA topic	Monitoring of Local Plan 2045 outcomes (every year)	Monitoring of sustainability outcomes (every 3 years)	Target/ standard
1. Carbon emissions	Contributions secured towards and proportion spent from energy offset fund (assumes that all other developments are net zero carbon)	Change in per capita CO2 emissions	Net zero carbon city by 2040
2. Resilience to climate change	Applications permitted against Environment Agency flood risk advice	Change in no. homes in flood zone 3	Minimise numbers of new dwellings in flood risk/avoid increasing flood risk elsewhere in city.
3. Efficient use of land & 7. Green infrastructure and leisure	Applications permitted on protected green space		Resist loss of protected green space
4. Local housing needs	Net housing completions	Change in population / households	Delivery of new housing to meet identified needs.
5. Inequalities	Net affordable housing completions	Changes in inequalities according to indices of Multiple Deprivation	Reductions in deprivation
6. Services, facilities and infrastructure	Applications permitted for new community spaces,	Significant new community assets	Delivery of new services/facilities to

	cultural venues and visitor attractions		support local residents
8. Traffic and air pollution	Air quality progress: NOx, PM10, PM2.5	Modal split of journey in Oxford	City/UK air quality standards
9. Water		Changes in quality of watercourses according to WFD classifications for chemical quality and biological quality.	Water Framework Directive targets
10. Biodiversity	Biodiversity net gain being delivered in the city.	Condition of SSSIs, integrity of SAC, condition of local wildlife sites.	No reduction in condition/integrity of ecological designations.
11. Urban design and heritage	Applications permitted that result in the loss of listed buildings, registered parks and gardens, scheduled monuments	Change in no. heritage assets at risk	No loss in protected heritage
12. Economic growth	Net gain / loss of employment floorspace (sqm)	% employment / unemployment in the city	Supporting economic growth through job creation.

9. Next steps

9.1 Any comments on the Regulation 19 Submission Draft Local Plan and this SA/SEA report should be submitted as part of the consultation which begins 30th January 2026. More details can be found on the website: https://www.oxford.gov.uk/oxford-local-plan-2045

9.2 The Local Plan is expected to be submitted for examination later in 2026. Once submitted for examination, the timetable is not within the City Council's control. Based on the timescales for the examination of the Oxford Local Plan 2036 the examination period is expected to be around 15 months, from submission to adoption meaning that the Local Plan is expected to be adopted in 2027.

Appendix A - Feedback from the consultation bodies on the scope of the SA report

Fulfilling the requirements of the Strategic Environmental Assessment legislation, the Council sought to make an early version of this scoping study (incorporating Tasks A1 to A4) available to the consultation bodies for feedback on the scope of the report. The Council made this document available for six weeks to the consultation bodies (Historic England, Natural England and the Environment Agency) via email on January 17th 2025 and invited feedback by February 28th 2025. This section summarises the feedback received, which is set out in Table A.1.

Table A.1: Key feedback received on early Sustainability Appraisal Scoping Study and Council responses from Natural England (NE), Environment Agency (EA) and Historic England (HE)

Respondent	Feedback provided	Council response
NE	Welcome the key issues identified within the report and support the SA objectives within the framework as they aptly cover our interests in the natural environment. We have no further comments to make on this consultation.	Feedback noted, no further actions proposed.
EA	Consider the SA Objectives highlighted in topic papers [Green Infrastructure and Biodiversity; Flood risk, SuDS and drainage and Natural Resources including air, water, soil quality and Infrastructure] of interest to the Environment Agency to be satisfactory.	Feedback noted, no further actions proposed.
EA	Agree with the key sustainability issues listed in Topic Paper 9 highlighted as issues for the Local Plan to address. Pleased to note in Topic Paper 9, that Oxford City Council will undertake a Water Cycle Study -WCS.	Feedback noted, no further actions proposed.
EA	*"Prioritising brownfield land for development may reduce opportunities for the remediation of contaminated sites which could be repurposed for public amenity or as green infrastructure with a focus on ecological/biodiversity functions."* If this is a key issue that the proposed plan will address, then the above point is not clear.	Background paper amended.
EA	Point also under *'Land/soils' should read; - "Restoration and protection of carbon-rich peat reserves that have already been degraded by historic development in the city."*	The Local Plan is limited in how it can drive restoration but point has been reworded in Background paper to try and accommodate.
EA	In Topic Paper 7, under the key issues for the Local Plan to address, the last bullet point should read; *"There will be residual risks of flooding after applying the Sequential approach Test to locating development and incorporating flood defence measures.*	Background paper amended.
EA	It is stated in Topic Paper 9 that; *"Oxford has seen significant industrial change to the present day in fact Oxford's industrial*	Background paper amended.

	history has resulted in a substantial amount of land affected by contamination." To further ensure the local plan addresses the protection of ground water resources, the Environment Agency's guidance on groundwater protection should also be referenced.	
EA	In Topic Paper 14, under the issues for the Local Plan to address, the last bullet point should read; *Meeting the wastewater infrastructure needs of additional development in the city over the Local Plan period. This is because of the awareness of how challenging this issue is*. Also, in Topic Paper 14, the list of policy framework/plans, policies and programmes should include the forth coming Water Cycle Study.	Background paper amended, the Water Cycle study has been referenced in the water infrastructure sub-section of the current situation section of the paper. The study is also referenced in topic paper 009 which talks about water resources/quality more generally.
EA	Note the list in Section 3 A as well as in topic papers 5, 7, 9 and 14 of relevant Policies, Plans and Programmes and consider it satisfactory. The plan maker (Oxford City Council) would need to update the Strategic Flood Risk Assessment and Water Cycle Study evidence base to help them understand the impact of planned growth in Oxford City Council on flood risk, water quality and resources. We suggest the following are also added to the list as they are relevant to the preparation of the local plan. • Planning Practice Guidance - Flood risk section, • Environment Agency SFRA Guidance, • Flood and Water Management Act 2010, • Flood Risk Regulations 2009 , • Strategic flood risk assessment good practice guide. • Water cycle studies guidance • Water supply, wastewater and water quality - GOV.UK	Noted, we agree many of these resources are useful, though some of it is practical guidance that may be better referenced elsewhere. Some are referenced in the relevant background papers, particularly BP007 on flood risk. Additionally, some of this guidance will be useful for preparing evidence base (SFRA and Water Cycle Study) and can be referenced there where appropriate.
EA	Regarding collecting baseline information: Advise a focus on updating the evidence base i.e. Strategic Flood Risk Assessment (SFRA) level 1 and 2 and producing the Water Cycle Study (WCS) which are useful in informing growth in Oxford City. Important to capture changes to national policy as well as to any flood map changes in Oxford, but also to understand the impact of growth on the water environment.	Noted, we have updated section 1.6 to flag we are aware of need for updating these docs and that this is happening in due course (as well as referring to them in relevant background papers).
EA	Consider that the environmental problems described in Section 5 (Table 5.1) highlight the main issues of relevance for the SEA topics/themes within the EA's remit. And the key environmental issues and trends which characterise Oxford appear to be highlighted. The Environment Agency would expect Oxford's local plan to cover the following topics, but not limited to: Net Gain; Flood risk management; Climate change; Strategic water planning; Drainage and infrastructure; Green and blue infrastructure; Contaminated land; Water Framework Directive objectives; Biodiversity; Waste management.	*For reference, Table 5.1 is now Table 3.3 in Reg 19 version of this report.* Comment is noted, the Regulation 18 first draft local plan addresses all these topics across its various draft policies (note some topics are grouped into other policies).

EA	Table 6.1: 'SA/SEA framework for plan objectives, alternatives and policies', the SA objectives and issues covered under the various SEA themes appear reasonable. Make the following suggestions: • SA objective 3: would be beneficial to include soil and land contamination under the issues that the 2042 plan will address, considering Oxford's industrial history which has resulted in a substantial amount of land affected by contamination. • For assessing the impacts of the sites and their ability to support sustainable development, we encourage the inclusion of a commentary section within the framework matrices to state, where necessary, the reasons for the effects cited and the score given to help explain the rationale behind the assessment results. This allows the transparency and also allows the reader to understand the rationale behind the scores given.	*For reference, Table 6.1 is now Table 3.4 in Reg 19 version of this report.* SA objective 3 has been amended to make it clearer that land contamination would also be factored into issues considered. A comments box to record rationale for scoring of sustainability impacts in the site assessments is included alongside the score itself and would be used where necessary.
EA	It is important for alternatives to be considered from an early stage in the process. It appears an appraisal of Reasonable Alternatives has not yet been undertaken but will be carried out at the Regulation 18. The plan-maker may use a hierarchy to help identify suitable alternatives when considering plan options. The same hierarchy can be used to judge if suggested alternatives are reasonable, realistic and relevant. The diagram in Table 14 in Annex 5 of A Practical Guide to the Strategic Environmental Assessment Directive (publishing.service.gov.uk) contains further advice on developing and accessing alternatives can be found.	Comments are noted, for the Regulation 18 consultation, a Part 2 report is included as part of the Interim Sustainability Appraisal which addresses this.
EA	Other minor points: Please amend sentence in section 1.1 to: - 'It will need to include measures to improve public transport, protect the historic environment, protect and enhance the natural environment, and nature, reduce carbon emissions, and protect against flooding.' We agree with the key problems in Oxford outlined in section1.3. It will be useful for section 2.1 to include the fact Rivers form an intrinsic part of the unique environment of Oxford city and promotes tourism and a range of important water-based sports and social activities in the city. In Table 4.2: Current situation and likely future without the plan, we agree that without the 2042 plan, there will be Very negative impacts (compared to the current situation) on water resources. We note the Table states that the impact of the 2042 plan on water quality is unclear. We believe this is likely to end up being positive (compared to the current situation). This is because of the willingness by Oxford City Council to address water quality issues by engaging with the Environment Agency as well as working on producing a Water Cycle Study evidence to inform growth in Oxford City.	Report has been amended in response to these points.
HE	The Scoping Report is light on detail about heritage policies, plans and programmes, and Background Paper 11 includes only some of	Background paper amended, additional detail

	this content (principally within a section on "Current situation"). Analysing this in more detail, SA Objective 11 considers both designated and non-designated heritage; but the background paper centres only on designated assets. We recommend strengthening the SA baseline by updating Background Paper 11 and adding more detail that connects with designated and non-designated assets and associated programmes, such as the Oxford Heritage Asset Register and work on the local Historic Environment Record. Also, this would offer an opportunity to recognise the extent and nature of non-designated archaeological remains in Oxford which have been discussed during LP2040 production.	added to section 2 and 3 including highlighting the presence of non-designated heritage.
HE	Need to correct Background Paper 11 regarding entries in Oxford on the national Heritage at Risk Register (the wrong 3 assets are listed) and we recommend liaison with the Council's conservation team regarding the position on local buildings at risk.	Background paper amended, references have been updated to reflect the current situation.
HE	The Cowley study merits inclusion in any revised Background Paper 11, as an important piece of the Council's expanding evidence base.	Background paper amended, reference to the emerging work has been added.
HE	We are broadly comfortable with the proposed SA Framework and draft objectives. Regarding decision-making criteria, SA objective 11 should refer to setting and/or the interests that collectively comprise significance. A focus solely on archaeological or historic features within the site could miss wider impacts and opportunities. Potential wording for consideration: "~~Does~~ Is development of the site likely to affect the significance (including the setting) of one or more heritage assets, including ~~contain~~ any associated historic~~al~~, ~~or~~ archaeological, artistic and/or architectural interests ~~features~~?"	Decision-making criteria related to Table 5.12 has been updated for the site assessment framework using suggested wording.
HE	Page 14: presumably the Scoping Report will be updated to reflect recent announcements regarding support for growth in the Oxford – Cambridge corridor. Page 25: Unsure that a future without a new local plan can be considered positive for heritage. Note in background paper 11: "For Oxford, this lack of local level policies could present a real risk to the unique heritage of the city. "	The scoping report has been updated to reflected the recent announcements. In relation to likely future without a new local plan, the policies of the LP2036 would continue to apply and there would remain strong protection through national policy, though we assessed that positive impacts would be reduced in this scenario due to reduced ability to respond to ongoing pressures or changes in local context. We are happy

		to discuss this detail further however.
HE	Page 32: we advise minor wording changes to the text linked with SA objective 11 in Table 5.1, specifically we suggest: • revised wording for the second bullet, focusing on formal assessment of heritage impacts, rather than consideration of impacts on archaeological and historical value: "Potential heritage impacts of new development proposed in the plan should be assessed, both in terms of any direct physical impacts and impacts on setting ~~on areas of archaeological and historical value should be considered~~." • Revised wording for the third bullet, adding reference to heritage significance and the challenges arising from the intensification of existing sites: "Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character."	*For reference, Table 5.1 is now Table 3.3 in Reg 19 version of this report*. We have made amendments to the text in response to these points.
HE	Pages 37 – 39 (Table 6.1): as the Council is aware, "non-heritage" themes such as carbon emissions and green infrastructure have a heritage dimension. No major changes to the approach suggested – though reference to heritage is worth considering as an issue for SA Objectives 1, 2 and 7 and 12. There is scope to embed such nuance in other relevant topic papers as appropriate, which in turn inform relevant sections of the new plan, and potentially Table 6.2. We look forward to continuing our positive engagement with the Council on the cross-cutting nature of heritage. Also note, for objective 11 the issues should also include other non-designated assets, not just those of local importance.	*For reference, Table 6.1 is now Table 3.4 in Reg 19 version of this report*. Comments around cross-cutting nature of heritage are noted and something we will keep in mind as we prepare the plan. Objective 11 has been tweaked re: non-designated assets.
HE	Page 44 (Table 6.12): we suggest deleting "(Scheduled Ancient Monument)" in the top row. Including only Scheduled Monuments implies non-designated archaeological assets of national importance are not treated in the same way, which we do not believe is the intention.	*Table 6.12 now Table 3.15 in updated draft in the updated version of the report*. We have updated the wording to reflect that Scheduled Monument is one consideration (but may not be the only one).
HE	Strongly recommend liaison with the Council's conservation team and archaeological advisers to inform the approach to SA. They are best placed to advise on: local historic environment issues and priorities.	Comment is noted.

Appendix B – Detailed SA appraisal of select policy options sets

Policy Options set 001a: Housing requirement for the plan period

The following updated policy options, reflecting revised plan period and additional Strategic Housing Land Availability Assessment work, have been considered:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2025-2045).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.9,267 dwellings over the Plan period 2025-2045).
- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

SA objective	Option A	Option B	Option C	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	--	-	--	Carbon impacts likely to arise from all options without additional mitigation, though more housing in city may reduce in-commuting and reduce transport emissions.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-	-- To meet the higher housing requirement, the Council will need to take a more relaxed approach to constraints – potentially developing	0 Takes into account constraints like flood risk, green space etc.	-- To meet the higher housing requirement, the Council will need to take a more relaxed approach to constraints – potentially developing	

	being, the economy and the environment.	more green spaces, areas of flood risk.		more green spaces, areas of flood risk.	
3.	To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**?** Might allow more efficiency in terms of higher capacity, but potentially sacrificing other uses like green space etc	**?** Arguably most efficient approach as capacity approach would mean still seeking to max out the developable land on sites, but also providing for open space, green infrastructure etc to meet other objectives.	**?** Might allow more efficiency in terms of higher capacity, but potentially sacrificing other uses like green space etc	Ultimately, depends upon implementation
4.	To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**++** The Government's Standard Method identifies housing need in the absence of other locally specific factors.	**+** Does depend upon implementation, likely does not meet housing need in full within the city, but attempts will be made to meet unmet need elsewhere. Will however still make a substantial contribution to housing need.	**++** Depends upon implementation, would likely bring forward more housing in the city to meet need, however trying to meet a global number this could come at expense of meeting other specific local needs (e.g. family dwellings,).	
5.	To reduce poverty, social exclusion, and health **inequalities**.	**?**	**?**	**?**	Depends upon implementation for all options. Depends where in the city the housing comes forward, also the tenure of the housing (e.g. how much is affordable etc). More housing isn't necessarily

				going to help inequality alone.
6. To provide accessible essential **services and facilities**.	**?**	**?**	**?**	Depends upon implementation, new housing should come alongside provision for facilities/services (e.g. developer contributions/CIL). However, nature of city means many small sites that limits opportunities to provide for new services/facilities, leading to cummulative impacts.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**-** More pressure on existing sites and potentially more loss of green spaces including various green features on sites.	**0** Wouldn't be delivering new GI, however potentially more space on sites to incorporate GI – however this is likely to be more about mitigation of impact.	**-** More pressure on existing sites and potentially more loss of green spaces including various green features on sites.	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**-?** More people accommodated in the city with some associated increase in cars. Potentially more workers able to live closer to employment reducing in-commuting	**+/-?** More people accommodated in the city and likely some increase in cars (though to lesser degree than other options). Potentially more workers able to live closer to	**-?** More people in the city and going beyond need to support growth. Though potentially more workers able to live closer to employment reducing in-commuting generated.	Complex topic to score due to varying factors that could impact traffic/emissions. Generally it is assumed emissions related to transport will reduce as private vehicles move away from fossil fuels

	generated from beyond boundaries.	employment reducing in-commuting generated from beyond boundaries, but to a lesser degree than other options, though impact beyond boundaries would be highly dependent on how any unmet need is planned for (e.g. proximity to public transport).		and air quality measures in the city continue to have positive effects.
9. To achieve **water** quality targets and manage water resources.	**--** More people means more demand for water and more pressure on wastewater.	**+/-** More people means more demand for water and more pressure on wastewater. Capacity approach, would include scope to incorporate buffers to streams and other mitigations etc.	**--** More people means more demand for water and more pressure on wastewater.	All options would put additional stress on the water environment.
10. To conserve and enhance Oxford's **biodiversity**.	**-?** Does depend upon implementation – development would deliver net gain, might not be within the city. If more sites are used for development, even less opportunity to deliver net gain in city (or protect informally important biodiversity sites).	**0** Does depend upon implementation – development would deliver net gain, but might not be within the city. But would allow protection of a network of green sites important for supporting biodiversity, and may enable developments to better mitigate impacts	**-?** Does depend upon implementation – development would deliver net gain, might not be within the city. If more sites are used for development, even less opportunity to deliver net gain in city (or protect informally important biodiversity sites).	Assume that net gain is requirement regardless of local policy.

		on biodiversity or to accommodate more biodiversity features.		
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**--** Will depend on implementation to some degree, however, assuming a more minimal approach to heritage considerations and wider place-making choices in order to maximise capacity of sites which could lead to harm to assets onsite and nearby.	**0** Capacity is based on taking into account considerations like impact on heritage. More scope to incorporate other features to support good urban design.	**--** Will depend on implementation to some degree, however, assuming a more minimal approach to heritage considerations and wider place-making choices in order to maximise capacity of sites which could lead to harm to assets onsite and nearby.	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**+/++** Will make some contribution to economic growth by adding to housing and reducing barrier to employment in city, though some employment sites could be lost to housing.	**+** Will make some contribution to economic growth by adding to housing.	**++** Aims to provide enough homes for high economic growth, however, some employment sites could be lost to housing	

Conclusions/potential mitigation needed

Options A and C have some significant benefits for supporting housing and the economy but also come at the cost of more significant negative impacts against various other objectives. Option B would have positive impacts for housing and economy as it would still make an important contribution to housing need, though to a lesser degree than the other options, but it also incurs much less in the way of negative impacts for other objectives because of the capacity-based approach that drives it. Depending on the option selected, mitigation will be necessary in relation to carbon emissions, water and potentially traffic/air pollution (though this is less certain as impacts are hard to judge). Were options a or c to be selected, additional mitigation would need to be considered for a range of other areas including in relation to design/heritage, biodiversity, green infrastructure and climate resilience.

Policy Options set 002e: Employer-linked affordable housing

Policy options considered:

- **Option a:** On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b:** Do not include an employer linked housing policy.

SA objective	Option A	Option B	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**N/A**	**N/A**	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**N/A**	**N/A**	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of	**+** Potentially may lead to more efficiently using sites, or parts of sites, that would	**0**	

greenfield and Green Belt land.	otherwise not come forward.		
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**++** Would bring forward housing on sites that would not otherwise come forward, though this may not be available to everyone, it would still meet an identified need.	**0**	
5. To reduce poverty, social exclusion, and health **inequalities**.	**+** The sites would not otherwise be providing any housing. Whilst the affordable housing that would come forward might not be social rented housing, it would still be affordable rent set at a level agreed with the Council.	**0**	
6. To provide accessible essential **services and facilities**.	N/A	N/A	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and	**+** Depends upon implementation (e.g. who the units are offered to), but is likely to support this	**0**	

reducing the need to travel by car/ lorry.	criteria (e.g. reducing car travel – and some people would be housed on site).		
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	N/A	N/A	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**++** Part of the purpose of the policy is to support recruitment and retention of employees for key employment sectors.	**0**	

Conclusions/potential mitigation needed

Option a has greater positive sustainability impacts than option b. The assessment does not identify any obvious requirement for mitigations to be factored in alongside either option.

Policy Options set 003a: Houses in Multiple Occupation (HMOs)

Policy options considered:

- **Option a:** Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b:** Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c:** Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.
- **Option d:** Do not have any restriction on HMOs.

Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option A, C or D.

SA objective	Option a	Option b	Option c	Option d	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	N/A	N/A	N/A	N/A	Potentially, option b and d could encourage more HMOs which would be denser development – potentially better for emissions – same energy source? Very indirect.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the	N/A	N/A	N/A	N/A	

economy and the environment.					
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**+**	**+**	**+**	**+**	New HMOs or converting existing homes would be positive for efficient use of land. HMOs are generally a very space-efficient way to house people.
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-** This is potentially helping to protect the existing mix of housing sizes and types (e.g. family dwelling), but also allowing HMOs to come forward.	**+/-** This option could meet certain communities' needs but these would be competing with others.	**+/-** This is potentially helping to protect the existing mix of housing sizes and types (e.g. family dwelling), but also allowing HMOs to come forward.	**-** In some areas it wouldn't make a difference, but in other areas there is likely to be a signficant amount coming forward in others at the expense of meeting other local housing needs.	Anecdotally, there appears to be some demand for this type of accommodation, but it is not measured explicitly. All options could meet certain community's needs, but it would compete with other types of housing need.
5. To reduce poverty, social exclusion, and health **inequalities**.	**0**	**+?** Purpose-built HMOs can provide a better quality of environment for residents and neighbours – planning can influence the 'healthiness' that is designed into the development.	**0**	**0**	Some of the health impacts are controlled by a separate regulatory regime (selective licensing). Planning can control the design elements.

6. To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	Potentially, more HMOs/higher density means more people and more pressure on existing services. Cumulative impact as they are not contributing to provision.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	Potentially, more HMOs/higher density means more people and more pressure on existing green infrastructure/spaces. Cumulative impact as they are not contributing to provision.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	N/A	N/A	N/A	N/A	
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	

11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**0** The use of a threshold would prevent an overconcentration of HMOs in any one area, limiting the negative impacts to amenity/local character etc.	**+/-?** Uncertain, could result in more HMOs coming forward with associated negative impacts on local amenity, though depends upon implementation, however, new build gives the opportunity to tailor the design to mitigate impacts.	**-?** Very much depends upon implementation. This option could lead to some neighbourhoods becoming inappropriately dominated – although the policy can control which areas – losing some local character where significant numbers of new HMOs come forward whilst others maintain theirs.	**-** Depends upon implementation but likely more negative. This option could lead to any of the neighbourhoods becoming inappropriately dominated, losing some local character where significant numbers of new HMOs come forward whilst others maintain theirs.	Scoring against this criterion considers the potential harmful urban design impacts that can arise from HMOs such as bins, bicycles, car parking etc.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.					

Conclusions/potential mitigation needed

Option A and C both perform better in sustainability impacts than option D, though there is some additional uncertainty with elements of option C compared with A, which could result in additional negative impact under obj 11. Option B does potentially have additional positive impacts in regard to obj 5, but this is an additional option (rather than an alternative approach that can be directly compared with the other options). The assessment does not identify any obvious requirement for mitigations to be factored in alongside either option.

Policy Options set 003b: Location of new student accommodation

Policy options considered:

- **Option a**: Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.
- **Option b**: Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.
- **Option c**: Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d**: Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use, which was considered to be the area where there could be significant effects that needed to be investigated further.

SA objective	Option A	Option B	Option C	Option D	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	N/A	N/A	N/A	N/A	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**0**	**0**	**0** Would depend upon implementation. Would apply to campus sites or not – might encourage more efficient use of campuses.	**?** Potentially encourages more efficient use of institutional land and university-owned sites where space on the campus would be forced to be maximised – which might not otherwise be the case.	
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in	**+/-** Potentially meets more of the student housing need but this	**+/-** Potentially meets more of the student housing need (and slightly more than	**+/-** Potentially allows more student accommodation to come forward and	**+/-** Potentially means not meeting full student housing need but would	Essentially it is a balance between opening up more sites to meet specialist housing

	a decent affordable home.	would be balanced out against not meeting/losing housing provision for other housing need.	option a) but this would be balanced out against not meeting/losing housing provision for other housing need.	meet needs, but would likely be competing with meeting other housing needs which might not be met as a result.	ensure other housing needs outside campus sites is not lost to student accommodation.	need (students) and restricting it to preserve accommodation for wider housing need.
5.	To reduce poverty, social exclusion, and health **inequalities**.	N/A	N/A	N/A	N/A	
6.	To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	
7.	To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	
8.	To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student	**+** Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student	**-** Potentially means student accommodation in inaccessible sites e.g. edge of city. Potentially forces reliance on private vehicles.	**+** Depends upon implementation, some locations will be more accessible to public transport/active travel than others.	

	accommodation sites)	accommodation sites)			
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**+** Limits new accommodation to the areas that can arguably most-easily accommodate without additional harm to amenity.	**-** The addition of arterial routes allows the risk of long stretches of student accommodation to develop, negatively impacting amenity of the area.	**?** Depends upon implementation – could result in negative impacts as not preventing over-concentration.	**+** Generally, more positive, ensuring that student accommodation is located on the main university campuses, although potentially some negative impact where some student accommodation is outside the campuses.	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and	N/A	N/A	N/A	N/A	

knowledge-based economy and the culture/leisure/ visitor sector.					

Conclusions/potential mitigation needed

Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts.

Policy Options set 008c: Retrofitting existing buildings including heritage assets

Policy options considered:

- **Option a:** Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d:** Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting key principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

SA objective	Option A	Option B/C	Option D	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**+** Would support energy efficiency/carbon reduction measures in existing non-heritage buildings	**+** Would support energy efficiency/carbon reduction measures in heritage assets, historic buildings etc. (with some constraints)	**0** No explicit local support for energy efficiency/carbon reduction retro-fit.	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**+** Would support climate resilience measures in existing non-heritage buildings	**+** Would support climate resilience measures in heritage assets, historic buildings etc. (with some constraints)	**0** No explicit local support for climate resilience retro-fit.	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**N/A**	**N/A**	**N/A**	
4. To meet **local housing needs** by ensuring that everyone has the	**N/A**	**N/A**	**N/A**	

opportunity to live in a decent affordable home.				
5. To reduce poverty, social exclusion, and health **inequalities**.	**+** Helps to make existing homes more liveable and (over time) more affordable – particularly in terms of lowering energy bills/reducing exposure to fuel poverty.	**+** Helps to make existing homes that are also older buildings more liveable and (over time) more affordable – particularly in terms of lowering energy bills/reducing exposure to fuel poverty.	**0**	
6. To provide accessible essential **services and facilities**.	**N/A**	**N/A**	**N/A**	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**N/A**	**N/A**	**N/A**	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Heating systems (e.g. boilers) are a source of some of the pollutants contributing to poor air quality in the city. Where retro-fit drives replacements in boilers	**+** Heating systems (e.g. boilers) are a source of some of the pollutants contributing to poor air quality in the city. Where retro-fit drives replacements in boilers	**0**	

	to electric systems this will have some limited positive impacts in helping to reduce this source of pollution.	to electric systems this will have some limited positive impacts in helping to reduce this source of pollution.		
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**0** Some retrofit measures (e.g. solar panels, small wind turbines) have the potential to change the character of a neighbourhood, although this impact is likely to be insignificant outside conservation areas etc.	**-?** Some retrofit measures are incompatible with heritage assets, listed buildings etc. The impact would depend on the specific implementation of the principles/requirements in the policy.	**0**	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the	N/A	N/A	N/A	

culture/leisure/ visitor sector.				

Conclusions/potential mitigation needed

Option A and B/C both have positive impacts against a number of criteria. Option B/C may have negative impacts in terms of urban design/historic environment, though this depends on how retro-fit schemes are implemented. Mitigation for this impact could be achieved through a robust set of principles/guidance as part of the policy or in supporting guidance.

Policy Options set 012d: Motor vehicle parking design standard

Policy options considered:

- **Option a:** Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b:** Adopt parking standards for residential developments
- **Option c:** Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.
- **Option d:** Adopt parking standards for non-residential developments

For this appraisal, options b and d which refer to parking standards, assumes the Council would apply County standards. This means that for residential, there will be more parking provision per household (e.g. one space per dwelling) than the low car option. For non-residential development, the standards seek car free development or operational use only with supporting evidence, which means applicants are able to justify higher levels of provision according to their site's needs which can result in significantly more provision – so it will depend upon implementation.

SA objective	Option a	Option b	Option c	Option d	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**+**	**-**	**+**	**+/-?**	Low car would achieve significant reductions in car parking (and transport emissions). Parking standards would result in more car parking for resi, but for non-resi, impact is less certain as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and	**+**	**-**	**+**	**+/-?**	Low car standards mean that applicants will need to give proper and adequate

	layout, and minimise the use of greenfield and Green Belt land.					consideration as to where the car parking should be located in the most efficient way. Parking standards will result in more land being used for car parking which is inefficient, but for non-resi, impact is less certain as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
4.	To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-?** Low car may provide more space for housing, however the space may be used for other uses. Equally, low car could impact viability of some schemes and ability to deliver affordable housing although the evidence for this is complex and uncertain.	0	0	0	

5.	To reduce poverty, social exclusion, and health **inequalities**.	**-?** Even though low car would allow some spaces for operational needs (e.g. those who need a car for work), it might not provide enough spaces. Typically, many such jobs that rely on a car are low paid, so could negatively impact this group. However, does depend upon implementation of each scheme (and who is occupying).	0	0	0	
6.	To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	
7.	To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.

accessible for all.					
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+**	**-**	**+**	**+/-?**	Low car would achieve significant reductions in car parking (and transport emissions/congestion). Parking standards would be county standards, which would result in more car parking for resi, but for non-resi, impact is less certain, as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.
11. To promote **good urban**	**+**	**-**	**+**	**+/-?**	Low car standards mean that applicants

design through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.					will need to give proper and adequate consideration as to where the car parking should be located in the most efficient way (including making space for active/sustainable transport measures) which should benefit urban design. Parking standards will result in more land being used for car parking which is inefficient, though again, impact for non-resi is less certain depending on if car free is delivered or not.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**0**	**0**	**+/-?** Low car may provide more space for employment uses, however the space may be used for other uses. Equally, low car could impact viability of some schemes including new developments although the evidence for this is	**0**	

			complex and uncertain. It will also depend upon implementation and the specifics of the site.		

Conclusions/potential mitigation needed

Options A and C are score most positively against the SA objectives. Option B has negative impacts against some of the criteria, potentially allowing additional cars than the low car options which could have some congestion impacts and emissions, though in relation to emissions these are likely to reduce in the long term as transport decarbonises. Option D is uncertain because it allows applicants to justify car requirements which may result in additional vehicles (or may result in fewer vehicles where car free development is delivered), it depends on implementation.

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Appraisal of policy options for Protection of GI network and green features (updated from Policy Options set 005a)

The following options were considered (see Reg. 18 Background Paper 005: Green Infrastructure and Biodiversity for further details) in developing draft policy G1:

- **Option a:** Identify a network of green and blue infrastructure for protection, informed by the green infrastructure study. Incorporate multi-functional green spaces of varying sizes, with clear criteria for inclusion in the network. All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of a network means that it would be challenging for them to be replaced elsewhere). (Core)
- **Option b:** Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in exceptional circumstances, to permitting development with reprovision of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy. (Core + Supporting)

- **Option c:** In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecological sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.
- **Option d:** Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the retention of existing trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover. Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.
- **Option e:** 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 re-provided.
- **Option f:** Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.

For the purposes of this appraisal, the Council has considered what the preferred approach at Regulation 18 would look like in practice where this related to protection of a hierarchy of green spaces and appraised two options which relate to the extent of protection that would be afforded to green spaces within the network.

- **Option a* -** Protect a limited network of green spaces from any and all development through local policy (core spaces). Allow remaining green spaces to be developed in line with national policy.
- **Option b* -** Protect a limited network of green spaces from any and all development through local policy (core spaces) AND protect a broader network of green spaces from development through local policy but permit their development if the harm/loss can be mitigated through like-for-like reprovision (supporting spaces). Allow remaining green spaces to be developed in line with national policy.

**Land with intrinsic constraints e.g. flood zone 3b, national ecological/heritage designations would be protected regardless of option*.

SA objective	Option a*	Option b*	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**0**	**0**	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**-**	**0**	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**-**	**+/-**	
4. To meet **local housing needs** by ensuring that	**+**	**+**	

everyone has the opportunity to live in a decent affordable home.			
5. To reduce poverty, social exclusion, and health **inequalities**.	**+/-**	**0**	
6. To provide accessible essential **services and facilities**.	**0**	**0**	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**+/-**	**+**	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the	**0**	**0**	

need to travel by car/ lorry.			
9. To achieve **water** quality targets and manage water resources.	**-**	**0**	
10. To conserve and enhance Oxford's **biodiversity**.	**+/-**	**+**	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**?**	**0**	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion	**0**	**0**	

of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.			

Conclusions/potential mitigation needed

Option 2* (protection of the Core and Supporting GI Network) represents the draft policy approach (Policy G1) consulted on at Reg 18 (summer 2025). This option ensures a high level of protection for the city's most important green infrastructure assets (Core GI), while allowing development to take place where sites have been identified as part of the Supporting GI network providing any harm or loss of features is satisfactorily mitigated. The supporting GI network is made up of a number of different typologies including general public amenity space and playing fields/ pitches (associated with primary and secondary schools, the two universities (including individual Oxford colleges), and private sports facilities). Where development potential exists on sites within the supporting GI network, these spaces are typologies that could feasibly be re-provided as part of development proposals. This approach would not give rise to significant numbers of new homes, in fact any new homes that came forward would be captured sufficiently with the plan's existing windfall estimations. Broadly speaking this policy approach scores well against some of the other SA framework criteria. For instance, given the re-provision requirements of the policy in relation to SA objective 7, it is likely that this approach would give rise to minor positive benefits for green infrastructure, which may have been lost without this additional protection.

Option 1 (protection of the Core GI network) would ensure a high level of protection for the city's most important green spaces only (some of which already receive intrinsic protection by virtue of their location in flood zone 3b, or because they also benefit from national ecological or heritage designations). The absence of a local designation for supporting green spaces (and associated green space reprovision requirements) would only be likely to have a marginal effect on housing delivery. This is due other factors including national planning policy for open space (including playing fields and formal play spaces. Removing the supporting GI network designation from the plan would at best have a marginal effect on housing delivery (any homes delivered would be picked up through the housing windfall allowance). However, the removal a tier of protection from

the green infrastructure network, would have a range of likely negative effects including on SA objective “inequalities”. This is because some supporting GI is located in areas of the city with known open space inequalities. Reducing open space in these parts, of the city, in the absence of policy protection for the supporting GI network, would potentially worsen inequalities in these areas the city.

On balance, given the marginal effects on housing delivery of removing the Supporting GI tier of the Green Infrastructure Network, and the raft of minor negative effects identified in the Table above, Option 2 (which provides a local policy designations for both Core and Supporting GI) has been taken forward in the Reg. 19 Plan.

Sustainability Appraisal Appendix C - Regulation 19 stage site assessment forms incorporating sustainability appraisal

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SPN1: Diamond Place and Ewert House

Site name	Diamond Place and Ewert House
SHLAA reference (and OLP2036 Policy if applicable)	018 Policy SP6
Ward	Summertown
Total site size (ha)	1.73 ha
Existing use(s)	Oxford City Council and University of Oxford owned public car park, offices and academic uses.

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	An Outline Strategic Business Case has been prepared by one of the landowners (City Council) who consider that it is possible to bring forward a viable scheme. OUD, as the development agency arm of the University of Oxford, are keen to explore the site's development potential and have an ambition to provide some student accommodation. The University will need to find alternative accommodation for the Examination Building. In order to maximise the public benefits of this scheme, it will be important to undertake a comprehensive redevelopment of the site involving both key landowners, so the timing, phasing and mechanism for partnership working will be key to its delivery.
Does the landowner specify types of development	Housing both market and affordable, student accommodation, replacement community hall and potentially a new health / medical centre. Possibly retention of some element of car parking.

Stage 1b conclusion
Consider allocation of the site for a mixed-use development, principally housing and student accommodation. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 *(Patches of surface water flood risk present within site, including a larger patch over the existing car park)*
Flooding of land surrounding site for access/ egress	0	There is safe access/ egress from the site – area surrounding site is in Flood Zone 1

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Site is previously developed land (with buildings in use on site) and includes a car park.
Green belt?	0	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site is allocated for at least 135 dwellings (or if delivered as non-self-contained student accommodation, the equivalent number of rooms when the relevant ratio is applied).
Affordable housing provision	?	Depends on implementation (if delivered as dwellings where the site is likely to be policy compliant and deliver 40% affordable housing or if delivered as self-contained student accommodation).

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 95% of neighbourhoods in England – IMD 2025).

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	I	Depends on implementation. A replacement community centre will be required if the existing community centre is demolished. The allocation also allows for healthcare facilities and town centre supporting uses including additional shops/cafes/services/ Class E uses.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	Site allocated for housing – 10% public open space provided on site but could potentially be more depending on how the scheme evolves/ design.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*

Sustainable transport links (bus stop)	+	Site is 200m away from Banbury Road bus stops, which are very well served with numerous frequent buses including the 2, 2A, 700, S4 gold and S5 gold.
Sustainable transport links (rail station)	-	More than1600m from the nearest rail station (Oxford and Oxford Parkway are equidistant from the site).
Primary Schools	-	More than 800m from the nearest primary school (St Aloysius Catholic Primary School is 1300m away).
Secondary Schools	+	Less than 800m from the nearest secondary school (Cherwell School is 400m away).
GP Surgeries	+	Less than 800m from the nearest GP surgery (Summertown Health Centre is 350m away).
Post office	-	More than 800m from the nearest post office (Kendall Crescent and St Giles on Woodstock Road are both 2100m away).
Air Quality	-	Site is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	Site is not within 30m of a water body

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Potential protected species constraints are likely limited to roosting bats in existing buildings. The school fields east of the site are well connected to the wider landscape via hedgerows. There would be an opportunity to deliver meaningful ecological enhancements through habitat creation in the east of the allocation site.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	There is high potential for archaeological interest as the site is adjacent to an area of cropmarks of Prehistoric or Roman era.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register.
Listed Buildings	-	The Grade II listed Diamond Cottages sit near to the site, between Ferry Leisure Centre and the Banbury Road. At present, the cottages are characterised by their back-land feel and their backdrop is already of significantly larger-scale and more modern developments. There is some potential for the backdrop to be enhanced.
View Cones	0	Site lies outside of a view cone
Historic Core Area	0	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	The redevelopment of the site is principally for housing and student accommodation. While it would involve the loss of some Ewert House, Examination Building and some offices, the majority of which are associated with the University of Oxford. As the loss of the University-associated buildings are likely to form part of a wider estate strategy, it is unlikley that there will be direct losses of jobs associated with the knowledge economy resulting from this redevelompent. As such, there is likely to be no change these jobs within the city.
Diversifying the economy	I	Depends on implementation. The redevelopment of the site would provide opportunities for skills and training programmes to be

end employment opportunities		introduced associated with the construction of the new development, and provide some other jobs linked to the service sector / retail, cafes, and subject to viability, a new medical centre.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, principally via Diamond Place or Ewert Place and potentially other options depending on scheme that comes forward.
Can walking and cycling connections with the surrounding area be achieved?	Yes, there is an opportunity to significantly improve walking and cycling through the site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There is a change in ground level from north to south between the two principal car parks. Site contains trees which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees within the site and adjacent to it will influence the developable area of site and its capacity.
Are land contamination issues likely?	No known contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The relationship between the development site and the nearby listed buildings (Diamond Cottages), needs to be carefully considered.

Stage 2 conclusion
There are no significant conflicts with national policy or environmental or physical constraints to the development of this site, although potential heritage sensitivities such as the archaeological potential of the site and nearby Listed Buildings will need to be considered. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN2: Elsfield Hall, Elsfield Way

Site name	Elsfield Hall, Elsfield Way
SHLAA reference (and OLP2036 Policy if applicable)	20b2
Ward	Cutteslowe
Total site size (ha)	0.39ha
Existing use(s)	Vacant – formerly in use as an office.

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes- residential

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Very small patches of surface water flood risk adjacent to the northern and western boundaries of the site.)*
Flooding of land surrounding	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	+	Building on site are vacant.
Green belt?	0	Not on green belt land.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site would provide more than 10 new homes
Affordable housing provision	+	Site provides up to 40% affordable housing

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	Site not in or adjacent to a regeneration area

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*It is unlikely community facilities will change.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	Site not allocated OR amount of public open space remains the same due to the allocation

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Within 400m of 'Harefields' bus stops on Banbury Rd. Served by service no. 2, 2A, 24, 700, S4, S5, S7, X4*
Sustainable transport links (rail station)	-	*1.8km from Oxford Parkway Station*
Primary Schools	+	*Cutteslowe Primary School less than 800m away (via pedestrian/cycle bridge over A40 Elsfield Way).*
Secondary Schools	-	*Cherwell School over 800m from site*
GP Surgeries	-	*Banbury Road Medical Centre, Summertown Health Centre both over 800m from site.*
Post office	+	*Kendall Crescent post office located within 250m of the site*
Air Quality	-	*Site is located within an Air Quality Management Area and is within 150m of an air quality hotspot: Cutteslowe Roundabout.*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	*Site is not within 30m of a water body.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Contains no nature designations but Kendall Crescent Amenity Green Space lies to the west of site and there is potential to improve wildlife linkages or habitat continuity.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
Historic Core Area	0	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*

Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy end employment opportunities	0	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

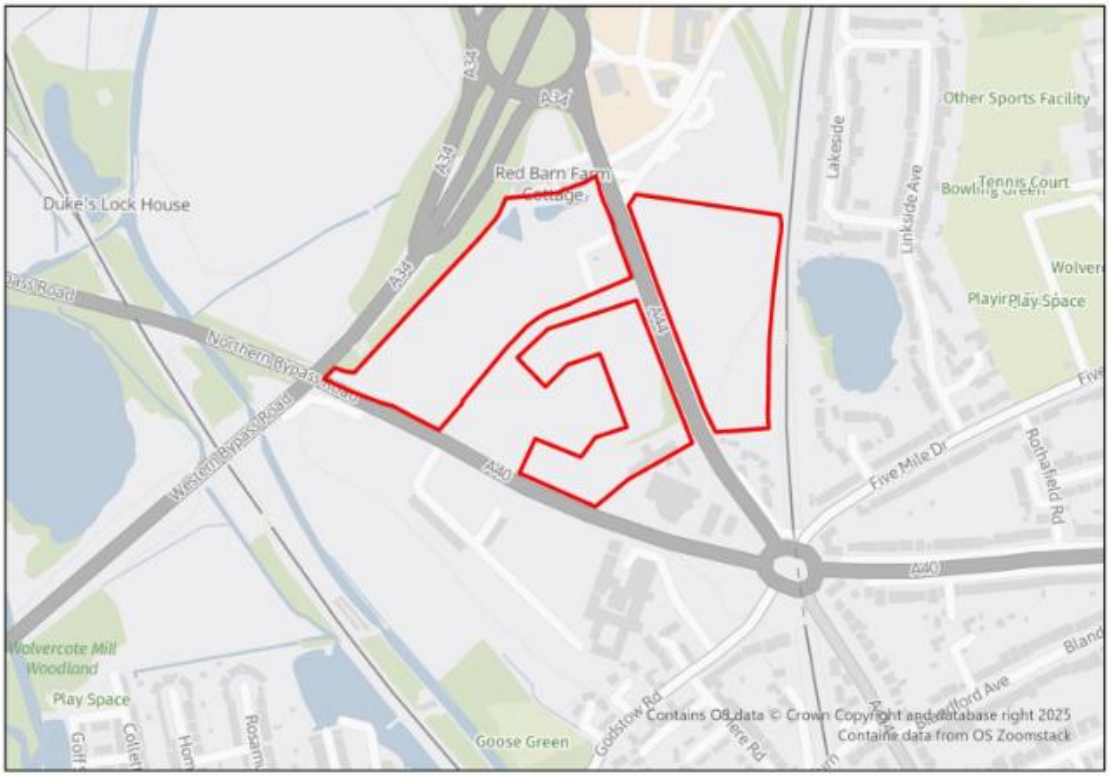
Can access for vehicles be achieved?	Yes, existing vehicular access from Harefield Road.
Can walking and cycling connections with the surrounding area be achieved?	Yes, via Harefield's Road
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Will require contamination site investigation if not already completed.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is located within a residential area but the A40, Elsfield Way is immediately to the south of the site and there may be traffic noise.

Stage 2 conclusion
No insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN3: Oxford North Remaining Phases

Site name	Oxford North remaining phases
SHLAA reference (and OLP2036 Policy if applicable)	001a1
Ward	Wolvercote
Total site size (ha)	13.28
Existing use(s)	Part under construction, part greenfield

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	Site has outline permission (as part of wider Oxford North development). Earlier phases on adjoining sites have built out, and some parts have reserved matters permissions. Hybrid permission for (18/02065/OUTFUL) for 480 homes and up to 87,300m2 employment and also (21/01053/RES), (22/00081/RES), (22/00675/RES) and (24/00411/VAR).

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner confirmed (2025) intention to develop rest of site for mixed use including residential and R&D.
Does the landowner specify types of development	Hybrid outline permission sets out mix of uses, primarily employment and residential.

Stage 1b conclusion
Continue to next stage of assessment, site allocation will help to ensure remaining (non-commenced) phases are delivered in a sustainable and comprehensive way.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 Patches of surface water flood risk present, particularly towards the northern part of the site.
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – majority of land surrounding site is in Flood Zone 1.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	Part under construction and parts are unprotected open space.
Green belt?	0	Not on green belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site is due to deliver at least the remaining new homes, as set out in outline permission.
Affordable housing provision	+	Residential phases expected to deliver affordable housing.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site not in or adjacent to a regeneration area

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	+	S106 for the outline permission sets out that the wider Oxford North development, within which this site falls, will pay contributions to expanding nearby facilities such as a Primary School in Wolvercote.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	++	Public open space will be provided onsite at the higher level of 15%

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	< 400m from a bus stop (S2, and 300 at Peartree Park & Ride)

Sustainable transport links (rail station)	-	> 1600m from train station (Oxford Parkway)
Primary Schools	-	1100m to Wolvercote Primary School
Secondary Schools	-	>800m from the nearest secondary school with spaces
GP Surgeries	-	1500m to Wolvercote GP surgery
Post office	-	>800m from the nearest post office (Summertown)
Air Quality	-	Whole city is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	--	Site contains two balancing ponds

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Remaining phases are 1km from Oxford Meadows SAC or SSSI. Small corner on western edge of the parcel on west of A44, and strip running down eastern boundary of the parcel to east of A44, is identified in the LNRS.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Conservation Areas & Register of	-	None within the site, but close to Wolvercote Conservation Area designation so potential impacts on setting.

Parks and Gardens (RPG)		
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
Historic Core Area	0	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	Site will support growth in knowledge-based economy
Diversifying the economy end employment opportunities	+	Commercial phase of site will likely provide affordable workspace

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes - access via A44 and A40, new link road within site has also already been constructed.
Can walking and cycling connections with the surrounding area be achieved?	Yes - Area is well connected to pedestrian and cycle routes into Oxford and surrounding area, and improvements being delivered as part of S106.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Two balancing ponds delivered already through earlier phases.
Are land contamination issues likely?	Contamination risks being addressed under current planning permission.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Eastern parcel adjoins railway line, which may have noise implications for the proposed residential on that parcel.

Stage 2 conclusion
Site is generally sustainable. Site has outline permission, and parts have reserved matters permissions. Site should be considered further for allocation which will help to ensure remaining (non-commenced) phases are delivered in a sustainable and comprehensive way. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN4: Oxford University Press Sports Ground

Site name	Oxford University Press Sports Ground
SHLAA reference (and OLP2036 Policy if applicable)	049 Policy SP52
Ward	Wolvercote
Total site size (ha)	3.65
Existing use(s)	Private sports ground

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has indicated a willingness to develop the site.
Does the landowner specify types of development	Housing and public open space

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Large patch of surface water flood risk along the upper side of the eastern perimeter, with small patches along the southern perimeter.)*
Flooding of land surrounding	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	***SA rating***	***Comments***
Previously developed land?	-	*Site is unprotected open space (private sports ground) including a cricket pitch and three tennis courts. Part of the Green Infrastructure Network (supporting).*
Green belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	***SA rating***	***Comments***
Housing provision	++	*Site would provide more than 10 new homes. (Site allocation in Oxford Local Plan 2036 is for a minimum of 130 homes, depending on relocation of the cricket pitch).*
Affordable housing provision	+	*Site likely to deliver affordable housing*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	***SA rating***	***Comments***
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in or adjacent to a regeneration area*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Site not allocated for community facilities*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	*Site allocated for housing – 10% public open space to be provided on site*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*The site is 400m from the nearest bus stop (Jordan Hill on Banbury Road). Buses along Banbury Road are frequent and include the 2, 2A, 700, S5 and S7.*
Sustainable transport links (rail station)	+	*Less than 1600m from the nearest rail station (Oxford Parkway is 1500m away)*
Primary Schools	-	*More than 800m from the nearest primary school (Wolvercote Primary School)*
Secondary Schools	-	*More than 800m from the nearest secondary school (Cherwell School)*
GP Surgeries	-	*More than 800m from the nearest GP surgery (Wolvercote Surgery)*
Post office	-	*More than 800m from the nearest post office (Kendall Crescent)*
Air Quality	-	*Site is within an Air Quality Management Area (AQMA)*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	*Site is not within 30m of a water body*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Contains no nature conservation designations but has potential for nature conservation interest. Aerial imagery indicates the site is comprised of grassland used for recreational purposes (cricket pitch), developed land, and boundary hedgerows/tree lines. It forms part of a wider block of semi-natural habitats incorporating the golf course to the north, and the lake and cemetery to the south. As such, it may act as a green corridor in the landscape, potentially for nesting birds, foraging and commuting bats, badgers, reptiles, and amphibians. Any development proposals should assess what connectivity is provided and preserve. Any of the faunal groups identified above could also provide constraints within the application site itself.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*General potential for Roman and prehistoric activity and specific interest for proximity to Lower Palaeolithic Wolvercote Channel*
Conservation Areas & Register of Parks and Gardens (RPG)	*0*	*Site is not in or on the edge of a conservation area or site on the Register of Parks and Gardens*
Listed Buildings	*0*	*Site contains no identified historic building constraint*
View Cones	*0*	*Site lies outside of a view cone*
Historic Core Area	*0*	*Site lies outside the City Council's locally designated Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change in number of jobs/economic floorspace in knowledge-based economy*
Diversifying the economy end employment opportunities	*0*	*No change in employment base or access to affordable workspaces*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site is accessible by vehicle from Jordan Hill.
Can walking and cycling connections with the surrounding area be achieved?	Pedestrian and cycle connections from Jordan Hill via Banbury Road.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The existing use is as a private sports ground. There are limited physical features/ changes in ground level etc. Site contains significant existing trees along the northern and western boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by the Oxford City Council Jordan Hill Road (No.1) Tree Preservation Order 1981 and the Cherwell District Council (No.1) Tree Preservation Order, 1982. Existing trees will influence the developable area of the site and its capacity.
Are land contamination issues likely?	There are no likely land contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The adjacent business park is in use for science, technology, innovation and offices, so the potential for noise nuisance to impact residential uses on the development site would be low.

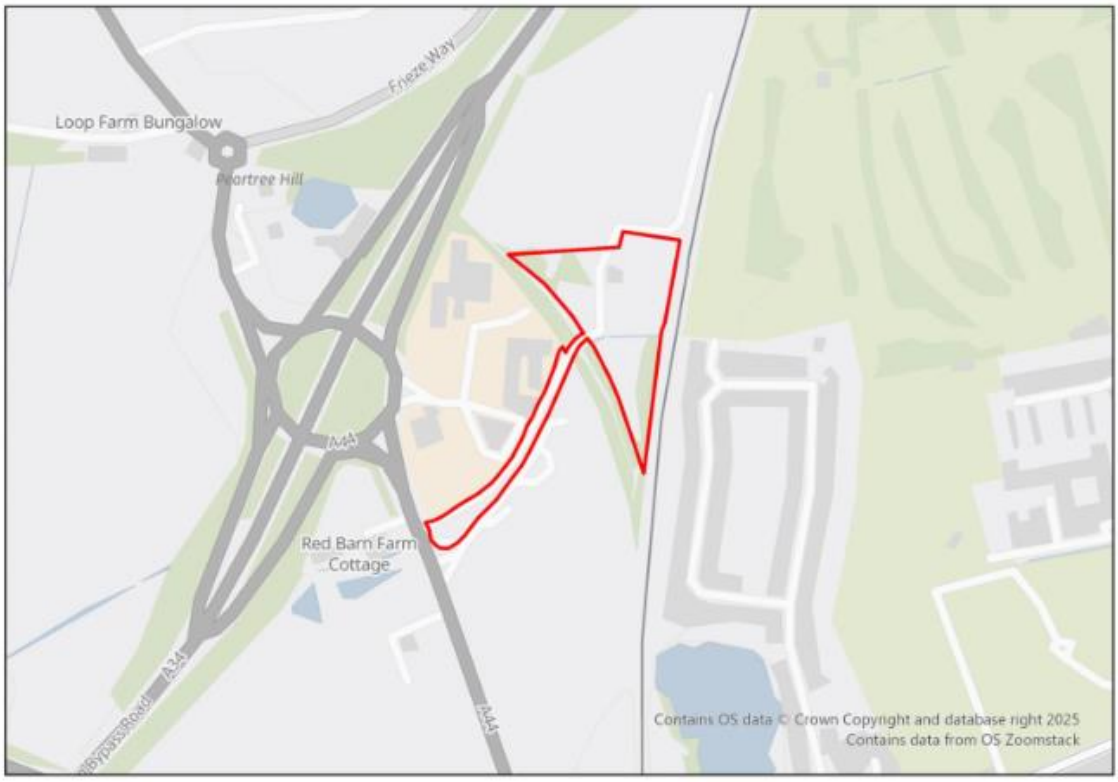
Stage 2 conclusion

The site scores quite well overall against the sustainability criteria and although the scoring for accessing local services such as schools and GP surgeries is low, there is good access to sustainable transport links which are in close proximity to the site.
Site to be put forward for allocation in Regulation 19 Local Plan.

SPN5: Pear Tree Farm

Site name	Pear Tree Farm
SHLAA reference (and OLP2036 Policy if applicable)	001e
Ward	Wolvercote
Total site size (ha)	2.54
Existing use(s)	Greenfield / farmland, including farm buildings

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
There are no clear conflicts with national policy or insurmountable environmental or physical constraints. However, site allocation policy itself would benefit from acknowledging the EWR Safeguarding Direction (19 November 2025) and highlighting the procedural implications of the site's potential inclusion within this land. The Direction (19 November 2025) maps suggest that part of the eastern boundary of the site is included within the safeguarded area. Where a planning application is submitted on land included within the EWR Safeguarding Direction, the East West Rail Company becomes a statutory consultee and must be consulted in accordance with the instructions in the Direction before planning permission can be granted. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner confirmed intention (confirmed 2025) to develop the site for residential-led development, as part of wider scheme with the parcel of land to the north (in Cherwell district).

Stage 1b conclusion
Landowner has confirmed intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	0	Site in Flood Zone 1 Some small patches of surface water flooding.
Flooding of land surrounding site for access/ egress	0	Surrounding area in Flood Zone 1

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	Site is unprotected open space plus some farm buildings
Green belt?	0	Site is not on Green Belt land (de-designated in previous local plan)

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**++**	Site allocated for residential development (in Northern Gateway AAP) and would provide more than 10 new homes
Affordable housing provision	**+**	No known viability challenges. Site would likely provide up to 50% affordable housing

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within	**0**	Site is not in or adjacent to a regeneration area (2025 data)

the top 20% most deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	No change

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**+**	Allocated for residential, so public open space will be required to be provided onsite. The type and layout of this could take the form of wilder, natural areas that are more informal in design and can play a dual role in allowing people to get closer to nature, whilst also supporting existing species. Onsite open space could also help with maintaining the UGF score and for supporting biodiversity.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**-**	Approximately 500m from a bus stop (S2 or Park & Ride 300)
Sustainable transport links (rail station)	**-**	> 1600m from train station (Oxford Parkway). Station is relatively close but the pedestrian/cycle access is longer due to site being severed by the railway line.

Primary Schools	**-**	>800m from Wolvercote Primary School
Secondary Schools	**-**	>800m from the nearest secondary school with spaces
GP Surgeries	**-**	>800m Wolvercote GP surgery
Post office	**-**	>800m from the nearest post office (Summertown)
Air Quality	**-**	Whole city is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**0**	Site is not within 30m of a water body

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	No nature conservation designations on site, although majority of site falls within the LNRS and there is substantial tree coverage on site.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	Background Roman and Bronze Age sites to east and west but not close by, sizable development would require evaluation in relation to general potential.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint

View Cones	0	Site lies outside of a view cone
Historic Core Area	0	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**0**	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy end employment opportunities	**0**	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access to the site is a constraint as the current single-lane track would not be suitable for this development in its current form. An alternative access would be required.
Can walking and cycling connections with the surrounding area be achieved?	Current access is single lane track to the A44. As site adjoins railway line and proximity to Oxford Parkway, there is potential to improve pedestrian/cycle access to station.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Substantial tree coverage on site Telephone mast which would constrain development if required to be retained.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Railway line and A34 adjoins site, likely to need buffers & screening for noise for residential uses

Stage 2 conclusion

Site is generally sustainable as a site allocation for residential development. Access road for vehicles & pedestrians needs addressing as the current single-lane track would not be suitable for this development in its current form. Additionally the site adjoins the A34 and railway line so mitigation may be required to minimise noise impacts on new residents. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN6: Red Barn Farm

Site name	Red Barn Farm
SHLAA reference (and OLP2036 Policy if applicable)	001c
Ward	Wolvercote
Total site size (ha)	0.96
Existing use(s)	Classroom/workshop/office buildings and a motorcross track

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner confirmed (2025) intention to develop for economic
Does the landowner specify types of development	Economic development (knowledge economy)

Stage 1b conclusion
Landowner has confirmed (2025) intention to develop for employment (R&D/knowledge economy). Continue to next stage of assessment.

Stage 2 assessment – Qualitative assessment of deliverability (incorporating Sustainability Appraisal)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**0**	Site is in Flood Zone 1 (Southern portion of the site is impacted by surface water flood risk).
Flooding of land surrounding	**0**	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Site is mostly previously developed land (with buildings in use on site), the track part is grass/soil
Green belt?	0	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	0	Site allocated for use other than housing
Affordable housing provision	0	Site allocated for use other than housing

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	I	Development of the site could lead to decrease in community/training facilities unless these are appropriately reprovided. Will depend upon implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	I	Development for employment would provide some landscaping. Policy suggests that design of outdoor spaces could seek to incorporate a variety of features including pocket parks; trees and hedges; green roofs; as well as linear features that can facilitate movement through the site and integrate with surrounding areas.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	< 400m from a bus stop, service S2 and the Peartree Park & Ride (300)
Sustainable transport links (rail station)	-	> 1600m from train station (Oxford Parkway)
Primary Schools	-	1100m to Wolvercote Primary School
Secondary Schools	-	>800m from the nearest secondary school
GP Surgeries	-	1500m to Wolvercote GP surgery
Post office	-	>800m from the nearest post office (Summertown)
Air Quality	-	Whole city is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Site is within 30m of a water body (balancing ponds within the adjoining Oxford North development)

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	No nature conservation designations on the site, but there is substantial tree coverage around perimeter. Policy suggests Trees could be retained especially along perimeter with A34 to help buffer noise. There may be potential to improve habitat provision through enhancement of the remaining green space which is currently unlikely to provide much in ecological terms.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Does the site contain any historical, or archaeological features?

Criteria	*SA rating*	*Comments*
Archaeology	I	Site contains no known archaeological sites but Roman remains recorded in the general area, site would require evaluation.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
Historic Core Area	0	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	++	Development of site for employment would support jobs in knowledge-based economy, as part of the wider Northern Gateway area. Policy specifies that employment uses on the site must be linked to knowledge economy.
Diversifying the economy end employment opportunities	+	Likely to provide affordable workspace as part of development (

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Current vehicle access onto the A44 is unlikely to be suitable for any significant increase in traffic without upgrading. Any plans for a left-in left-out junction would need to be agreed with the Highways Authority, or low-car development could be an option given the proximity of park & ride.
Can walking and cycling connections with the surrounding area be achieved?	Generally area is well connected to pedestrian and cycle routes into Oxford and surrounding area.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Nearby balancing ponds on adjoining site. Substantial tree coverage around perimeter of site could be retained as buffer to traffic of A34/A44 which adjoin the site on two sides at raised levels.
Are land contamination issues likely?	Land contamination issues are unlikely given the current use.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Noise from adjoining A34/A44, which are also at raised levels, orientation of buildings could help mitigate this.

Stage 2 conclusion
Site allocation for employment generally scores well against sustainability objectives, the main negative scores relate to access to schools, GP etc which are less significant to development for employment compared to if the site were being developed for residential. The existing community facilities on the site are important to local young people so whilst the area is suitable for redevelopment, the loss of this community facility needs to be addressed and mitigated as part of any redevelopment. Employment use would complement the adjoining Oxford North development. Vehicle access needs to be addressed, because the current access

onto the A44 is unlikely to be suitable for any significant increase in traffic. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS1: 474 Cowley Road

Site name	474 Cowley Road
SHLAA reference (and OLP2036 Policy if applicable)	**516**
Ward	**Donnington**
Total site size (ha)	**0.34ha**
Existing use(s)	**Former use as a commercial timber yard, now vacant.**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Planning application 17/01463/FUL for construction of a 64-bed care home not implemented.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes.
Does the landowner specify types of development	Residential development. Planning permission was granted in September 2017 for the demolition of the existing buildings on the site and erection of a 64-bedroom care home, along with landscaping and car parking facilities (17/01463/FUL). Development was not implemented and the site remains available.

Stage 1b conclusion
Consider further for allocation for residential development, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	-	Site is partially in Flood Zone 3a *(Large patches of surface water flood risk within central and northern areas of site).*

Flooding of land surrounding site for access/ egress	-	Access immediately from the site, for a short duration in either direction of Cowley Road lies within Flood Zone 3a, after which the access lies within Flood Zone 1.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	+	The site will make use of previously developed land (with vacant buildings on site).
Green belt?	0	The site is not on Green Belt land.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site will deliver at least 20 homes.
Affordable housing provision	+	Affordable housing likely to be policy compliant.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site not within one of the most deprived areas of Oxford.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Site not allocated for community facilities.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	No change.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<400m to the nearest bus stop. There are frequent services on the 1, 5A City, 5 City, 10 etc.
Sustainable transport links (rail station)	-	>1,600m to Oxford Train Station.
Primary Schools	+	<800m to the nearest primary school (St Frideswide Primary School).
Secondary Schools	+	<800m to the nearest secondary school (Greyfriars Catholic School).
GP Surgeries	-	>800m to the nearest GP surgery
Post office	-	>800m to the nearest post office
Air Quality	-	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	The site does not contain and is not near a body of water.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Site is adjacent to Allotments (Elder Stubbs Charity Allotments). If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Trees along the boundary should be retained and protected. Reptiles, bats, birds, badgers and potentially invertebrates are likely present. To provide mitigation, retention and where possible enhancement of habitat suitable for reptiles along the south-western area of the site is likely required. However, this must be informed through protected species surveys.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	General potential only. Requirement for evaluation would depend on the scale of development.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is not within a conservation area.
Listed Buildings	0	The site is not within close proximity to a listed building.
View Cones	0	The site does not lie within the city's view cones.

Historic Core Area	0	The site is not within the city's High Building's Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs.
Diversifying the economy end employment opportunities	0	No change.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site can be accessed from Cowley Road, almost opposite the junction with Gillian's Way.
Can walking and cycling connections with the surrounding area be achieved?	There are existing cycling and pedestrian connections but there is potential to significantly improve these.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant physical features identified. Site contains existing trees around and near to boundaries which are important to neighbouring residential properties. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Any re-development of this site would require a site investigation and contamination risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site is bounded by a residential area. To the north-west are the rear gardens of the residential properties in Milton Road and to the south is a car repair business set behind 496-510 Cowley Road.

Stage 2 conclusion

No significant constraints to development however, part of sites lies in FZ3a so will need careful design and planning. Subsequent stages in the planning process (e.g., planning application stage) likely to need to be supported by suitable site-specific FRA work. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS2: ARC Oxford

Site name	ARC Oxford
SHLAA reference (and OLP2036 Policy if applicable)	587 (SP10 – Oxford Business Park and AOC7 – Cowley Branch Line)
Ward	Cowley
Total site size (ha)	35.4 Ha
Existing use(s)	Office/ Lab/ R&D/ vacant plots

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Part	Numerous planning applications for various plots at various stages of the planning process.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes, numerous planning applications at various stages of the planning process
Does the landowner specify types of development	Yes, employment uses focusing on labs/ R&D

Stage 1b conclusion
Consider further for allocation for a mix of employment uses including labs/ R&D and other appropriate Class E and B employment uses. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Patches of surface water flood risk present across site)*
Flooding of land surrounding site for access/ egress	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*A mix of previously developed land and vacant plots*
Green belt?	*0*	*Site is not on Green Belt Land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	*I*	*Depends on implementation*
Affordable housing provision	*I*	*Depends on Implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site not in or adjacent to a Regeneration area. Site within one of 40% most deprived areas (IMD – 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Community facilities likely to remain the same.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	*Amount of public open space likely to remain the same although redevelopment opportunities will bring potential to improve public realm*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Numerous frequent service bus stops within the site boundary, including "The Longwall" stop on Garsington Road*
Sustainable transport links (rail station)	-	*Site more than 800m from Oxford Railway station (over 5km)*
Primary Schools	+	*Nearest Primary School is less than 800m away (Our Lady's Catholic Primary School is 550m away)*
Secondary Schools	-	*Nearest Secondary school is more than 800m away (Oxford Academy, Sandford Lane is over 2km away)*
GP Surgeries	+	*Nearest GP Surgery is less than 800m away (Temple Cowley Medical Group is 750m away)*
Post office	-	*Nearest Post Office is more than 800m away (Balfour Road is more than 1.5km away)*
Air Quality	-	*Within the city-wide AQMA. Not in proximity to a current air quality hotspot*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Site contains two small ponds*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Site not within a designated ecological site. Opportunities for improvements and enhancements through green walls/ roofs etc.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site contains potential for Roman archaeology*
Conservation Areas & Register of Parks and Gardens (RPG)	-	*Western boundary of the site is adjacent to the Temple Cowley Conservation Area*
Listed Buildings	-	*Site contains no listed building constraints, however adjacent to the western boundary of the site (Hollow Way) is the Grade II Listed Nuffield Press East Wing and Attached Former School House*
View Cones	*0*	*Site lies outside the city's view cones*
Historic Core Area	*0*	*Site lies outside the historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities	+	*Site likely to continue to support key knowledge-based sectors that drive economic growth*

in the knowledge-based economy		
Diversifying the economy end employment opportunities	+	*Site has potential to help deliver affordable workspaces*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains numerous trees associated with landscaping. No Tree preservation orders on site. Site is a fairly regular shape and no significant changes in ground level.
Are land contamination issues likely?	Contamination risks possible associated with former use.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins the ring road and a residential area.

Stage 2 conclusion
No insurmountable constraints to development. Care should be taken if redeveloping buildings near the western site boundary as there is an opportunity to improve the relationship between the site and the conservation area and listed building. Air quality at Hollow Way (again at the western boundary of the site) has previously been a potential issue and it will be important to ensure that this does not persist. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS3: Bertie Place Recreation Ground

Site name	Bertie Place Recreation Ground
SHLAA reference (and OLP2036 Policy if applicable)	008a Policy SP3
Ward	Hinksey Park
Total site size (ha)	0.67ha
Existing use(s)	Recreation ground, playground, MUGA

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	Yes	Small amount (approximately 1%) of site lies within FZ3b and some of access

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	Planning application 23/00988/FUL not yet determined. 31 units.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Planning application indicates landowner intention to develop for residential.
Does the landowner specify types of development	Residential

Stage 1b conclusion
Landowner has set out intentions through planning application. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	--	*Site is partially in Flood Zone 3b* *(Small patch of surface water flood risk towards western boundary on site)*
Flooding of land surrounding	-	*Access/egress from the site and immediate surroundings lies within Flood Zone 2. Part of Abingdon Road which lies in close proximity to the site is in Flood Zone 3b.*

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	*Unprotected green space*
Green belt?	*0*	*Not Green Belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Current allocation for housing and application for 31 homes. Unlikely other uses would be proposed or would align with strategy.*
Affordable housing provision	+	*Site is subject to a live planning application for 31 affordable homes.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in or adjacent to a regeneration area*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Site not likely to deliver new community facilities.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	-	*Depends on how loss is compensated for, but the developable part of the site is currently a small recreation ground, multi-use games area (MUGA) and playground.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	Better than 10min frequency at peaks of buses to the city centre (many of which go to Abingdon in the opposite direction) (X2, X3 and 35 most frequent). Bus stop on Abingdon Rd or Redbridge P&R both under 250m
Sustainable transport links (rail station)	-	*3.2km walk to Oxford Parkway Station, closest station*
Primary Schools	+	*700m to New Hinksey Primary School*
Secondary Schools	-	*2300m to Greyfriars Oxford Catholic School*
GP Surgeries	+	*c.800m walk to South Oxford Health Centre*
Post office	-	*1,500m to Donnington PO*
Air Quality	-	*Site is within Air Quality Management Area*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Within 30 m of a water body (Redbridge Stream)*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	The recreation ground appears to contain regularly managed grassland, likely of limited diversity, though the tree lines bordering the site may be of greater value. There will be few protected species considerations.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	*0*	*Site contains no known archaeological sites or has limited/uncertain archaeological potential*
Conservation Areas & Register of Parks and Gardens (RPG)	*0*	*Site is not in or on the edge of a conservation area or site on the RPG*
Listed Buildings	*0*	*Site contains no identified historic building constraint*
View Cones	*0*	*Site lies outside of a view cone*
Historic Core Area	*0*	*Site lies outside the City Council's designated historic core area.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change in the number of jobs/economic floorspace supporting the knowledge economy.*
Diversifying the economy end employment opportunities	*0*	*No change.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – road access from Bertie Place, although only potential for one route in, one route out, so site will be a cul-de-sac (for vehicles) There is pedestrian access through to the Abingdon Road and Wytham Street
Can walking and cycling connections with the surrounding area be achieved?	Yes – good pedestrian and cycling connections using National Cycle Route 5 which cuts through the site and will need to continue through the site, even if its exact location is altered
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	A number of established trees onsite, particularly around perimeter Sites contain significant existing trees and woodland which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Yes, but can be mitigated.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins existing residential development

Stage 2 conclusion
Access/egress from the site is over land in moderate flood risk so will need further investigation and mitigation is likely to be required. Re-provision of MUGA and playground will be required. No

other significant constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS4: Cowley Marsh Depot

Site name	**Cowley Marsh Depot**
SHLAA reference (and OLP2036 Policy if applicable)	**016** **Policy SP35**
Ward	**Temple Cowley**
Total site size (ha)	**1.71ha**
Existing use(s)	**City Council depot, storage for refuse vehicles**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Potentially in the catchment of Lye Valley SSSI

Is the site greenfield in flood zone 3b?	No	Brownfield Flood Zone 3b
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner (City Council) confirmed intention to develop, subject to alternative site for the Depot uses being found
Does the landowner specify types of development	Residential proposed

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	**Comments**
What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b, plus large patches of surface water flood risk within central area of site.

Flooding of land surrounding site for access/ egress	-	Majority of the land surrounding the site for access/egress lies within Flood Zone 3b (not insurmountable)

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Site is previously developed land, with buildings in use as depot. Fairly low density so redevelopment could make more efficient use of site
Green belt?	0	Not Green Belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site would provide more than 10 new homes
Affordable housing provision	+	Site is allocated for residential and would be required to provide affordable housing

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Site not allocated for community facilities

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	Site allocated for housing – 10% public open space provided on site

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<100m to Marsh Road bus stop. Frequent services to Oxford City Centre eg 1, 5, 10
Sustainable transport links (rail station)	-	Approx 4400m to Oxford Rail station
Primary Schools	+	Approx 450m to St Christophers Primary School, Temple Road
Secondary Schools	-	Approx 1000m to Oxford Spires Academy, Glanville Road
GP Surgeries	+	Approx 800m to Temple Cowley Medical Group
Post office	-	Approx 1.5km to Donnington Post Office
Air Quality	-	Site is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Boundary Brook runs along eastern boundary of the site

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest including roosting bats and nesting birds. Identified in LNRS as area that could help improve biodiversity (along southern boundary of site). Can improve wildlife linkages or habitat continuity from adjoining core GI site. TPO nearby Land west of Leafield Road) but not within site.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	Site contains no known archaeological sites
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	-	Very small part of site (northern corner) is within Crescent Road View Cone
Historic Core Area	0	Site lies outside the City Council's locally designated Historic Core Area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	Site in existing employment use but not in knowledge-based economy. No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy end employment opportunities		While the site does support employment uses it is in use as a depot for the city council. As such, should site come forward for residential development, there are unlikely to be job losses as the city council is rationalising its estate.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – via Marsh Road, including for emergency vehicles
Can walking and cycling connections with the surrounding area be achieved?	Yes – via Marsh Road (and Cowley Marsh Sports field if site is opened up). There are safe, segregated surfaced pedestrian/cycle access routes across the field to the Boundary Brook nature reserve green corridor and National Cycle Route 57 which also follows along the Brook.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Hedgerow along the eastern boundary with cycle lane 2 existing dwellings on site.
Are land contamination issues likely?	Yes – former depot and fueling station
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Adjoins residential uses to the north and opposite site of Marsh Road

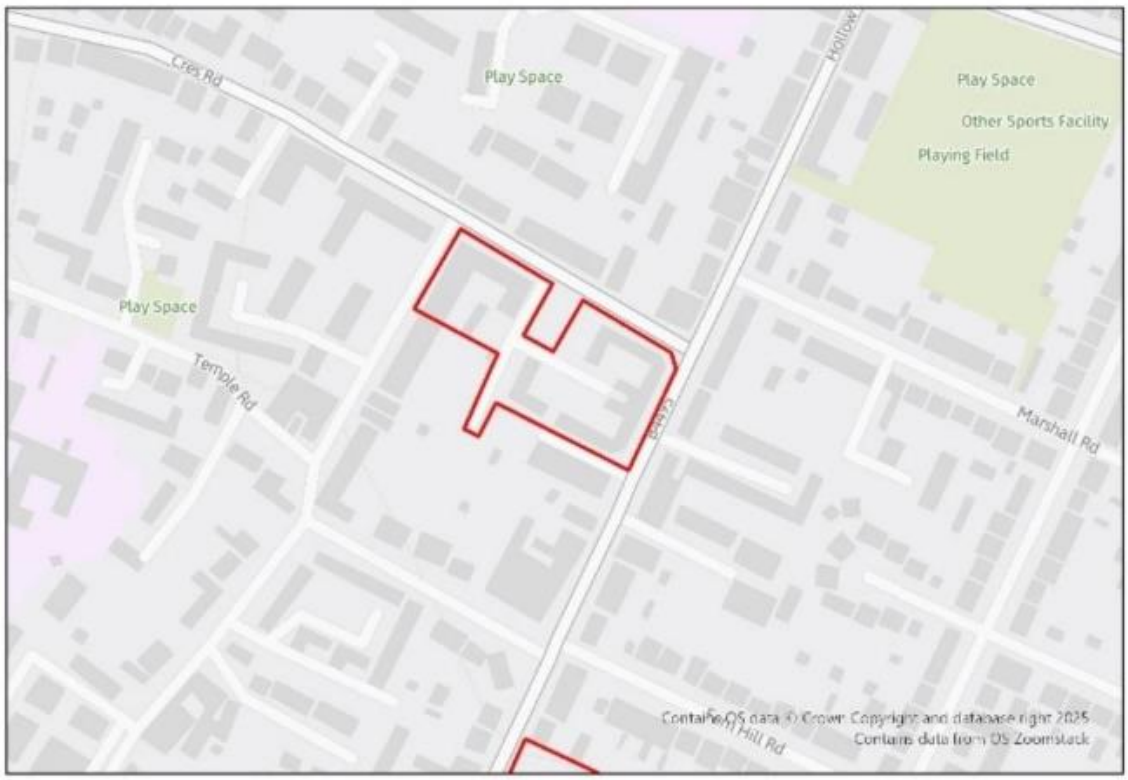
Stage 2 conclusion
The site is generally sustainable – it is on previously developed land and is an accessible location. The site is not sensitive from an ecological perspective however it lies within one of the city's locally designated View Cones so development should be designed accordingly. The flood risk classification of the site has increased in recent years following updated Environment Agency modelling data, which will need an SFRA Level 2 assessment to explore the risks in more detail. This may impact on capacity but is not thought to be insurmountable. Finding a site to relocate the existing depot uses is

challenging so is likely to impact delivery timelines. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS5: Crescent Hall

Site name	**Crescent Hall**
SHLAA reference (and OLP2036 Policy if applicable)	**017**
Ward	**Temple Cowley**
Total site size (ha)	**0.9**
Existing use(s)	**Student accommodation**

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	

Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	The landowner has expressed interest in further developing the site for student accommodation.
Does the landowner specify types of development	Student accommodation

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1*

		(Small patch of surface water flood risk towards the northern corner of the site, with a much larger patch within the south eastern half of the site, towards Hollow Way).
Flooding of land surrounding site for access/ egress	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	***SA rating***	***Comments***
Previously developed land?	*0*	*Site is previously developed land (with buildings in use on site)*
Green belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	***SA rating***	***Comments***
Housing provision	++	*Site is currently in use as student accommodation. There is the potential to increase the current number of student rooms by further developing the site, and by more than the number of student rooms that equate to 10 dwellings.*
Affordable housing provision	*?*	*Depends on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	***SA rating***	***Comments***

Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 60% of neighbourhoods in England – IMD 2025).*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Site not allocated for community facilities*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	*Site not allocated*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Site is less than 400m away from a bus stop. The nearest one is the Crescent Hall bus stop on Hollow Way which is 150m away. Buses along Hollow Way are frequent and include the 10, 600 and 700.*
Sustainable transport links (rail station)	-	*Over 1600m from the nearest rail station (Oxford)*
Primary Schools	+	*Less than 800m from the nearest primary school (St Christopher's C of E Primary School is 500m away)*
Secondary Schools	-	*More than 800m from the nearest secondary school (Oxford Spires Academy)*

GP Surgeries	+	*Less than 800m from the nearest GP surgery (Hollow Way Medical Centre is 300m away)*
Post office	-	*More than 800m from the nearest post office (Woodfarm)*
Air Quality	-	Site is within Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	Site is not within 30m of a water body

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Contains no nature conservation designations but has potential for protected species to be present such as roosting bats and nesting birds. Could improve wildlife linkages or habitat continuity.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	*0*	*Site lies within a large zone of general potential for Roman Kilns and has low to moderate archaeological potential.*
Conservation Areas & Register of Parks and Gardens (RPG)	-	*Site lies on the edge of the Temple Cowley Conservation Area*
Listed Buildings	*0*	*Site contains no identified historic building constraint*
View Cones	*0*	*Site lies outside of a view cone*
Historic Core Area	*0*	*Site lies outside the City Council's locally designated Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change in number of jobs/economic floorspace in knowledge-based economy*
Diversifying the economy end employment opportunities	*0*	*No change in employment base or access to affordable workspaces*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site is accessible by vehicle from Crescent Road.
Can walking and cycling connections with the surrounding area be achieved?	There are existing walking and cycle connections with the surrounding area to/ from the site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees along the Crescent Road, Junction Road and Hollow Way frontages which are important to public amenity in the area and will provide valuable ecosystem services. These trees are protected by the Oxford City Council Crescent Road (No.1) Tree Preservation Order 1998. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	There are no likely land contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site is already in use for student accommodation, however design sensitivity would be required for further redevelopment as there are residential uses in close proximity to the site.

Stage 2 conclusion

The site scores well overall against the sustainability criteria and has good access to sustainable transport links. However, design sensitivity is likely to be required due to the site's location adjacent to a conservation area. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS6: Former Iffley Mead Playing Field

Site name	**Former Iffley Mead Playing Field**
SHLAA reference (and OLP2036 Policy if applicable)	**104 (OLP 2036 ref SP38)**
Ward	**Rose Hill & Iffley**
Total site size (ha)	**2.04**
Existing use(s)	**Vacant, former playing field**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	Vacant but outside flood zone
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	Outline application submitted July 25 for up to 90 homes (25/00813/OUT). Yet to be determined.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Site has been allocated for residential use in current plan, and landowner retains interest.

Stage 1b conclusion
Site does not have insurmountable obstacles to development and is suitable for allocation for residential use. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1.* *Very small patch of surface water flood risk on the south eastern boundary.*
Flooding of land surrounding site for access/ egress	*0*	*One of two existing access routes to the site lies within Flood Zone 1 and could potentially provide hazard free access to and from the site via Augustine Way/Iffley Turn. (Cavell Road at NE corner of site lies within Flood Zone 3).*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	*Site is vacant greenfield*
Green belt?	*0*	

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Site would provide more than 10 new homes*
Affordable housing provision	+	*Affordable provision will depend on policy at time of application. Current 2036 policy requires a min of 40%.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*

Regeneration area (within the top 20% most deprived areas IMD)	+	*Site is adjacent to an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Site is allocated for residential use, although suitable complementary uses would be considered on their merits*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	*Site allocated for housing, which will require min 10% public space on site.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*There are a number of bus stops within 400m of site, served by several routes towards city centre and suburbs.*
Sustainable transport links (rail station)	-	*Oxford Rail Station is approx 4km away.*
Primary Schools	+	*A number of primary schools are within 800m of site (Larkrise, St Frideswide, Greyfields). Site is also directly opposite Iffley Academy, which is a SEND specialist school.*

Secondary Schools	-	*Site is directly opposite Iffley Academy, which is a SEND specialist school, nearest secondary schools are at least 900m away.*
GP Surgeries	+	*Nearest GP surgery just over 400m distance (Donnington Medical practice)*
Post office	+	*Nearest post office within 800m (at junction between Iffley Road/Howard Street)*
Air Quality	-	*Entire city is within an AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	*Site is 350m from Thames watercourse.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	*0*	*Site has no specific ecological designations, although it has been vacant for some time and mature planting is present throughout so there is potential for biodiversity value.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*The site has general archaeological potential, as it is located 70m from a Neolithic pit circle and there is potential for further remains. It also has potential for Early Saxon settlement as the Archeox excavation to the north recovered a significant amount of Saxon pottery. Any sizable development will require pre-determination evaluation (geophysical survey and trenching).*
Conservation Areas & Register of	-	*Site boundary adjoins Iffley CA*

Parks and Gardens (RPG)		
Listed Buildings	*0*	*No listed buildings on site.*
View Cones	*0*	*Site lies outside a view cone but there is potential for it to impact views from the Rose Hill view cone.*
Historic Core Area	*0*	*Site is not in historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	*0*	*Site is allocated for residential use so no implications for knowledge economy expected*
Diversifying the economy end employment opportunities	*0*	*Site is allocated solely for residential use and suitable complementary uses.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Mature planting and trees on site boundary.
Are land contamination issues likely?	Significant contamination unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is directly opposite Iffley Academy.

Stage 2 conclusion

There are a number of physical and policy constraints, however these are not considered to be insurmountable, though potential mitigations may need to be considered as part of any allocation where necessary. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS7: Kassam Stadium

Site name	Kassam Stadium
SHLAA reference (and OLP2036 Policy if applicable)	028a LP2036 Policy SP14 028c
Ward	Littlemore + Northfield Brook
Total site size (ha)	6.52 ha
Existing use(s)	Kassam football Stadium with related conference facilities, car parking, cinema, bowling, other community/leisure uses

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes – mixed use development including R&D (already planning permission for part of site 23/01198/FUL)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**--**	Very small area of Flood Zone 3a and 3b immediately adjacent to the brook, slightly wider area of Flood Zone 2. Patches of surface water flooding, particularly south of the stadium.

Flooding of land surrounding site for access/ egress	**0**	Grenoble Road nearly all free of flood risk.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	Site consists of previously developed land
Green belt?	**0**	Site lies outside the Oxford Green Belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**++**	The landowner is interested in developing the site for a mix of uses including a significant amount of residential, which it is suitable for.
Affordable housing provision	**+**	The site is likely to include deliver of affordable housing (not suitable for student accommodation)

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most	**++**	Site is within a regeneration area.

deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**I**	Community function would be replaced, but whether there is additional or the form will depend on implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**+**	Site is likely to deliver additional public open space.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	<400m to nearest bus stop outside Kassam stadium which provides 3A service every 30mins to Templars Square and the 600 service every 30 mins to the Hospitals and Thornhill Park and Ride. Most of the site is within 800m of Pegasus Road stop with the 1 and 5 services running approximately every 5-6mins to the City Centre and Oxford Rail station.
Sustainable transport links (rail station)	**I**	Over 3.5km walk to Oxford Station, however there is potential for the site to be within walking distance of the Cowley Branch line station if this is delivered during the plan period.
Primary Schools	**-**	Approximately 1km to Windale Primary and John Henry Newman Academy Primary.
Secondary Schools	**-**	Approximately 1.5km to Oxford Academy.

GP Surgeries	**+/-**	Some parts of the site are within 800m of the nearest GP Surgery (The Leys Health Centre) while other parts of the site are further away.
Post office	**-**	Over 1km to Littlemore PO or Balfour Road PO (Dunnock Way Drop and Collect within 800m of some of the site).
Air Quality	**-**	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**-**	Northern boundary of site within 30m of a watercourse.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., along brook. The site is dominated by hardstanding and the stadium, with patches of vegetation along the brook and to the east. It appears to have very limited intrinsic ecological value. However, it is bordered by the Littlemore Brook and Northfield Brook OCWSs, which provide a corridor for wildlife. A buffer should be included to support these features. There is scope to deliver significant ecological enhancements, which should include an element focused on buffering the brooks. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	The Minchery Farmhouse is on the adjacent site. There is potential for prehistoric, Roman and medieval archaeology, dispersed Roman pottery manufacturing activity, burials and other features east and north of the standing Nunnery dormitory range. This will need to be explored as part of any redevelopment.
Conservation Areas & Register of Parks and Gardens (RPG)	**0**	The site is outside of a conservation area.
Listed Buildings	**-**	Minchery Farmhouse (Grade II*) is adjacent to the site.
View Cones	**0**	Site lies outside of a view cone
Historic Core Area	**0**	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	***0***	Some employment-generating uses as part of the stadium, which will be replaced.
Diversifying the economy end employment opportunities	***0***	Unlikely to provide affordable workspace.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access exists from Grenoble Road
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area (e.g., to Blackbird Leys). Potential for improvements to be made depending on use delivered.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant changes in ground level. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Includes areas of filled ground which may be unsuitable for housing without mitigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	N/A

Stage 2 conclusion
No insurmountable constraints to development. Proximity to Grade II* listed Farmhouse may require design sensitivity in a small part of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS8: Land at Meadow Lane

Site name	Land at Meadow Lane
SHLAA reference (and OLP2036 Policy if applicable)	389 Policy SP42
Ward	Rose Hill and Iffley
Total site size (ha)	0.99ha
Existing use(s)	Private green space, in the past rented out for horse grazing

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	Yes	Small part in corner of the site.
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has expressed an intention to develop this site.
Does the landowner specify types of development	Seeking to deliver residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	--	Small amount of Flood Zone 3a and 3b on the western boundary of the site, and a slightly wider area of Flood Zone 2. Surface water flooding in same area.
Flooding of land surrounding	0	Safe access and egress from the site can be achieved as the route identified is flood-free, with the majority of the site also in Flood Zone

site for access/ egress		1. (There is a watercourse running along the site's western boundary, but the site would not be accessed from here).

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	Site is unprotected open space.
Green belt?	0	Not in the Green Belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	
Affordable housing provision	+	

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Not within a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Amount of community facilities likely to remain the same as a result of the application.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	-	>400m to nearest bus stop, Iffley turn. Services include 3 City, 3A.
Sustainable transport links (rail station)	-	>3200m from Oxford railway station
Primary Schools	-	>800m from nearest primary school (Rose Hill School)
Secondary Schools	-	>800m from nearest Secondary School (Greyfriars Oxford Catholic School)
GP Surgeries	-	>800m from the nearest GP surgery
Post office	-	>800m from the nearest post office
Air Quality	-	Whole city is within an Air Quality Management Area.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Small watercourse along western boundary of the site

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Site contains no nature designations. Ecological assessments undertaken in support of a planning application have found the site is of value for invertebrates, and badger activity is evident. As such, the site is highly ecologically constrained. Although it is not subject to any designations for its wildlife value, it may qualify at least as an Oxford City Wildlife Site (if not a Local Wildlife Site). Any development proposals coming forward should retain and enhance as much of the habitat supporting the invertebrate assemblage as possible, and ideally the badger sett as well. If this cannot be achieved, a detailed assessment of how invertebrates and badgers utilise the site and surrounding land should be made, to inform a package of mitigation and compensation measures that ensures there are no residual impacts on either.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Known archaeological potential. General potential for Iron Age and Roman activity and located within the historic core of the medieval village.
Conservation Areas & Register of Parks and	--	Site lies within the Iffley Conservation Area.

Gardens (RPG)		
Listed Buildings	-	Two Grade II Listed Buildings (Tudor Cottage and Townsend Close) and a Grade II Listed Wall (Wall and Gate of Townsend Close) nearby. The setting and any impacts on it of any proposed development would need to be understood as part of any application.
View Cones	-	Site within view cone
Historic Core Area	0	Not within historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	No change in the number of jobs/ economic floorspace in the knowledge economy
Diversifying the economy end employment opportunities	0	No change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes. Via Church Way. Limited access for existing properties along Meadow Lane
Can walking and cycling connections with the surrounding area be achieved?	Yes.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees and hedgerows which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by the location within the Iffley Village Conservation Area. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the

	criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit and enhance the character and appearance of the Iffley Village Conservation Area.
Are land contamination issues likely?	No significant contamination risks identified.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding uses are residential.

Stage 2 conclusion
This site is an unprotected undeveloped greenfield site with a small portion of the site in Flood Zone 3b. There are some heritage assets on the site including the site's location within the Iffley Conservation Area. It has some general archaeological potential and is sited within one of the city's locally designated view cones. Careful design will be needed to mitigate impacts on nearby heritage assets. There are also ecological concerns, in terms of the potential for badgers and invertebrates, but with potential for a scheme that responds to these carefully. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS9: Littlemore Mental Health Centre, Sandford Road

Site name	Littlemore Mental Health Centre, Sandford Road
SHLAA reference (and OLP2036 Policy if applicable)	33
Ward	Littlemore
Total site size (ha)	6.6
Existing use(s)	Site is in use for health care facilities, includes employer linked housing. Use Class C2.

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Within 200m of SSSI (Littlemore Railway Cutting)
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Intending to develop some residential (employer-linked) subject to operational hospital uses.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	*Site is in Flood Zone 1* *(Patches of surface water flood risk present throughout site)*
Flooding of land surrounding site for	0	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	*Site is currently in use as a mental health centre.*
Green belt?	0	*Site is not on green belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	I	*Depends on implementation.*
Affordable housing provision	I	*Depends on implementation.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	+	*Site is adjacent to an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Bus stops located on Sandford Road - services 3A, 45, X40*
Sustainable transport links (rail station)	-	*Oxford Rail station over 1.6km from site*
Primary Schools	-	*John Henry Newman Academy located over 800m from the site*
Secondary Schools	-	*The Oxford Academy located over 800m from the site*
GP Surgeries	-	*Donnington Medical Practice over 800m from the site*
Post office	-	*Littlemore Post Office over 800m from the site*
Air Quality	-	*Site is located within an Air Quality Management Area*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	--	*Site contains a water body.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	0	*Scrub by Heyford Hill Roundabout (incl. Littlemore Railway Cutting SSSI, which is a geological SSSI)* *Site has tree, grassland, pond and ditch habitats. Potential for various Priority/ Principal species in the area including swifts, badgers, common toad, hedgehog, grass snake, starling, dunnock, house sparrow, song thrush, reed bunting, starling.* *Earthwatch Tiny Forest: Littlemore within/ adjacent to site.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Has archaeological potential – roman pottery has been found previously, also Iron Age and Roman remains recorded nearby.*
Conservation Areas & Register of Parks and Gardens (RPG)	0	*Site is not in or on the edge of a conservation area or near site on the RPG register. Littlemore Conservation Area is located to the north of the site beyond the railway line.*
Listed Buildings	0	*Site contains no identified historic building constraint but heritage assets are located nearby.*
View Cones	0	*Site lies outside of a view cone*
Historic Core Area	0	*Site lies outside the City Council's locally designated Historic Core Area.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	*No change in number of jobs/economic floorspace in knowledge-based economy*
Diversifying the economy end employment opportunities	0	*No change in employment base or access to affordable workspaces*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access from Sandford Road
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are numerous trees on the northern (railway cutting) and southern (A4074) boundaries and other trees within the site. There is also a hedge line along site frontage with Sandford Road. There is a pond and brook on the site. Site is within 200m of SSSI (Littlemore Railway Cutting)
Are land contamination issues likely?	Any re-development on this site would likely require a contamination site investigation and risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	N/A

Stage 2 conclusion
No insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS10: MINI Plant Oxford

Site name	MINI Plant Oxford
SHLAA reference (and OLP2036 Policy if applicable)	497 (SP8 MINI Plant Oxford; AOC7 – Cowley Branch Line)
Ward	Blackbird Leys
Total site size (ha)	69.9Ha
Existing use(s)	Car Plant (Mix of B2/ B8 and Class E(g) uses associated with manufacturing process)

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	Application reference 23/02166/FUL for 26,350sqm net (GIA) under construction

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – ongoing ambitions continue to produce BMW MINI at MINI Plant Oxford.
Does the landowner specify types of development	No however, an appropriate mix of B2/ B8 and Class E(g) employment uses to enable on-going car manufacturing to remain in the city has been assumed.

Stage 1b conclusion
Landowner has ongoing ambitions to continue to use the site for car manufacturing. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	*Site is in Flood Zone 1* *(Large patches of surface water flood risk present, particularly centrally and towards the western corner of site.)*

Flooding of land surrounding site for access/ egress	0	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	*Site is previously developed land (in use as car manufacturing plant)*
Green belt?	0	*Site not within the Green Belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	0/l	*Site is primarily a non-residential allocation however policy E1 allows housing delivery on employment sites if landowner sought this.*
Affordable housing provision	0/l	*Site unlikely to deliver affordable housing but depends on implementation.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most	0	*The site is not within a Regeneration Area. (Site lies within an area that is more deprived than 55% of neighbourhoods – IMD 2025)*

deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	*Community facilities unlikely to change*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	*Public open space unlikely to change*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Nearest Bus Stops is Factory Gate (Garsington Road) - less than 400m from site entrance. This is a frequent service bus stop. There is turn style access for workers directly onto the site.*
Sustainable transport links (rail station)	-	*Oxford Railway station is more than 800m away (in fact, more than 5km away)*
Primary Schools	-	*Nearest Primary school is more than 800m away (St Francis CofE Primary)*
Secondary Schools	-	*Nearest secondary school is more than 800m away (Oxford Academy is almost 2km away)*
GP Surgeries	-	*Nearest GP Surgery is more than 800m away (Hollow Way Medical Centre – part of St Bartholomew & Hollow Way Medical Practice is 1.5km away)*

Post office	-	*Although Balfour Road Post Office is within 800m of Gate 10 (Garsington Road), given the size of the site, the majority of it is more than 800m away from the nearest Post Office*
Air Quality	-	*Within city-wide AQMA but outside of recognised air quality "hotspot".*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Pond within 30m of eastern site boundary*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Contains no nature conservation designations. However, site contains 9ha approx. of former playing fields. Aerial imagery shows some hedgerows on this greenspace which have some ecological potential. The remainder of the site contains limited green spaces which seem to comprise artificially landscaped areas including trees and mowed grass areas.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site is of archaeological interest as the Dorchester-Alchester Roman Road runs through the site and there is potential for roadside settlement. Archaeological remains from the Bronze Age and Roman remains have also previously been recorded.*
Conservation Areas & Register of Parks and Gardens (RPG)	0	*Site is not in or on the edge of a conservation area or site on the RPG register*

Listed Buildings	0	*Site contains no identified historic buildings constraint*
View Cones	0	*Site lies outside of a view cone*
Historic Core Area	0	*Site lies outside the historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	I	*Unlikely to increase jobs in knowledge-based sectors due to nature of employment – i.e., car manufacturing but depends upon implementation*
Diversifying the economy end employment opportunities	I	*Site would support continued diversification of employment base by continuing to offer car manufacturing jobs – again generally depends upon implementation*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes, although size, nature and location of the site – accessed from Oxford Ring Road (A4142) result in a rather car-dominated environment.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The site contains scattered trees around car parking areas and along main vehicular routes. Overall, the site appears relatively flat.
Are land contamination issues likely?	Possible contamination issues due to many years of use as a car manufacturing plant. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins a railway line, the ring road and other industrial/ storage style employment. Site is also adjacent to fields/ arable land and sports pitches.

Stage 2 conclusion

No insurmountable constraints to continued car-manufacturing-related development activities at this site. The site has some archaeological potential due to its proximity to the Dorchester-Alchester Roman Road. Potential for surface water flood risk at parts of site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS11: Overflow Carpark at Kassam Stadium

Site name	**Overflow carpark at Kassam Stadium**
SHLAA reference (and OLP2036 Policy if applicable)	**028b** **Policy SP14**
Ward	**Northfield Brook**
Total site size (ha)	**2.29**
Existing use(s)	**Surface level overflow car park**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**--**	*Site is partially in Flood Zone 3b (south-western corner of car park and partly along south-eastern perimeter).* *(Patch of surface water flood risk towards far eastern corner of site)*
Flooding of land	**-**	*A very small part of the initial access route is within Flood Zones 2 and 3a, although most of the route lies within Flood Zone 1.*

surrounding site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	*Site consists of previously developed land*
Green belt?	**0**	*Site lies outside the Oxford Green Belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**++**	*Landowner interest in developing the site for housing, which is a suitable use.*
Affordable housing provision	**+**	*Site likely to deliver affordable housing.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	**+**	*Site is adjacent to a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**I**	There is potential for community facilities to be delivered on site however this would depend on implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**+**	*Site likely to deliver additional open space.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**-**	*600m to Littlemore 5A every 30 mins, just over 800m to Pegasus Road stop with buses every 5-6mins to the city centre*
Sustainable transport links (rail station)	**I**	Over 3.5km walk to Oxford Station however there is potential for the site to be within walking distance of a new Cowley Branch line station if this delivered during the plan period.
Primary Schools	**-**	*Just over 800m to John Henry Newman Academy primary*
Secondary Schools	**-**	*1.4km to Oxford Academy*
GP Surgeries	**-**	*1.4km to The Leys Health Centre*
Post office	**-**	Over 1km to Littlemore PO or Balfour Road PO
Air Quality	**-**	*Whole city is within an AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**-**	*Southern boundary of site within 30m of a watercourse*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., along brook. The site is dominated by hardstanding and the stadium, with small patches of vegetation in the northern parcel. It appears to have very limited intrinsic ecological value. However, it is bordered by the Littlemore Brook and Northfield Brook OCWSs, which provide a corridor for wildlife. A buffer should be included to support these features. There is scope to deliver significant ecological enhancements, which should include an element focused on buffering the brooks. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	There is potential for prehistoric, Roman and medieval archaeology. The archaeology is dispersed and mostly focused around the fringes of the car park (peat with potential for prehistoric pollen sequences near the Bingo Hall, dispersed Roman pottery manufacturing activity, burials and other features

		east and north of the standing Nunnery dormitory range). This will need to be explored as part of any redevelopment.
Conservation Areas & Register of Parks and Gardens (RPG)	**0**	The site is outside of a Conservation Area but close to the Littlemore Conservation Area.
Listed Buildings	**0**	Site is nearby Minchery Farmhouse (Grade II*) although not within the setting of.
View Cones	**0**	Site lies outside of a view cone
Historic Core Area	**0**	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	**0**	*Not expected to lead to a change in the number of jobs or amount of floorspace in knowledge-based economy.*
Diversifying the economy end employment opportunities	**0**	*No change in employment base or access to affordable workspaces expected.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access exists from Grenoble Road, through the main Kassam site and across the bridge into the site.
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area, e.g., to Blackbird Leys and Littlemore, but improvements would be needed.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Vegetation around the edges of the site. Brook to the south is a wildlife corridor which can be enhanced.

Are land contamination issues likely?	Includes areas of filled ground which may be unsuitable for housing without mitigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	n/a

Stage 2 conclusion
No insurmountable constraints to development. Proximity to Grade II* listed Farmhouse may require design sensitivity in a small part of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS12: Oxford Science Park

Site name	Oxford Science Park
SHLAA reference (and OLP2036 Policy if applicable)	588 LP2036 Policy SP9 – Oxford Science Park & Policy AOC7 – Cowley Branch Line
Ward	Littlemore
Total site size (ha)	27.33
Existing use(s)	Mix of employment uses (mainly office and labs) and ancillary uses including car parking and nursery.

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	Site not greenfield, but some areas of Flood zone 3b,

		generally following the line of the watercourse which runs through the site.
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	Yes	All remaining plots, either have planning permission or development has commenced

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Confirmed intention to retain/redevelop for employment R&D uses
Does the landowner specify types of development	Employment (R&D) uses – primarily a mix of laboratory and office buildings and associated uses

Stage 1b conclusion
Confirmed landowner intention, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***

What flood zone(s) is the site in?	**--**	Site is partially in Flood Zone 3b - the flood zone largely follows the boundaries of the watercourse which runs east-west along northern portion of site. Areas of Flood Zone 2 and 3a extend slightly further beyond. (Various patches of surface water flood risk present within site)
Flooding of land surrounding site for access/ egress	**0**	There is safe access/egress from the site – surrounding area for access to the site is Flood Zone 1.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Site is previously developed land
Green belt?	0	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	I	Site unlikely to deliver new homes however policy E1 allows housing delivery on employment sites if landowner intentions were to change
Affordable housing provision	I	Site unlikely to deliver affordable housing because no housing is proposed, but depends on implementation.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	++	Site is partly within 20% most deprived, and partly within 30% most deprived.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Community facilities unlikely to change as a result of allocation

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	Public open space should be provided as part of redevelopment of plots

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	Bus stop on site (number 45 – limited hours service). Also close to site (Park Homes stop – frequent service stop, close to the site – 550m away)
Sustainable transport links (rail station)	-	Oxford Station is more than 5km away
Primary Schools	-	John Henry Newman Academy is 1.5km away

Secondary Schools	-	The Oxford Academy is 2km
GP Surgeries	-	The Leys Health Centre is more than 2km away)
Post office	-	Littlemore Stores & Post Office is more than 2km away)
Air Quality	-	Within AQMA but outside of identified hotspot or area in breach of local air quality standards

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	--	Littlemore Brook runs through the site

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Littlemore Brook (Oxford City Wildlife Site) runs through the site. Several trees appear on-site as does a small area of woodland which screens acts as a visual screen from the sewage infrastructure located to the south. Trees along part of the northern boundary to the site are covered by a TPO woodland group area (which runs part of the way along the Littlemore Brook from the A4074 and then acting as a boundary between Littlemore house and the new development directly to the south and the Science Park itself. Northern boundary and area on the east (generally following the watercourse) identified in LRNS as areas that have the potential to become important for biodiversity.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Archaeological potential for Saxon and Roman remains
Conservation Areas &	0	Site not within one of the city's conservation areas or on the RPG register

Register of Parks and Gardens (RPG)		
Listed Buildings	-	Minchery Farmhouse (Grade II*) is adjacent to the site.
View Cones	0	Site lies outside the city's view cones
Historic Core Area	0	Site lies outside the city's historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	Development of remaining plots, and intensification of existing developments will support the knowledge economy.
Diversifying the economy end employment opportunities	+	Site has potential to deliver affordable/ flexible workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, access already exists
Can walking and cycling connections with the surrounding area be achieved?	Yes, active travel connections can be improved as accessibility of area is car-dominated
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains trees, hedgerows and woodland likely to form part of structural landscaping. Site contains Littlemore Brook – Oxford City Local Wildlife Site. No significant changes in ground level.
Are land contamination issues likely?	Some areas of potential contamination are present resulting from filled ground. Further site investigations will be required.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Oxford Sewage Treatment Works is located to the South of the site (smells). Residential properties in Littlemore are located to the North. A4074 is located to the west (noise) and

	to the east is the Kassam Stadium including the Ozone Leisure Park.

Stage 2 conclusion
Site is generally sustainable for ongoing / intensified use for employment, and more so with the opportunities for sustainable travel that will come with the reopening of Cowley Branch line with a new passenger station adjoining this site during the plan period. Care will need to be taken in terms of the site's proximity to the brook (including in relation to potential need for buffers but also in terms of addressing flood risk arising from the watercourse); to nearby protected trees; and the potential for archaeology which may need investigation. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS13: Ozone Leisure Park and Minchery Farmhouse

Site name	**Ozone Leisure Park and Minchery Farmhouse**
SHLAA reference (and OLP2036 Policy if applicable)	**028c**
Ward	**Littlemore**
Total site size (ha)	**3.0 ha**
Existing use(s)	**Cinema, bowling, other community/leisure uses**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes – mixed use development including R&D (already planning permission for part of site 23/01198/FUL)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**--**	Very small area of Flood Zone 3a and 3b immediately adjacent to the brook, slightly wider area of Flood Zone 2. Patches of surface water flooding.
Flooding of land	**0**	Grenoble Road nearly all free of flood risk.

surrounding site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	Site consists of previously developed land
Green belt?	**0**	Site lies outside the Oxford Green Belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	***0***	
Affordable housing provision	***0***	

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	**++**	Site is within a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**I**	Community function would be replaced, but whether there is additional or the form will depend on implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**+**	Site is likely to deliver additional public open space.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	<400m to nearest bus stop outside Kassam stadium which provides 3A service every 30mins to Templars Square and the 600 service every 30 mins to the Hospitals and Thornhill Park and Ride. Most of the site is within 800m of Pegasus Road stop with the 1 and 5 services running approximately every 5-6mins to the City Centre and Oxford Rail station.
Sustainable transport links (rail station)	**I**	Over 3.5km walk to Oxford Station, however there is potential for the site to be within walking distance of the Cowley Branch line station if this is delivered during the plan period.
Primary Schools	**-**	Approximately 1km to Windale Primary and John Henry Newman Academy Primary.
Secondary Schools	**-**	Approximately 1.5km to Oxford Academy.
GP Surgeries	**+/-**	Some parts of the site are within 800m of the nearest GP Surgery (The Leys Health Centre) while other parts of the site are further away.
Post office	**-**	Over 1km to Littlemore PO or Balfour Road PO (Dunnock Way Drop and Collect within 800m of some of the site).

Air Quality	**-**	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**-**	Northern boundary of site within 30m of a watercourse.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., along brook. The site is dominated by hardstanding and the stadium, with patches of vegetation along the brook and to the east. It appears to have very limited intrinsic ecological value. However, it is bordered by the Littlemore Brook and Northfield Brook OCWSs, which provide a corridor for wildlife. A buffer should be included to support these features. There is scope to deliver significant ecological enhancements, which should include an element focused on buffering the brooks. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**--**	Contains the Minchery Farmhouse, which formed part of Littlemore Priory. There is potential for prehistoric, Roman and medieval archaeology (peat with potential for prehistoric pollen sequences near northwestern corner of the Ozone, dispersed Roman pottery manufacturing activity, burials and other features east and north of the standing Nunnery dormitory range). This will need to be explored as part of any redevelopment.
Conservation Areas & Register of Parks and Gardens (RPG)	**0**	The site is outside of a conservation area.
Listed Buildings	**--**	Minchery Farmhouse (Grade II*)
View Cones	**0**	Site lies outside of a view cone
Historic Core Area	**0**	Site lies outside the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**+**	The redevelopment of the ozone leisure park presents an opportunity to deliver an increase in jobs to support the knowledge economy.
Diversifying the economy end employment opportunities	**+**	The Kassam Stadium is a site where affordable workspaces may be expected to come forward. This site would therefore support diversification of the employment base or provide affordable workspaces.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access exists from Grenoble Road

Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area (e.g., to Blackbird Leys). Potential for improvements to be made depending on use delivered.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant changes in ground level. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Includes areas of filled ground which may be unsuitable for housing without mitigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	N/A

Stage 2 conclusion
No insurmountable constraints to development. Proximity to Grade II* listed Farmhouse may require design sensitivity in a small part of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS14: Redbridge Paddock

Site name	Redbridge Paddock
SHLAA reference (and OLP2036 Policy if applicable)	113 Policy SP29
Ward	Hinksey Park
Total site size (ha)	3.64ha
Existing use(s)	Private open space previously used for horse grazing.

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes (2025 confirmed intention)
Does the landowner specify types of development	Yes – Residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	-	A very small portion of the site lies within Flood Zone 3a, mainly along the watercourses, with a marginally higher area within Flood Zone 2 (mainly towards the northern boundary of the site). Only a few very small patches of surface water flooding.

Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site from the south, as the ring road and Abingdon Road lies in Flood Zone 1.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	Site is meadowland used for grazing until recently (unprotected private open space)
Green belt?	0	Site not in the green belt.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site allocated for homes and residential moorings.
Affordable housing provision	+	Site expected to deliver policy compliant levels of affordable housing.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Site not allocated for community facilites.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	10% POS will be provided within the site.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	Less than 100m away there are regular bus services on the Abingdon Road, and from the Park and Ride opposite the site
Sustainable transport links (rail station)	-	Oxford railway station is over 20 minutes walk (3500m)
Primary Schools	-	The nearest school is more than 800m away.
Secondary Schools	-	The nearest school is more than 800m away.
GP Surgeries	-	The nearest GP surgery is more than 800m away.
Post office	-	The nearest post office is more than 800m away.
Air Quality	-	Entire city lies within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Weirs Mill Stream, a tributary of the Thames, runs along the eastern edge of the site.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	0	Within 50m of the Iffley Meadows SSSI Site is not subject to any designations for its wildlife value; however, the land opposite the River Thames forms part of the Iffley Meadows Site of Special Scientific Interest (SSSI). The potential for any proposed development to directly or indirectly impact the SSSI must be assessed. Aerial imagery indicates Redbridge Paddock is dominated by grassland with areas of scattered scrub and potentially a woodland belt along the eastern boundary. Numerous tree lines are present. Iffley Meadows SSSI is noted for its alluvial flood meadows containing a rich grassland flora. It should be a priority to establish the distinctiveness and condition of the grassland within the allocation site to understand the extent of constraint this provides to potential development. Potential protected species constraints include roosting bats, foraging and commuting bats, badger, water vole, otter, breeding birds, reptiles, and invertebrates. In addition, the River Thames is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination as a result of any proposed development. A lighting strategy should be submitted in support of any planning application, setting out the lighting associated with the proposed development. Given the proximity of the proposed development, this will need to account for both internal and external lighting. It is vital that a suitable buffer in terms of size and composition is provided to the River Thames and Iffley Meadows SSSI. This should include retaining the existing treeline / woodland belt and delivering high quality habitats within the river corridor. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the

		area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Potential for Norman/ medieval archaeological remains.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site not within a conservation area or RPG
Listed Buildings	0	Site does not contain any listed buildings
View Cones	0	Site not within view cone
Historic Core Area	0	Site outside the city's locally designated high buildings area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	Site not allocated for employment, unlikely to support additional jobs in the knowledge economy.
Diversifying the economy end	0	No change.

employment opportunities		

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access to the site would be from Abingdon Road and may require either a connection into the existing signalised junction from Abingdon Road/Old Abingdon Road or a connection into the existing traffic signals for buses accessing the Redbridge P & R site opposite.
Can walking and cycling connections with the surrounding area be achieved?	Yes two points of access would be required for pedestrians and cyclists: one to the west connecting with the bus stops at the P & R site and the other to the north connecting with existing bus stops on Abingdon Road. The existing cycle track which runs along the western boundary should be retained.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Weir Mill stream forms the eastern boundary to the site, the site is comprised of made up ground being a former landfill site. Site contains significant existing trees along the river bank which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity and to enhance the street scene along Abingdon Road and cycle track.
Are land contamination issues likely?	Yes – historic use as landfill
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No but consideration needs to be given about views into the site from Iffley village

Stage 2 conclusion
No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS15: Sandy Lane Recreation Ground

Site name	**Sandy Lane Recreation Ground**
SHLAA reference (and OLP2036 Policy if applicable)	**SHLAA #289** **Local Plan 2036 policy SP11**
Ward	**Blackbird Leys**
Total site size (ha)	**5.15ha**
Existing use(s)	**Green open space with sports pitches, vacant car parking area off Ambassador Avenue currently used for motorbike training**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	2023 landowner intention to develop.
Does the landowner specify types of development	Local Plan 2036 allocation establishes site as suitable for residential on the western part of site, subject to reprovision of sports facilities and safeguarding land for Cowley Branch line.

Stage 1b conclusion
Landowner has confirmed intention to develop – continue to next stage of assessment.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	*Site is in Flood Zone 1*. *Surface water flooding across site*.

Flooding of land surrounding site for access/ egress	0	*There is safe access and egress from the site- surrounding streets in Flood Zone 1.*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	Site is greenfield land (public open space)
Green belt?	0	Site not in the green belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Site is allocated residential-led development. Landowner intention to include significant amount of residential.*
Affordable housing provision	+	*Site should be capable of providing affordable housing.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation.*

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most	**0**	*The site is not within a Regeneration Area. (Site lies within an area that is more deprived than 64% of neighbourhoods – IMD 2025)*

deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	I	*Development of the site could lead to decrease in sports facilities unless these are appropriately reprovided. Will depend upon implementation.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	-	Development at this site likely to reduce the amount of available public open space.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<400m to nearest bus stop on the Blackbird Leys Road with frequent services
Sustainable transport links (rail station)	-	Currently more than 1600m from Oxford Railway Station, however, potential to be in close proximity to Cowley Branch Line in future.
Primary Schools	+	Primary school within 800m
Secondary Schools	-	Nearest secondary school is more than 800m away.
GP Surgeries	-	1.5km to nearest GP in Blackbird Leys.
Post office	-	About 1km to Balfour post office
Air Quality	-	Whole city within AQMA but not in proximity to hotspot.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	Not within 30m of a watercourse

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	No designations on or near the site. The site is currently an open space for recreational sports pitches, there is scrub and vegetation and some tree planting along the southeastern and southwestern edges of the site. Potential protected species constraints are likely limited to nesting birds in boundary vegetation. There may be potential to improve habitat provision through enhancement of the remaining green space which is currently unlikely to provide much in ecological terms.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	A sizable site with Roman kiln 90m to west and medieval stray finds to the east means some potential for deposits on site.
Conservation Areas & Register of Parks and Gardens (RPG)	**0**	Nothing notable
Listed Buildings	**0**	Nothing notable
View Cones	**0**	Nothing notable

Historic Core Area	**0**	Nothing notable

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	*Unlikely to result in change in the number of jobs related to the knowledge economy.*
Diversifying the economy end employment opportunities	0	*No change.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, from BBL road however there is a slope from the road and so the change in levels needs to be considered.
Can walking and cycling connections with the surrounding area be achieved?	There is a cycle path running along the north-western side of the site beyond the ring road. There is scope to improve connections for pedestrian and cycling by creating access through the retail park.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Change is ground levels as the BBL road is above the site Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Some made ground and potential fill so likely minor contamination risks. Site investigations would be required.

Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The ring road runs along one side of the site and the Cowley Branch Line to the other side which if opened up to passenger services would result in more train movements with the potential for more noise and pollution.

Stage 2 conclusion
The site is generally a sustainable one with limited heritage or biodiversity sensitivities, however, any development will need to take into consideration the loss of existing pitch provision and deliver appropriate reprovision to mitigate for losses of these public facilities. Additionally, the site adjoins a railway line and the A4142 and mitigation may be required to minimise impacts on new residents. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS16: Templars Square

Site name	Templars Square
SHLAA reference (and OLP2036 Policy if applicable)	014 Policy SP3
Ward	Cowley
Total site size (ha)	3.88Ha
Existing use(s)	Mixed use including retail, parking, residential

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Planning permission was granted (November 2021) for a mixed-use scheme comprising retail, 225 residential units and hotel (16/03006/FUL). There has since been a change in ownership and this permission has expired.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 2 assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Mixed of uses including retail and residential

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***

What flood zone(s) is the site in?	**0**	*Site is in Flood Zone 1* *(Patches of surface water flood risk present across site, particularly towards the south western area around Hockmore Street and central area to the east.)*
Flooding of land surrounding site for access/ egress	**0**	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	***SA rating***	***Comments***
Previously developed land?	**0**	*Site is occupied and in use for retail, economic and residential uses*
Green belt?	**0**	*Site not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	***SA rating***	***Comments***
Housing provision	**++**	*Expired permission includes 225 residential units. Landowner intent remains to deliver housing.*
Affordable housing provision	**+**	*Likely that any new scheme coming forward would deliver affordable housing.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	***SA rating***	***Comments***

Regeneration area (within the top 20% most deprived areas IMD)	**0**	*Site is not within one of the most deprived areas of Oxford.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	**0**	*Community facilities likely to remain the same- would be protected by policy.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**I**	Public open space could be re-modelled or re-provided as part of residential e.g. rooftop gardens. There is also opportunity to improve access and visual links to nearby green spaces especially the park area opposite (John Allen Park), and to create new areas of attractive public open space within the site.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot? 18 St Omer Rd, Oxford OX4 3HBtemp

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	Multiple frequent bus services adjacent to the site, along Between Towns Road, Crowell Road and Barns Road, with services connecting to the City Centre, Cowley Road, JR Hospital, and Blackbird Leys. (Services 1, 5A, 5, 10, 700). Also less frequent (hourly) services connecting further afield to Great Milton, Chalgrove and Watlington (services 11, 46).

		Also within 400m are bus stops along Oxford Road, including Brookes Bus frequent service. Policy SP3 also notes that bus stopping facilities should also be improved.
Sustainable transport links (rail station)	**-**	5.3km to Oxford Rail Station
Primary Schools	**+**	Primary schools within 800m (Church Cowley St James).
Secondary Schools	**-**	Greyfriars Oxford Catholic School 1.3km, Oxford Spires Academy 1.9km
GP Surgeries	**+**	Temple Cowley Health Centre 500m
Post office	**+**	Onsite and Rose Hill 650m
Air Quality	**-**	Whole city is within an AQMA

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**0**	Not within 30m of a water body

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	The site is predominantly brownfield so there will be opportunities to introduce some biodiversity and natural resource enhancements, e.g. more trees, green walls, roof gardens. Semi-natural habitats are absent from the site. Potential protected species constraints include roosting bats and nesting birds; however, the urban surrounding reduces the likelihood that bats are present. The need for survey work should be assessed on a case-by-case basis with any application coming forwards.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	Site is of archaeological interest - Historic core of Church Cowley and western end of Roman pottery manufacturing compound, though heavily built up.
Conservation Areas & Register of Parks and Gardens (RPG)	**-**	Partly adjoins Beauchamp Lane CA
Listed Buildings	**-**	Site forms the setting of a number of listed buildings on Beauchamp lane.
View Cones	**0**	The site is not in a View Cone, although is in an elevated position in the city.
Historic Core Area	**0**	Site outside of Historic Core Area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**0**	No change in the number of jobs/economic floorspace in the knowledge-based economy.
Diversifying the economy end employment opportunities	**I**	In this district centre location, there is scope for affordable workspace to be delivered and diversification outside of the knowledge economy, but it will depend on implementation.

Other constraints which could affect suitability of site for development

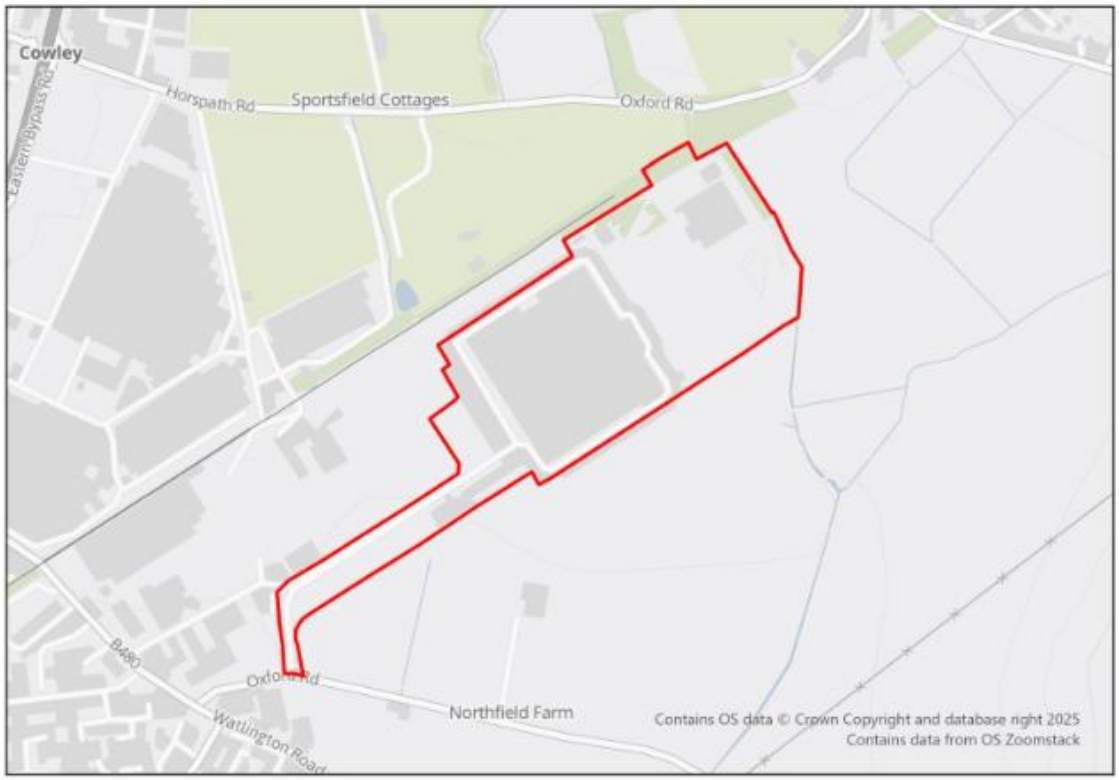
Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes There is currently pedestrian access from all directions, all around the site. The surrounding pavements are fairly wide. Height differences across the site at present could present access issues for wheelchair users and buggies, as the site is accessed in some places via stairways. Opportunity to enhance public realm to accommodate improved pedestrian connectivity across Between Towns Road and across Barns Road which are both busy roads, and an improved pedestrian and cycle experience e.g. there are some large junctions that cyclists would currently need to navigate including the junction at the entrance to John Allen Way, and other ways to improve support for walking and cycling should also be explored as the current situation is skewed towards access by car.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There is a variation in base level across the site, with the rear/northern side of the site being 1-2 storeys higher up that the base level at the southern edge of the site along Between Towns Road. No significant physical features, a few ornamental trees.
Are land contamination issues likely?	Contamination risks potentially present. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	None identified, mainly residential surrounding the site

Stage 2 conclusion
The site is previously developed land and is in an accessible location. The site is also not sensitive from an ecological perspective. However, it lies adjacent to a conservation area, so design sensitivity in that location will be required. Also, the site has some archaeological potential. None of the heritage constraints are insurmountable. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS17: Unipart

Site name	Unipart
HELAA reference (and OLP2036 Policy if applicable)	120 (Policy SP7 Unipart and Policy AOC7 Cowley Branch Line)
Ward	Blackbird Leys
Total site size (ha)	30.63ha
Existing use(s)	Warehousing, Industrial uses, offices

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes, landowner has expressed an interest to redevelop the site within the plan period
Does the landowner specify types of development	Yes – employment uses

Stage 1b conclusion
Landowner has confirmed intent to develop. Consider site further for employment uses, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	*Site is in Flood Zone 1* *(There are patches of surface water flood risk present throughout site)*
Flooding of land	0	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

surrounding site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	*Site is previously developed land and with buildings in use on site*
Green belt?	0	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	0/ I	*Site is primarily a non-residential allocation however policy E1 allows housing delivery on employment sites if landowner sought this.*
Affordable housing provision	0/I	*Site unlikely to deliver affordable housing but depends on implementation.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	*The site is not within a Regeneration Area. (Site lies within an area that is more deprived than 55% of neighbourhoods – IMD 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	*Site unlikely to deliver community facilities*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	*Public open space is unlikely to increase resulting from the allocation of this site.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Less than 100m from site entrance to "Buildbase" Bus Stop (11 City bus)*
Sustainable transport links (rail station)	-	*More than 1600m from nearest railway station (Oxford Station)*
Primary Schools	-	*More than 800m from nearest Primary School (Pegasus Primary School)*
Secondary Schools	-	*More than 800m from nearest Secondary School (Oxford Academy is more than 2km away)*
GP Surgeries	-	*More than 800m from nearest GP Surgery (The Leys Health Centre is more than 1km away)*
Post office	-	*More than 800m from nearest Post Office (Balfour Road Post Office is more than 1km away)*
Air Quality	-	*Within AQMA but outside known "hotspots"*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Hollow Brook runs along the north-eastern boundary of the site*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Site is highly urbanised with mainly artificial/ impermeable surface cover. It contains an area of scrub to the north-east and trees and hedges on the boundaries. There are opportunities for greening of surfaces/ roofs.* *Potential for Open Mosaic Habitat to be present in the surrounding developed land. Potential protected species constraints likely include breeding birds, foraging and commuting bats, reptiles, badgers, and water vole and otters (associated with Hollow Brook). Hedging/trees on boundaries.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site is of archaeological interest as part of the access road is on the line of the Dorchester-Alchester Roman road and there is high potential for roadside settlement. There is also high potential for other prehistoric and Roman remains (sites are recorded to the north & south of the plot).*
Conservation Areas & Register of Parks and Gardens (RPG)	0	*Site is not within or adjacent to a conservation area or RPG site*
Listed Buildings	0	*Site contains no identified historic building constraint*
View Cones	0	*Site lies outside of a view cone*

Historic Core Area	0	*Site lies outside the City Council's locally designated Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	*Site likely to be redeveloped in the plan period for a mix of B class and E class jobs, the latter have the potential to support the knowledge economy*
Diversifying the economy end employment opportunities	+	*The site is likely to be redeveloped in the plan period and has the potential to support diversification of the employment base by nature of the mix of B class and E class jobs. Also has the potential to deliver affordable workspaces*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, Vehicular access exists
Can walking and cycling connections with the surrounding area be achieved?	Yes, it is possible to achieve these although currently the site has poor accessibility for walking and cycling
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant features however site is an irregular shape.
Are land contamination issues likely?	Potential for contamination. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is in an industrial area with adjacent fields (to the east).

Stage 2 conclusion
There are no notable issues with the site. The site is currently designated as a category 1 employment site and is likely to continue to remain suitable for employment uses in future. Design would need to consider any impacts to the hollow brook on the boundary of the site and

should take opportunities to incorporate natural features to break up the urbanised nature of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE1: Churchill Hospital

Site name	Churchill Hospital
SHLAA reference (and OLP2036 Policy if applicable)	012 Policy SP19
Ward	Churchill
Total site size (ha)	22.74
Existing use(s)	Hospital, student and staff accommodation

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Partially	Incremental change including 2 completed permissions for housing. Still significant potential and intention for change.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Planning permission 19/01039/FUL for 19 key worker units, completed, and permission for further 32 units also completed (June 2022).
Does the landowner specify types of development	Potential interest in further development at the site, as hospital, research, and additional housing.

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Several patches of surface water flood risk present within site)*
Flooding of land surrounding	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Site is occupied and is in use as an NHS Trust hospital.*
Green belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	*I*	*The hospital will remain the principal use of the site, however there is already accommodation on the site and the hospital trust may propose more, depending on implementation.*
Affordable housing provision	*I*	*If housing comes forward it is likely to be in the form of employer-linked housing, affordable to staff of the hospital trust.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	/	Unlikely to increase community facilities on site but precise mix will depend on implementation and which of the other suitable uses come forward. Depends on implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	/	Depending on how much of the site is brought forward for residential there is the potential to require some public open space. Depends on implementation

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<300m away from the nearest bus stop with frequent service into Oxford City Centre e.g. 15, 600, 700
Sustainable transport links (rail station)	-	> 1600m from train station (4.2km)
Primary Schools	-	*>800m from Wood Farm Primary (c.1km)*
Secondary Schools	+	*600m from the nearest secondary school (Cheney School)*
GP Surgeries	-	*1,200m from nearest GP surgery (Brookes Medical Centre)*
Post office	-	1,100m from the nearest post office (Wood Farm Post Office)
Air Quality	-	*Whole city is within an AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Boundary Brook runs along the southern boundary*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	While there are no designated ecological features on the site itself, the site directly adjoins a number of designated ecological sites and parts of the GI network including Lye Valley SSSI, Boundary Brook wildlife corridor and local/ city wildlife sites. The site and boundary does contain deciduous woodland which would constitute a priority/ principal habitat. The site itself is mostly built out and dominated by buildings and hardstanding, with pockets of green space comprising grassland, scrub and scattered trees. The site has significant existing trees scattered within it and near to the western boundary growing along Boundary Brook which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. Protected species constraints within the site are likely limited to roosting bats and nesting birds; consideration should also be given to what value different parts of the site may hold for ecological connectivity in the wider landscape. Any planning application will need to demonstrate how a reduction in the quantity or quality of groundwater recharge, or an increase in surface water run-off, will be avoided to ensure there are no significant effects on the Lye Valley SSSI.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	This site has known archaeological potential (Roman pottery manufacturing and further Roman archaeological remains).
Conservation Areas & Register of Parks and Gardens (RPG)	*0*	
Listed Buildings	*0*	
View Cones	*0*	
Historic Core Area	*0*	

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*I*	Site has potential to deliver additional jobs to support the knowledge economy and life sciences.
Diversifying the economy end employment opportunities	*I*	

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access already exists
Can walking and cycling connections with the surrounding area be achieved?	Existing connections and routes to site are established, although movement within the site can be improved by making more pedestrian and cyclist friendly and more legible.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site has significant existing trees scattered within it and near to the western boundary growing along Boundary Brook which are important to

	public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. Peat reserves potential at northwestern corner of site.
Are land contamination issues likely?	Long-established continuous medical use onsite so it may be possible.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins SSSI.

Stage 2 conclusion
Site does not have significant constraints to development. The site's proximity to the Lye Valley SSSI means that any development that does take place will need to be fully mitigated to ensure that development does not adversely impact the SSSI. No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE2: East Oxford Bowls Club

Site name	East Oxford Bowls Club
SHLAA reference (and OLP2036 Policy if applicable)	204
Ward	St Clement's
Total site size (ha)	0.3ha
Existing use(s)	Recreation

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes.
Does the landowner specify types of development	Residential.

Stage 1b conclusion
Landowner has confirmed intent to develop, consider further for allocation for housing. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 *(Surface water flood risk is located predominantly inside the north western, south eastern and south western perimeter of site, with a patch located more centrally.)*
Flooding of land surrounding site for	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	+	Site is previously developed with vacant buildings on site.
Green belt?	0	Site is not on Green Belt land.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site allocated for residential development and would provide more than 10 homes.
Affordable housing provision	+	Site would likely provide up to 40% affordable housing.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not within or adjacent to a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Allocation would lead to loss of former community facility, although this is no longer in use or accessible ot the public.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	Site not allocated.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<400m from multiple bus services on Cowley Road.
Sustainable transport links (rail station)	-	>1600m from Oxford train station.
Primary Schools	-	>800m to the nearest primary school.
Secondary Schools	-	800m to the nearest secondary school (Oxford Spires Academy).
GP Surgeries	+	<800m from the nearest GP (Bartlemas Surgery).
Post office	-	>800m from the nearest post office (Donnington Post Office).
Air Quality	-	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*

Water	0	Site is not within 30m of a water body.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Adjacent to green infrastructure network (allotments). Site itself contains no nature conservation designations but has potential for nature conservation interest. Potential to improve wildlife linkages or habitat continuity. Records of swifts <100m from site.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	Located between Leper Hospital and Cowley Road the potential is unclear, would require desk based assessment in first instance.
Conservation Areas & Register of Parks and Gardens (RPG)	-	Site is entirely within Bartlemas Conservation Area.
Listed Buildings	-	Site forms the setting of multiple listed buildings within the conservation area.
View Cones	-	Within view cone/High Buildings Area.
Historic Core Area	0	Site is not within Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*

Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/employment floorspace in knowledge-base economy.
Diversifying the economy end employment opportunities	0	No change in employment base or access to affordable workspaces.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes.
Can walking and cycling connections with the surrounding area be achieved?	Yes.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	As the site is entirely within a conservation area, all trees within and surrounding the site are subject to a Tree Protection Order.
Are land contamination issues likely?	No.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No.

Stage 2 conclusion
No insurmountable constraints although any potential development would need to take into account the site's sensitive historic environment including nearby listed buildings, the view cone and make a positive contribution to Bartlemas Conservation Area. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE3: Government Buildings and Harcourt House

Site name	Government Buildings and Harcourt House
SHLAA reference (and OLP2036 Policy if applicable)	024 (formerly also 023) Policy SP16
Ward	Headington Hill and Northway
Total site size (ha)	2.37ha
Existing use(s)	Car park, offices and cadet accommodation

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes - landowner has confirmed intention.
Does the landowner specify types of development	Yes - mixed use academic development to include residential for staff and students with complimentary commercial uses.

Stage 1b conclusion
Consider site further for allocation for mixed use academic development to include residential development for staff and students, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	*Site is in Flood Zone 1* *(Patches of surface water flood risk around the southern half of the lower parcel)*.
Flooding of land surrounding site for access/ egress	0	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	*The site is previously developed with some buildings in use*
Green belt?	0	*Site not in the Green Belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Site currently allocated residential-led development. Landowner intention to include significant amount of residential.*
Affordable housing provision	I	*Depends on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	*The site is not within a Regeneration Area. (Site lies within an area that is less deprived than 93% of neighbourhoods – IMD 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*

Community facilities	I	Site has potential to deliver community facilities- depends on implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	I	*Likely to deliver public open space, depending on amount and form of residential.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Bus stop outside site with buses 100 and X3 to city centre about 10min frequency*
Sustainable transport links (rail station)	-	*c.3km to Oxford Station*
Primary Schools	+	*c.300 metres to St Michaels CE*
Secondary Schools	-	*1.3km to Cheney School*
GP Surgeries	-	*c.1km to Brookes Medical Centre*
Post office	+	*c.600m to St Clement's Post Office*
Air Quality	-	*Whole city is within an AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	*Site is more than 30m away from a water body*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	There are limited opportunities for habitat creation at this site however there are opportunities to retain and enhance existing features. Buffering of the woodland (where possible), could also help to mitigate the impacts of development. The site is within 200m of a Local Wildlife Site and within 600m of the New Marston Meadows SSSI. The site is comprised of hardstanding, buildings, scrub and woodland. Part of the northern parcel is identified by Natural England as potentially containing Open Mosiac Habitat (a priority habitat). This would require a detailed botanical survey to determine presence/absence. Small areas of woodland in the southern parcel (mostly at the boundary) are also included on the priority Habitat Inventory. Potential protected species constraints include foraging and commuting bats, roosting bats (trees and buildings), badgers, and nesting birds. Existing trees on the site, some protected by TPOs.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Potential for archaeological remains on the site. The Civil War Parliamentarian siege line has been identified in Headington Hill Park, suggesting that it runs through the northern of the two plots. This would warrant protection through sensitive design if the line confirmed by trenching as it's the only part of the siege line confidently located to the east of the town.
Conservation Areas & Register of Parks and Gardens (RPG)	--	This site is in two parts. Part 1 (Government Buildings) is adjacent to the Headington Hill Conservation Area and Part 2 (Harcourt House) is within it. The whole site is opposite to the to St Clements and Iffley Road CA.
Listed Buildings	-	There are no listed buildings on the sites but the Grade II* Headington Hall sits within the park and St. Clements Church is nearby.

View Cones	-	The Headington Hill viewcone passes through Part 1 (Government Buildings) and South Park Viewcone passes to the south of Part 2 (Harcourt House). Significant view lines are indicated in the conservation area documents from Headington Hill Hall towards the site and along the paths at the back of Part 2 (Harcourt House).
Historic Core Area	0	*The site is outside the Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	I	Depends on implementation – if site brought forward for other uses than residential.
Diversifying the economy end employment opportunities	I	Depends on implementation – if site brought forward for other uses than residential .

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – via Marston Road
Can walking and cycling connections with the surrounding area be achieved?	Partially, via Marston road. Part 1 (Government Buildings) has potential for pedestrians access alongside the existing vehicle entrance. However, Part 2 (Harcourt House) does not currently have pedestrian access. There is the potential for pedestrian linkage between the sites where Cuckoo Lane and the Park meet the road. Good existing cycle connections from Marston Road to the city centre. Further plans to improve environment for cyclists from the County Council.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Yes - Large mature trees define the north and south edges of the site including a number of TPOs. A high hedge separates the site from the Marston Road and low trees and shrub define back edge Sites contain significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Various trees at the northern site are protected by OCC-Marston Road (No.1) TPO, 2000, and trees at the south site are protected within the Headington hill Conservation Area. Existing trees within the sites and adjacent to them will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity and the character and appearance of the conservation area
Are land contamination issues likely?	Potential for contamination at Government Buildings site (although site previously remediated, further investigations may be required). No known issues on Harcourt House site. Depending on proposed use, a site investigation and contamination risk assessment may be required to confirm absence of risks.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No significant issues identified – however, there are a number of historic environment/heritage constraints which would need to be carefully considered and addressed within the design of any scheme, including archaeological potential. Opportunities should also be sought to incorporate green features which can improve connectivity with neighbouring green spaces, as well as to retain significant green features on boundaries. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE4: Jesus College Sports Area

Site name	**Jesus College Sports Area**
SHLAA reference (and OLP2036 Policy if applicable)	**234 and 026 (SP43)**
Ward	**Donnington**
Total site size (ha)	**234 = 0.8** **026 = 0.55** **Combined = 1.35**
Existing use(s)	**Open air sports**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner (2025) confirmed intention to develop for postgrad accommodation.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Several small patches of surface water flood risk present within site)*

Flooding of land surrounding site for access/ egress	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	*Unprotected open space*
Green belt?	*0*	*Site is not within GB*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Previously allocated for housing in part.*
Affordable housing provision	*I*	*Will depend on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Not in or adjacent to regen. area*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*I*	*Depending on the scale and type of housing delivered, there could be potential to require a small increase in community facilities, however, this would depend on implementation.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*I*	*Site has potential to deliver public open space, but depends on implementation.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	>400 from bus stops located on Cowley Road – high frequency services including no's 1, 5, 10
Sustainable transport links (rail station)	-	>3500m miles from Oxford Railway station via Bartlemas Close and B480
Primary Schools	-	Over 800m from a primary school (East Oxford Primary)
Secondary Schools	+	>1,100m from Oxford Spires Academy
GP Surgeries	+	> 800m from Bartlemas Surgery and Cowley Road Medical Practice
Post office	+	>1000m from Donnington Post office
Air Quality	-	Site is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	Ditch to south of site

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., through retention of hedgerows, green roofs, walls, etc. Aerial imagery indicates the site is dominated by grassland subject to recreational use, with hedgerows flanking two boundaries. Potential protected species constraints are likely limited to nesting birds. The land is at the edge of a block of green space including the Lye Valley and Oxford Golf Course, and it would be beneficial for any development to deliver ecological enhancements onsite where possible. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e., at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*

Archaeology	-	Site contains no known archaeological sites. Roman kilns to the east at Oxford Spires, general potential for prehistoric and Roman would likely require assessment and evaluation.
Conservation Areas & Register of Parks and Gardens (RPG)	-	Adjacent to Bartlemas Conservation Area but within the Bartlemas Historic Hamlet.
Listed Buildings	-	No listed buildings onsite but within the setting of a no. of listed buildings – including Grade 2* Bartlemas Farm House and Bartlemas House and Grade 1 listed St Bartholomew Chapel – these buildings can be seen from within the site/ the site frontage on Bartlemas Close.
View Cones	-	Crescent Road View Cone across part of site
Historic Core Area	*0*	Outside the locally designated High Buildings Area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	*0*	No change in jobs for the knowledge economy
Diversifying the economy end employment opportunities	*0*	No change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes from Bartlemas Close and Barracks Lane
Can walking and cycling connections with the surrounding area be achieved?	Yes – Cycle route along the site's southern boundary – National Cycle Route 57. Walking connections to existing residential areas north and south of site via Bartlemas Close and Barracks Lane.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Ditch to southern boundary, outside of site. Site contains significant existing trees and hedgerows along the southern and western boundaries which are important to public amenity in the area and will provide valuable ecosystem services. 2 group of trees north of the pavilion in the western corner of the site are protected by the OCC -Bartlemas Close (No.1) TPO, 2006. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding area is primarily residential in nature.

Stage 2 conclusion
Although the site is protected open space it is in a suitable location for residential development. The site is adjacent to an existing CA and lies within an Historic Hamlet. Part of the site also lies within a view cone. Design sensitivity will be required in order to mitigate impacts on heritage assets. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE5: John Radcliffe Hospital

Site name	John Radcliffe Hospital
SHLAA reference (and OLP2036 Policy if applicable)	027, OLP2036 SP41
Ward	Headington Hill and Northway
Total site size (ha)	27.75
Existing use(s)	Hospital including A&E & associated uses, key worker accommodation

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 1b assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Site is available and viable for development. There are a number of planning permissions for the site, with some being implemented.
Does the landowner specify types of development	Landowner has expressed an interest in delivering some employer-linked affordable housing on site in addition to maintaining hospital-related uses. Site likely to be developed in phases as part of hospital restructuring within the Local Plan time period.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***

What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Patches of surface water flood risk present throughout site, with noticeably larger patches around the hospital buildings to the north west and south east.)*
Flooding of land surrounding site for access/ egress	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	***SA rating***	***Comments***
Previously developed land?	*0*	*Site is currently in use.*
Green belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	***SA rating***	***Comments***
Housing provision	*I*	*Depends on implementation*
Affordable housing provision	*I*	*Depends on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	***SA rating***	***Comments***

Regeneration area (within the top 20% most deprived areas IMD)	*0*	*The site is not in a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*It is unlikely that the amount of community facilities will change.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*<100m from several stops on site and in the immediate vicinity e.g. X3 City, 700, 10*
Sustainable transport links (rail station)	-	*Oxford Station (4.6 km)*
Primary Schools	+	*St Joseph's RC Primary School (750m)*
Secondary Schools	-	*Cheney School (1.7 km)*

GP Surgeries	+	*The Manor Surgery (500 m)*
Post office	-	*Marston Road (1.2 km)*
Air Quality	-	*Entire city is with AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	--	*Watercourse (brook between car parks) on site and on site boundaries.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity.* *The site boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland. Extent needs to be confirmed from TVERC database.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*The eastern part of the site has significant potential because it incorporates parts of the medieval village of Headington. Significant new development in undisturbed areas may require evaluation.*
Conservation Areas &	--	*Outer comparatively less developed edge of site within Old Headington CA, with most of site directly adjacent.*

Register of Parks and Gardens (RPG)		
Listed Buildings	--	*Grade II listed Manor House, annex and boundary wall within site boundary on outer edge*
View Cones	*0*	*While not within view cones the site is very prominent in views across Oxford.*
Historic Core Area	*0*	*Not within high buildings area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	*0*	
Diversifying the economy end employment opportunities	*0*	

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access already exists.
Can walking and cycling connections with the surrounding area be achieved?	Footpaths and cycleways connecting to the site, with links through the site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are some mature hedges on site. Site contains many significant existing trees. Some of the trees are protected by location within the Old Headington Conservation Area.
Are land contamination issues likely?	Investigation and risk assessment would be required due to current and historical use of land.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause	The site is located within an area of mixed character including residences, educational

disturbance or environmental issues such as noise or smells?	sites, and partly within the setting of heritage assets.

Stage 2 conclusion
Part of the site falls within a conservation area, with the remainder within the setting of this conservation area. The site contains a number of listed buildings on its outer edge. Design sensitivity will be needed to mitigate potential impacts on heritage assets at certain parts of the site. No insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE6: Land Surrounding St Clement;s Church

Site name	Land Surrounding St Clement's Church
SHLAA reference (and OLP2036 Policy if applicable)	117 Policy SP18
Ward	St Clement's
Total site size (ha)	2.31ha
Existing use(s)	Greenfield land surrounding churchyard.

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. The landowner (Magdalen College) has intention to develop
Does the landowner specify types of development	Primarily residential

Stage 1b conclusion
Consider further for allocation for residential-led development, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	-	A small area in the western part of the site, adjacent to the River Cherwell lies in Flood Zone 3a. Surface water flood risk south of the church.
Flooding of land	*0*	There is safe access/egress from the site – area surrounding site is Flood Zone 1.

surrounding site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	The site is greenfield and will therefore not make use of previously developed land. The site can be defined as unprotected open space, surrounding a churchyard.
Green belt?	*0*	*Site is not on Green Belt land.*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Landowner interest in housing, which is a suitable use for the site.*
Affordable housing provision	+	*Likely to deliver affordable housing (unless student accommodation).*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not within one of the most deprived areas of Oxford.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	It is unlikely that any development will increase the provision of essential services and facilities on site. Facilities will remain the same.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	*Likely that development would create additional public open space.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Bus stop outside site with buses 100 and X3 to city centre about 10min frequency*
Sustainable transport links (rail station)	-	*2.7km to Oxford Station*
Primary Schools	+	*c.750m to East Oxford Primary School*
Secondary Schools	-	*c.1.2km to Cheney School*
GP Surgeries	-	*Just over 800m from most of the site to St Clement's Surgery*
Post office	+	*Under 800m to St Clement's Post Office.*
Air Quality	-	*Whole city is within an AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Adjacent to Cherwell*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	*0*	The site is within 50m of Long Meadow Oxford City Wildlife Site (OCWS). Aerial imagery indicates the site is comprised of grassland, with scrub incursion from the hedgerows at the boundaries. The site is located at the edge of the central green corridor through Oxford (to the west) and areas of parkland and woodland (to the east). The River Cherwell is located immediately adjacent to the western boundary. One meadow in the surrounding landscape is identified by Natural England as priority habitat, another is identified as an OCWS. It should be a priority to establish the distinctiveness and condition of the grassland within the allocation site to understand the extent of constraint this provides to potential development. Potential protected species constraints include roosting bats (both in trees onsite and in the adjacent St Clement's Church), foraging and commuting bats, nesting birds, badger, reptiles, water vole and otter (associated with the River Cherwell). In addition, the River Cherwell is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination as a result of any proposed development. If St Clement's Church has the potential to support roosting bats, neither the church nor flightpaths to and from it should be subject to illumination either. A lighting strategy should be submitted in support of any planning application, setting out the lighting associated with the proposed development. This will need to account for both internal and external lighting.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	*0*	Site contains no known archaeological sites.
Conservation Areas & Register of Parks and Gardens (RPG)	--	The entire site is within the St Clement's and Iffley Road Conservation Area. The site is also adjacent to the Headington Hill Conservation Area and Central (University & City) Conservation Area.
Listed Buildings	-	The site is adjacent to St Clement's Church, which is Grade II* listed.
View Cones	--	*The site is partly within a view cone.*
Historic Core Area	*0*	*Site lies outside of the Historic Core Area.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change expected.*
Diversifying the economy end employment opportunities	*0*	*No change expected.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	There is existing vehicular access via Marston Road; however this will need to be improved.
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections are already established within the area, however these could also be improved to better connect the site.

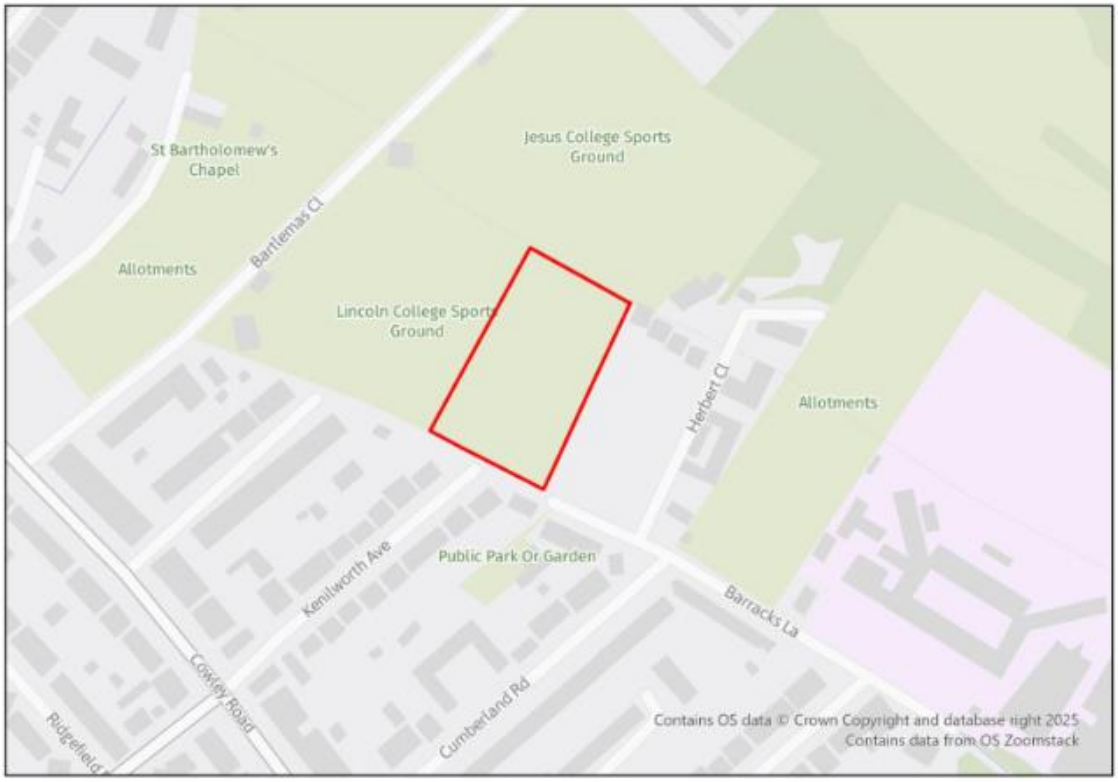
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	St Clement's Churchyard is adjacent to the site and contains a number of designated TPO's.
Are land contamination issues likely?	The current land use suggests contamination issues are unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is adjacent to Magdalen College Sports Ground South.

Stage 2 conclusion
Site is greenfield land surrounding a churchyard and forming the setting of the adjacent listed building, it is also located within a conservation area and may have ecological sensitivities; new development will need to consider impacts and respond accordingly. There is some flood risk on the site and proximity to the watercourse will also need to inform design response. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE7: Lincoln College Sports Ground

Site name	Lincoln College Sports Ground
SHLAA reference (and OLP2036 Policy if applicable)	032 (SP40)
Ward	Donnington
Total site size (ha)	0.8ha
Existing use(s)	Open air sports

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner (2025) confirmed intention to develop for postgrad accommodation.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Several small patches of surface water flood risk present within site)*
Flooding of land surrounding	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	***SA rating***	***Comments***
Previously developed land?	-	*Unprotected open space*
Green belt?	*0*	*Site is not within GB*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	***SA rating***	***Comments***
Housing provision	++	*Previously allocated for housing in part.*
Affordable housing provision	*I*	*Will depend on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	***SA rating***	***Comments***
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Not in or adjacent to regen. area*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*I*	*Depending on the scale and type of housing delivered, there could be potential to require a small increase in community facilities, however, this would depend on implementation.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*I*	*Site has potential to deliver public open space, but depends on implementation.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	>400 from bus stops located on Cowley Road – high frequency services including no's 1, 5, 10
Sustainable transport links (rail station)	-	>3500m miles from Oxford Railway station via Bartlemas Close and B480
Primary Schools	-	Over 800m from a primary school (East Oxford Primary)
Secondary Schools	+	>1,100m from Oxford Spires Academy
GP Surgeries	+	> 800m from Bartlemas Surgery and Cowley Road Medical Practice
Post office	+	>1000m from Donnington Post office
Air Quality	-	Site is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	Ditch to south of site

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., through retention of hedgerows, green roofs, walls, etc. Aerial imagery indicates the site is dominated by grassland subject to recreational use, with hedgerows flanking two boundaries. Potential protected species constraints are likely limited to nesting birds. The land is at the edge of a block of green space including the Lye Valley and Oxford Golf Course, and it would be beneficial for any development to deliver ecological enhancements onsite where possible. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e., at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Site contains no known archaeological sites. Limited/ uncertain archaeological potential. Roman kilns to the east at Oxford Spires, general potential for prehistoric and Roman would likely require assessment and evaluation.
Conservation Areas &	-	Adjacent to Bartlemas Conservation Area but within the Bartlemas Historic Hamlet.

Register of Parks and Gardens (RPG)		
Listed Buildings	-	No listed buildings onsite but within the setting of a no. of listed buildings – including Grade 2* Bartlemas Farm House and Bartlemas House and Grade 1 listed St Bartholomew Chapel – these buildings can be seen from within the site/ the site frontage on Bartlemas Close.
View Cones	-	Crescent Road View Cone across part of site
Historic Core Area	*0*	Outside the locally designated High Buildings Area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	*0*	No change in jobs for the knowledge economy
Diversifying the economy end employment opportunities	*0*	No change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes from Bartlemas Close and Barracks Lane
Can walking and cycling connections with the surrounding area be achieved?	Yes – Cycle route along the site's southern boundary – National Cycle Route 57. Walking connections to existing residential areas north and south of site via Bartlemas Close and Barracks Lane.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Ditch to southern boundary, outside of site. Site contains significant existing trees and hedgerows along the southern and western boundaries which are important to public amenity in the area and will provide valuable

	ecosystem services. 2 group of trees north of the pavilion in the western corner of the site are protected by the OCC -Bartlemas Close (No.1) TPO, 2006. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding area is primarily residential in nature.

Stage 2 conclusion
Although the site is protected open space it is in a suitable location for residential development. The site is adjacent to an existing CA and lies within an Historic Hamlet. Part of the site also lies within a view cone. Design sensitivity will be required in order to mitigate impacts on heritage assets. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE8: Manzil Way Resource Centre

Site name	**Manzil Way Resource Centre**
SHLAA reference (and OLP2036 Policy if applicable)	**SHLAA ref: #574** **LP2036 ref: SP46**
Ward	**St Clement's**
Total site size (ha)	**0.75 ha**
Existing use(s)	**Administrative uses and health facilities**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	SHLAA records that: Leaseholder (Oxford Health NHS Foundation Trust) has indicated (2023) that site could be available for broad range of alternative uses if it were to be declared surplus to requirements. Not currently available but likely to be in plan period subject to wider estate reorganisation.
Does the landowner specify types of development	SHLAA records that: developer has indicated site would be suitable for broad range of alternative uses. LP2036 allocation establishes the site as being suitable for improved health-care facilities and associated administration; and/or residential development including employer-linked affordable housing

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***

What flood zone(s) is the site in?	**0**	*Site is in Flood Zone 1* *(Surface water flood risk present throughout site, particularly around the main buildings).*
Flooding of land surrounding site for access/ egress	**0**	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	*Site is previously developed land with buildings in use on site.*
Green belt?	**0**	*Site is not designated as greenbelt.*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**I**	*Depends on implementation. May be opportunity to deliver some housing during the plan period.*
Affordable housing provision	**I**	*Depends upon implementation.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within	**0**	*Site is not in or adjacent to a regeneration area*

the top 20% most deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	**0**	*It is unlikely that the amount of community facilities will change.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**0**	*Allocation would not lead to loss of public open space, though ability to provide 10% additional open space is unlikely due to size constraints of site.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	*200 metres to bus stop on the Cowley Road*
Sustainable transport links (rail station)	**-**	*3km to train station*
Primary Schools	**+**	*550m to East Oxford Primary School*
Secondary Schools	**-**	*1.3km to Oxford Spires; 1.9km to Cheney School.*
GP Surgeries	**+**	*Bartlemas Surgery 92m*

Post office	**-**	*St Clements Street post office is 900m*
Air Quality	**-**	*Within city-wide AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**0**	*Nothing notable nearby.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	*No international/national or local sites within 200m. Opportunity to link with area of green space/ park to the south of the site which could help enhance existing wildlife corridors/ green infrastructure/ ecological habitats. Potential for enhanced/ additional planting/ screening/ landscaping. Opportunities for 'green' communal areas. Opportunity to incorporate root protection areas for existing trees into overall scheme design.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	*There is potential for Roman pottery as previously found near Cowley Road hospital.*
Conservation Areas & Register of Parks and Gardens (RPG)	**0**	*Not within or on edge. Is to the west of the Bartlemas Conservation Area but not adjoining.*
Listed Buildings	**0**	*No listed buildings identified on Historic England mapper.*

View Cones	-	*Majority of site falls within the Crescent Road View Cone.*
Historic Core Area	**0**	*Not within or on edge*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**0**	
Diversifying the economy end employment opportunities	**0**	

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – via Manzil Way.
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains existing trees and hedges which are collectively important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	East Oxford Central Mosque lies to the north of the site.

Stage 2 conclusion
The site is brownfield land and has existing residential dwellings (their rear gardens) located to the east. No significant ecological constraints, though some potential heritage constraints as view cone crosses part of the site and site is close to the Bartlemas Conservation Area, which may need to be considered as part of the allocation. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE9: Marston Paddock Extension

Site name	**Marston Paddock Extension**
HELAA reference (and OLP2036 Policy if applicable)	**114e**
Ward	**Marston**
Total site size (ha)	**0.51**
Existing use(s)	**Vacant farmhouse and curtilage including outbuildings and parking area**

Site location plan

Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes (2025 confirmed intention)
Does the landowner specify types of development	Yes – Residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Flood Zone 1*
Flooding of land surrounding site for access/ egress	*0*	*Safe access and egress to the site*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Site is previously developed land, as a farmhouse and curtilage, although with green features found within the site.*
Green belt?	--	*Site within Green Belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	
Affordable housing provision	+	

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*

Community facilities	*0*	*Site not allocated for community facilities*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	*Some new publicly accessible open space will be required as part of the 'golden rules' for Green belt release.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Bus stop about 400m with buses every 30mins*
Sustainable transport links (rail station)	-	*>1,600m from train station*
Primary Schools	-	*>800m from the nearest primary school*
Secondary Schools	-	*>800m from the nearest secondary school*
GP Surgeries	-	*>800m from the nearest GP surgery*
Post office	-	*>800m from nearest post office*
Air Quality	-	*While city within AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	*Site is not within 30m of a water body*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for significant nature conservation enhancement

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	*0*	
Conservation Areas & Register of Parks and Gardens (RPG)	--	*Site within Old Marston Conservation Area*
Listed Buildings	*0*	
View Cones	*0*	
Historic Core Area	*0*	

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change in number of jobs/economic floorspace in knowledge-based economy*
Diversifying the economy end	*0*	*No change in employment base or access to affordable workspaces*

employment opportunities		

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, from Butts Lane
Can walking and cycling connections with the surrounding area be achieved?	Site within existing urban area with existing pedestrian and cycle connections.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Some significant trees along boundaries and scattered within site, whic hare important to public amenity in the area and will provide valuable ecosystem services. The quality of existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Potential contamination risks from previous uses and waste materials including tyres and scrap cars. Full contamination risk assessment would be required to determine contamination risks and any remediation required.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding uses are fields and Old Marston village, with the A40 relatively close.

Stage 2 conclusion
No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE10: Nuffield Orthopaedic Centre (NOC)

Site name	Nuffield Orthopaedic Centre (NOC)
SHLAA reference (and OLP2036 Policy if applicable)	042 SP20
Ward	Headington
Total site size (ha)	8.38
Existing use(s)	Hospital and medical research

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Within 200m of Rock Edge SSSI and 350m of Lye Valley SSSI.
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Some scope for intensification of the site for hospital uses but this is unlikely during the during the plan period as landowner is focusing on other sites within their ownership.
Does the landowner specify types of development	Healthcare, medical research

Stage 1b conclusion
Site is not available for residential development and whilst there is some scope for intensification of the site for hospital related uses, it is unlikely to be during the plan period. Continue to next stage.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**0**	*Site is in Flood Zone 1* *(South-east quarter of site has a large area of surface water flood risk, with smaller patches interspersed across rest of site).*

Flooding of land surrounding site for access/ egress	**0**	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	*Buildings currently in use on site.*
Green belt?	0	*Not green belt land.*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	0	*Site would not provide new housing.*
Affordable housing provision	0	*Site not allocated for housing.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	*Site is not within a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	0	*It is unlikely that the amount of community facilities will change.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	*Public open space remains the same due to allocation.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Less than 400m from multiple bus stops on Old Road and Windmill Road.*
Sustainable transport links (rail station)	-	*Site is more than 1600m from train station.*
Primary Schools	+	*Less than 800m from the nearest primary school with space (Wood Farm Primary School)*
Secondary Schools	+	*Less than 800m from Cheney School.*
GP Surgeries	-	*More than 800m to the nearest GP.*
Post office	+	*Less than 800m to Wood Farm Post Office.*
Air Quality	-	*Site is within an AQMA.*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	*Site is not within 30m of a water body.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	0	*200m from Rock Edge SSSI.* *Within 350m of Lye Valley SSSI.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site has potential for archaeological interest as Roman remains have been found in the area.*
Conservation Areas & Register of Parks and Gardens (RPG)	0	*Site is not in or on the edge of a conservation area or site on the RPG register*
Listed Buildings	0	*Site contains no identified historic building constraint*
View Cones	0	*Site lies outside a view cone*
Historic Core Area	0	*Site lies outside the City Council's locally designated Historic Core Area.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*

Employment Opportunities in the knowledge-based economy	I	*Depends on implementation.*
Diversifying the economy end employment opportunities	I	*Depends on implementation.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Mature trees on Old Road and Windmill Road frontages.
Are land contamination issues likely?	No
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
There are no significant conflicts with national policy or environmental or physical constraints to the development of this site, although the proximity of the site to two nearby SSSI's would need further consideration in any proposals that come forward; as well as potential for archaeological remains. The site is viable for intensification of medical related uses, although the landowners are currently focusing on other properties within the Trust. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE11: Oxford Brookes Marston Road Campus

Site name	Oxford Brookes Marston Road Campus
SHLAA reference (and OLP2036 Policy if applicable)	439 LP2036 Policy SP50
Ward	Headington Hill & Northway
Total site size (ha)	1.18 ha
Existing use(s)	Educational facilities

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner update 2025 - confirmed intention to retain for use for academic and research but may be available during plan period if surplus.
Does the landowner specify types of development	Academic and research uses.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (A significant proportion of the site is at risk from surface water flooding.)
Flooding of land	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

surrounding site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Yes.
Green belt?	0	Not in Green Belt.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	I	Landowner wishes to maintain the principle of institutional use and student accommodation use with a potential option to dispose for housing following a strategic review of its requirements. Site allocated for residential use including student accommodation in emerging plan, although delivery will be dependent on implementation.
Affordable housing provision	I	If residential development or student accommodation is brought forward on the site, then there is the potential to deliver some affordable housing through financial contributions.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most	0	Site is not in or adjacent to a regeneration area.

deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	I	Depends on implementation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	I	Depends on implementation.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<400m from bus stops on Jack Straws Lane.
Sustainable transport links (rail station)	-	>1600m from train station.
Primary Schools	+	<550m to the nearest primary school (St Michaels CE Primary)
Secondary Schools	-	>2,400m to the nearest secondary school (Cheney School)
GP Surgeries	-	>1600m from the nearest GP surgery (Brookes Medical Centre)
Post office	-	>850m from the nearest post office (Marston Road post office)
Air Quality	-	The whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	There are ponds within the nature park but over 30m distance.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Contains The Quad, part of Milham Ford Field and Quad Local Wildlife site. Both parcels of the LWS are included in the designation due to the presence of botanically rich unimproved grassland. The main 'Nature Park' should be excluded from any development area, while any development should be encouraged to retain the Quad as well. There may be an opportunity to fund ongoing and additional habitat management through any development. Potential protected species constraints include roosting bats, foraging and commuting bats, breeding birds, reptiles, amphibians, badgers, and invertebrates. Please note the current Biodiversity TAN also states: "Additional consideration shall be given to developments in the vicinity of the Lye Valley SSSI and the Milham Ford City Wildlife Site. An Infiltration Drainage and Pollution Control Scheme for roof and hard surfacing run-off is required where the development is in the catchment area of the above sites. This is because reduction in water entering the aquifer is threatening the survival of this nationally rare habitat. Applicants for development in this area should discuss the requirements with the Council at an early stage." If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e., at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	None identified
Conservation Areas & Register of Parks and Gardens (RPG)	-	The site lies over the boundary, but within the setting of the Headington Hill Conservation Area and thus has an important relationship to the conservation area which will need to be considered.
Listed Buildings	0	No statutory heritage assets on the site. Former school have been included on the OHAR (i.e. the local list). School has a fairly significant history and is identified as a landmark in the Oxford in its Landscape Setting document.
View Cones	0	The site sits just to the south of the Doris Field Memorial Park view cone which skirts north east corner of site and looks south west
Historic Core Area	0	No

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	I	Depends on implementation. Potential for research-related jobs to support the knowledge economy.
Diversifying the economy end employment opportunities	0	No change.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes from north and south of site. However, roads offer limited capacity into site (narrow and fairly quiet). Site may be more suitable for car free development that would not put additional pressure on surrounding connections.
Can walking and cycling connections with the surrounding area be achieved?	Yes from north and south of the site – depending on layout of development, opportunity to establish and north/south connection through site (currently divided by the buildings)
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The car park to the north of the site is on two levels with a fairly substantial slope. The 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 could be easily retained. There is a medium-sized tree located within the car parking to the north of the site as well as a couple of other medium-sized trees along the borders on the southern frontage, also appears to be 2-4 trees in north-west corner behind hedge. The site and boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland. Extent needs to be confirmed from TVERC database. Site contains significant existing trees and hedgerows along the northern boundary and Jack Straws Lane frontage and also trees scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	No major contamination issues likely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	None identified.

Stage 2 conclusion
No significant issues identified – care will need to be taken around how the development impacts the LWS (the Quad) which is within the site and adjacent (Milham Ford Field). The site may be better suited to car free development, to reduce pressure on the surrounding access roads into the site from

the north and south. There may also be an opportunity to create a pedestrian/cycle route through the site.

The site sits within the setting of (adjacent to) the Headington Hill Conservation Area, and the design of any proposal will need to respond to this accordingly. Equally, whilst the former school building itself is not subject to designation, it is noted as a landscape feature in the Oxford Landscape Assessment with some positive architectural features that would preferably be retained in any development and guidance could be set out in the allocation.
Site to be put forward for allocation in Regulation 19 Local Plan.

SPE12: Rectory Centre

Site name	Rectory Centre
SHLAA reference (and OLP2036 Policy if applicable)	428
Ward	St Clement's
Total site size (ha)	0.21ha
Existing use(s)	Healthcare

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	Yes	0.21hectares

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has confirmed intention to redevelop site.
Does the landowner specify types of development	Landowner intends to redevelop for residential use subject to consolidation of existing uses onto alternative sites.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 *(Patch of surface water flood risk in south eastern corner of site.)*
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Site is previously developed land (with buildings currently in use)
Green belt?	0	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site allocation proposes a minimum of 21 residential dwellings at the site.
Affordable housing provision	+	It is likely that affordable housing would be provided at policy compliant levels.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	-	Re-development of this site would lead to a loss of community healthcare facilities, policy includes mitigation and suggests that these should be re-provided elsewhere however the precise amount would depend on implementation and assessed need.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	Site under 1.5ha. No requirement to provide public space on site. As such public open space likely to remain the same as a result of the allocation.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	The site is located <200m from a bus stop on Cowley Road that is frequently served by buses, including routes number 1, 5 and 10 and on Headington Road served by 8, 15, 108, 120, 275, N8, N400, ST2, X3, X20, X32.
Sustainable transport links (rail station)	-	Oxford Station is situated 2.5km from the site, a walk of >30 minutes.
Primary Schools	+	The site is located <800m from the nearest primary school (East Oxford Primary School)
Secondary Schools	-	The site is located >800m from the nearest secondary school (Cheney School).
GP Surgeries	+	The site is located <800m from the nearest GP surgery (Manzil Way)

Post office	+	The site is located <800m from the nearest post office (St Clements Street)
Air Quality	-	The entirety of Oxford is situated within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	The site is not within 30m of a body of water.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	The site is not within proximity to an area designated for its biodiversity value. Aerial images show the site is almost entirely developed land, bordered by a tree line to the east that is situated within private residential gardens.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	The site contains no known archaeological sites and has limited archaeological potential.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is not in or on the edge of a conservation area or site on the RPG.
Listed Buildings	0	The site does not contain and is not near to any listed buildings.
View Cones	-	The site lies within the Crescent Road View Cone.
Historic Core Area	0	Not within historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

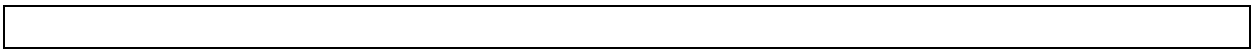
Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	There would be no change in number of jobs/employment floorspace for the knowledge-based economy.
Diversifying the economy end employment opportunities	0	No change.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site has existing vehicular access from Rectory Road and car parking spaces on southern boundary.
Can walking and cycling connections with the surrounding area be achieved?	Site has good walking and cycling connections with the surrounding area as it is located in the Cowley Road District Centre.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The site does not contain any significant physical features that would impact upon potential redevelopment.
Are land contamination issues likely?	The site has potential contamination. Any re-development of this site would require a site investigation and contamination risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	All surrounding properties are residential in nature and the potential for disturbance or environmental issues is low.

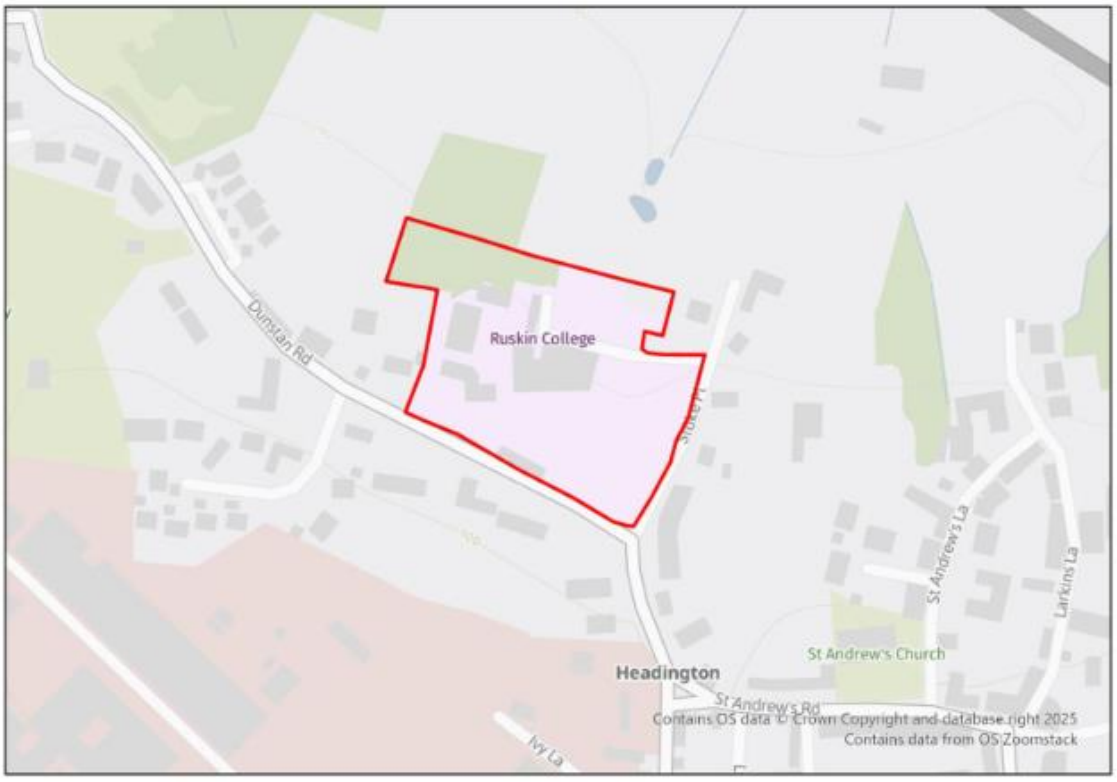
Stage 2 conclusion
The site scores well overall against the sustainability criteria and there are limited constraints to development at this location. Consideration will need to be given as to the accommodation of existing healthcare facilities on alternative sites and to the likely necessity for remedial works. Site to be put forward for allocation in Regulation 19 Local Plan.



SPE13: Ruskin Campus

Site name	Ruskin Campus
SHLAA reference (and OLP2036 Policy if applicable)	054 SP55
Ward	Headington
Total site size (ha)	1.86
Existing use(s)	University campus

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Approval has been granted for student accommodation on part of site (ref 22/00962/FUL), but work has not yet commenced.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – approval has been granted for student accommodation on part of site (ref 22/00962/FUL), but work has not yet commenced.
Does the landowner specify types of development	Approval has been granted for student accommodation on part of site (ref 22/00962/FUL), but work has not yet commenced.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses and planning consent issued. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Patches of surface water flood risk present, particularly towards eastern end of site.)*
Flooding of land surrounding	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Land is occupied by university buildings that are currently in use.*
Green belt?	*0*	*Site is not on green belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Proposed development is for student accommodation*
Affordable housing provision	*0*	*Affordable housing is not included in proposed development*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Not within a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Approved scheme does not include community facilities provision that is open to wider public*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	*Amount and accessibility of open space in development may be dependent on implementation*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	-	*Several bus stops in the vicinity, although they are not directly adjacent to site.*
Sustainable transport links (rail station)	-	*Rail station is 5km away*
Primary Schools	-	*Nearest primary school is 1100m away, although there is a special needs school nearer. (St Andrew's)*
Secondary Schools	-	*Nearest secondary school is 2000m away (Cheney School)*
GP Surgeries	+	*Approx 450m from The Manor Surgery*
Post office	-	*More than 800m from nearest Post Office.*
Air Quality	-	*Entire city is within an Air Quality Management Area.*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*

Water	*0*	*Site is over 30m away from nearest watercourse.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*The grounds comprise of extensive private open space, no specific ecological designations although with the location there is potential for linkages with adjoining greenfield and wildlife continuity. Dunstan Park wildlife site located to the west.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	The site is of archaeological interest with Iron Age activity and Roman pottery production having been recorded previously.
Conservation Areas & Register of Parks and Gardens (RPG)	--	*Entire site is within Old Headington CA.*
Listed Buildings	--	*Site contains Grade II listed Rookery (Ruskin College) and is in the setting of Grade II listed walled garden.*
View Cones	*0*	*Site is not within any view cones.*
Historic Core Area	*0*	*Site is outside of Historic Core Area.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities	*0*	*Current and proposed uses are for higher education with no significant research activity expected.*

in the knowledge-based economy		
Diversifying the economy end employment opportunities	*0*	*Current and proposed uses are for higher education with no significant research activity expected*.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains several mature trees, and changes in level at various points.
Are land contamination issues likely?	No
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No ecological designations, but the site contains Grade II listed heritage assets within the site boundary.

Stage 2 conclusion
There are a number of physical and policy constraints, however these are not considered to be insurmountable. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE14: Ruskin Field

Site name	Ruskin Field
SHLAA reference (and OLP2036 Policy if applicable)	463 SP56 (part of site)
Ward	Headington
Total site size (ha)	3.51ha
Existing use(s)	Field

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. The landowner has confirmed that the site is available.
Does the landowner specify types of development	Landowner intention to develop for residential.

Stage 1b conclusion
Landowner has expressed intention to develop for residential use - continue to the next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	**0**	Site is in Flood Zone 1 *(Patches of surface water flood risk present in close proximity to watercourse)*

Flooding of land surrounding site for access/ egress	**0**	There is safe access/egress from the site – area surrounding site is Flood Zone 1

SA objective 3. To encourage the **efficient use of land** through good design and layout and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**-**	Site is greenfield land (unprotected open space).
Green belt?	**0**	Site is not in the Green Belt.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**++**	The developer has expressed the intention to develop a minimum of 28 dwellings.
Affordable housing provision	**I**	Depends on implementation.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most	**0**	Site is not in or adjacent to a regeneration area.

deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**0**	Site is not allocated for community facilities so would remain the same.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**+**	10% public open space on site likely achievable as housing allocation

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**-**	> 400m to the nearest bus stops. Halliday Hill stop is 1000m away connecting to Risinghurst (Service 14). Headington Shops is 1000m away connecting to the City Centre (Services 8, 400, X20). John Radcliffe Main Entrance is 1100m away with multiple destinations (including Services 10, 14, 600).
Sustainable transport links (rail station)	**-**	>1600m to Oxford Train Station (over an hour's walk).
Primary Schools	**-**	>800m to the nearest primary school (New Marston, St Andrews).
Secondary Schools	**-**	>800m to the nearest secondary school (Cheney).
GP Surgeries	**+**	<800m to the nearest GP surgery (The Manor Surgery).
Post office	**-**	>800m to the nearest post office.

Air Quality	**-**	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	--	There is a pond to the south of the site, and a ditch that runs through the site to this.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	*Contains no nature conservation designations but has potential for nature conservation interest. Site is located within close proximity to Dunstan Park wildlife site.* *Aerial imagery indicates the site is comprised of grassland and hedgerows/tree lines. There is potentially a wetland element given the springs, seepages, and ponds in the surrounding area. This should be established through detailed botanical survey.* *Potential protected species constraints include roosting bats, foraging and commuting bats, breeding birds, reptiles, amphibians and invertebrates. The site contains Section 41 (Priority/Principal) habitats that fall within the LPA Biodiversity Duty. Decideous Woodland. Extent needs to be confirmed from the TVERC database.* *Site contains significant existing trees and hedgerows around boundaries of site and marking historic field boundaries, and also indiviudal trees and groups of trees scattered within the site, which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by location within the Old Headington Conservation Area. Hedgerows are potentially "important" under the Hedgerow Regs. Existing trees and hedgerows will influence developable area of site and its capacity. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	*Evidence of Iron Age activity and Roman pottery production has been recorded from this site, so it has significant archaeological potential.*
Conservation Areas & Register of Parks and Gardens (RPG)	**--**	*The site is entirely within the Old Headington Conservation Area.*
Listed Buildings	**--**	*There is a Grade II listed wall to the south of the site (Walls of Walled Garden at Ruskin College). The site lies within the settings of a number of other listed buildings: The Rookery (Ruskin College), Grade II, Stoke House, Grade II listed, 8 Dunstan Road, Grade II listed, The Manor Farmhouse and Garden Wall of Manor Farmhouse, both Grade II, Church of St Andrew, Grade II*.*
View Cones	**0**	*The site is not within the city's view cones.*
Historic Core Area	**0**	*Not within historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**0**	*No change in number of jobs.*
Diversifying the economy	**0**	*No change.*

end employment opportunities		

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	There is currently no vehicle access to the site. Foxwell Drive is adjacent to the site and therefore access could be created to the site from there.
Can walking and cycling connections with the surrounding area be achieved?	Improved walking and cycling connections are likely to be required.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees and hedgerows around boundaries of site and marking historic field boundaries, and also individual trees and groups of trees scattered within the site, which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by location within the Old Headington Conservation Area. Hedgerows are potentially "important" under the Hedgerow Regs.
Are land contamination issues likely?	Current land use suggests that land contamination issues are unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The A40 (Oxford ring road) is at the northern boundary of the site which may cause disturbance such as noise and pollution. Mitigation may be necessary to minimise these impacts.

Stage 2 conclusion
Overall the site scores fairly well against the criteria. No significant heritage concerns although design sensitivity likely to be required as the site is within a conservation area and there is a listed wall to the south of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE15: Slade House

Site name	Slade House
SHLAA reference (and OLP2036 Policy if applicable)	124 Policy SP57
Ward	Lye Valley
Total site size (ha)	1.31 Ha
Existing use(s)	Former NHS care facility currently used for staff training and office accommodation, owned by Oxford Health NHS Trust

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes, site expected to be developed within Local Plan period.
Does the landowner specify types of development	Landowner has expressed an interest in redeveloping site if is surplus to requirements following wider estate re-organisation. Specified uses are improved healthcare facilities and associated administration and/ or residential development including employer linked affordable housing.

Stage 1b conclusion
Consider further for allocation for improved healthcare facilities, associated administration and/ or residential development including employer linked affordable housing. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***

What flood zone(s) is the site in?	0	*Site is in Flood Zone 1* *(Patches of surface water flood risk present, particularly towards the east of the site).*
Flooding of land surrounding site for access/ egress	0	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	*Site is mainly PDL.*
Green belt?	0	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	I	*Potential for delivery of some housing at this site but precise amount will depend on implementation.*
Affordable housing provision	I	*Potential for delivery of some affordable housing tenures at this site but precise amount will depend on implementation.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*

Regeneration area (within the top 20% most deprived areas IMD)	**0**	*Site is not in or adjacent to a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	0	*Unlikely to be any change in community facilities as result of this allocation.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	I	*Site is only slightly larger than threshold (1.5ha) for delivery of 10% public open space on site. Whether public open space is provided on site will depend on how site is brought forward.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Nearest bus stop is the corner house. Frequent services to the city and other destinations. E.g. 10, 100, 600, NU5, OX7, U5 Brookes.*
Sustainable transport links (rail station)	-	*Oxford Station (5.9 km)*
Primary Schools	-	*Tyndale School (1.4 km)*

Secondary Schools	-	*Cheney School (2.4 km)*
GP Surgeries	+	*Wood Farm Health Centre (500m)*
Post office	-	*Wood Farm Post Office (900m)*
Air Quality	-/--	*Air quality hotspot is nearby (on Eastern Bypass Ring Road), although this is probably far enough from site to alleviate any direct impacts.*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	Site is not near water body.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	0	*Site allocation policy requires assessment of potential recreational pressure on nearby Brasenose and Shotover SSSI which may include onsite mitigation measures.* *Aerial imagery indicates the site contains developed land and associated amenity habitats. Potential protected species constraints are likely limited to roosting bats and nesting birds.* *If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*

Archaeology	-	*Parliamentarian siege line may cross through this plot. May require evaluation depending on build footprint.*
Conservation Areas & Register of Parks and Gardens (RPG)	0	*Not within conservation area*
Listed Buildings	0	*No listed buildings on site*
View Cones	0	*Not within view cones*
Historic Core Area	0	*Not within historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	I	*Site is currently mainly used for admin and training purposes. Depends upon implementation whether the site allocation will result in any net change.*
Diversifying the economy end employment opportunities	0	*Site is currently mainly used for admin and training purposes, diversification of use unlikely with allocated uses.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access already exists.
Can walking and cycling connections with the surrounding area be achieved?	Footpaths and cycleways run in front of the site (Horspath Driftway)
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are some mature trees and mature hedges on site. Site contains scattered significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by the OCC - Horspath Driftway/Eastern By-Pass (no.1) TPO, 1994. Existing trees will influence developable

	area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	No significant contamination issues likely but might need further investigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site located in a residential area, including student accommodation adjoining northern boundary.

Stage 2 conclusion
There are no significant constraints to development on the site. The site should be considered further for allocation subject to any additional work informing Regulation 19 Local Plan. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE16: Thornhill Park (Phase 2)

Site name	**Thornhill Park (phase 2)**
SHLAA reference (and OLP2036 Policy if applicable)	**38a2** **LP2036 SP47**
Ward	**Barton and Sandhills**
Total site size (ha)	**3.39 ha**
Existing use(s)	**Former offices & landscaping**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	Planning permission (21/01695/FUL) for mixed use residential, hotel, car parking and sport grounds, not yet implemented.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – planning permission and confirmed intention to develop
Does the landowner specify types of development	Yes

Stage 1b conclusion
Landowner has set out intentions for residential development. Continue to next stage of assessment.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**0**	Site is in Flood Zone 1 There are some small patches of surface water flood risk to the north of the site close to the London Road and a couple of smaller patches further south.
Flooding of land surrounding site for access/ egress	**0**	There is safe access/ egress from the site – area surrounding site is in Flood Zone 1.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Part previously developed, part greenfield
Green belt?	0	Site is not within the green belt.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site allocated for residential development and would provide more than 10 homes.
Affordable housing provision	+	Site expected to deliver affordable housing in line with policy.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site outside of a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	-	Allocation would lead to a loss of community facilities. However, the existing pavilion is 25 years old and at the end of its lifespan, unable to comfortably accommodate the needs. The loss is considered acceptable provided a contribution is made towards a replacement pavilion as set out in the previous planning permission.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	Given site size, site expected to deliver at least 10% open green space.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	Less than 400m from Thornhill Park and Ride.
Sustainable transport links (rail station)	-	>1,600m from Oxford Railway Station
Primary Schools	-	>800m from the nearest primary school (Barton Park Primary)
Secondary Schools	-	>800m from the nearest secondary school (Cheney School)
GP Surgeries	-	>800m from the nearest GP surgery
Post office	+	<800m from the nearest post office
Air Quality	-	Whole city within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Watercourse running along eastern boundary of the site

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Previous ecological assessments indicate the site is comprised of species-poor grassland, scattered trees, scrub, and developed land. It contains a medium population of great crested newt (GCN) and multiple bat roosts. Updated surveys would be required in support of any planning application, while both GCN and bats are European Protected Species and therefore any consented development would only be able to proceed under licence from Natural England. Other potential protected species constraints include reptiles, nesting birds, and badgers. Site contains significant existing treesaround the boundaries and scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. All trees within the site are protected by the OCC - London Road (No.1) TPO, 1994. Existing trees will influence developable area of site and its capacity. The site is not designated for its nature conservation value. However, it is located in close proximity to the CS Lewis Nature Reserve and any planning application must assess the potential for recreational impacts on this site and agree suitable mitigation measures for any impact. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. Opportunities exist to plant new trees to improve connectivity within GI network. Create or enhance suitable flower-rich grassland habitats with plentiful populations of violets and light patches of scrub for the Dark Green Fritillary Create new areas of lowland meadow by creating and restoring meadows in suitable locations (particularly on floodplains) Create areas of species-rich acid grasslands in suitable locations Create new areas of heathland on suitable soil types.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	The site has been evaluated for the recent planning application and no significant archaeology was identified.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site outside conservation area
Listed Buildings	0	Site contains no listed building constraint however Grade II listed milestone located close to the site (in the central reservation of the A40).
View Cones	0	Site outside the locally designated view cones
Historic Core Area	0	Site lies outside the locally designated high buildings area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy.
Diversifying the economy end employment opportunities	0	No change in employment base or access to affordable workspaces.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes - Existing access from the A40
Can walking and cycling connections with the surrounding area be achieved?	Yes

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees around the boundaries and scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. All trees within the site are protected by the OCC - London Road (No.1) TPO, 1994. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area
Are land contamination issues likely?	Site investigations would be required due to previous use and potential contamination risks. Extensive investigations works completed over parts of site already?
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
The site itself has limited constraints for development. Design sensitivity will be required, as development in the southern part of the site could have a visual impact on open countryside, and there are also ecological sensitivities in terms of protected species and proximity to local ecological site that would need to be addressed. Unless the consented scheme is implemented, the site should be considered further for a mixed-use including residential allocation. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE17: Union Street Car Park

Site name	**Union Street Car Park**
SHLAA reference (and OLP2036 Policy if applicable)	**061**
Ward	**St Clement's**
Total site size (ha)	**0.24**
Existing use(s)	**Public Car park**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	No live planning application.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Residential and/or student accommodation

Stage 1b conclusion
Developer has expressed intent to develop. Site should be considered for allocation for residential use, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site and immediate surrounding areas are in Flood Zone 1.* *(An area of surface water flood risk runs along the length of Collins Street, forming the northern boundary of the site and extending down the eastern and western boundaries).*

Flooding of land surrounding site for access/ egress	*0*	*Site and immediate surrounding areas are in Flood Zone 1.*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	+	*Site is in use as a car park.*
Green belt?	*0*	*Site is not on green belt land.*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	*I*	*Landowner has expressed intention of developing site as residential or student accommodation*
Affordable housing provision	*I*	*Landowner has expressed intention of developing site as residential or student accommodation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in a ward that is in or adjacent to a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*I*	*Community facility (supermarket) already exists on site, provision will depend on implementation.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	*Site allocated for housing – dependent on implementation but open space can be provided.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Several bus stops along Cowley Road, with a wide range of routes*
Sustainable transport links (rail station)	-	*Site is 2.7km from Oxford Rail Station*
Primary Schools	+	*Site opposite East Oxford Primary School*
Secondary Schools	-	*Nearest state secondary school is 1.12km*
GP Surgeries	+	*Nearest GP is in St Clements (approx 600m away)*
Post office	+	*Nearest Post office is approx 600m away*
Air Quality	-	*Entire city is within AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	*No watercourses nearby*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	*0*	*No designations onsite, site is c.200m from South Park which is core in GI network. Not much potential for linkages with wider network other than providing for local amenity.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	*0*	*No known archaeological sites or potential*
Conservation Areas & Register of Parks and Gardens (RPG)	*0*	*Site is not in a conservation area.*
Listed Buildings	*0*	*No listed buildings on site.*
View Cones	-	*Site is within Crescent Road view cone*
Historic Core Area	*0*	*Site is outside Historic core.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*

Employment Opportunities in the knowledge-based economy	*0*	*Site is not promoted for employment or knowledge economy uses, but residential so no impact expected on quantity of employment floorspace.*
Diversifying the economy end employment opportunities	*0*	*Site is not promoted for employment or knowledge economy uses, but residential so no impact expected on quantity of employment floorspace.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, although this may be affected by LTNs.
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Site investigation would be required due to previous use and slight potential contamination risks.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No insurmountable obstacles to development, though sensitivity in respect to the view cone should be addressed. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE18: Warneford Hospital

Site name	**Warneford Hospital**
SHLAA reference (and OLP2036 Policy if applicable)	**#063** **LP2036 Policy SP22**
Ward	**Headington**
Total site size (ha)	**8.67ha**
Existing use(s)	**Hospital, research, playing fields**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Site is currently subject to an undetermined application (25/01859/OUTFUL) Previous applications, relating to Intensive Care Annex (21/00302/FUL)

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	2025 – landowner confirmed intention to develop surplus areas
Does the landowner specify types of development	Current allocation establishes site as suitable for healthcare related facilities primarily plus other uses inc residential and student accommodation, academic research, B1 uses with a link and education.

Stage 1b conclusion
Landowner has confirmed intention to develop – continue to next stage of assessment.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	0	Site is in Flood Zone 1

		Patches of surface water flood risk present in the south-west of the site and also some smaller patches around the north-east boundaries.
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	0	Site is currently in use as a hospital and research centre, but does include some undeveloped green space. Some green infrastructure on the site.
Green belt?	0	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	0/I	*Site is primarily a non-residential allocation however policy E1 allows housing delivery on employment sites if landowner sought this.*
Affordable housing provision	I	Depends on implementation

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*

Regeneration area (within the top 20% most deprived areas IMD)	0	*The site is not within a Regeneration Area. (Site lies largely within an area that is less deprived than 74% of neighbourhoods – IMD 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**I**	Provision of community facilities will depend on implementation of uses.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**I**	Site has potential for providing public open space, but precise type and quantum will depend on implementation.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	<100m from bus stop with frequents services (Roosevelt Drive)
Sustainable transport links (rail station)	**-**	Oxford Station (3.9 km)
Primary Schools	**-**	1.6 km from Wood Farm Primary School
Secondary Schools	**+**	250m from Cheney School

GP Surgeries	**-**	About 1.4km from Bartlemas Surgery, Cowley Medical Centre
Post office	**-**	St Clements St Post Office (1.6 km)
Air Quality	**-**	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	Nothing notable within 30m, although the site lies within the catchment area of Lye Valley SSSI, which contains important peat deposits and as a result is particularly sensitive to impacts to groundwater flows and other changes to hydrology.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**-**	Site is adjacent to OCWS – Warneford Meadows and Orchard Potential for protected species constraints in the site likely include roosting bats, foraging and commuting bats, nesting birds, and reptiles. Site sits between two green corridors, and onsite there are several mature trees, lawns and hedges, and a playing field. Proposals should consider what connectivity the site provides to protected species and seek to preserve and enhance existing permeability through the site.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	Site is of archaeological interest for potential Roman remains. This will require further investigation as part of any redevelopment.
Conservation Areas &	**-**	Adjoins Headington Hill CA

Register of Parks and Gardens (RPG)		
Listed Buildings	**--**	Various elements of the hospital complex are Grade II listed (the main hospital building, ancillary annexes (mortuary, nurses home, and chapel), front garden wall including lodge and piers)). Warneford Meadow nearby is on the Oxford Heritage Asset register.
View Cones	**0**	Site not within a view cone
Historic Core Area	**0**	Site not within historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**I**	Hospital use and research centre likely to remain onsite, expansion or otherwise depends on implementation of development plans.
Diversifying the economy end employment opportunities	**I**	No indication on diversification of employment use on the site

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes via Roosevelt Road. Boundary wall and gate piers are at least partially covered by the listing so creating new access points will be difficult to deliver.
Can walking and cycling connections with the surrounding area be achieved?	Existing connections and routes to site are established. No segregated cycle paths through the site. Pedestrian walkways limited outside of built footprint. Car movement is currently prioritised through site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains extensive greenspace around that makes a noticeable contribution to the setting and creates a character that is less institutional than nearby Churchill Hospital. Site contains significant existing trees scattered across the site which are important to public amenity in the area and will

	provide valuable ecosystem services. Existing trees are protected by the OCC - Warneford Hospital (No.1)TPO, 1994 and the OCC -Warneford Hospital (no.1) TPO, 1994. There is an orchard adjacent to the south eastern boundary of the site. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity and enhance the setting of the Listed Buildings. Within 200m of peat reserves potentially
Are land contamination issues likely?	Although significant contamination is not expected, a site investigation will be required.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Wildlife site adjoins site, residential dwellings on east and west boundaries. Hospital uses likely to be retained onsite.

Stage 2 conclusion
There are heritage sensitivities including presence of listed buildings and adjacent conservation area; ecological sensitivities including adjacent local wildlife site and potential for protected species on site; as well as presence of protected trees on the site which will need to be addressed through appropriate mitigation requirements as part of any allocation. These are not considered insurmoutable. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW1: Banbury Road University Sites – Parcel B

Site name	Banbury Road University Sites - Parcel B
SHLAA reference (and OLP2036 Policy if applicable)	006b Policy SP31
Ward	Walton Manor
Total site size (ha)	1.26
Existing use(s)	Academic and student accommodation

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	Yes	22/02849/FUL - provision of student accommodation (130 student rooms) and an

planning process (development commenced)?		academic building approved November 2024.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – the planning application approved in November 2024 indicates there is landowner intention to develop.
Does the landowner specify types of development	The approved planning application is for student accommodation and academic use.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(Patches of surface water flood risk present within site)*
Flooding of land surrounding site for	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*The site is previously developed land with buildings in use on site.*
Green belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*The site has planning permission for the provision of 130 student rooms (C3 equivalent: 52 dwellings)*
Affordable housing provision	*0*	*Site is allocated in LP2036 for housing (including student accommodation) and other uses which typically would not provide affordable housing. The recent planning approval also does not make provision for affordable housing. Policy compliant affordable housing delivery.*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 90% of neighbourhoods in England – IMD 2025).*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Site not allocated for community facilities and the recent planning approval only included development relating to student accommodation and academic facilities.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	*The amount of public open space is likely to remain the same due to the allocation.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*The site is less than 400m from a bus stop. The nearest one is the Bevington Road bus stop on Banbury Road which is 200m away. Buses along Banbury Road are frequent and include the 2, 2A, S4, S5 and S7.*
Sustainable transport links (rail station)	-	*Over 1600m from the nearest rail station (Oxford)*
Primary Schools	+	*Less than 800m from the nearest primary school (St Barnabas C of E Primary School is 650m away)*
Secondary Schools	-	*More than 800m from the nearest secondary school (Cherwell School). Most of the schools within 800m are private/independent schools.*
GP Surgeries	+	*Less than 800m from the nearest GP surgery (Jericho Health Centre/ Observatory Medical Practice are 550m away).*
Post office	+	*Less than 800m from the nearest post office (St Giles is 500m away)*
Air Quality	-	*Site is within an Air Quality Management Area (AQMA)*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	*0*	*Site is not within 30m of a water body*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	*Contains no nature conservation designations but surveys undertaken (in association with planning application 22/02849/FUL) identified numerous bat roosts on part of the site bounded by Bevington Road.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site is of archaeological interest as it is located on the line of a Bronze Age linear barrow cemetery and there is potential for prehistoric and Roman remains.*
Conservation Areas & Register of Parks and Gardens (RPG)	--	*The site lies entirely within the North Oxford Victorian Suburb Conservation Area.*
Listed Buildings	--	*There is one Grade II listed building within the site located at 59 Banbury Road. There are several other Grade II listed buildings within the vicinity of the site, notably across the other side of Banbury Road including Wycliffe Hall, Wykeham House, 60 and 62 Banbury Road and Gees' Restaurant immediately adjacent to the north of the site.*
View Cones	*0*	*Site lies outside of a view cone*
Historic Core Area	*0*	*Site lies outside the City Council's locally designated Historic Core Area.*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change in number of jobs/economic floorspace in knowledge-based economy*
Diversifying the economy end employment opportunities	*0*	*No change in employment base or access to affordable workspaces*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site is already accessible by vehicle from Banbury Road.
Can walking and cycling connections with the surrounding area be achieved?	Site is bounded by pedestrian and cycle connections on Banbury and Woodstock Road.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are a considerable number of trees across the site, particularly around its perimeter but no other topographical constraints. One of the trees (in front of 10 Winchester Road) is protected by a Tree Preservation Order.
Are land contamination issues likely?	There are no likely land contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site adjoins residential and educational uses, so design sensitivity would be required.

Stage 2 conclusion
The site scores well overall against the sustainability criteria and has good access to sustainable transport links. However, design sensitivity is likely to be required due to the site's location within a conservation area, and the high number of listed buildings around the site, as well as the Listed Building within it.

Site to be put forward for allocation in Regulation 19 Local Plan (unless construction has commenced in the meantime).

SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel

Site name	**Botley Road sites around Cripley Road including River Hotel and Westgate Hotel**
SHLAA reference (and OLP2036 Policy if applicable)	**(613) - 0.34ha** 3-15 Botley Road and The River Hotel **(614) - 0.31ha** Land at Cripley Place **(615) - 0.19ha** Westgate Hotel, Botley Road and 3-7 Mill Street
Ward	**Osney & St Thomas**
Total site size (ha)	**0.84ha**
Existing use(s)	**Mixed uses including hotel with associated car park, residential dwellings and retail unit (courier service).**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner indicates interest in mixed use development, including residential use.

Stage 1b conclusion
Landowner has confirmed intention to develop the site . Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	-	*Three of the four parcels partly lie within Flood Zone 3a, whilst the parcel to the southeast (south of Botley Road and east of Mill Street) lies within Flood Zone 2. Flood Zone 2 is prevalent within all four parcels.* *Small area of surface water flood risk present within most southwestern parcel (north of Botley Road and west of Mill Street).*
Flooding of land surrounding site for access/ egress	--	*Site is adjacent to Osney Bridge. Mill Street and Park End Street are other access routes and are within Flood Zone 2.*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Buildings are occupied and in use.*
Green belt?	*0*	*Site is not in green belt.*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Site allocated for residential development and would provide more than 10 homes.*
Affordable housing provision	+	*Site has potential to deliver policy compliant affordable housing*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site is not in a regeneration area.*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Community facilities unlikely to change resulting from allocation*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	*Public open space unlikely to change resulting from allocation.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Site is in a very central location and opposite to city's key transport hub so a variety of options are available, including buses, taxis and rail links.*
Sustainable transport links (rail station)	+	*Site is opposite Oxford railway station.*
Primary Schools	+	*Nearest primary school is West Oxford Community School, approx 650m.*

Secondary Schools	-	Nearest secondary school is over 800m from the site.
GP Surgeries	+	*Nearest GP is located 800m away (Beaumont Street)*
Post office	-	*Nearest Post office located more than 800m away*
Air Quality	-	*Entire city is designated as an AQMA.*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Western edge of site is directly adjacent to Thames/Isis watercourse.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	*0*	*No ecological designations on site or adjacent.* Given part of the site's location adjacent to watercourse and associated riparian habitat potential for a variety of protected species. Appropriate ecological surveys should be undertaken. A lighting strategy may be required along the river. The mature trees adjacent to the river should be protected. A 10m watercourse buffer should be maintained along the river or reinstated where possible. Any habitat delivery should be reflective of the River Thames context (i.e., providing for species such as otter and bats with natural vegetation along the river boundary). Habitat would benefit from being delivered along the river corridor, with habitat retained and enhanced in line with the LNRS. Whole site covered by LNRS.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site is wholly located within City Centre Archaeological Area*
Conservation Areas & Register of Parks and Gardens (RPG)	-	*Part of the site allocation located adjacent to Osney Town CA*
Listed Buildings	*0*	*Site contains no listed buildings.*
View Cones	-	*Site within a View Cone (Boar's Hill)*
Historic Core Area	-	*Site is within Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	*0*	*No change in knowledge economy jobs*
Diversifying the economy end employment opportunities	*0*	*Wider employment opportunities unlikely to change through redevelopment.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	sites would likely require a site investigation and contamination risk assessment if re-developed to a sensitive end-use.

Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site is adjacent to a mainline railway track. The immediate surrounding area is of mixed character comprising of residential dwellings, hotels and some commercial uses.

Stage 2 conclusion
Site is in a sustainable and accessible location. There are several considerations including flood risk and above and below ground heritage, however these are not insurmountable and are likely be able to be addressed through appropriate further investigation/ mitigation at the planning application stage. Site should be allocated for a residential-led scheme (housing). Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW3: Canalside Land, Jericho

Site name	**Canalside Land, Jericho**
SHLAA reference (and OLP2036 Policy if applicable)	**011** **Policy SP33**
Ward	**Jericho and Osney**
Total site size (ha)	**0.49 ha**
Existing use(s)	**Part boat hire base, garages, open space, derelict workshops, boat repair yard. The site has been derelict since 2006.**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Multiple land ownership. Confirmed intention from one landowner for part of the site.
Does the landowner specify types of development	Planning application 20/01276/FUL (18 units) indicates intent to develop. Planning application was refused in 2022 and the applicants lodged an appeal which was determined in 2023. The appeal was allowed however the appeal for Listed Building Consent was dismissed on the basis that the proposed works were covered by Ecclesiastical Exemption and therefore Listed Building Consent was not required

Stage 1b conclusion
Consider further as an allocation for a mixed-use development including residential and boatyard. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***

What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b *(Patches of surface water flood risk towards centre/ north east of site.)*
Flooding of land surrounding site for access/ egress	-	The initial parts of the access route are within Flood Zone 2, with the hazard rating generally low at the start of the route. Access/ egress from the site is over land at moderate to low risk/ hazard.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	+	The site would make use of previously developed land although the existing buildings would need to be cleared from the site.
Green belt?	0	The site will not be on Green Belt land.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	I	Site allocated for a number of uses including residential development however precise amount of units delivered will depend on implementation.
Affordable housing provision	I	Precise amount of affordable housing to be delivered on site will depend on implementation, including possible off site contribution.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within	0	Site not within regeneration area.

the top 20% most deprived areas IMD)		

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	+	Development likely to increase the amount of community facilities on site as one of the allocated uses is a replacement community centre.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	Site allocated for mixed use including a pubic open space.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	-	>400m to the nearest bus stop (10-minute walk) (850m). The bus routes to this site which go into Oxford city centre only travel via and stop along Woodstock Road. Services on this road are frequent.
Sustainable transport links (rail station)	+	Site is within a 1km walk of Oxford train station.
Primary Schools	+	The nearest primary school is within a 5-minute walk of the site (350m).
Secondary Schools	-	Site is just over 1km away from the nearest secondary school.
GP Surgeries	+	Site is within 500m of GP surgery.
Post office	+	Site is within 500m of a post office.

Air Quality	-	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Site is adjacent to Oxford Canal.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Site is near to Oxford Meadows SAC and may require mitigation including notice boards and signage for example. Site is adjacent to Oxford Canal which is an Oxford City Wildlife Site. The site supports a small number of common bat roosts but is otherwise of limited ecological value. Key to any development is avoiding potential impacts on the Canal and the wildlife that utilise it, including foraging and commuting bats, otter and (potentially) water vole. Any planning application should incorporate a robust lighting assessment that demonstrates no additional artificial lightspill on the Canal – from either exterior or interior lighting – or otherwise demonstrate that the lightspill will avoid any significant impacts on the faunal interest. Site contains significant existing trees including a false acacia and silver birch in the public open space north of the church and an ash tree in the church grounds next to Cardigan Street. There also is a row of important trees adjacent to the site along the western side of the Canal Towpath. These trees are collectively important to public amenity in the area and will provide valuable ecosystem services. All these trees are protected by location within the Jerichio Conservation Area. Existing trees will influence developable area of site and its capacity. If existing trees are removed new trees should be planted to fully mitigate the impact tree canopy cover green infrastructure in the area. Opportunities exist to plant new trees to improve connectivity within GI network.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	0	Site contains no known archeological sites or has limited or uncertain archaeological potential.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Site is entirely within the Jericho Conservation Area.
Listed Buildings	--	Site is adjacent to a Grade I Listed Building (Church of St Barnabas).
View Cones	0	Site lies outside of a View Cone.
Historic Core Area	-	Site lies within the historic core area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	Site has been designated for mixed-use development with residential. Any new boatyard will have employees and new leisure moorings will support tourism.
Diversifying the economy end employment opportunities	0	Site has been designated for mixed-use development with residential.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access to the site already exists but is likely to need improvements.
Can walking and cycling connections with the surrounding area be achieved?	The site is within the urban area with existing cycle and pedestrian connections but is likely to need improvements.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site is adjacent to the Oxford canal and includes a docking basin. Site contains significant existing trees including a false acacia and silver birch in the public open space north of the church. There also is a row of important trees adjacent to the site along the western side of the Canal Towpath. These trees are collectively important to public amenity in the area and will provide valuable ecosystem services. All these trees are protected by location within the Jerichio Conservation Area. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Historical dockyard area. Potential for contamination.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is adjacent to Oxford Canal on one side. Site adjoins residential therefore will need to consider sensitive design.

Stage 2 conclusion
The site scores well against a number of the sustainability criteria. Flood risk is an issue which will need to be addressed and the site is in a sensitive location with regard to the historic environment, in particular the conservation area and the Grade I Listed St Barnabus Church. There are potential biodiversity sensitivities which will also need to be considered, particularly with how the site interfaces with the canal. However none of the constraints are insurmountable and so the site is to be put forward for allocation in Regulation 19 Local Plan.

SPCW4: Faculty of Music

Site name	Faculty of Music
SHLAA reference (and OLP2036 Policy if applicable)	021 OLP2036 SP36
Ward	Holywell
Total site size (ha)	0.33
Existing use(s)	Academic use

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – the planning application submitted in July 2025 indicates there is landowner intention to develop.
Does the landowner specify types of development	The submitted planning application is for a change of use to create a graduate centre including student accommodation (25/01872/FUL). Currently undetermined.

Stage 1b conclusion
Developer has confirmed intent to develop. Consider further for allocation for residential, continue to next stage.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	-	Site is partially in Flood Zone 2 – a small area on the eastern edge.

		Patches of surface water flood risk on the eastern, southern and western boundaries, with a narrow corridor of surface water flood risk extending into site from the west.
Flooding of land surrounding site for access/ egress	*0*	There is safe access/egress from the site – area surrounding site is Flood Zone 1

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	Site is previously developed land (with buildings in use on site) and in academic use
Green belt?	*0*	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site allocated for ongoing academic uses, residential development and/or student accommodation. Minimum number of dwellings to be delivered is 23 (or if delivered as student rooms, the equivalent number of student rooms where the relevant ratio is applied).
Affordable housing provision	*I*	Depends on implementation (no affordable housing to be delivered under the current but undetermined planning application).

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*

Regeneration area (within the top 20% most deprived areas IMD)	*0*	Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 50% of neighbourhoods in England – IMD 2025)

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	Site not allocated for community facilities.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*0*	The amount of public open space is likely to remain the same due to the allocation.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	City centre location with multiple bus stops and routes on St Aldate's and Speedwell Street. The nearest bus stop (Police Station on St Aldate's) is less than 100m from the site.
Sustainable transport links (rail station)	*0*	Between 1200 and 1600m from the nearest rail station (Oxford)
Primary Schools	-	More than 800m from the nearest primary school (St Ebbe's C of E Primary School is 850m away)
Secondary Schools	-	More than 800m from the nearest secondary school (Cheney School is more than 3000m away).

GP Surgeries	+	Less than 800m from the nearest GP surgery (Northgate Health Centre is 600m away).
Post office	+	Less than 800m from the nearest post office (Oxford Post Office is 350m away).
Air Quality	-	Site is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	Site is within 30m of a water body (Trill Mill stream lies adjacent to the eastern boundary of the site).

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Adjacent to GI network (Wildlife Corridor at Christchurch Meadow), so potential for improving wildlife linkages

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Located within the City Centre Archaeological Area. The site has potential for Middle-Late Saxon Archaeology (adjacent to possible causeway), also location of a short-lived medieval friary and has medieval and post-medieval potential. Potential for waterlogging and well preserved eco and artefacts.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Entire site within Central (University & City) Conservation Area. Sensitive location - Christ Church Meadow; a Grade I Registered Park and Garden located in very close proximity to the site.
Listed Buildings	-	There are several Grade I and Grade II listed buildings, particularly towards the north of the site on St Aldate's. The Grade II listed

		Christ Church Footbridge and flanking walls in the Memorial Garden and Screen all lie immediately adjacent to the north of the site.
View Cones	*0*	Site lies outside of a view cone
Historic Core Area	-	Site lies within the City Council's locally designated Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	*0*	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy end employment opportunities	*0*	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, but site is located off St Aldate's in city centre, so is unlikely to be suitable for uses that require parking or generate much traffic. Therefore, continued academic use and/or student accommodation is most suitable.
Can walking and cycling connections with the surrounding area be achieved?	Very good walking and cycling connections already exist.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Some mature trees are located towards the western boundary of the site. Some of these existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	None identified
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Sensitive location in terms of conservation area, listed buildings, and archaeology.

Stage 2 conclusion
Significant historic environment constraints will need to be addressed and mitigated in terms of conservation area, listed buildings, and archaeology. Development will also likely need to be low car or car free in this city centre location. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW5: Jowett Walk (South)

Site name	Jowett Walk (South)
SHLAA reference (and OLP2036 Policy if applicable)	664
Ward	Holywell
Total site size (ha)	0.21
Existing use(s)	Site currently a house, gardens and car park.

Site location plan

Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	Yes	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion

No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Available for student accommodation

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	*0*	*Site is in Flood Zone 1* *(No surface water flood risk present on site)*
Flooding of land surrounding site for access/ egress	*0*	*There is safe access/egress from the site – area surrounding site is Flood Zone 1*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	Site is previously developed land (with buildings in use on site)
Green belt?	**0**	Site is not on Green Belt land

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**++**	Site would provide more than 10 new homes
Affordable housing provision	**I**	Depends on implementation

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	**0**	Site is not in or adjacent to a regeneration area

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**0**	Site not allocated for community facilities OR amount of community facilities remain the same due to the allocation

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**0**	Site not allocated OR amount of public open space remains the same due to the allocation

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**-**	> 400m from a bus stop
Sustainable transport links (rail station)	**-**	> 1600m from train station
Primary Schools	**-**	>800m from the nearest primary school with spaces
Secondary Schools	**-**	>800m from the nearest secondary school with spaces
GP Surgeries	**-**	>800m from the nearest GP Surgery
Post office	**-**	>800m from the nearest post office
Air Quality	**-**	Site is within an Air Quality Management Area (AQMA)

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**0**	Site is not within 30m of a water body

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*

Ecology and Biodiversity	**+**	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	Site within the central archaeological area
Conservation Areas & Register of Parks and Gardens (RPG)	**--**	Site lies in a conservation area (Central Area)
Listed Buildings	**0**	Site contains no identified historic building constraint
View Cones	**0**	Site lies outside of a view cone
Historic Core Area	**-**	Site lies within the Historic Core Area.

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**0**	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy end employment opportunities	**0**	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, via Jowett Walk and Mansfield Rd.
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Unlikely, but any re-development of this site would require a site investigation and contamination risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW6: Manor Place

Site name	Manor Place
SHLAA reference (and OLP2036 Policy if applicable)	031 (SP45)
Ward	Holywell
Total site size (ha)	1.24Ha
Existing use(s)	Former tennis court, allotments, orchards

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Although in close proximity to New Marston Meadows SSSI
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has an intention to develop.
Does the landowner specify types of development	Potential for student accommodation or car free residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	-	Site is partially in Flood Zone 3a *(Patches of surface water flood risk to the east of the site, noticeably towards the south eastern corner).*
Flooding of land surrounding	*0*	The access road to the site is within Flood Zone 1, therefore safe access/ egress from the site can be achieved.

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	-	Unprotected open space
Green belt?	0	Site not in Green Belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site allocated for a minimum of 43 dwellings, which could be delivered as student accommodation
Affordable housing provision	I	Depends on implementation.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	Amount of community facilities unlikely to change as a result of allocation.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	Amount of public open space would not change as a result of allocation.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	<400m from a bus stop.
Sustainable transport links (rail station)	-	>1600m from Oxford Train Station.
Primary Schools	-	>800m from nearest primary school with spaces (St Michael's CE Primary School).
Secondary Schools	-	>800m from nearest secondary school with spaces (Cheney School).
GP Surgeries	-	>800m from the nearest GP surgery (KES Northgate).
Post office	-	>800m from nearest post office (St Aldate's)
Air Quality	-	Site is located within an Air Quality Management Area.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*

Water	-	Site is bordered by the River Cherwell.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	-	Contains no nature conservation designations. Aerial imagery indicates the site contains grassland, scrub, woodland, and scattered trees. Patches of the woodland are included on the Priority Habitat Inventory. The site baseline is likely to have a high biodiversity value, making it difficult to achieve a net gain alongside development. Potential protected species constraints include foraging and commuting bats, roosting bats (trees), reptiles, badgers, nesting birds. Any development should seek to link in with the surrounding woodland and meadows and provide high-quality semi-natural habitat. The site contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty. Decideous Woodland. Extent needs to be confirmed from TVERC database. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network. Site contains significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees are protected by location within the Central Conservation Area. Existing trees will influence developable area of site and its capacity. Strip running through middle of site within LNRS, and also along eastern boundary.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Within city centre archaeological area. The site is of archaeological interest with Civil War defences having been excavated previously. The site contains the line of Royalist defences that should be preserved in situ.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Within conservation area
Listed Buildings	-	A number of Listed Buildings surround the site including Magdalen College Wall (Grade II*) and on the other side of the river St. Catherine's College Music Room (Grade I) and a number of other Grade I listed buildings associated with St. Catherine's College.
View Cones	-	Within view cone
Historic Core Area	-	Within high buildings area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	0	Development of the site is unlikely to increase jobs associated with the knowledge economy.
Diversifying the economy end employment opportunities	0	No Change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes.
Can walking and cycling connections with the surrounding area be achieved?	Yes.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Trees exist on the site, change in levels and the River Cherwell borders the site. Site contains significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees are protected by location within the Central Conservation Area. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	No known contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjacent to a cemetery.

Stage 2 conclusion
Site has a number of heritage constraints which will require sensitive design in order to overcome. The site lies in a view cone and within the locally designated high buildings area and the height of any buildings should be restricted. However, no insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan for student accommodation or residential development.

SPCW7: Nuffield Sites (Island site)

Site name	Nuffield sites – Island site
SHLAA reference (and OLP2036 Policy if applicable)	070 SP1 – West End Sites
Ward	Osney & St Thomas
Total site size (ha)	0.65ha
Existing use(s)	Mix of uses including hotel, retail, office and other town centre uses

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes, mix of uses including commercial and residential (including student accommodation)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	--	*Site is partially in Flood Zone 3b* *(Patches of surface water flood risk towards western and northern part of site).*

Flooding of land surrounding site for access/ egress	-	*Access/egress from the site (from both Hythe Bridge Street and Park End Street) lies within Flood Zone 2, with a small part within Flood Zone 3.*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Site is previously developed land with buildings in use on site*
Green belt?	*0*	*Site is not on green belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Likely to deliver more than ten dwellings*
Affordable housing provision	*I*	*Depends on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Outside regeneration area. Site within one of the 20% least deprived areas in the country. (IMD, 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Amount of community facilities likely to remain the same*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*I*	*Given location, potential to deliver an element of civic space*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Several Bus stops within 400m of site (within immediate vicinity of site) Park End Street (Bus stop D1) serves numerous routes within the city (1, 5, 14) and also further afield (S1, S3 gold)*
Sustainable transport links (rail station)	++	*Site within 800m from Oxford Railway station*
Primary Schools	-	*Nearest primary school (West Oxford) is just over 800m away (850m from centre of site)*
Secondary Schools	-	*Nearest secondary schools more than 800m away. Activate Learning is 500m away but this is a further education college.*
GP Surgeries	+	*KES Northgate (Northgate Health Centre) is 500m away*
Post office	+	*Oxford Post Office (St. Aldate's) is 700m away*
Air Quality	-	*Whole city is within an Air Quality Management Area*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Site within 30m of a water body (Wareham Stream)*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	*0*	*Site within 100m of Middle Fisher Row Gardens – locally protected space.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site within city centre archaeological area*
Conservation Areas & Register of Parks and Gardens (RPG)	-	*Site adjacent to boundary of Central (City and University) Conservation Area*
Listed Buildings	-	*Part of site potentially forms part of setting of a listed building (Cooper's Marmalade Factory or The Jam Factory, 27 Park End Street is nearest Listed Building)*
View Cones	*0*	*Not within view cone as within historic core area*
Historic Core Area	-	*Site lies within the historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	*Site has potential to increase jobs/ floorspace relating to the knowledge economy*
Diversifying the economy end employment opportunities	+	*Potential to deliver affordable workspace at this site*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Wareham Stream runs adjacent to western site boundary
Are land contamination issues likely?	Contamination risks likely to be present. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No insurmountable development considerations at this stage. There are various heritage considerations including views and archaeology. Part of the site is also in an area of flood risk, so will require further site-specific analysis at the planning application stage. Site to be put forward for allocation in Regulation 19 Local Plan as part of a wider mixed-use allocation (including Worcester St Car Park and Land South of Frideswide Square) for a mix of uses commercial and residential (including student accommodation) and other appropriate complementary town centre uses.

SPCW7: Nuffield Sites (Worcester Street Car Park)

Site name	**Nuffield sites - Worcester Street Car Park**

SHLAA reference (and OLP2036 Policy if applicable)	**081 (SP1 – West End Sites and AOC1 – West End and Osney Mead)**
Ward	**Carfax & Jericho**
Total site size (ha)	**0.51ha**
Existing use(s)	**Surface Level Car Park**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes, mix of uses including commercial and residential (including student accommodation)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	*-*	*Site is partially in Flood Zone 3a (narrow strip along the western boundary, adjacent to Castle Mill Stream)* *(Patches of surface water flood risk from south west to north east across the site and towards the southern corner).*
Flooding of land surrounding site for access/ egress	*0/-*	Safe access/egress exists from the site to the east, where the route lies entirely within Flood Zone 1. However, access to the west (via Botley Road) includes land within Flood Zone 2.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Majority of the site is a surface level car park. Site boundary also includes a pub (The Lighthouse)*
Green belt?	*0*	*Site not in the green belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Site has potential to deliver more than 10 residential units*
Affordable housing provision	*I*	*Depends on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Outside regeneration area. Site within one of the 20% least deprived areas in the country. (IMD, 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*

Community facilities	*0*	*Amount of community facilities likely to remain the same*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*I*	*Site has potential to improve public realm both on site and in immediate vicinity but ultimately how much is delivered will depend on implementation*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Numerous within 400m offering a range of frequent service bus services to and from destinations in the city and further afield (e.g., Bus Stop D2, Park End Street)*
Sustainable transport links (rail station)	++	*Oxford Railway station is less than 800m away*
Primary Schools	-	*Several primary schools are more than 800m away (1km approx. – West Oxford Primary and St Barnabus, Jericho)*
Secondary Schools	-	*Nearest secondary schools more than 800m away. Activate Learning is 500m away but this is a further education college.*
GP Surgeries	+	*Several GP Surgeries within 800m (19 Beaumont Street and Northgate Medical Centre)*
Post office	+	*Main Post Office (St Aldate's) is less than 800m away*
Air Quality	-	Entire city is within AQMA

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*

Water	-	*Western site boundary is within 30m of Castle Mill Stream*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	*0*	*No nature conservation designations on site. Site within 100m of Middle Fisher Row - locally protected space.* *The site contains several mature trees on the western boundary. Given the location of these trees within the Central (City and University) conservation area, these trees are likely protected.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site located within the City Centre Archaeological Area. Potential for late Saxon/ Norman remains. Site has potential to form part of the setting of Oxford Castle Scheduled Ancient Monument*
Conservation Areas & Register of Parks and Gardens (RPG)	--	*Entire site located within the Central (University and City) Conservation Area*
Listed Buildings	-	*Site has potential to form part of the setting of nearby Listed Buildings (e.g., Grade II Listed Nuffield College)*
View Cones	*0*	*Not within view cone as within historic core area*
Historic Core Area	-	*Site is wholly located within the historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	*Site has potential to increase number of jobs associated with the knowledge economy*
Diversifying the economy end employment opportunities	+	*Site has potential to support diversification of employment base/ provide affordable workspace*

Other constraints which could affect suitability of site for development

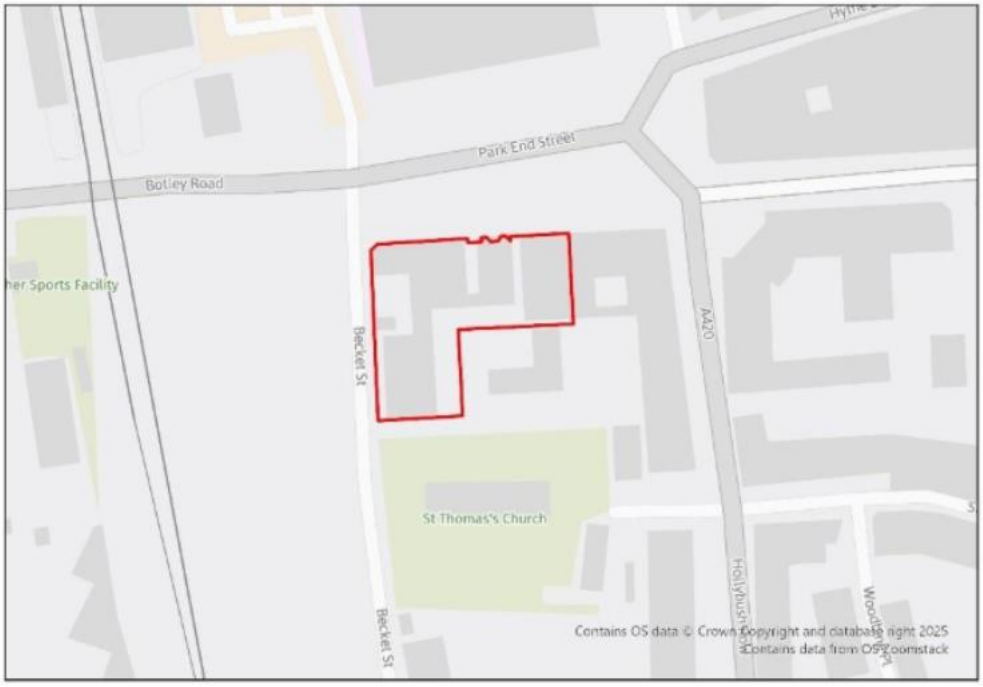
Can access for vehicles be achieved?	yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site is regular shaped and flat. Trees on western boundary and adjacent to Castle Mill Stream (also on western boundary)
Are land contamination issues likely?	Contamination risks likely to be present. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	This site is very close to Castle Mound Scheduled Ancient Monument. Unlikely to cause noise or smells but potential visual impact will need consideration.

Stage 2 conclusion
This site does not contain any insurmountable constraints, with only a narrow strip falling within flood zone 3b. There are however a range of heritage constraints including its location within the Central (City and University) Conservation Area, views, and the fact that the site lies within the the setting of various listed buildings and the Castle Motte. These will need to be given due consideration. Site to be put forward for allocation in Regulation 19 Local Plan as part of a wider mixed-use allocation (including the Island Site and Land South of Frideswide Square) for a mix of uses commercial and residential and other appropriate complementary town centre uses.

SPCW7: Nuffield Sites (Land south of Frideswide Square)

Site name	**Nuffield Sites - Land south of Frideswide Square**
SHLAA reference (and OLP2036 Policy if applicable)	**624 (and within AOC1)**
Ward	**Carfax & Jericho**
Total site size (ha)	**0.26**
Existing use(s)	**Range of residential and ground floor retail**

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes.
Does the landowner specify types of development	Landowner intention to facilitate a general improvement to the area, including this site. Landowner proposing a mix of uses including commercial and residential (including student accommodation) across several sites within ownership (including this site).

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	-	Site is wholly in Flood Zone 2 *(Surface water flood risk present across majority of site)*
Flooding of land surrounding	-	Land immediately surrounding the area along Becket Street and Park End Street lies within Flood Zone 2, and further west along Botley Road within Flood Zone 3.

site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	Previously developed land with buildings in use on site
Green belt?	**0**	Site not in Green Belt

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Site has potential to deliver more than ten units
Affordable housing provision	I	Potential to deliver housing or student accommodation at this site given its city centre location. Amount of affordable housing would depend on implementation.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	0	*Outside regeneration area. Site within one of the 20% least deprived areas in the country. (IMD, 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	0	*Amount of community facilities likely to remain the same*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	0	*Unlikely to change as a result of allocation*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Site within 400m of bus stops on Frideswide Square*
Sustainable transport links (rail station)	++	*Site within 800m of Oxford Railway Station*
Primary Schools	+	*Less than 800m from nearest primary school (West Oxford Community Primary School)*
Secondary Schools	-	*More than 800m from nearest secondary school*
GP Surgeries	+	*Less than 800m from nearest GP surgery (19 Beaumont Street Surgery)*
Post office	-	*Post Office (St. Aldate's) is over 800m away*
Air Quality	-	*The entire city is within an AQMA*.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	0	*Site is not within 30m of a water body.*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	Site contains no nature conservation designations but has potential for nature conservation interest.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	Site within local area of archaeological importance
Conservation Areas & Register of Parks and Gardens (RPG)	--	Site within Central (City and University) Conservation Area
Listed Buildings	-	Site adjacent to several listed buildings including Grade II Listed Coopers Marmalade Factory (adjacent) and the Grade II Listed St Thomas Vicarage is behind the site and the Grade II Listed Church of St Thomas the Martyr is in close proximity to it.
View Cones	0	Not within view cone as within historic core area
Historic Core Area	-	Site lies within the city's historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*

Employment Opportunities in the knowledge-based economy	I	This site has the potential to increase the number of jobs in the knowledge economy but how these are delivered will depend on implementation.
Diversifying the economy end employment opportunities	I	Site has potential to support diversification of the employment base or provide affordable workspaces but how these are delivered will depend on implementation.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes.
Can walking and cycling connections with the surrounding area be achieved?	Yes. Existing connections.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No. brownfield city centre site. contains buildings.
Are land contamination issues likely?	Unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No.

Stage 2 conclusion
The site lies within the historic core area, within a view cone, within the city archaeological area and within the Central (University and City) conservation area. Given heritage considerations, sensitive design is likely to be required. Site is well served by a range of public transport opportunities. Site is also within a flood risk zone, including access, and this will need to be considered further along with any relevant mitigation requirements where necessary. Site to be put forward for allocation in Regulation 19 Local Plan as part of a wider mixed-use allocation (including Worcester St Car Park and the Island Site) for a mix of uses commercial and residential and other appropriate complementary town centre uses.

SPCW8: Osney Mead

Site name	Osney Mead
SHLAA reference (and OLP2036 Policy if applicable)	586 (SP2 Osney Mead and AOC1 West End and Osney Mead)
Ward	Osney & St Thomas
Total site size (ha)	17.8
Existing use(s)	Mix of employment uses including industrial, warehousing and academic activities

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes – an innovation quarter containing a mix of uses including commercial, education and residential (including student accommodation)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	--	Flood Zone 3b to the west and middle of the site, larger area of Flood Zone 3a extends across most of northern boundary, nearly all of the site in Flood Zone 2. Areas of surface water flooding scattered across the site.

Flooding of land surrounding site for access/ egress	--	Main access through Flood Zone 3b.

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Site contains previously developed land including buildings (both in use and vacant) and areas of hard-standing*
Green belt?	*0*	*Site is not within the Green Belt*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	*I*	*Site has potential for homes/ student accommodation.*
Affordable housing provision	*I*	*Depends on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site not within a regeneration area. (Site within one of 20% least deprived areas according to (IMD 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Criteria	*SA rating*	*Comments*
Community facilities	+	*Site has ability to deliver community facilities as part of redevelopment*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	+	*Site has potential to deliver public open space/ make improvements to public realm through redevelopment opportunities.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	-	*Site is more than 400m from nearest Bus stops on Botley Road (circa 800m from "Osney Island" bus Stop on Botley Road*
Sustainable transport links (rail station)	+	*Site is 1km from Oxford Station on foot*
Primary Schools	+	*Nearest Primary School (West Oxford Primary) is less than 400m from the site*
Secondary Schools	-	*Nearest secondary school is more than 800m away*
GP Surgeries	-	*Nearest GP Surgery (19 Beaumont Street) is more than 800m away*
Post office	-	*Nearest Post Office (Oxford St Aldate's) is more than 800m away*
Air Quality	-	*Site is within an Air Quality Management Area but not within air quality "hotspot"*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Site is bounded by Bullstake Stream (to the south) and the River Thames (to the north)*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Site not within a designated nature conservation area. Potential to improve relationship with adjacent habitats including the Bullstake Stream, River Thames and surrounding fields by ensuring development close to/ near the boundaries preserves/ restores/ re-naturalises bankside habitats and provides buffers. The trees on the northern bank are situated within the Osney Town conservation area and as such are afforded protection by virtue of their location within the conservation area.*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site lies outside the city centre archaeological however there may be archaeological potential at the site*
Conservation Areas & Register of Parks and Gardens (RPG)	-	*North western boundary of the site is immediately adjacent to the boundary of the Osney Town conservation area. Trees situated along the riverbank are within the conservation area boundary. Potential for northern part of site to be within the setting of the conservation area.*
Listed Buildings	-	*Site contains no listed buildings however Listed buildings nearby include Osney Abbey (Grade II), Osney Cottage (Grade II) and a Grade II Listed memorial 300 yards south of Osney Lock (Grade II)*
View Cones	-	*Part site lies within the Raleigh Park View Cone*
Historic Core Area	-	*Eastern half of the site falls within the Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	*The Landowner's ambition is to create an innovation area which would be likely to support an increase in jobs and floorspace in knowledge-based sectors*
Diversifying the economy end employment opportunities	*I*	*Currently the site provides a diverse employment base which could be impacted through the comprehensive delivery of a knowledge-based innovation area. However, the creation of such an innovation area could also bring about opportunities to deliver flexible and/or affordable workspaces.*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes, Oxpens Bridge will enhance connectivity with the city centre enabling improved cycling and walking connections with the west end of the city centre.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant changes in ground level however the River Thames and Bullstake Stream provide the northern and southern boundaries (respectively) to the site. Site contains a number of mature trees. Trees on the northern site boundary are within the Osney Town Conservation area and so benefit from protection.
Are land contamination issues likely?	Unknown, however, given the site's history as an industrial estate and considering the variety of previous industrial-related uses, contamination issues are possible.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site located close to fields, is bounded by the river and some residential development nearby on Ferry Hinksey Road. Site adjacent to a substation and contains several pylons which may impact on future development aspirations.

Stage 2 conclusion
While not insurmountable, flood risk issues are potentially significant and will require mitigation. Redevelopment of the site should be undertaken sensitively so as not to detract from views into and out of the historic city core. Development of an Innovation area has the potential to impact existing local businesses who may be displaced. Allocate site for a mixed-use innovation area including commercial, educational and residential uses (including student accommodation), acceptability of residential uses is subject to conclusions of further flood risk assessment. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW9: Oxford Railway Station and Becket Street Car Park

Site name	**Oxford Railway Station and Becket Street Car Park**
SHLAA reference (and OLP2036 Policy if applicable)	**075 (a+b) (SP1 West End Sites and AOC1 West End and Osney Mead)**
Ward	**Osney and St Thomas**
Total site size (ha)	**2.56ha (in SHLAA)**
Existing use(s)	**Railway station and associated ancillary uses/ surface level car parking**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
The East West Rail Safeguarding Direction (19 November 2025) Maps suggests that the entire of the proposed site allocation lies within the safeguarded area. Where a planning application is submitted on land included within the EWR Safeguarding Direction, the East West Rail Company becomes a statutory consultee and must be consulted in accordance with the instructions in the Direction before planning permission can be granted. There are no clear conflicts with national policy or insurmountable environmental or physical constraints. However, site allocation policy itself would benefit from acknowledging the EWR Safeguarding Direction (19 November 2025) and highlighting the procedural implications of the site's inclusion within this land. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. Network Rail is working to redevelop the site to support necessary upgrades to Oxford Railway Station to enable delivery of wider transport objectives (e.g., East West Rail and Cowley Branch Line)
Does the landowner specify types of development	Mixed use – residential and economic

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	-	*Site is partially in Flood Zone 2* *(Patches of surface water flood risk present within site, with the largest patches around the station building in the northern parcel and inside part of the eastern perimeter of the southern parcel along Becket Street.)*
Flooding of land surrounding site for access/ egress	-	*The initial parts of the current access route are within Flood Zone 2 (Botley Road and Becket Street) and then Flood Zone 3 if heading further west onto Botley Road.*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Site is previously developed land in use*
Green belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Likely to deliver more than ten dwellings*
Affordable housing provision	*I*	*Given city centre location, a range of residential typologies are acceptable. As such, the precise amount of affordable housing would depend on implementation*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Site not within a regeneration area* *Oxford Station is within one of the 20% least deprived areas.* *Becket St Car Park is within one of the 50% least deprived areas (IMD,2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*Provision of community facilities unlikely to change.*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	*I*	*Given location, potential to deliver an element of civic space/ public realm.*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	+	*Site contains bus stops with many frequent services to a range of locations*
Sustainable transport	++	*Site contains Oxford Railway Station*

links (rail station)		
Primary Schools	+	*West Oxford Primary School is 750m away*
Secondary Schools	-	*The nearest secondary education provider is more than 800m away. Activate Learning is 650m away but this is a further education college.*
GP Surgeries	+	*Beaumont Street Surgery is 700m away*
Post office	-	*Post Office (St. Aldate's) is over 800m away*
Air Quality	-	*Within City-wide AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	***SA rating***	***Comments***
Water	*0*	*Northern boundary of site is just over 60m from Castle Mill Stream/ Sheepwash Channel*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	***SA rating***	***Comments***
Ecology and Biodiversity	+	*Contains no nature conservation designations with limited potential for nature conservation interest. Redevelopment has the potential to improve wildlife linkages*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	***SA rating***	***Comments***
Archaeology	-	*Station site in close proximity to two Scheduled Ancient monuments (Rewley Abbey and Swing Bridge, LNWR Station). Whole site lies within the city centre archaeological area. Site is therefore of potential archaeological interest.*
Conservation Areas & Register of	-	*Becket Street car park is adjacent to the Central (University and City) conservation area*

Parks and Gardens (RPG)		
Listed Buildings	-	*Potential that part the Becket Street car park lies within the setting of the Church of St Thomas the Martyr (Grade II) Listed Building. Several other Listed Buildings including Combe House (Grade II) and St Thomas Vicarage (Grade II) are close by.*
View Cones	-	*Not within a view cone as whole site within Historic Core Area.*
Historic Core Area	*0*	*Whole site lies within the Historic Core Area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	***SA rating***	***Comments***
Employment Opportunities in the knowledge-based economy	*I*	*Depending on precise nature of redevelopment, the site has potential to bring forward jobs to support the knowledge economy*
Diversifying the economy end employment opportunities	*I*	*Depending on precise nature and scale of redevelopment, site has potential to support diversification of employment base*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, vehicular access to the site already exists
Can walking and cycling connections with the surrounding area be achieved?	Yes,
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Site contains railway infrastructure which has potential for contamination
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is adjacent to the railway line and part of the site contains the Oxford Railway station. Potential for noise issues, smells and other environmental issues associated with the railway.

Stage 2 conclusion
The site lies within the historic core area, and within the city archaeological area. It is also adjacent to the Central (University and City) conservation area. Given heritage considerations, sensitive design is likely to be required. Site is well served by a range of public transport opportunities. There is some flood risk on the site which may need to be addressed and appropriately mitigated. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW10: Oxpens

Site name	**Oxpens**
SHLAA reference (and OLP2036 Policy if applicable)	**076 (Policy SP1 West End Sites and AOC1 West End and Osney Mead)**
Ward	**Osney and St Thomas**
Total site size (ha)	**6.3ha**
Existing use(s)	**Ice Rink, car park, former filling station, open space, sheltered housing and businesses**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	Yes	The site partially lies within Flood Zone 3b greenfield

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
The East West Rail Safeguarding Direction (19 November 2025) Maps suggests that part of the northern boundary of the site (adjacent to the river and the railway line) is included within the safeguarded area. Where a planning application is submitted on land included within the EWR Safeguarding Direction, the East West Rail Company becomes a statutory consultee and must be consulted in accordance with the instructions in the Direction before planning permission can be granted. There are no clear conflicts with national policy or insurmountable environmental or physical constraints. However, site allocation policy itself would benefit from acknowledging the EWR Safeguarding Direction (19 November 2025) and highlighting the procedural implications of par of the site's inclusion within this land. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. Resolution to Grant Outline Permission (Planning Committee January 2024)
Does the landowner specify types of development	Yes. Outline permission proposes a mixed use scheme including homes, jobs and a hotel as well as public realm improvements

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	--	*Site is partially in Flood Zone 3b* *(Patches of surface water flood risk present within site, with the largest patches located towards the eastern end)*
Flooding of land surrounding site for access/ egress	-	*Initial access/egress from the site is within Flood Zone 1, although the route (A420) quickly crosses into Flood Zone 2 to both the east and west.*

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	*0*	*Part of the proposed site allocation contains publicly accessible open space (however this is outside the redline boundary of the planning application). The site also contains some previously developed land, some of which is surface level car parking and some of which contains a mixture of occupied and unoccupied buildings.*
Green Belt?	*0*	*Site is not on Green Belt land*

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	*Resolution to grant planning permission (Jan 2025) for 234 homes and 258 units of student accommodation*
Affordable housing provision	++	*40% affordable housing achieved on-site in relation to the 234 homes*

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	*0*	*Outside regeneration area. Site within one of the 50% least deprived areas in the country. (IMD, 2025)*

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	*0*	*No obvious change in built community facilities*

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	++	*Public open space retained and proposed to be significantly enhanced (likely to result in more than 10% of the site area)*

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	-	*Closest frequent service bus stops are located on Frideswide Square and Park End Street (more than 400m away). While there is a bus stop opposite the site, it does currently appear to be in use.*

Sustainable transport links (rail station)	+	*Oxford Railway Station is 600m away*
Primary Schools	-	*Two primary schools more than 800m away (West Oxford Primary is 1.1km while St. Ebbe's CofE Primary is 900m away)*
Secondary Schools	-	*The nearest secondary education provider is more than 800m away. Activate Learning is 650m away but this is a further education college.*
GP Surgeries	-	*Northgate Health Centre is 1km away*
Post office	-	*St Aldate's Post Office is over 800m away*
Air Quality	-	*Within City Centre AQMA*

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	-	*Site is within 30m of River Thames*

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	+	*Potential for improvements to wildlife linkages*

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	-	*Site lies within City Centre Archeological Area*
Conservation Areas & Register of Parks and Gardens (RPG)	*0*	*Very small portion of the site is opposite a tight corner boundary of the Central (University and City) conservation area (due to existing buildings). Unlikely to impact setting. Similarly, a portion of the south western boundary of the site is closely aligned to the boundary of the Osney Town conservation area however existing railway infrastructure acts as buffer between them.*

Listed Buildings	*0*	*No Listed Building constraint identified*
View Cones	*0*	*Not within view cone as within historic core area*
Historic Core Area	-	*Site lies within the historic core area*

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	+	*Site likely to increase jobs/ floorspace associated with knowledge economy as recent resolution to grant outline planning permission includes at least 64,057sqm of employment floorspace*
Diversifying the economy end employment opportunities	+	*Potential to diversify employment base and/ or provide affordable workspace*

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Trees within the site. Site is adjacent to watercourse (River Thames)
Are land contamination issues likely?	Site contains a former petrol filling station so potential for contamination on a small part of the site
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	One of the site boundaries runs alongside the railway line. Potential for environmental issues such as noise and smells.

Stage 2 conclusion
Part of the site is located in Flood Zone 3b which will need to be taken into consideration. The site contains various heritage considerations so careful design will be required. Although in the

city centre ,Oxpens Road/ Thames Street is not on a frequent service bus route however both the Westgate and Oxford Railway Station/ Frideswide Square/ Park End Street provide a good range of frequent service bus stops however these stops are all more than 400m away.

Site should be allocated for a mix of uses including commercial and residential (including student accommodation) and other appropriate complementary town centre uses. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW11: St Thomas School and Osney Warehouse

Site name	**St Thomas School and Osney Warehouse**
SHLAA reference (and OLP2036 Policy if applicable)	**SHLAA ref: #616** **LP2036 ref: falls within AOC1 West End and Osney Mead**
Ward	**Osney & St Thomas**
Total site size (ha)	**0.41 ha**
Existing use(s)	**St Thomas: multiple social enterprises/community uses** **Osney Warehouse: visual arts company including studio, exhibition, education spaces/community uses**

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes - Call for sites 2025
Does the landowner specify types of development	Call for sites 2025 landowner confirmed intention to develop for mix of uses including employment and resi/ student accommodation/ specialist elderly. Also, site was identified (but not allocated) in the former West End Area Action Plan for residential use and open space.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	*SA rating*	*Comments*
What flood zone(s) is the site in?	-	Nearly all of the site is in Flood Zone 2. (Surface water flood risk present in western half of site)
Flooding of land surrounding site for access/ egress	-	Access/egress from the site is over moderate to low hazard land

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	Site is previously developed land with buildings in use on site.
Green belt?	**0**	Site is not designated as greenbelt.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	++	Whilst the two sites in combination have the potential to deliver more than 10 new homes, the SHLAA 2025 identifies that it is unlikely to be able to deliver net gain in 10+ units alongside reprovision of community uses.
Affordable housing provision	+	Site would likely provide up to 40% affordable housing.

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	**++**	Site is not within a regeneration area.

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**I/-**	Depends upon implementation, development any development would require the reprovision of community based facilities, although this could lead to a loss on site.

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**0**	Allocation would not lead to loss of public open space, however opportunities to provide additional 10% likely limited due to size constraints of site.

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	350m to Park End Street bus stop D6

Sustainable transport links (rail station)	**++**	550m to train station
Primary Schools	**-**	1km to West Oxford Community Primary School
Secondary Schools	**-**	1.8km Magdalen College Secondary School
GP Surgeries	**-**	750m to Beaumont Street surgery
Post office	**+**	Nearest post office is less than 800m away (St Aldates)
Air Quality	**-**	Within city-wide AQMA

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**0**	Nothing identified nearby, though Castle Mill stream is to the east (more than 30m)

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	No international/national or local sites within 200m. Sites separated by line of mature trees. Likely to provide habitat for roosting, foraging and commuting bats and nesting birds. Records of swifts within 100m. Retention of trees onsite to retain ecosystem benefits such as shading, as well as avoid the requirement for mandatory BNG. the development design should look to enhance the tree line with species rich grassland margins and further individual tree delivery across the site. All of the eastern parcel, and most of the western parcel apart from northwest corner are within LNRS.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	Within the City Centre Archaeological area. Close to poorly understood route of western Royalist defences and located south of Osney Lane where there is some potential for medieval settlement before later contraction. Any significant new build likely to require assessment and evaluation.
Conservation Areas & Register of Parks and Gardens (RPG)	**--**	Western half of the site is within Central (University and City) Conservation Area
Listed Buildings	**0**	No
View Cones	**0**	Not within a view cone as within historic core area
Historic Core Area	**-**	Site is within the historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**I**	Depends on implementation as to whether there would be any gains – No jobs or economic floorspace would be lost in the knowledge-based economy given that the existing uses of the buildings are related to social enterprises and a visual arts studio.
Diversifying the economy end employment opportunities	**I**	Depends on implementation – Current uses support a diversification of the employment base, therefore depending on implementation, there is potential to lose this if the site is redeveloped.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – vehicular access is currently off Oxpens Road to the rear, or via St Thomas St/ Woodbine Pl onto Osney Lane. No direct

	access from Holybush Road/Oxpens Road onto Osney Lane.
Can walking and cycling connections with the surrounding area be achieved?	Yes – there are already some connections in place and pedestrian only access routes can be utilised to reach further into the city centre
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Pedestrian access to City of Oxford College separates the two sites. Site is level and no significant physical features are present There are significant existing trees significant existing trees along the west boundary of the eastern site, growing alongside the pedestrian access to City of Oxford College, which are important to public amenity in the area and will provide valuable ecosystem services. However, the viability of the trees long term is doubtful and consideration should be given to their replacement. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Potential for contamination issues at eastern portion of the site due to the former use of the warehouse (Underhills Hide and Skin Market). Contamination risks may be present due to previous use. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	SHLAA records that surrounding uses include: housing, employment and education. Not particularly sensitive given that the site in question is in employment use, although acknowledge that little noise/ other nuisance is likely to be generated given the current operation/ nature of use is likely to be fairly quiet with limited vehicular movements.

Stage 2 conclusion
The site is previously developed land and its location is suitable for sustainable development. The site is not sensitive from an ecological perspective, although there are potential heritage sensitivities, as well as addressing loss of community uses (depending upon implementation) which may need to be addressed as part of allocation. Much of the site is also exposed to flood risk and this will need to be appropriately investigated in further detail and mitigated where necessary. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW12: West Wellington Square

Site name	West Wellington Square
SHLAA reference (and OLP2036 Policy if applicable)	#065 LP2036 policy SP62
Ward	Carfax and Jericho
Total site size (ha)	0.88ha
Existing use(s)	Academic and Institutional uses

Site location plan

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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	2025 – Landowner confirmed intention to develop within plan period.
Does the landowner specify types of development	Current allocation establishes site is suitable for academic institutional, student accommodation and residential development including employer-linked affordable housing. Uses appropriate to LP2036 policy V4 (inc use class E) will also be suitable in local centre.

Stage 1b conclusion
Landowner has confirmed intention to develop – continue to next stage of assessment.

<u>Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)</u>

SA objective 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

See SA Objective 8 for decision-making criteria.

SA objective 2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Criteria	***SA rating***	***Comments***
What flood zone(s) is the site in?	**0**	Site is in Flood Zone 1 Small patches of surface water flood risk to the south-west corner of site and also near the eastern boundary
Flooding of land	**0**	There is safe access/egress from the site – area surrounding site is Flood Zone 1

surrounding site for access/ egress		

SA objective 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Criteria	*SA rating*	*Comments*
Previously developed land?	**0**	Yes.
Green belt?	**0**	Site is not in the Green Belt.

SA objective 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Criteria	*SA rating*	*Comments*
Housing provision	**++**	
Affordable housing provision	**I**	Depends on implementation- likely to be student accommodation

SA objective 5. To reduce poverty, social exclusion, and health **inequalities**.

Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Criteria	*SA rating*	*Comments*
Regeneration area (within the top 20% most deprived areas IMD)	**0**	Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 80% of neighbourhoods in England – IMD 2025).

SA objective 6. To provide accessible essential **services and facilities**.

Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Criteria	*SA rating*	*Comments*
Community facilities	**0**	

SA objective 7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

Decision-making criteria: Will it increase the provision of public open space?

Criteria	*SA rating*	*Comments*
Public open space	**0**	Site adjoins Wellington Square open space. Unlikely to be scope to provide open space directly within the site itself due to size and constrained nature of site

SA objective 8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Criteria	*SA rating*	*Comments*
Sustainable transport links (bus stop)	**+**	Nearest bus stop less than 300m (St Giles/Banbury Rd) with frequent services. Site is in fairly close proximity to city centre with range of additional connections.
Sustainable transport links (rail station)	**+**	1km to Oxford Rail Station
Primary Schools	**+**	500m to St Barnabus Primary School
Secondary Schools	**-**	2.3km to Cherwell School
GP Surgeries	**+**	400m Beaumont Surgery
Post office	**+**	350m Walton Street Post Office
Air Quality	**-**	Whole city is within an AQMA.

SA objective 9. To achieve **water** quality targets and manage water resources.

Decision-making criteria: Does the site contain, or is it near, a water body?

Criteria	*SA rating*	*Comments*
Water	**0**	Site more than 30m from a water body.

SA objective 10. To conserve and enhance Oxford's **biodiversity**.

Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Criteria	*SA rating*	*Comments*
Ecology and Biodiversity	**+**	Not located on or close to a designated ecological site. Development may offer opportunity to enhance ecology/biodiversity at adjoining Wellington Square green space (GI network). The site is largely developed, with semi-natural habitats limited to garden space (with numerous mature trees). Potential protected species constraints are likely limited to roosting bats and nesting birds.

SA objective 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Criteria	*SA rating*	*Comments*
Archaeology	**-**	There is a high potential for archaeological interest as it is the site of the Wellington Workhouse and a line of Civil War defences.
Conservation Areas & Register of Parks and Gardens (RPG)	**--**	Entire site within Central (City & University) Conservation Area, to which many of the buildings make a positive contribution.
Listed Buildings	**-**	Adjacent to listed buildings including 4-15 Walton Street (Grade II)
View Cones	**0**	Not within a view cone
Historic Core Area	**-**	Within the historic core area

SA objective 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Criteria	*SA rating*	*Comments*
Employment Opportunities in the knowledge-based economy	**I**	Potential for an increase in jobs the support the knowledge economy but precise uses will depend on implementation.
Diversifying the economy end employment opportunities	**0**	No Change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Access is limited to a single-width carriageway between two buildings off Walton Street and is not suitable for any material increase in traffic movements.
Can walking and cycling connections with the surrounding area be achieved?	Very well connected for walking and cycling
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees at the rear of properties and on the green space near the corner of Walton Street and Little Clarendon street which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by their location within the Central Conservation Area. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area and to enhance the character and appearance of the conservation area.
Are land contamination issues likely?	None identified
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	None identified

Stage 2 conclusion
The site is previously developed land and is in an accessible location. There are some potential heritage sensitivities regarding the conservation area and archaeology, as well as nearby listed

buildings and location of the site within the historic core of the city. These would need to be addressed through appropriate mitigation requirements where necessary as part of any allocation. Site to be put forward for allocation in Regulation 19 Local Plan.

Background paper 001

Title: Housing Need, Requirement and mix

This paper addresses the overall need for housing in Oxford, how the housing requirement may differ from this, and the mix of unit sizes needed.
Relevant Local Plan 2045 Objectives: • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
Relevant SA Objective(s): 4. To **meet local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.
SEA theme(s): Material assets, population and human health.

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1. Introduction

1.1 Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply. Oxford is an international city and important part of the knowledge economy, with a world-renowned university and hospitals. In addition, the mix of housing sizes also needs to be considered, as some will need smaller (1-bed) units and others larger homes to accommodate a large family. How to manage particular housing types such as Houses in Multiple Occupation (HMOs) is also important. This paper focuses on overall housing need and mix. The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily. Meeting the needs of those in high housing need, or those who may struggle to afford to remain in the city, is also important to meet social objectives such as overcoming inequalities and improving health and wellbeing. Affordable Housing is considered in Background Paper 002. Particular groups have particular housing needs, including students, those who need extra care, gypsy, traveller and boaters. Specialist housing need is considered in Background Paper 003.

1.2 This topic paper begins with a review of the national, regional and local policy context relating to housing need and requirement. It then goes on to look at the current situation in Oxford and includes a discussion on housing need and Oxford's housing target. The "current situation" section then moves on to discuss housing supply. The next section talks about the likely future without a new local plan and discusses housing supply and the competing pressures for limited land available in the city. Finally, some key sustainability and plan issues are identified.

1.3 Historically Oxford has been unable to meet its calculated housing need. The last round of Local Plan's in Oxfordshire aimed to meet the needs assessed in the 2014 Oxfordshire Housing Market Assessment, updated for Oxford in 2018. Oxford's total capacity for housing was less than its calculated need. So unmet need was taken by the other districts' local plans (full details are set out within this paper).

1.4 The Oxford Strategic Housing Land Availability Assessment (January 2026) shows that the current capacity is 9,267 dwellings for the Local Plan period 2025-2045 (including a 10% buffer to applicable sites). This shows that Oxford's total capacity for housing is still less than its calculated need.

1.5 Paragraph 71 of the NPPF states that a range of market and affordable housing types should be available to meet a wide range of needs. Policy H5 contributes towards this by shaping the size of dwellings. The evidence which has informed the % requirements include the Updated Specialist Housing Needs Evidence (2025, Iceni) combined with factors from the affordable housing register including mix of unit sizes, need to downsize and the existing housing stock.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework (NPPF) states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 61). At paragraph 62 the NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance. The NPPF also considers that the needs of groups with specific housing requirements are addressed. Paragraph 63 provides an indication of those groups which includes, older persons, students, and gypsies and travellers. Paragraph 69 sets out that a housing figure for the whole local authority area should be included by strategic policy making authorities and Paragraphs 72-77 provide the national policy position on identifying land for homes. Paragraphs 78-81 discuss how strategic policy making authorities should maintain the supply and delivery of new homes.

2.2 The National Planning Policy Framework (NPPF) (2024) requires local planning authorities to plan for a mix of homes based on current and future demographic trends, market trends and the needs of different groups in the community. The size, type, tenure and range of homes needs to reflect local needs to ensure that mixed and balanced communities are supported. The housing need across Oxford is high and as such all types and sizes of dwellings are required. However, some sites and the area context will lend itself to certain mixes of dwellings. The city centre and district centres are most likely to be suitable for higher density developments and it is expected that dwelling densities would continue to be higher than those in neighbouring districts reflecting Oxford's urban area.

National Planning Practice Guidance (PPG)

2.3 The National Planning Practice Guidance (PPG) includes additional guidance on the following housing topics relevant to housing need and supply:

- Housing and economic land availability assessment;
- Housing and economic needs assessment;
- Housing needs of different groups;
- Housing needs for older and disabled people;
- Housing supply and delivery.

2.4 The PPG re-iterates the expectation for strategic policy-making authorities to follow the standard method for calculating housing need (Paragraph: 002 Reference ID: 2a-002-20241212). This explains that the standard method uses a formula that incorporates a baseline of local housing stock, which is then adjusted upwards to reflect local affordability pressures. This is intended as an unconstrained assessment of the number of homes needed in an area. The PPG is clear that this assessment does not produce the housing requirement figure.

2.5 The PPG goes on to explain the housing requirement (040 Reference ID: 2a-040-20241212). The PPG says that, once the need is calculated using the standard method, the planning authority should make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

2.6 The PPG also provides advice about assessing land availability within the boundaries of a plan-making authority including setting out the purpose of this assessment. Paragraph 001 Reference ID: 3-001- 20190722 of the PPG sets out that "An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period." In relation to whether or not a site should be allocated, the PPG sets out that the role of the land availability assessment is to provide information on the range of sites which are available to meet the local authority's requirements but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

Regional and Local Context

Oxfordshire Housing and Growth Deal

2.7 The Oxfordshire Housing and Growth Deal supports the delivery of 100,000 homes in Oxfordshire between 2011 and 2031 and secured £215million of funding including £60million for affordable housing and £150milllion for infrastructure improvements including for road and rail. As part of this deal, there was a commitment to produce a county-wide strategic plan. For this reason, work began on the Oxfordshire Plan 2050, which was to provide high-level strategy to inform the districts' local plan, including on housing need and the housing requirement for each district. However, work on this plan was eventually aborted by the constituent authorities.

Neighbouring Local Plans

2.8 In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of housing need identified in the 2014 Strategic Housing Market Assessment (SHMA) due to the constrained nature of Oxford. Oxford's need was assessed as a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). The approach taken by the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) was that the mid-point of this range should be taken as the starting point for assessing the level of need and unmet need (i.e. 28,000). Based upon extensive evidence, the Oxfordshire Growth Board agreed an apportionment of homes to be provided within each of the districts. The assumed capacity for Oxford was 10,000 dwellings.

2.9 In the last round of Local Plans, the other Oxfordshire districts agreed to deliver 14,300 dwellings, which met the majority of unmet need arising from Oxford's Local Plan 2036. These were apportioned as follows:

Table 2.1

Cherwell Local Plan	4,400
South Oxfordshire	4,950
Vale of White Horse	2,200
West Oxfordshire Local Plan	2,750

2.10 Originally, the intention for the next round of local plans was that housing need and requirements would be informed by the Oxfordshire Plan 2050. The Oxfordshire Growth Needs Assessment was undertaken, agreed and published, and initial work on the Oxfordshire Plan 2050 consulted on. This had not yet got to the point of developing a strategy to use to apportion the need between the districts. Further work to update the OGNA was commissioned, but agreement on this work could not be reached, and work on

the Oxfordshire Plan ceased. Work had commenced on the Oxford Local Plan 2040, and to enable this to continue, Oxford, with Cherwell, commissioned a Housing and Economic Needs Assessment to inform the housing need of those two authorities. The Oxford Local Plan 2040 was submitted for examination on this basis, but the Inspectors concluded that the duty to cooperate had not been met because the HENA looked at the whole of Oxfordshire in order to establish the housing need of the two authorities.

2.11 Work has continued on local plans in each Oxfordshire district, however in the meantime delivery of homes to meet Oxford's unmet need for has been very slow to come forward. Negotiations and joint working have been on-going to ensure strategic sites deliver for Oxford's unmet need, including for example co-operative working on Development Briefs and by ensuring there are signed agreements on nomination rights for the affordable housing, so it meets the needs of those on Oxford's housing list. More details are provided in Section 5 below.

Oxford Growth Commission

2.12 The Interim Report of the Oxford Growth Commission (2025) highlights that *"local authorities collectively are not planning to meet their minimum housing requirements on a County wide basis".* Failure to meet Oxford's unmet need does not "support the scale of economic growth across the County" which are linked to the government's ambitions for the Oxford-Cambridge Growth corridor, and forecasted population growth.

Oxford Local Plan 2036

2.13 The Oxford Local Plan 2036 contains a number of policies relating to housing need and supply. In particular Policy H1 sets the housing requirement for the plan period. The housing requirement for the plan period from 2016-2036 is 10,884 homes, which is a stepped trajectory to reflect the anticipated delivery of housing over the plan period. The housing requirement in the Oxford Local Plan 2036 is as follows:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

2.14 Policy H4 sets the mix of dwelling sizes. This applies only to affordable housing. For market housing, an explanation of the proposed housing mix is required. There are exceptions to the policy requirement for affordable housing, for example in the city and district centres, where density may be high and only smaller units are suitable.

Housing and Economic Land Availability Assessment

2.15 This is a constraint-based assessment that seeks to identify sites and broad locations and assesses their development potential. The assessment looks at whether sites and broad locations for development have the potential to come forward as part of the development plan process. (i.e., are sites or broad locations for development available and achievable?) The most recent one carried out for Oxford was to support the Oxford Local Plan 2040 and was completed in September 2023, with an addendum completed in March 2024. This

showed the capacity of Oxford to be 9,851 for the period 2020-2040, which is an average of 493 dwellings per annum. This will be updated to support the Oxford Local Plan 2045.

Oxford City Council "Our Strategy" 2024-2028

2.16 One of the five main priorities of the City Council's strategy to 2024 is to deliver 'good, affordable homes'. The strategy recognises that 'To address Oxford's housing issues we must drive up standards for existing housing alongside a focus on providing new homes, working in partnership across the housing sector.'

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Housing Need

3.1 In national planning policy, an area's housing need is different from the housing requirement. The NPPF December 2024 makes it clear that the assessment of housing need should be generated using the Government's Standard Method. Oxford's housing need has been calculated as 1,087 dwellings per year, using the standard method and affordability ratio (Office for National Statistics, March 2025). The housing need figure may be updated after the new affordability figures are released in March 2026.

Housing Requirement

3.2 The NPPF recognises that there may be reasons to set a housing requirement that is different to the housing need as calculated by the Standard Method. It also recognises that there may be unmet need, if the housing need is greater than the number of homes that can realistically be delivered within the plan period within the planning authority's area. This is the case in Oxford as the housing need is significantly greater than the capacity of the city.

3.3 There are very significant constraints on the capacity of the city – physically with the city's tight administrative boundary and Green Belt, and environmentally with large areas of national and international biodiversity interests and areas within flood zone 3b functional flood zone as well as heritage and townscape considerations. Oxford's housing requirement is therefore a constrained and capacity-based target. The Inspector for the Oxford Local Plan 2036 acknowledged in his report that Oxford's housing requirement was only a proportion of the total number of homes that made up the total housing need.

3.4 Oxford's physical and environmental constraints on its capacity for growth are not new issues and through the joint working undertaken as part of the Growth Board, an element of Oxford's unmet need was apportioned to the surrounding Oxfordshire district councils to accommodate within their administrative areas as part of the Duty to Cooperate process. This led to strategic allocations for growth in plans for all of the Oxfordshire district authorities most recent Local Plans.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Housing Supply

4.1 Oxford's constrained capacity for housing land has traditionally meant that there is strong competition for land for housing, student accommodation, employment and other uses. In order to help address the supply of housing, the strategy for the Oxford Local Plan 2036 was housing-focused and prioritised delivery of homes. The strategy sought to allocate no new employment sites, instead prioritising the loss of certain low quality, poorly located employment sites (category 3 employment sites) for housing. Notwithstanding this approach, there is continued pressure on infrastructure as a large proportion of housing developments are on small-scale infill sites and offer limited opportunities to deliver new on-site strategic infrastructure. This has been exacerbated by changes to national policy in recent years which include permitted development for residential conversions from other uses including offices and shops. Such changes of use are not subject to the same planning considerations in relation to supporting infrastructure to support the new homes formed.

4.2 Work with the other Oxfordshire authorities has resulted in a number of strategic allocations being made in the plans of our neighbours to help meet housing need. Other actions by the City Council to deliver housing, such as setting up a housing company and setting affordable housing delivery as a corporate priority, will continue to push forward housing delivery.

Housing Completions

4.3 Since 2006, the majority of new homes have been delivered on small-scale, dispersed brownfield sites, either re-developing existing units or converting existing buildings. The city's last remaining strategic greenfield sites are Barton Park and Oxford North. For the last few years, annual delivery at Barton Park has made a significant contribution to housing delivery, and more recently housing has begun to be delivered at Oxford North.

4.4 Table 4.1 shows the net additional completions from 2016/17 (the base date of the 2016 Local Plan) which is taken from the 2023/24 Annual Monitoring Report published in December 2024. This takes into account dwellings gained and lost through new build completions, demolitions, changes of use and conversions and includes completions of purpose built student accommodation.

Table 4.1 - Showing net additional completions since 2016 (Oxford City Council 2025)

Year	Dwellings (net) completed (built)
2016/17	419
2017/18	367
2018/19	358
2019/20	790
2020/21	711
2021/22	581

2022/23	554
2023/24	365
2024/25	272
TOTAL (since 2016/17)	**4,417**

4.5 In the 24/25 monitoring year there were 272 recorded completions which represents a decrease compared to recent years. This follows a decrease in 21/22 and 22/23 compared to 19/20 and 20/21. This is reflective of both the lack of new large strategic sites, and also wider economic circumstances, including uncertainties from Brexit and the global economic situation (affected by Covid, the Ukraine war and other globally significant effects), and the lack recently of large student accommodation schemes. Changed economic circumstances have also tipped the balance towards delivery of economic development, particularly research and development, rather than housing, which has resulted in fewer conversions from economic sites to housing.

4.6 Likely trends without the plan include continued residential completions from a variety of sources including from Oxford City Housing Limited.

5. Key issues addressed through the Local Plan 2045

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to housing delivery objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Housing need

5.3 Housing need is an unconstrained assessment of the minimum number of homes needed in an area. The housing need for Oxford is determined by the Government's Standard Method for calculating housing need. The NPPF and PPG is clear that whilst alternative methods may be used to set the Plan's housing requirement, the Standard Method is the appropriate method for calculating housing need.

5.4 The December 2024 Standard Method uses a formula that incorporates a baseline of local housing stock, adding 0.8% to this, then adjusting upwards to reflect local affordability pressures, using the latest ONS median house price to workplace earnings ratio. The

method accounts for economic growth indirectly by application of the affordability ratio, as a number of pressures from a successful economy will impact on affordability, leading to an uplift when calculating the housing need. The Standard Method housing need for Oxford is currently 1,087, which is 21,740 over the 20-year plan period.

Housing requirement

5.5 Assessing housing need is the first step in deciding how many homes to be planned for. The number of homes to be planned for should be reflected in the housing requirement specified in the Local Plan. Policy H1 sets the housing requirement for the Plan period. The housing requirement may exceed the need if that can be justified based on, for example, economic ambitions. Likewise, a housing requirement can be set that if lower than the calculated need if there are constraints on capacity. In this case, a housing capacity assessment, carried out using the Housing and economic land availability assessment guidance needs to demonstrate that constraints limit housing capacity. It is also necessary to show that all efforts have been made to identify capacity for housing.

5.6 Over the 18 years from 2006/07 to 2023/34 housing delivery in Oxford has averaged 451 dwellings per annum, varying from 200dpa in 2010/11 to 821 in 2006/7. Therefore, from the outset, it has seemed unlikely that enough housing sites could be found to meet the identified housing need.

5.7 Every effort has been made to identify housing capacity in the city, as set out in the SHLAA. The SHLAA assesses the housing capacity over the Plan period as 9,267 dwellings (463dpa). Therefore, the housing requirement set out in Policy H1 is for 463 dwellings per annum.

Unmet housing need

5.8 Where a housing requirement set in a Plan is lower than the identified housing need, this creates an unmet housing need. The onus is on the planning authority generating this need to approach councils located where this need could be met appropriately, and to attempt to reach agreement for the unmet need to be incorporated into their local plans.

5.9 There is a long history in Oxford of working with our neighbours on housing matters, with the most recently adopted suite of Local Plans in Oxfordshire based on a joint assessment of housing need and an apportionment of, and provision for, Oxford's unmet need, As work has progressed on this Local Plan, there have been regular conversations between the Oxfordshire authorities on the likely level of Oxford's unmet need and the commitments of the neighbouring authorities to assist with this. In addition to the regular Oxfordshire Planning Policy Officers and Heads of Planning meetings the City Council took the initiative in Spring 2025 to set up a Duty to Co-operate Forum.

5.10 The Duty to Co-operate Forum has met every month since June 2025 to discuss Duty to Co-operate matters arising from our plan production processes and largely focussing on

Oxford's Plan and housing matters. This group has agreed a process for the conversation on unmet need with streams of work and key milestones identified to facilitate it. This has included: workshops on Oxford's SHLAA approach and emerging outputs, and the sharing of the full SHLAA report ahead of its publication: a formal request for assistance with unmet need; and confirmation of and collation of commitments of each of the Oxfordshire districts. This conversation is ongoing and has enabled an Interim Joint Statement of Common Ground to be published on the matter as part of the Regulation 19 consultation material, with the intention of publishing a detailed Memorandum of Understanding at the submission of the Oxford Local Plan.

5.11 The Interim Statement of Common Ground provides details on the commitments towards Oxford's unmet need in the adopted and emerging plans of neighbouring districts (as of January 2026). This confirms that Oxford has calculated the level of unmet need for the period 2025-2045 to be: 12,373 homes; that all the Oxfordshire authorities have in combination made provision for 14,300 homes in their currently adopted Local Plans; and that they plan to continue to provide for Oxford's unmet need in their emerging Local Plans (the emerging Plans of Cherwell, South Oxfordshire, Vale of White Horse are currently at examination and West Oxfordshire has recently published a Regulation 18 consultation document). This gives the City Council confidence that our identified unmet need can be met.

Housing mix

5.12 The Updated Housing Needs Assessment (2025, Iceni) provides an analysis of housing need including mix, size and tenure of homes needed. To consider the mix of homes needed, a model is applied that starts with the current profile of housing in terms of number of bedrooms and the tenure. Data about the age of households and typical sizes of homes they occupy enables demographic projections to be applied to see how much each age group is expected to grow in number and therefore the profile of housing need over the 2025-2045 period. The size of housing that households occupy relates more to their wealth and age than the number of people they contain, so in projecting it is not simply assumed that an increase in single-person households will automatically translate into a need for smaller units. Issues of supply can also impact occupancy patterns. The issue of choice is less relevant in the affordable sector. Table xxx below shows the identified need for different sizes of unit by tenure.

Table 5.1: Modelled mix of housing by size and tenure (assuming capacity-led level of housing growth).

	1-bed	*2-bed*	*3-bed*	*4-bed*
Market	*10%*	*26%*	*41%*	*23%*
Affordable home ownership	*24%*	*35%*	*24%*	*16%*
Affordable housing (rented)	*30%*	*34%*	*30%*	*5%*

Source: Iceni Housing Market Model

5.13 In setting the mix for the affordable housing element of a scheme, as well as the modelled outputs based on demographics, information about current needs represented by the housing list. The City Council's Housing Services team are able to understand immediate and pressing needs. Following consultation with Housing Services, it was established that the current (and immediate) demand for 2-bed homes is relatively low. On the other hand, there are currently long waits for 1 bedroom properties. This is expected to be a long-term trend, with countywide homelessness transformation moving to a Housing–Led model seeking to move people into supported accommodation and rough sleepers quickly into one bedroom accommodation, so demand will continue and expect this pressure to further build.

5.14 It is important that an appropriate mix of dwelling sizes is provided to help meet the needs of the range of household types, with an understanding of immediate needs, but also needs projected over the Plan period. A range of sizes will allow more flexibility over time. Therefore, Policy H5 sets out the appropriate mix of dwelling sizes. A mix is provided for affordable rented forms of dwellings, and separately for affordable rent for those over 65 and also for affordable ownership forms of homes. These mixes are provided in the form of range to allow for other site-specific considerations to inform the exact mix.

5.15 There are a number of other factors that influence the appropriate mix on a particular site including the site context and local needs. To enable a fully flexible response to current and site-specific requirements, no mix is set out for market housing, However, Policy H5 does set out that evidence will be required to support the proposed mix on residential sites, which can draw from the Specialist Housing Needs Evidence, market demand, design considerations and housing register.

Appendix A- Policy Options and Preferred Approaches

Policy options set 001a (draft Policy H1): Housing requirement

The Government has introduced a 'Standard Method' to be used to calculate each planning authority's individual housing need. It is important that the overall housing need is fully understood, in order to be able to plan to meet that need. The NPPF is clear that the housing need should be calculated using the Standard Method. The strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

This means that there are not really options for calculating housing need. The housing need for Oxford calculated by the Standard Method introduced in December 2024 is currently 1,087. That means that the housing need over the 20-year plan period 2025-2045 is currently 21,740.

However, there are different potential options for the housing requirement set out in the Local Plan. The housing requirement is what it is expected will be delivered each year. The housing land supply will be calculated using this figure, and it will be used as the target for the Housing Delivery Test. The NPPF sets out that the requirement may be higher than the identified housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment

Table 1 - Policy options set 001a: Housing requirement for the plan period

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).	The NPPF says that local plans should aim to meet identified need. Meeting housing need in full would help reduce social problems such as overcrowding and homelessness, as well as problems employers have attracting staff. It may help improve affordability. Meeting housing need within the city may help communities stay together.	It is simply not physically possible to meet the entire housing need within the city's tightly drawn boundary, potentially at all and certainly without significant detrimental effects on other objectives, including protecting open space and avoiding functional floodplain. Housing completions over the previous decade and more have averaged at around 400dpa, which reflects that most housing in Oxford is delivered on small brownfield sites. In seeking to accommodate this level of need in full there will be pressure to use unsuitable sites or to build at densities that negatively impact character and quality of life. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is also a significant need in the city and to protect important green spaces and local character. But even with the pressure of the target and negative impacts, it is still not considered achievable.
Option b Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with	The requirement would be deliverable within the city (this is the only option that achieves this). The principle has been tested at examination and found sound for LP2036, the Core Strategy, and the 2016 Local Plan before that.	It will need to be shown that need is being met elsewhere if provision is not made for the full need. A basis will still be needed for the need calculation, even if it is not meeting the requirement. If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.

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the spatial strategy (c.9,800 dwellings over the Plan period 2022-2042).		
Option c Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.	The Standard Method need calculation is based on existing housing stock with an affordability uplift applied. It does not, therefore, necessarily take account of the exceptionally strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting. The affordable housing need in Oxford is also incredibly high and not necessarily fully accounted for by the affordability uplift. Attempting to meet this need helps overcome social problems exacerbated by insufficient housing.	The HELAA evidence base indicates that this option would be undeliverable in Oxford over the plan period, thus there would be significant unmet need issues and we would need to work with other Oxfordshire districts to make provision to accommodate unmet need in their areas. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a or b or c **High-level screening conclusion? -**the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes **Rationale:** These options are about the housing requirement that has been determined as the basis of the Local Plan. The housing requirement may differ from housing need, which is calculated using the Standard Method. The NPPF states the

housing requirement may exceed the housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment. There are growth ambitions for Oxford, but there is also limited capacity. Reflecting these growth ambitions through an increased housing requirement would only lead to a greater level of unmet housing need, which could not be met in Oxford anyway. Setting the housing requirement at the level of the Standard Method need calculation would mean that many other aims and ambitions would need to be compromised, and it is likely would still be unachievable. The housing requirement may also be lower than the need in order to reflect those constraints on capacity (option b).

In terms of sustainability impacts, the most relevant SA criteria are **criterion 4 local housing needs** and criterion **12, to achieve sustainable economic growth**. However, there is potential for indirect impacts on a broad range of criteria, if the strategy is to attempt to meet housing needs, which would compromise other objectives. Delivery of housing is essential to meet local housing needs, and indicators suggest there are many negative impacts in Oxford form a severe lack of suitable, affordable homes. Housing is also necessary to sustainably support economic growth. There is, therefore, potential for significant impacts from these options and they should be taken forward for further appraisal.

Housing Requirement – Draft policy H1

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The preferred approach for the Local Plan 2045 is to have a local policy that sets the total housing requirement over the plan period, and annualised. The housing requirement could be based on the identified need, or could exceed it in order to support a greater level of economic growth. However, the preferred approach is to base the housing requirement on the housing capacity. This is to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would certainly mean that pressure would be placed on other policies aiming to meet the Plan' strategy, such as in relation to green infrastructure .

The options set was tested through the Sustainability Appraisal with Option B performing better in balancing positive and negative impacts. Option B scored positively for meeting housing needs and economic growth because it makes an important contribution to housing need and was more positively scoring compared with the other options in relation to objective 10 (biodiversity), 11 (heritage), 9 (water), 7 (adequate Green Infrastructure) and 2 (resilience to climate change). This is because the capacity-based target can take account of these other considerations. Whereas if the aim was to meet the need above the identified capacity, as in the case of Options A and C, whilst these options do score better than option B for meeting local housing need (objective 4) and achieving sustainable economic growth (objective 12), they also incur significant compromises to other objectives at the same time including the need for green infrastructure, high quality design and climate resilience which is likely to compromise the overall sustainability of the Local Plan.

This means **option B** is proposed as the preferred approach.

Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms)

The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. There are a range of considerations in setting a mix, including that some sites and locations will be more suitable for different types of dwelling, and that needs may change over time. Ensuring a range of units sizes is available will be key to meeting a range of needs. The mix could be defined by number of bedrooms or bedspaces.

Table 2 - Policy options set 001b: Mix of dwelling sizes (no. bedrooms)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a policy mix to ensure a range of sizes of unit for affordable housing only (this would apply to all tenures except the market housing).	It is important that there is a housing mix where possible to meet a wide range of demand. The affordable housing mix will be informed by the housing register (a snapshot in time), existing housing stock, and acknowledgement that tenants' needs change over time and may need to downsize.	A mix can be constraining or occasionally conflict with other aspirations, for example higher densities could be achieved if there was no requirement for large units, or the local context may be more suited.
Exclude certain areas or types of development from any set mix where they would benefit	This ensures that where a mix is most suitable it will bring benefits of ensuring a range of units to meet a range of needs, but where it is not relevant or beneficial there is greater flexibility.	Depending on the exclusions, this may significantly reduce the number of sites where a set mix is required, which could affect the availability of a range of sizes over time.

from greater flexibility. For example exclude smaller sites where there is less opportunity to create a mix, avoid high density areas such as the district centres as they are suitable for small units to further increase density, do not apply to employer-linked housing as there will be specific needs linked to the staff.		
Option b Set a mix for both market and affordable homes and on a broad range of sites, for example including all those over 10 units.	This would help ensure a range of units is available for the open market and to meet the range on the affordable housing register.	This would not allow for a flexible response to the market, to changing needs in an area, or the context of a site. This more prescriptive policy approach would mean that sites at district centres and in the city centre would need to have a range of unit sizes, rather than just those that maximise density, so overall numbers may be reduced. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example.

Option c Do not specify a mix of unit sizes for any type of development but do require at least 2 or 3 types of unit size in all developments over, for example, 25 units.	This would enable the mix to be tailored to the site context and the most up-to-date data, for example the current needs on the housing list. It would also ensure there is more than one unit type coming forward. More flexibility would allow more tailoring to the location.	This level of flexibility in the policy requirement could be met by a very limited range of unit sizes. It would be more likely to fail to meet identified needs and could lead to an imbalance in sizes of new units entering the market and available as affordable housing, both in the short term and the longer term.
Option d Do not specify a mix but require the mix to respond to the Housing Register and therefore identified needs.	Such an approach could help ensure that what is being delivered is meeting immediate needs. It would provide an indicative mix which would also be informed by housing officer engagement to ensure that what is delivered is reflective of the most up to date needs.	Such an approach is dependent on reliable and up to date data. The housing list is only a snapshot in time (updated continuously). If for example there are several years with a need mainly for small units and only those are delivered, this will lead to a lack of variety, then in later years when needs may change and there will not be enough larger units to accommodate needs appropriately. This would not achieve mixed or balanced communities. It would not provide enough certainty for developers; a policy with a changing requirement may not be found sound.
Option e **Do not include a mix policy.**	Provides complete flexibility.	The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. It would be difficult to demonstrate that the Plan is providing for the needs of different groups in the community as per the NPPF. One-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - various combinations (e.g. either a, c, d, e or a+b or a+c).
High-level screening conclusion? - the options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? - No

Rationale: There is no specific national requirement for a policy although it is indirectly important to helping meet NPPF requirement and there is local context which supports the inclusion of some sort of locally prescribed approach although various constraints in Oxford lead to several potential options for how best to formulate a policy. Options a and c represent different levels of scope over which to apply a mix requirement (applying just to affordable element or market provision too), meanwhile options d and e represent different ways to influence mix without having such a broad mix specification as is presented in options a and c. Option e is simply to not set a local policy in relation to housing mix and could be considered as another different option. Option b is more of an additional dimension to specifying a housing mix policy and could be incorporated alongside either option a or c.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, most directly, this would be **criterion 4. Local Housing Needs** because of how they influence the balance of dwelling sizes that could come forward and help to meet needs of different groups in the community**.** Indirectly, the options also have impacts that relate to **criterion 5. Inequalities**, with some of them influencing the mix within the affordable housing element which will help to cater for those who have more difficulty accessing affordable housing, as well as **criterion 3. Efficient Use of Land** (because mix can influence how many dwelling on a site) and **criterion 11. Urban design** (influencing housing mix can influence an applicant's ability to reflect local context).
Between the options, the level of sustainability impact is unlikely to vary significantly, with each of the option a, c, d or e likely having a minor positive impact for SA criteria 4. and 5. and minor negative for criteria 3. and 11. There is a potentially more positive and more negative impact in option c that addresses both market and affordable, with these impacts decreasing towards neutral across option a and then options d and c. Option e of not having a policy would likely be a neutral impact in terms of sustainability impacts. Overall, the extent of sustainability impacts is not considered to be significant for any of the criteria regardless of option and the relevant SA criteria that the impacts relate to themselves do not differ significantly between the options, so it is not considered necessary to scope in for detailed assessment.

Section 5 identified that there were a number of topics that the Local Plan 2045 could implement policy to address housing need, requirement and mix. Under each of the topics, there were various options for policy approaches which could be taken, with differing

impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Mix of housing sizes – Draft policy H6

The preferred approach for the Local Plan 2045 is to have a local policy that sets a mix of housing sizes in certain circumstances, but for many schemes requires the chosen mix to be justified and explained, but does no se a specified mix. The proposed mix applies only to affordable housing, and excludes the types of schemes where the mix would be difficult to achieve, or conflict with other aims, such as in flats in the city centre or district centres where delivery of only one or wo bedroom units helps to achieve density aims and may be more fitting to the infill development often appropriate in these locations.

Whilst either of the four options, option A, B, C or D or various combinations of these could be taken forward, the preferred approach is a combination of **Options A and B** which ensures a mix of affordable home sizes to meet needs over the plan period, requires justification of the selected mix, and provides flexibility to respond to size-specific needs and changing circumstances.

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Policy options set 001c (draft policy H8): Loss of dwellings

Given the scale of housing need in Oxford, it is important to ensure that the existing stock is protected otherwise the benefits of delivering new housing would be undermined. The city also faces considerable pressure from the use of residential units as short term lets such as Airbnb which are taking more properties away from family homes or from the longer term private rented sector. There are a range of considerations in setting an approach however the lack of available land and sites can constrain development of other facilities needed to support the local community. Future legislation may help us to control changes of use to short term lets.

Table 3 - Policy options set 001c: Loss of dwellings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Resist a net loss of dwellings	Such specific reasons for an exception could include conversion to a nursery or primary care facility;	The loss of dwellings undermines the benefits of building a mix of new homes.

except for specific reasons.	therefore, introducing some flexibility would allow for the loss of dwellings to provide community facilities, or support/complement existing community uses in the area.	
Option b Resist the subdivision of family homes.	Help maintain the existing supply of family homes to ensure a varied supply of homes across the city.	Precludes the sub-division of the existing housing stock which in some instances would be a better or more efficient use of land in a particular location and provide more homes where the need is so great. The loss of family dwellings undermines the benefits of building a mix of new homes, which include homes suitable for families
Option c Have no restrictions on the loss of dwellings.	No restrictions means that housing stock can be changed as the market demand requires. There would be more flexibility to respond to the market. Overall numbers of homes could increase.	Losing control over the existing supply of housing stock would undermine the benefits of bringing forward housing in new development to meet the population's current and future needs (objectively assessed need).

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? – various options/combinations (option a, b, or c or a combination of options a and b). **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Options a seeks to prevent the loss of homes unless their loss would provide or bring improved benefit to the local community. Option b seeks to specifically prevent the subdivision of family homes to help ensure that the

mix of homes available includes those suitable for families. Option c is to not set any restrictions at all via the Local Plan. Option a or b could be carried forward on their own or combined with each other.

In terms of sustainability impacts, the different options all relate primarily to **criterion 4. Housing Need, criterion 6 Essential services and criterion 11 Urban design.** Options a and b are likely to have more positive impacts against criterion 4. Option c could potentially place a greater demand on local services, having the potential to have a negative impact on criterion 6. Option c could also potentially lead to more of a negative impact against criterion 4 as the populations' current and future housing needs are not able to be met and also criterion 11 as the character of the neighbourhood could change as demand for local services could change. Overall, the sustainability impacts do not differ significantly between the options and it is not considered necessary for detailed appraisal.

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Development involving Loss of dwellings – Draft policy H8

The preferred approach for the Local Plan 2045 policy is to have a local policy that addresses the protection of existing housing stock. This will help to relieve pressure on the use of dwellings that are of a suitable size for families and assist with the management of demand for residential units to be subdivided or converted or be brought into use as short term lets.

This means either **option A or B**, or a combination of both option A and option B could be taken forward. Option A will help ensure that homes are not lost unless their loss would provide or bring improved benefit to the local community. Option B will help prevent the subdivision of homes and ensure that the mix of homes includes homes that are suitable for families.

Background paper 002

Affordable Housing

This paper explains the key issues relating to affordable housing needs in Oxford, and the context to delivering affordable housing that reflects the local circumstances in Oxford (especially that they need to be truly affordable to Oxford residents).
Relevant Local Plan 2045 Objectives: • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
Relevant SA Objective(s): 4.To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home
SEA theme(s): Material assets, population, human health

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1. Introduction

1.1 Affordability (or unaffordability) of housing for people living in Oxford is a key issue to address in LP2045 and is also a corporate priority of the City Council more broadly. It is an issue that goes back many years, as a result of the high land values and property prices in Oxford not being matched by salaries, resulting in many people being priced out of the market to buy or to rent homes in Oxford.

1.2 The problems cannot be solved by planning policies alone, but LP2045 can help to address it alongside other Council initiatives and programmes including the Affordable Housing Delivery Programme and the Council's housing company OX Place delivering affordable homes.

1.3 This paper explains the key issues relating to affordable housing needs in Oxford. It then explains how LP2045 could seek to address these needs with policies to deliver affordable housing that reflects the local circumstances in Oxford and that is truly affordable to Oxford residents.

1.4 This paper helps to explain the following housing-related topics:

- Delivering affordable homes (contributions from residential developments)
- Affordable housing contributions from new purpose-built student accommodation
- Affordable housing contributions from self-contained older persons accommodation
- Employer-linked affordable housing.

1.5 This paper focuses on the affordability of housing and factors affecting the delivery of affordable housing, whilst Background Paper 003 covers specialist housing need.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework and Planning Practice Guidance

2.1 The National Planning Policy Framework (NPPF) sets out that Local Plans should deliver a sufficient number and range of homes to meet identified housing need, including affordable housing. It defines affordable housing in Annex 2 of the NPPF. The

Planning Practice Guidance (PPG) sets out further clarification about how the NPPF should be applied, including how to calculate affordable housing need and supply.

2.2 Elements of national policy and guidance that are particularly relevant to delivering affordable housing in Oxford are:

- The threshold of 10 dwellings for seeking developer contributions towards affordable housing (thereby exempting developments of 1-9 dwellings from affordable housing requirements) (PPG paragraph 023).
- The Viability PPG sets expectations for the viability assessment with the intention of creating realistic, deliverable policies based on sites which are likely to come forward. Affordable housing provision is a significant consideration.
- The Permitted Development Rights (General Permitted Development Order) for conversion of office to residential, which has a similar impact of effectively exempting those conversion developments from affordable housing contributions.

2.3 The former NPPF requirement to include First Homes in the affordable housing mix, has now been removed from the NPPF (explained in footnote 31 of NPPF). Instead, there is greater emphasis on delivering social rent (paragraphs 63 and 64 of the NPPF). These amendments to the NPPF are more closely aligned with the aspirations in Oxford for affordable housing that is truly affordable to those in Oxford in housing need.

Housing and Planning Act 2016

2.4 The Housing and Planning Act (2016) sets out measures intended to boost the supply of new housing nationally, to devolve significant new powers to a local level, and to support first time buyers to make home ownership more affordable. There were also various reforms to social housing, which do not directly impact the delivery of new affordable housing but do affect the supply of Social Rent housing available because of initiatives such as right to buy.

Oxford City Council Corporate Strategy 2024-28

2.5 The City Council Corporate Strategy 2024-28 identifies housing affordability as a key issue facing the city, both for local people and local employers. The Corporate Strategy identifies delivering good, affordable homes as one of the key priorities.

Oxford City Council Housing, homelessness and rough sleeping strategy 2023-2028

2.6 Oxford City Council's Housing, homelessness and rough sleeping strategy 2023-2028 sets out intentions to provide more affordable and low carbon homes, alongside wider intentions to improve conditions for those renting homes, and to prevent homelessness and rough sleeping. Providing more affordable homes is identified as a key priority, and actions to deliver this include OX Place delivering a build programme, working with housing associations to build new homes including Social Rent, and working with neighbouring councils to ensure that more affordable housing is built in and around Oxford.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 Oxford is one of the least affordable cities, due to the mismatch between average house prices/rent levels and average salaries (the affordability ratio). The high cost of housing in Oxford, compared to wages, (known as housing affordability) has many impacts and consequences, and many people who work in Oxford cannot afford to live here. The English Indices of Deprivation 2025 (IoD 2025) is the most recent measure of relative deprivation across small areas of England. It shows that Oxford has become relatively less deprived in the income domain. Oxford ranks 210 out of 296 most deprived nationally in terms of average score for income. Where 1 is most deprived and 296 is least deprived. This is a reduction since 2019, when Oxford ranked 201 out of 317. However, at the Lower-Layer Super Output Area (LSOA) level, Oxford still has 8 areas in the bottom 20% for income (compared to 9 LSOAs in 2019). This suggests that whilst Oxford is becoming relatively less deprived overall, there are still pockets of income deprivation prevalent within the city.

3.2 In August 2024 the average house price in Oxford was £489,000. This is more than 12 times the average household earnings; this makes it one of the least affordable places in the country. This has consequences for the economy and key services, as employers struggle to attract and retain staff, including essential hospital staff, health and social care workers, teachers, as well as those in retail, hospitality, and office workers. There are also potential social impacts on families and communities who may be split up because of housing costs. Even when applying so-called affordable housing purchase products, such as shared ownership or First Homes, it is still unaffordable for many people in Oxford to own their own home.

3.3 As a consequence of high house prices, there is a large private rented sector in the city. However, rent levels are also very high, so renting a home via the private-rented sector is also out of reach for many people. The average private rent in Oxford is £1,725 a month (September 2024). This can result in Oxford's workforce needing to share rented accommodation or needing to commute into the city in order to find suitable accommodation. It also means that Social Rent housing plays an important role in meeting affordable housing needs in Oxford.

3.4 Social Rented housing is the lowest cost compared to market values. Tenants rent from the City Council or a Housing Association, usually at about 40% of market cost (ie what a private landlord would charge for the same home). Thus as the lowest cost option it helps provide housing for those in greatest need. Unsurprisingly, there is a huge demand for this type of housing in the city, yet it is also the most expensive to build (due to the larger discounts on returns). There are also significant numbers of people who do not have sufficient priority on the housing register to be considered for Social Rent (when compared to households in even greater housing need), yet market housing is also out of reach. So it is also important that intermediate types of housing (such as shared ownership models) continue to be provided as well.

Oxford City Housing Register

3.5The Oxford City Council Housing Register records how many people have registered to apply for Social Rent housing in the city. There are currently (January 2026) just under 4,000 residents on the housing register, and it is expected that only around 12% of these will be housed within a year.

3.6 Regardless of the method used, Oxford is one of the most expensive places to buy or rent a property in comparison with monthly earnings, as a result of high land values, limited land availability, and a shortage of homes. This means that housing is so expensive - in absolute terms and compared to average salaries - that many people are priced out of the market and many people who work in the city are unable to afford to live here.

Affordable housing delivery

3.7 The City Council has been working to increase the delivery of affordable homes through a number of measures across council departments. Some affordable housing is delivered through planning permissions on qualifying sites, some is delivered directly by the City Council through the affordable homes programme, and some is delivered via the City Council's Housing Company OX Place. There are also various other complementary programmes and initiatives by the City Council to tackle homelessness and reduce empty homes.

3.8 Table to show affordable housing completions in Oxford 2016/17 to 2023/24, taken from Authority Monitoring Report 2023/24:

Table 3.1

Year	Affordable housing completed
2016/17	20
2017/18	17
2018/19	105
2019/20	104
2020/21	144
2021/22	274
2022/23	273
2023/24	61

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 One of the biggest issues facing residents in Oxford is the unaffordability of homes, to rent or to buy. Overall the affordability of housing in Oxford is likely to continue to be an issue in future, as the lack of land for housing (including for affordable housing) and increasing land values push house prices up further. Research suggests that social and affordable housing accommodation is likely to need to continue to play an important role for Fast Growth Cities (FGCs) such as Oxford and Cambridge, where overall increases in the housing stock are unlikely to fully address affordability issues alone.

4.2 The supply of affordable homes to meet need in Oxford is likely to remain a challenge, particularly Social Rent, but also market rates and discounted purchase options, such as shared ownership. Market rental prices are also likely to continue to increase as the unaffordability of buying homes puts additional pressure on the rental market. In turn this also affects the types of homes required, and there is already high demand for shared accommodation in the private rental sector as a lower cost option than renting or purchasing individual properties.

4.3 The supply of affordable housing is being challenged due to the compounding impact of: a general lack of land supply for new homes within Oxford, losses through Right to Buy, especially since the increased discount introduced in 2012; changes to national policy which reduce the opportunities for delivering new affordable homes through developer contributions, for example the city is not allowed to secure affordable homes when new homes are delivered via office to residential prior approval B56 permissions, and even with an updated local plan this situation would not change; and caps on rental incomes for local authorities or registered providers which are set nationally.

4.4 Together these factors are likely to impact on the overall numbers of new affordable homes delivered, as well as the mix and balance of communities in Oxford during the Plan period.

4.5 If the affordability of housing worsens, then there would also be other knock-on effects because it affects not just where people can afford to live and quality of life, but also impacts the economy as employers in key sectors in Oxford already have problems recruiting and retaining staff. If economic growth is constrained, then this affects not just Oxford but the wider region and even the national economy as Oxford is a net contributor nationally.

4.6 The City Council is committed to the delivery of affordable housing through several initiatives which are outside of the local plan and would happen anyway without the plan. The City Council has set up OX Place as a wholly owned company, which has an aim of delivering more affordable housing. The Council's Affordable Housing Delivery Programme also directly delivers new homes as well as taking on homes from developer contributions. But there also needs to be supply from other sources (through developer contributions and housing associations) so overall it would be more difficult to deliver affordable housing without an up-to-date local plan.

4.7 The City Council has also been working with the other Oxfordshire district councils to help deliver homes to address Oxford's unmet need outside the city boundary. Neighbouring Local Plans make provision for these additional homes, including delivery of affordable homes. The City Council has been working with its partners on the allocation policy and management of those new affordable homes in adjoining districts, in particular ensuring that those on Oxford's housing register will be eligible to apply for the new homes. However without an up-to-date local plan to establish the housing need and housing requirement then it is less certain that unmet need within adjoining districts would be delivered because it would be difficult for those

authorities to deliver additional housing over and above their own requirements if it has not been tested by an Inspector.

4.8 Affordability is also influenced by government policies related to incentivising home ownership and house building including delivery of affordable housing, which would influence affordable housing delivery in Oxford with or without a plan.

4.9 Most of these initiatives focus on helping people to purchase homes, however the nature of the housing market in Oxford means that even with those support measures, purchase options are still out of reach for many people in Oxford and/or they are not workable or viable for developers. Recently the NPPF was updated and no longer requires First Homes to be included within the affordable element of proposals.

4.10 So overall these national initiatives in terms of affordable housing delivery, and especially Social Rent, may be fairly limited in terms of take-up and their effectiveness in addressing housing needs in Oxford because the high prices and unaffordability pressures simply do not fit with the national models. Which is why local policies are needed in the LP2045 which are bespoke to address the particular circumstances and housing needs in Oxford.

4.11 In recent years, external economic factors – including Brexit and the war in Ukraine – have also affected construction costs and availability of materials, as well as rises in the costs of borrowing. These have significantly affected the viability of developments, as explained in more detail in the Viability Study. This affects how much value can be captured to deliver public goods, such as affordable housing, and also the supply of housing generally.

5. Key issues addressed through the Local Plan

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to affordable housing objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them. This background paper relates to

Policies H2, H3 and H4 of the Submission Draft Oxford Local Plan 2045. The policies options considered at Regulation 18 (shown in Appendix A) split draft policies requiring contributions to affordable housing into three- student accommodation contributions, contributions from commercial/employment and contributions from self-contained older persons accommodation. However, these have now been combined into one policy because of the overlaps between then. There have been further refinements, e.g. to be clear about the type of commercial/employment development that contributions to affordable housing is expected from, but the basic approaches have not changed.

Overall level of affordable housing and tenure split

5.3 Since the adoption of the OLP2036 (June 2020), several factors have resulted in needing to review the adopted policy approach of seeking 50% affordable housing (H2 in OLP2036) in the OLP2045. These factors include the impacts of a range of global and international factors on inflation, build costs and supply chains, all of which have added to the finance costs of development. This has impacted on viability and subsequently the capacity for residential development to deliver affordable housing (and other) contributions for the public good. These impacts were explored in the Viability Study 2026.

5.4 In preparing the LP2045 there are two key principles that we are seeking to balance in setting the levels in the developer contributions policies:

• To maximise the community benefits from developer contributions but without undermining the delivery of sites/the Plan; and

• To set the levels so that most schemes can viably deliver the policy requirements, whilst also retaining some flexibility to take site-by-site circumstances into account where necessary (but this should be only a minority of schemes, in order to not add unnecessary complexity or delays to the development management process).

5.5 The tenure scenarios tested were 80% social rented and 20% intermediate housing, and 70% social rented and 30% intermediate housing, both within an overall affordable housing percentage increasing in 5% intervals from 0-50%. Results were assed for the four selected benchmark land values (BLVs) considered in the viability assessment, which were secondary offices, secondary retail, secondary industrial and greenfield/undeveloped sites. The results are summarised in Appendix 6 and Appendix 7 of the viability assessment.

5.6 There are large differences in terms of the level of affordable housing that can viably be provided, depending both on the area and also the different BLVs. When tested against the highest benchmark values (secondary office and secondary retail uses), many schemes are unviable even with very low levels of or even no affordable housing. It is clear that some BLVs are highly unlikely to come forward for housing of any type in

the current climate, so attempting to set affordable housing levels very low to make these BLVs viable in only some areas is not a sensible approach. Instead, the focus has been on setting affordable housing at a level viable for most types of schemes in most areas for the BLVs that would viably deliver housing (i.e. secondary industrial and greenfield/undeveloped sites, rather than secondary retail and secondary offices).

5.7 Policy H2 sets the affordable housing target at a level that prioritises social rented tenure and is likely to be viable for most schemes with a BLV that would realistically come forward for housing.

Affordable housing contributions

5.8 For other types of residential development where the site would have otherwise been suitable for C3 residential development, and therefore assumed to be making a contribution towards affordable housing (purpose-built student accommodation and older persons accommodation), then Policies H3 sets out the contribution that will be sought for provision of affordable housing off-site.

5.9 Commercial developments have the potential to generate demand for affordable housing. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of affordable housing. Therefore, there is a clear justification for the introduction in Policy H3 for a requirement for contributions from employment development to affordable housing. The intention when setting the level for these contributions is that it is guided very much by the viability report, so that it is set at a level that is easily affordable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.

Employer-linked affordable housing

5.10 The other important policy in delivering affordable housing in Oxford to complement the policies above, is the employer-linked affordable housing policy H4, which is also intended to boost the supply of affordable housing where there are willing employers. In Oxford, there is high demand for accommodation in the private rental sector as a lower cost option that renting or purchasing individual properties. The employer-linked policy was first introduced in Oxford in the LP2036 as an innovative way for employers to address this issue by allowing the creation of "employer-linked affordable housing" as an alternative to the provision of the traditional "market and affordable" split. This unique tenure allows employers (such as the University of Oxford or the Hospital Trusts), to provide accommodation for their workers at reduced rents on sites owned by them, where the prospect of Socially-Rented accommodation coming

forward at these sites would prejudice the delivery of homes for staff who would potentially not be able to afford to live in the city. Monitoring of the LP2036 policy shows that affordable homes are being delivered in this way, such as at the John Radcliffe site, so the principle has been carried forward into Policy H4, following further engagement with key employers.

5.11 The list of specified sites reflects willing landowners, plus crucially they are sites that would otherwise not be available for residential uses (for example on operational campuses, health facilities, or education sites), if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

Viability cascade

5.11 Linked to these policies, it is also important that the Plan includes an overall viability policy to ensure that none of the policies requiring affordable housing contributions would risk development becoming unviable. This is addressed in the cascade approach for sites if the full policy requirement for affordable housing contributions is not viable. The viability cascade is set out in Policy V4, which cascades through the policy approaches that are likely to have the biggest effect on viability, prioritising delivery of affordable housing, particularly social rented housing.

Appendix A- Policy options and preferred approaches

Policy options set 002a (draft policy H2): Affordable housing contributions

Securing new affordable housing as part of larger developments is a significant way that more affordable homes can be provided in Oxford. In successive Plans the City Council has adopted policies that require the delivery of an ambitious percentage of affordable housing. These contributions – whether onsite or financial – have made a significant contribution to the supply of affordable homes in Oxford.

With any policy about contributions towards affordable housing there are various policy decisions to reflect how to direct those contributions towards most effectively delivering homes to meet the needs of local people in the specific context of Oxford. For example whether to prioritise affordable housing to rent or to buy; whether to maximise the number of affordable homes or the greatest levels of subsidy of the homes (but fewer affordable homes as they cost more in contributions); or whether to prioritise developer contributions towards other public benefits.

Table 1: Policy options set 002a Affordable housing contributions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek to maximise the overall number of affordable homes delivered through contributions	This would help to maximise the number of affordable homes, and to meet a range of different affordable tenures including for those who are seeking affordable home ownership options. Encourages a mix of tenures onsite. More flexibility to respond to market demands to help site viability.	To be viable, this option is likely to mean a lower proportion of Social Rented homes, and a larger proportion of intermediate tenures of affordable housing such as shared ownership, so would not help as many people on the housing register. Options other than Social Rent are not affordable to many of those in need of affordable housing in Oxford because of the prices to wages ratio in Oxford.
Option b Focus on maximising the number of Social Rent homes from developer contributions, even if this means fewer	This option would prioritise delivering affordable homes for those in the greatest housing need, that would not be able to afford alternative affordable housing tenures.	This is likely to result in the delivery of fewer affordable houses overall from contributions (because they cost more for developers to deliver), which could in turn worsen the level of affordable housing need if supply slows while demand continues.

affordable homes overall		Option does not help meet the needs of households that could afford shared ownership/ low-cost home ownership models. It would also not encourage mixed communities to focus on just one tenure or form of affordable housing.
Option c Do not maximise affordable housing contributions but set them at a lower level of contribution that leaves more opportunity for alternative developer contributions or greater profit margins.	This would allow for developer contributions to be directed to delivering other infrastructure or public benefits. A greater profit may also encourage delivery of sites for residential uses and make the profit levels more competitive against other land uses which are currently more attractive to developers in terms of profit levels (mainly R&D uses in recent years).	This approach would fail to maximise opportunities to address the affordable housing crisis and inequalities, and it is not necessary in order to encourage sites to come forward because that would be tested through the preparation of the local plan.
Option d Do not include any policy requiring affordable housing contributions.	This would minimise risk of affordable housing contributions negatively impacting on viability of sites, and it would allow maximum contributions towards other infrastructure and public benefits.	This would not at all be attempting to meet affordable housing needs, which would be contrary to the NPPF, so would not be a sound approach. It would also do nothing to address the housing crisis in Oxford or reducing inequalities.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? A or b or c or d **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about how to prioritise developer contributions from residential development in order to deliver public benefit in the form of affordable housing, which is a local priority. Options a and b prioritise delivering affordable housing, whilst option c prioritises affordable housing to a lesser degree (alongside other contributions or greater profits for the developer) and option d would set no local steer on affordable housing contributions. Options a and c are about the overall affordable housing requirement, usually as a percentage of the development, whereas b is about which tenure split to prioritise within that requirement. In terms of sustainability impacts, options a and b, would score positively against **criterion 4 local housing needs** by contributing to ensuring that everyone has the opportunity to live in a decent affordable home. Option c is also likely to contribute towards

criterion 4 plus other sustainability objectives such as **criterion 7. Green infrastructure** or accessibility/transport under **criterion 8** however these are likely to be minor positive impacts and would depend very much on implementation on a case-by-case basis what the contributions were targeted to. Option d would not help to meet **criterion 4**, nor would it be consistent with the NPPF which requires plans to making provision for housing including affordable housing (para 20). Similarly, by delivering affordable housing, options a, b, c would all score positively against **criterion 5 inequalities**, because access to affordable housing is a factor in reducing inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Delivering Affordable Homes – Draft policy H2

The preferred approach for the Local Plan 2045 policy is to take forward a combination of Options A and B. So the overall target is that sites should contribute 40% of the homes in a development as affordable housing, on qualifying residential developments (of 10 or more C3 units, or equivalent number of C2 rooms). Within that 40% the draft policy also seeks to prioritise delivery of social rent homes, requiring 80% of the affordable homes to be social rent, with the remaining as intermediate tenures.

The viability evidence does not identify a particular level of affordable housing that most schemes could viably deliver but suggests that a large proportion of the types of typical residential developments expected during the plan period could deliver this level. So whilst the 40% target is ambitious, the viability evidence suggests it could be applied on a maximum reasonable proportion basis whilst also allowing sufficient scope to meet other draft policy requirements.

Setting a lower proportion of affordable housing (either in part or the whole of the City) is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more than the revised target would no longer do so. Affordable housing delivery can therefore be maximised by adopting an ambitious target and accepting that this will not be universally achieved on all developments. Hence alongside this policy, there is also Draft policy S4 which sets out a viability cascade, to ensure that the contributions towards affordable housing do not make any developments unviable.

Policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation

Many sites for student accommodation could equally be suitable for non-student homes, from which an affordable housing would normally be sought. The exception to this, is where student accommodation is developed within existing university campuses, because market housing would not usually be provided within those sites. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from new purpose-built student accommodation.

Table 2: Policy options set 002b Affordable housing: financial contributions from new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek a financial contribution from all student accommodation developments, towards affordable housing	In many situations, affordable housing would not be suitable to be provided on student sites. Therefore, a financial contribution towards provision of affordable housing elsewhere within Oxford would help towards meeting affordable housing needs from sites that could otherwise be making contributions from residential development on such sites.	The seeking of financial contributions provides less certainty than developing on-site affordable housing because sites would need to be secured separately. The thresholds for qualifying sites would need to be tested through plan viability.
Option b Require financial contributions from student developments equivalent to 10 or more self-contained units [the same threshold as residential developments] or 25+ student rooms	This would mean that the financial contributions from student accommodation are sought on a comparable basis to residential development. It would also maximise the level of contributions towards much-needed affordable housing.	None identified.
Option c Only require financial contributions from larger student schemes, for example of more than	None identified.	This would result in a reduced financial contribution from what would be sought if the site was for general housing where the threshold is 10 dwellings. This could encourage landowners to opt for student accommodation in unsuitable locations instead of residential homes and would not help to

50 rooms (or 20 self-contained units).		address the constrained supply of new homes in Oxford or to meet housing needs within Oxford.
Option d Require affordable housing to be delivered on-site within larger student developments	Provides more certainty that affordable housing would be delivered if it is provided by the developer as part of the development.	In many situations, affordable housing would not be suitable to be provided on student sites, for example student accommodation is typically flats so in practice it would be difficult to provide separate entrances.
Option e Do not require an affordable housing contribution from any student accommodation developments	None identified.	This would make the development of student accommodation disproportionately more viable and therefore attractive to developers, than the development of general housing which would result in sites suitable for housing being delivered for student accommodation instead. This would not help to address the constrained supply of new homes in Oxford. It would also result in the loss of any financial contribution towards affordable housing that would have been secured if the site was being developed for general housing, so would result in fewer affordable homes provided in Oxford.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c or d or e **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** These options are about whether to seek contributions towards affordable housing from student accommodation developments, and about what size developments that requirement should apply to. Sites that are developed for student accommodation are also often suitable in principle for residential development, so seeking contributions on a comparable basis (ie for sites delivering 10 or more homes or equivalent number of student rooms at a ratio of 2.5:1) helps to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability, as well as providing an additional contribution source of much-needed affordable housing to address local needs. In terms of sustainability impacts, options a, b, c, d would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities**, with option a having the greatest potential positive impact because it would apply to the greatest number of developments. Whereas option d would do nothing to help achieve either of these

objectives. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Affordable housing contributions from new purpose-built student accommodation – Draft policy H3

The preferred approach for the Local Plan 2045 policy is to take forward Option B, so that contributions from student developments are sought on a comparable basis to residential schemes i.e. for the equivalent of 10 self-contained dwellings. The Government Housing Delivery Test sets out a ratio of 2.5 student bed spaces to 1 dwelling. Therefore, with the threshold at 10 dwellings for residential development affordable housing contributions, the threshold for student accommodation will be 25 bed spaces (or 10 or more self-contained student units as these are counted in monitoring terms as a dwelling). The viability evidence suggests that a large proportion of the types of typical student developments expected during the plan period could deliver this level. Exemptions are specified in the policy where contributions would not be sought.

The draft policy seeks financial contributions towards affordable housing (rather than onsite provision) because in many situations, affordable housing would not be suitable to be provided on student sites, for example student accommodation is typically flats so in practice it would be difficult to provide separate entrances.

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Policy options set 002c (Draft Policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation

Many sites for self-contained older persons accommodation could equally be suitable for mainstream residential development, from which an affordable housing would normally be sought. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from those developments.

Table 3: Policy options set 002c: *Affordable housing: financial contributions from self-contained older-persons accommodation*

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek a financial contribution from all	In many situations, affordable housing would not be suitable to be provided on older persons sites. Therefore, a financial contribution towards provision	The seeking of financial contributions provides less certainty than developing on-site affordable housing because sites would need to be secured

self-contained older persons accommodation developments, towards affordable housing	of affordable housing elsewhere within Oxford would help towards meeting affordable housing needs from sites that could otherwise be making contributions from residential development on such sites.	separately. The thresholds for qualifying sites would need to be tested through plan viability.
Option b Require financial contributions from developments equivalent to 10 or more self-contained units [the same threshold as residential developments]	This would mean that the financial contributions are sought on a comparable basis to residential development. It would also maximise the level of contributions towards much-needed affordable housing.	None identified.
Option c Only require financial contributions from larger development, for example of more than 20 self-contained units.	None identified.	This would result in a reduced financial contribution from what would be sought if the site was for general housing where the threshold is 10 dwellings.
Option d Require affordable housing to be delivered on-site within larger older-persons developments	Provides more certainty that affordable housing would be delivered if it is provided by the developer as part of the development.	In many situations, onsite provision of affordable housing within new developments for older persons such as retirement complexes, is unlikely to be appropriate because of the different housing needs and lifestyles. Management agreements and other restrictions (e.g. car parking) are also imposed which are also not necessarily appropriate to general housing.
Option e Do not require an affordable housing contribution from any older-persons accommodation developments	None identified.	This would make the development of older-persons accommodation disproportionately more viable and therefore attractive to developers. This would not help to address the constrained supply of new homes in Oxford. It would also result in the loss of any financial contribution towards affordable housing that would have been secured if the site

		was being developed for general housing, so would result in fewer affordable homes provided in Oxford.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c or d or e **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** These options are about whether to seek contributions towards affordable housing from self-contained older-persons accommodation developments, and about what size developments that requirement should apply to. Sites that are developed for older-persons accommodation are also often suitable in principle for residential development, so seeking contributions on a comparable basis (ie for sites delivering 10 or more homes) helps to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability, as well as providing an additional contribution source of much-needed affordable housing to address local needs. In terms of sustainability impacts, options a, b, c, d would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities**, with option a having the greatest potential positive impact because it would apply to the greatest number of developments. Whereas option d would do nothing to help achieve either of these objectives. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

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Affordable housing contributions from self-contained older-persons accommodation – Draft policy H4

The preferred approach for the Local Plan 2045 policy is to take forward Option B. This would mean that the financial contributions are sought on a comparable basis to residential development, whilst also maximising the level of contributions towards much-needed affordable housing.

Policy options set 002d (Draft policy H5): Affordable housing: financial contributions from new commercial development

Commercial developments can impact on affordable housing needs by encouraging workers in housing need to move to Oxford to take up new jobs generated by the proposed use of the new development. As such this policy explores whether those developments should contribute towards affordable housing provision.

Table 4: Policy options set 002d Affordable housing: financial contributions from new commercial development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require financial contributions towards off-site affordable housing from major commercial developments (over 1000sqm or 1ha)	Commercial developments have the potential to generate demand for affordable housing. Option would support economic growth by helping to deliver affordable housing to support a local workforce. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of affordable housing. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.	Requiring financial contributions towards affordable housing could impact on viability of developments, especially in the period soon after adoption, because this is not currently a local policy requirement so schemes already in the pipeline may not have factored it into costs. This could however be mitigated with a viability cascade to ensure that the policy does not prevent sites being developed. Furthermore in recent years the viability of commercial developments has been very strong in Oxford, outstripping even residential developments. Option would also need to be tested via a viability assessment to check that this typology of site could deliver the policy requirements.
Option b Do not require financial contributions towards off-site affordable housing from major commercial developments (over 1000sqm or 1ha)	Financial contributions could be sought towards alternative public benefits eg public transport as part of travel to work to support sustainable commuting to the site.	Option would not help to deliver affordable housing at all, with knock on effects for employers trying to attract and retain staff.

Option c Require onsite provision of affordable housing as part of major commercial developments (over 1000sqm or 1ha)	Provision of affordable housing close onsite has the potential to reduce commuting and help address recruitment issues, although the residents would depend on implementation (the tenure and allocations policy) as to who could access the homes. Introducing residential to areas which are solely employment presently, could help to bring more vibrancy to areas of Oxford which are otherwise only occupied for part of the day/week.	Onsite provision may not be feasible or practical on all sites depending on the size and location of the site, for example if the site adjoins land uses which are not compatible with residential, or if the site is located within a larger employment park which would otherwise be empty overnight and/or weekends it may not be a pleasant living environment, or on sensitive sites such as hospital sites where employers would only wish to house their own staff for security reasons. This would depend on implementation, and certain exclusions may be justifiable eg to exclude on-profit making sectors such as health and education. It could also impact on viability if the employment use cannot be maximised on the site, or could constrain the economic potential of the site. A cascade policy would be needed to ensure the policy does not prevent sites being developed, with an option to revert to equivalent off-site financial contributions if appropriate.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** These options are about whether to seek contributions towards affordable housing from commercial developments, and about whether the contribution should be via financial contributions or via onsite provision of homes. Commercial developments can generate demand for affordable housing, so these options therefore seek contributions towards addressing that. In terms of sustainability impacts, options a and c would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities.** Whereas option b would do nothing to help achieve either of these objectives. By helping to address affordable housing needs, options a and c would also support **criterion 12 economic growth** because affordable housing is often reported by employers as a key issue affecting recruitment and retention especially in essential

sectors such as health care and schools, as long as there is a viability cascade to ensure the contribution does not prevent sites coming forwards. Option b would not help to address affordable housing needs but could mean more contributions could instead be used towards other public benefits eg public transport improvements to support employment and sustainable travel to work which would deliver alternative sustainability benefits. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal. Implementation may need exclusions for certain types of employment site eg hospitals and schools.

Employer-linked affordable housing – Draft policy H5

The preferred approach for the Local Plan 2045 policy is to take forward Option A. To allow, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).

The list of specified sites reflects willing landowners, plus crucially they are sites that would otherwise not be available for residential uses (for example on operational campuses, health facilities, or education sites), if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

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Policy options set 002e (Draft policy H6): Employer-linked affordable housing

Many jobs in Oxford still require people to attend their workplaces because they are jobs that are not possible to do remotely, such as in frontline healthcare, teaching in schools and universities, as well as those working in manufacturing and R&D labs. Many of these workers are unable to afford market housing or even private rented accommodation in the city and find themselves living outside of Oxford with expensive and time-consuming commutes into the city, or living in shared accommodation in Oxford that is too small for their needs.

Employer-linked housing is a bespoke approach that was introduced in Oxford in the LP2036, as an additional means to help increase delivery of much-needed affordable housing. The policy provides an alternative means of delivering affordable housing, to supplement the affordable homes delivered via Policy H2.

It involves housing being developed on specified sites, by specified key employers, in the city to provide a means of delivering affordable housing for their own staff. This allows those employers to help to address their own recruitment and retention issues by providing housing on their own land. A typical example is the NHS providing staff accommodation within the hospital sites. For most of the

specified sites, employer-linked housing will only be one element of use on the site, for example operational hospital uses will be retained on the hospital sites, or schools will be retained alongside residential development.

Table 5: Policy options set 002e Employer-linked affordable housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).	Provides an alternative mechanism for employers to actively help address affordable housing issues for employees, which although the homes would only be for staff, the provision of homes in turn could help reduce pressure on the housing register. Could support wider objectives of the Plan such as supporting economic growth with a sufficient workforce, and decreasing need to travel. The option could help to bring forward sites which landowners would otherwise not make available for residential uses (for example by being located on operational campuses, health facilities, or education sites).	Limited number of employers could benefit as they would need to own (suitable) land to build on and be able to act as a developer. It is important that this policy does not undermine delivery of Social Rent housing because the homes would only be available to employees of the organisations and not to those on the housing register (those in greatest need). Hence it should be restricted only to sites unlikely to deliver affordable general needs housing to households in housing need.
Option b Do not include an employer linked housing policy.	Less risk of undermining delivery of much-needed Social Rented housing, if the site were to be developed then the normal affordable housing tenure split would apply including provision of social rent.	Landowners may be put off bringing forward certain sites, if the development would not be solely for their own staff e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living. Removing this policy could exclude an alternative potential supply of affordable housing or sterilise sites.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b **High-level screening conclusion?** the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes **Rationale:** These options are about whether to allow certain employers on certain sites, to develop those sites as affordable housing for rent solely for their own staff. As the site would be 100% affordable housing, the normal affordable housing tenure policies would not apply but would be agreed on a site-by-site basis to reflect the requirements of the workforce of that specific

employer. There is no specific policy framework for this type of provision in national policy, so the options are whether to have such a policy or not.

In terms of sustainability impacts, option a would contribute positively towards **criterion 4 local housing needs** and **criterion 5 inequalities,** and also **criterion 12 economic growth.** Under option b, the normal affordable housing tenure requirements would apply which would include social rent, however landowners may not develop the site if it cannot be guaranteed for their own staff e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living. Option b could therefore exclude an alternative potential supply of affordable housing or sterilise sites. Likely impacts of option b are therefore dependent on implementation, as it could mean sites developed for residential or it could mean sites not developed at all, entirely dependent on the landowner's intentions.

Affordable housing contributions from commercial developments – Draft policy H6

This is a new policy, which needs further testing through the Regulation 18 consultation and viability. As such there is no preferred approach identified at this stage.

Background paper 003

Specialist housing including student accommodation, self-build, elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.

This paper addresses Oxford's circumstances in relation to specialist housing provision including the provision of student accommodation, self build housing, housing for elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.
Relevant Local Plan Objective(s): • Provide access to affordable, high-quality and suitable accommodation for all.
Relevant SA Objective(s): 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.
SEA theme(s): Material Assets, Population, Human Health.

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1. Introduction

1.1 This Paper considers the need for and policy response to various types of specialist housing accommodation. Housing need is considered in Background Paper 001, but in addition we are required to consider the needs for particular types of housing and occupants. Affordable housing need is discussed in Background Paper 002. This paper focuses on student accommodation, self-build and custom build homes, elderly persons and other supported care housing, gypsy, traveller and travelling showpeople, and boat dwellers.

Student Accommodation

1.2 There are two higher education institutions within Oxford – University of Oxford and Oxford Brookes University, and also a campus of the University of West London in Dunstan Road. Provision of good quality, well managed student accommodation will be required, located in close proximity to those institutions.

Self-Build and Custom Housebuilding

1.3 Oxford's communities are varied, with differing needs for housing provision. With affordability issues, self-build and custom housebuilding can provide opportunity for individuals and groups to access the housing market a different way.

Elderly persons and other supported care housing

1.4 There are various types of supported housing, mainly provided for elderly persons, but also for others with specialist housing and additional care needs.

Gypsy, Traveller and Travelling Showpeople

1.5 The Traveller community lives in a variety of accommodation; including bricks and mortar homes, mobile homes, and touring caravans. Current and future accommodation needs for travelling communities were last assessed in 2024 at an Oxfordshire-wide level.

Boat Dwellers

1.6 Residential boats and their dwellers on both permanent and temporary visitor moorings, contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable.

Boarding School Accommodation

1.7 Oxford is home to several boarding schools which provide accommodation for their students.

Houses in Multiple Occupation

1.8 This paper sets out the context for Houses in Multiple Occupation (HMO) in Oxford.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Plans, Policies and Programmes

National Planning Policy Framework and Planning Practice Guidance

2.1 The National Planning Policy Framework (NPPF) makes it clear that to support the Government's objective of significantly boosting the supply of home, planning authorities should address the needs of groups with specific housing requirements and that policies should be informed by a local housing need assessment. At paragraph 63, the NPPF states *'Within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.'*

Student Accommodation

2.2 Paragraph 04 (reference ID 67-004-20190722) of the Housing Needs of Different Groups Planning Practice Guidance (PPG) published in July 2019 and updated in May 2021 states "Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area."

2.3 Paragraph: 025 (reference ID: 68-034-20190722) of the Housing supply and delivery guidance published in July 2019 and updated in December 2024, allows for student accommodation to contribute towards an authority's housing land supply based upon the amount of accommodation it releases in the wider the wider housing market.

Self-Build and Custom Housebuilding

2.4 The Self-Build and Custom Housing Building Act 2015 (as amended by the Housing and Planning Act 2016) defines Self-build and Custom Housebuilding as *"the building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those*

individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person".

2.5 The Council is required to keep a register of individuals and groups of individuals who are seeking to acquire serviced plots of land in their area to build homes for those individuals to occupy. The Act requires relevant authorities to "*keep a register of a) individuals, and b) associations of individuals, who are seeking to acquire services plots of land in the authority's area for their own self-build and custom housebuilding".* The requirements of the register are set out in the Self-build and Custom Housebuilding (Register) Regulations 2016. The Act also requires relevant authorities to publicise its register.

Elderly persons accommodation

2.6 *The Housing for Older and Disabled People PPG explains that* 'Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.' (Paragraph: 001 Reference ID: 63-001-20190626).

Gypsy, Traveller and Travelling Showpeople

2.7 The Planning Policy for Traveller Sites was last updated in December 2024. A key update was to the definition of "gypsies and travellers" clarifying that persons of nomadic habit of life, including those with a cultural tradition of nomadism or of living in a caravan are included within the definition. Paragraph 2 states that this document *"is a material consideration in planning decisions"*, whilst paragraph 3 specifies *"that, the Government's overarching aim is to ensure fair and equal treatment for travellers",* whilst also respecting the interests of the settled community. To help achieve this, the Government expects local planning authorities to make their own assessment of need and to plan for sites over a reasonable timescale.

Boat dwellers

2.8 The Housing and Planning Act 2016 (section 124) creates a duty under section 8 of the Housing Act 1985 to consider the needs of people residing in or resorting to a local authority area with respect to sites for caravans and the mooring of houseboats as part of the periodical review of housing needs. It deletes sections 225 and 226 of the Housing Act 2004.

Boarding School Accommodation

2.9 There are no national plans/policies or programmes relating to boarding school accommodation.

Houses in Multiple Occupation

2.10 HMO developments are governed under two different aspects- the Housing Act governs the licensing (and Oxford also has additional licensing) and planning legislation governs changes of use. For planning purposes, HMO are categorised differently under the Town and County Planning Use Class Order) to standard residential dwellings (C3), as either a small or large HMO. A large HMO is a dwellinghouse occupied by more than six non-related occupants sharing accommodation that is not separated into self-contained units, and where some domestic facilities (such as bathroom, kitchen or living space) are shared. Large HMO fall into the Sui Generis use-class and require planning permission. A 'small HMO' is the use of a dwelling house by no more than six unrelated occupants who share basic amenities (e.g. kitchen and bathroom). It falls under Use Class C4, and the legislation permits a change of use from a C3-dwellinghouse unless permitted development rights have been revoked. Oxford has an Article 4 Direction that removes these permitted development rights. As such, no change of use to either category of HMO is permitted within Oxford City Council boundaries without acquiring planning permission in advance.

2.11 HMO are also required to obtain a licence to operate. The licensing powers and standards are set out in the Housing Act 2004 and The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, and the licensing scheme is run by Oxford City Council. The Housing Act 2004 (and its resulting licensing scheme) is not a piece of planning legislation per se, and rather sits outside of the planning process as it operates.

Regional and Local Plans, Policies and Programmes

Student accommodation needs assessment

2.12 The Updated Specialist Housing Needs Assessment (2025, Iceni), is a technical report which draws together various bits of data, including the profile of students in the city and the existing student accommodation profile of the two universities, including their future expansion plans. It is the latest report of its kind, updating the Oxford Student Needs Assessment (2023, Iceni). The report considers the local context of Oxford where there is a significantly constrained land supply, with different forms of development competing against one another. It makes some recommendations as to how the relevant policies in the Oxford Local Plan 2036 should evolve. These currently set out where new student accommodation can be located and as well as how many full-time taught course students can live outside of non-university provided accommodation.

Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment

2.13 The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (2024, arc[4]) was undertaken on behalf of the city and all district authorities

within Oxfordshire. It sets out the need for these types of accommodation for each authority from 2023/24 until 2041/42 and establishes that Oxford City has a need of 0 for Gypsy and Traveller pitches and Travelling Showperson yards. However, the assessment does recommend that a criteria-based policy is included in any emerging plan for Oxford, as it provides a framework for assessing planning applications for these types of specialist housing. The assessment also clearly expresses that gypsies and travellers have different requirements from travelling showpeople and that this should be reflected in the criteria-based policy.

2.14 Paragraph 9.30 of the assessment notes that, *"the analysis of houseboat need would suggest there is additional need for residential moorings across waterways in Oxfordshire although there are complex dynamics relating to households living on waterways and accessibility to moorings. The principal location of residential moorings is in Oxford City."* Feedback from boat dwellers and stakeholders suggests that a range of 20-50 additional moorings should be made available, *"therefore, the current figure of 41 in the Oxford Local Plan 2036 as an expression of need remains appropriate."* (No specific needs for boat dwellers were identified in any of the district authorities.)

Specialist and Supported Housing Needs Assessment

2.15 Oxfordshire County Council has published a Specialist and Supported Housing Needs Assessment (2024, Housing LIN), which sets out the need for the various types of specialist and supported housing across Oxfordshire, broken down by district and over the next 10-20 years. This starts with background about the demographic profile and projections for each district. Oxford has a significantly younger age profile than the other districts, with significantly less growth of the elderly population expected. Nevertheless, there is still a need for additional accommodation over the plan period.

2.16 The Updated Specialist Housing Needs Assessment (2025, Iceni) involved working with Housing LIN to produce an assessment of need for sheltered/retirement and extra care units based on the capacity-led population projections as detailed in the report. It suggests a slightly higher level of need than indicated in the OCC report above. The assessment identifies a need in Oxford to 2045 of 1,029 additional sheltered/retirement housing (412 social/affordable rent, 102 shared ownership, 515 market). It identifies a need for 322 extra care units (152 social/affordable rent, 24 shared ownership, 152 market). Additionally, the report shows a need for 43 supported housing units for those with learning disabilities and autism; an estimated 121 supported housing units for those with mental health needs; and a short-term need for up to 10 supported housing units for care leavers and unaccompanied asylum seekers.

Oxford Local Plan 2036

Student Accommodation

2.17 The Oxford Local Plan 2036 (OLP2036), adopted in June 2020 is the current development plan for the city and sets out agreed planning policies for the city against which decisions are made. Policy H8 seeks to restrict the provision of new student accommodation to

specific locations – either on or adjacent to existing university campus sites; within the city centre or district centre or on a site allocated in the development plan to potentially accommodate student accommodation. This approach was intended to continue into the Local Plan 2040, albeit with some more flexibility, allowing new postgraduate accommodation to be built adjacent to existing postgraduate accommodation.

2.18 Policy H9 seeks to restrict the number of full-time taught course students that can live outside of non-university provided accommodation, with separate thresholds set for the University of Oxford and Oxford Brookes University. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. The Local Plan 2040 intended to carry forward this policy but with updated thresholds based on the latest data which was included in the Oxford Student Needs Assessment (2023, Iceni).

Self-Build and Custom Housebuilding

2.19 Policy H7 in the OLP2036 seeks to help encourage sufficient self-build and custom housebuilding to come forward and to support community-led housing. The policy approach is to set a threshold for self-build plots on residential sites. The policy requires 5% of the site area on residential sites of 50 or more units to be made available as self-build plots. The policy also sets out expectations of what plots should have, including services, and access to the public highway. In addition, the policy requires the use of a legal agreement to ensure that self-build plots that have not sold after 12 months of marketing be built and bought forward in the normal way, in accordance with other policies regarding affordable housing and housing mix.

2.20 In July 2022, following public consultation and updated government guidance Oxford City Council adopted a Local Connection Test to the Self-build and Custom Housebuilding Register to help understand the local demand for this type of housing within the city. This connection test splits the Self-build and Custom Housebuilding Register into two parts to provide a differentiation between those people with a local connection to the city (Part A) and those without (Part B).

Elderly persons accommodation

2.21 The Oxford Local Plan 2036 Policy H11 is generally supportive of new elderly persons accommodation, and sets criteria to ensure it is appropriately located and provides a suitable living environment. The intention of the Local Plan 2040 was to continue this approach. This was supported by the County Council. It is recognised that, to be viable, specialist housing needs to be of a reasonably large size, so that there are enough rooms to accommodate the on-site staff and facilities. Because of the lack of large sites in Oxford, there are limited opportunities to allocate parts of sites specifically for this use.

Gypsy, Traveller and Travelling Showpeople

2.22 Policy H12 is a criteria-based policy which sets out all the requirements to be met for any new pitches for the travelling community, including for travelling showpeople. The 2024 assessment carried out by arc[4] confirmed that this approach could be continued into the new Plan but emphasised that the policy should reflect the differing requirements needed for gypsies and travellers, and travelling showpeople (the latter who need more space for equipment etc.)

Boat Dwellers

2.23 Policy H13 is a criteria-based policy which sets out all the requirements to be met for any new residential moorings or if appropriate, temporary visitor moorings. The 2024 assessment carried out by arc[4] confirmed that the findings of the previous Oxford Boat Dwellers Accommodation Needs Assessment (2018) used to inform this policy has not changed and that the demand/ need for 41 new residential moorings in Oxford remains relevant.

Boarding School Accommodation

2.24 The Local Plan 2036 didn't include any policies regarding boarding school accommodation.

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)

Student Accommodation

3.1 The latest Authority Monitoring Report (2024/25) indicates that both universities are currently operating within their respective thresholds for the number of students living outside of university-managed accommodation. The Iceni report (2025) does not find evidence to suggest that the current threshold of 6,000 across the two institutions should be changed currently. One application for new academic floorspace was approved during this period which was compliant with Policy H9.

Self-Build and Custom Housebuilding

3.2 Oxford City Council has had a Self-build and Custom Housebuilding Register in place since 1 April 2016. Inclusion on the Register does not confer any form of entitlement in terms of the provision of serviced plots. Rather, its purpose is to provide local planning authorities with demand data that they can use to understand and plan for the future need for this type of housing in their area. Authorities may, at their discretion, advise people on the Register of relevant proposals for development. Additionally, authorities are expected to meet the level of need indicated by the Register, by permitting an equal number of serviced plots within the following three years to the number of registrations that are made over the preceding three years. This is a rolling requirement, running from the end of October each year.

3.3 Since its introduction in 2016, there have been 141 registrations (140 individuals and 1 group) on the Self-build and Custom Housebuilding Register (compared to 136 as of October 2023). As of January 2026 there are 76 individuals that have provided evidence to demonstrate a local connection to the city and have subsequently been added to Part A of the register (compared to 73 as of October 2023). Analysis of the addresses of those on Part B of the register suggests that a further 6 individuals cite an address on their expression of interest that would suggest a local connection to the city. Whilst these individuals have not provided evidence to demonstrate this local connection it provides a proxy indication of potential demand. The very small increases in each part of the register since 2023 show there has been an apparent decline in interest in recent years compared to years prior to this where the growth in the register each year was significantly greater.

3.4 The constrained housing land supply in Oxford together with the limited availability of greenfield sites and the typical nature of residential development sites in Oxford, means that in many developments it is not feasible to accommodate self-build plots. For example, in high density flatted developments, in office to residential conversions, in student accommodation developments (also typically flatted), or in employer-linked developments. The types of sites which tend to be more suitable for self-build plots are the larger sub-urban and typically greenfield sites – of which there are few in Oxford. However, proposals for community led and self-build/custom housing are being supported on appropriate sites. Since the adoption of the current Local Plan (OLP2036) there has been one development proposal that includes the provision of self-build plots. This is St Frideswide Farm (21/01449/FUL), a development of 134 homes, 5 or which are self-build. This development commenced in 2023.

Elderly persons and other supported care

3.5 There have been no planning applications for these types of development recently. It is to be expected that these types of development will only come forward sporadically, when a suitable opportunity arises.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

3.6 There have been no planning applications for these types of development during the last few years. However, the criteria-based policies within the Oxford Local Plan 2036 ensures that a policy framework is present to ensure that these types of applications can be assessed should they be submitted in the future.

Boarding School Accommodation

3.7 There have been several planning applications for boarding school accommodation in recent years. An example includes St Edward's School Oakthorpe House (21/O2481/FUL), a development of 11 student rooms and a one-bed flat. This development commenced in 2022. Additionally, D'Overbroeck's School 472-474 Banbury

Road (22/O2661/FUL), a development of a 4-storey boarding house and 2 semi-detached dwellings. This development commenced in 2023.

Houses in Multiple Occupation

3.8 HMO provide a significant amount of accommodation in Oxford, forming an important and valuable contribution to the housing market. For many people, they offer the only available and affordable solution as renting individually or buying a property in Oxford is too expensive.

3.9 Oxford City Council maintains a record of licenced HMO in the city, and this provides an up-to-date view of the number of HMO properties registered. The Regulations only permit publication of licences that are in force and prohibit publication of licences pending or expired licences. As the data is real-time, the register can change on a daily basis. Licences are, however, not published until they are issued and are removed once expired. As of the end of October 2023 there were 2,964 active licences on the register.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Student Accommodation

4.1 In the short term, very little would change without a new Local Plan. The latest Authority Monitoring Report (2024/25) indicates that both universities are still operating within their respective thresholds set out in Policy H9 which allows up to a certain number of full-time taught undergraduates to live outside of university managed accommodation. The Updated Specialist Housing Needs Assessment (2025, Iceni), suggests that the thresholds remain suitable as the Universities are tracking the low growth scenarios as set out in the original assessment, however Iceni also do not believe the thresholds should be reduced.

Self-Build and Custom Housebuilding

4.2 Without a new local plan, the *Self-build and Custom Housebuilding (Register) Regulations 2016* would still apply and there would be a requirement for the City Council to keep the Self-build and Custom Housebuilding Register. Whilst this would help gauge an idea of the level of demand for Self-build and Custom Housebuilding, without an up-to-date local plan there would be no policy framework and demand for this type of housing may not be met.

4.3 With the cost-of-living increases and ongoing affordability issues for housing in Oxford, the loss of a policy that is supportive of this type of housing could result in individuals and organisations seeking to build/ develop this type of housing outside of the city boundary. Therefore, the potential contribution to the overall housing provision that could come through this route would be constrained.

Elderly persons and other supported housing

4.4 In the case of other elderly persons accommodation, the current policy approach is to set criteria for where this is suitable and to ensure it is a good living environment. This policy adds clarity in terms of what is expected, smoothing the application process and ensuring high-quality applications. Without the policy approach, there would be less clarity for applicants and those making decisions on planning applications.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

4.5 The approach to these types of specialist accommodation in the Local Plan 2036 was to have criteria-based policies, which are aligned to the NPPF. Therefore, very little would change without a new Local Plan as the criteria-based policies for the travelling community and boat dwellers would still apply to any application submitted.

Boarding School Accommodation

4.6 The approach to this type of accommodation is to prevent the loss of dwellings, especially with the significant competition for land and sites in Oxford.

Houses in Multiple Occupation

4.7 Without a new local plan, the HMO licencing regimes would still apply to existing or new HMO, which would help to ensure the quality of accommodation for all those living in HMO in Oxford. However, the licencing does not control the location or distribution of new HMO. Without an up-to-date planning policy there would be no policy framework to guide necessary supporting infrastructure and amenity considerations such as appropriate parking, cycle parking and bin storage. Importantly, there would also be no mechanism to guide the location and distribution of HMO across the city. With the cost-of-living increases and ongoing affordability issues for housing Oxford, there may be even greater pressures for increased numbers of HMO. Unrestricted, this could put pressure on the supply of family-sized homes, potentially leading to their loss, and could also lead to clustering of HMO. If these are then housing predominantly one group of residents, i.e. young people or students, this can affect the mix and balance of the community, and in some cases lead to a perception of loss of community cohesion and neighbourhood character.

5. Key issues addressed through the Local Plan

Introduction

5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2045 will need to take account of varying needs and impacts of specialist accommodation that meets the needs of different groups. Housing is a social need, so it is important to try to provide the right types of housing for those who need it. Specialist housing is not however one size fits all and the accommodation needs of different groups will vary. The policies of the Local Plan can help address the varied needs for different specialist housing types.

5.2 The plan assess and responds to the need for specialist housing provision in a number of ways. The Options that were considered at Regulation 19 are shown in Appendix 1 (the policy numbering has changed slightly as two policies were combined, so each is one number lower in the draft submission version of the Plan). The policies presented in the Submission Draft Oxford Local Plan 2045 have not varied in any substantial way from these approaches.

Student Accommodation policy approach

5.3 Oxford is a world-renowned brand for educational excellence, principally because of the historic University of Oxford and also due to the highly respected Oxford Brookes University. It is as a result of this reputation that Oxford derives much of its high profile and prosperity.

5.4 This success also creates many pressures in the city. Oxford's reputation attracts tourists, language students, publishing businesses, spin-out university enterprises and medical research. The city also has students studying at other institutions, and a number of short-term students who visit the universities and language schools. It means there are significant numbers of students requiring accommodation.

5.5 In Oxford at the point of the 2011 Census, there were 29,924 full-time students aged 18 and over. This had increased by 10% in the 2021 Census to a total of 32,888 full-time students. This equates to around 20% of the City's population. In the 2024/25 academic year there were 26,595 students in total at the University of Oxford (compared to 24,510 in 2019 and 27,290 in 21/22) and 21,856 students in total at Oxford Brookes (compared to 16,673 in 2019 and 17,470 in 21/22).

5.6 Oxford has several language schools that attract students from all around the world. Courses at these institutions vary from part-time and full-time, from one-off courses to month-long courses and longer. The number of students at these institutions is therefore highly variable and particularly seasonable. The Oxford Student Needs Study (Iceni, 2023) estimated that, based on the 11 language schools assessed, during the peak week of enrolment there were 1,984 students studying languages in Oxford. There are also five

Further Education Colleges. These are institutions that offer any study after secondary education that is not part of higher education (i.e. that is, not taken as part of an undergraduate or graduate degree). Courses range from basic English and Maths to Higher National Diplomas.

5.7 Because the majority of language school courses are only a few weeks this means the accommodation need is for temporary accommodation rather than any kind of permanent accommodation. Most of this need is met and will continue to be met through homestays with families and in student accommodation not otherwise in use over the summer months. Many of the further education colleges in Oxford serve the existing residential population, so students more often than not live in existing residential households, either as part of a family unit or independently. Several of the institutions do already have accommodation for students who do have an accommodation need. The Oxford Student Needs Assessment (Iceni, 2025) therefore finds no significant need for additional student accommodation for students at institutions other than the universities over the plan period.

Overall approach to managing the impacts of student housing need

5.8 The approach of the Plan is to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts they may have, on established communities and on the housing market.

5.9 The demand for student accommodation places two main forms of pressure on the local housing stock:

- students accommodated directly in private rented housing; and
- from student accommodation being developed on sites that may equally be suitable for other types of housing.

5.10 These pressures on the local housing stock act to increase rents, worsening affordability, and also mean that sites that might otherwise deliver onsite affordable housing may come forward for student accommodation that does not deliver any onsite affordable housing. An additional consequence where there is a high proportion of students can be the perceived or actual harmful impacts on the host community or neighbourhood. A concentration of student halls can mean that they dominate an area, meaning a high proportion of transient occupants in an area, and an established community that becomes more fractured and less strong.

5.11 A policy approach is needed to manage the pressures of students in the best way, while recognising and responding to the forecast needs of educational institutions that have a housing need (predominantly the universities). There is a balance to be struck between encouraging students into halls because it frees up family housing, and limiting student halls because they take up new sites that could be used for new family housing. Hence, the Local Plan approach is to limit the over-concentration of HMOs, only allow student

accommodation in the most suitable locations and encourage universities to provide accommodation (in these locations) through the thresholds policy.

Linking new academic facilities with the adequate provision of student accommodation (Policy H9)

5.12 Policy H9 links new or redeveloped academic accommodation to the delivery of associated residential accommodation. The intention of the policy is to encourage educational institutions to ensure there is sufficient accommodation for their students, and therefore to limit the numbers of students living in general market housing in the city. In the case of the universities, this may be demonstrated if they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements such as teaching and nursing students and post-graduates on research-based courses. This longstanding policy approach is intended to attempt to manage and minimise the pressures of students on the housing market. In particular, the policy approach is deigned to balance the needs of the student population as well as local residents.

5.13 If the threshold for either university is breached, that university is prevented from gaining planning permission for new academic facilities that create additional capacity for students. There have been and will continue to be applications for facilities where the argument has been made and accepted that the development is unrelated to student numbers and so the thresholds are not relevant.

5.14 This policy has operated effectively since the introduction of the 1991-2001 Oxford Local Plan (adopted 1997). That plan recognised that students have particular housing needs and that the institutions have some responsibility for housing their students in purpose-built student accommodation. It recognised that purpose-built student accommodation can have the least impact on the availability of housing to long-term residents of the city. Policies HO26 and HO29 sought to restrict the numbers of students living outside of university accommodation to 4,000 at the University of Oxford and Oxford Brookes respectively. The 2001-2016 Local Plan found lower thresholds to be achievable and also introduced the link to academic accommodation. Policy ED.6 set a threshold for Oxford Brookes of 3,500 up to 2008 and 3,000 after that date. Policy ED.8 set the same threshold for the University of Oxford. The approach was continued in the Core Strategy Policy CS25, which set a threshold of 3,000 for each university, and continued in the Oxford Local Plan 2036, with current thresholds of 1,500 at the University of Oxford and 4,500 at Oxford Brookes (applied to a narrower range of students than previously, that excludes research-based students)

5.15 The PPG makes it clear that these caps or restrictions can be considered if other options won't support the needs of the student population and local residents and if there is understanding of the accommodation needs of universities and other higher education establishments (Paragraph: 004 Reference ID: 67-004-20190722). Care has been taken to understand the accommodation needs of the universities when setting the thresholds.

The Oxford Student Needs Assessment (2023, Iceni) and the Updated Specialist Housing Needs Evidence (2025, Iceni) used various sources of data to understand the current situation. To assess student accommodation needs over the plan period to 2045 they gathered information about what sites are in the pipeline and what the universities' growth plans are, as well as comparing this to historic growth patterns.

5.16 The accommodation needs of students vary greatly. Different types of institutions have different needs (as outlined in the background section, many language school students, for example, come for short stays and are often in homestays or student halls that are vacant during the summer). However, even amongst university students, there is a variation in the type of accommodation that is needed. Clearly student halls are not the answer for every student, and there will always be students living out. Some students may already live in or near the city at home, and they do not need accommodation. Some post-graduate students could be studying for many years whilst also working at the university and student halls are not the most suitable accommodation for them. Therefore, the policy focus is on students studying full-time on taught courses (so this excludes post-graduate research students and students on vocational or sandwich courses whilst they are working). Setting the thresholds 5.16 To set thresholds going forward, we need to predict how much student accommodation there will be and how many of the types of students with accommodation needs there will be over the relevant period. The profile of students and student numbers are always evolving. Iceni were commissioned to carry out the Student Needs Accommodation Assessment, Iceni, 2023 (and Updated Specialist Housing Needs Evidence, Iceni, 2025). This looked at the current profile of students and used information from the universities to forecast it going forward. Setting the threshold (and monitoring the policy) requires an understanding of the number of students requiring university accommodation (according to the definition in the policy, which is full-time, taught course students) against the number of students living in university-provided accommodation.

5.17 Both universities have predicted a growth in student numbers, which we need to respond to. It is difficult to be certain over the longer term in respect of the future recruitment of students. Factors that can influence this may be within the institutions' control (e.g. fees, facilities, courses offered, maintenance of academic reputation) but are as likely to be outside their influence (e.g. government policy, macro-economic situation). Both universities felt unable to accurately forecast over more than a short timeframe. Therefore, a threshold has only been included in draft Policy H9 to 2033.

Threshold calculation (Policy H9)

5.18 The Student Needs Assessment, using information from the University of Oxford, predicts 18,366 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2045) in 2033/34, using the low growth scenario. The accommodation assumption is that there will be an additional 809

rooms come forward in this time period, in addition to the 14,407 currently provided. This would leave a shortfall of 3,150 by 2033/4.

5.19 The Student Needs Assessment, using information from Oxford Brookes, predicts 10,670 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2045) in 2033/34, using the low growth scenario. The accommodation assumption is that there will be the same amount as the current situation. During this time period, some of Oxford Brookes's nomination rights on third-party purpose-built accommodation will expire. Oxford Brookes has said they may not renew these nomination rights. However, they also consider that they have enough information from students to know if they are living in this kind of purpose-built accommodation. There is therefore a slightly different wording for Oxford Brookes as compared to the University of Oxford (who have said they do not have this information) about the accommodation that can be considered to be meeting needs against the threshold, to enable this accommodation to be counted. The current amount of supply is 5,576 (including some accommodation with nomination rights that will expire). This would leave a shortfall of 5,576 in 2033/34.

5.20 The thresholds in Policy H9 are set at a level that allows for the anticipated growth in students anticipated above, alongside the understanding of supply and pipeline supply of student accommodation. This means that growth is not constrained, but also that care is taken to ensure no new negative impacts from development that enables increases in student numbers, with a need to retain existing accommodation, or fully replace it.

5.21 Purpose built student accommodation is not suitable in all locations. The intention of Policy H8 is to ensure student accommodation is prevented in locations which are not suitable or desirable for students to live. The most suitable locations are on existing university sites where there is no conflict with other housing types.

5.22 The locational restriction also recognises that it is important to locate student accommodation in a way that avoids unacceptable changes in character and great increases in activity along quieter residential streets. The proposed restriction means that student accommodation can be delivered only on or adjacent to existing campuses and within the city centre and district centres. These locations are particularly suited to absorbing student accommodation and the levels of activity associated with it. Campuses and sites adjacent to them are suitable because everything is on hand for students and they are not affecting an existing residential area. District centres and the city centres are suitable locations because student accommodation is suited to being on the upper floors, for example above retail and also because it means students will be located in accessible locations where public transport is available to key campus sites. Furthermore, the policy will prevent the domination of student accommodation in established residential areas and will help to maintain the quieter residential character and amenity of these streets and prevent complete domination by student accommodation.

Self-build and Custom housebuilding

5.23 To inform the OLP2045 policy, an exercise has been undertaken to establish whether there is an adequate supply of sites with potential to accommodate self-build housing. Table B of the Strategic Housing Land Availability Assessment (2026) sets out those sites which have met the SHLAA criteria and have development potential. Of those sites with development potential, the sites with capacity for at least 100 dwellings, that have not already been built out, or that do not yet have the benefit of a planning permission, have been reviewed for suitability for self-build. Sites that are expected to come forward as either flatted schemes, or as student accommodation or other communal accommodation types, or as employer-linked housing (for example the JR Hospital site) have been excluded as these would not be feasible for self-build plots to be incorporated into a scheme. For sites expected to come forward as mixed-use development, the proportion of the site expected to be developed for residential use has been estimated. The review of the SHLAA sites suggests that there are six sites in the city that could come forward where it would be feasible to include an element of self-build housing. These sites are as follows:

Helaa Ref	Site name	Total site size (hectares)	Proportion anticipated for residential (ha)	Total minimum no. Of dwellings estimated
018	Diamond Place	1.85	1.0 (mixed use and discounting likely student accommodation	135
0.28a	Kassam Stadium	6.52	3.4ha (Mixed use-discount likely car parking, replacement community facilities and commercial)	240
0.28b	Overflow Car Park at Kassam Stadium	2.29	2.29	100
113	Redbridge Paddock	3.64	3.64	200
289	Sandy Lane Recreation Ground	4.6	4.6 (assuming off-site reprovision of sports facilities)	250

590	Pear Tree Farm	2.03	2.03	111
TOTAL			**16.96**	

5.24 On the basis of the sites listed in the Table above, there is an anticipated 16.96ha for residential development where it could be feasible to incorporate self-build homes into the development. Policy H13 requires that 5% of the housing area of sites with potential for over 100 dwellings should be made available as self-build plots. The table above shows that 0.848ha would be available for self-build plots over the Plan period. Applying a 90 dwellings per hectare assumption, as the sites are predominantly gateway and district centre, would equate to around 77 self-build plots.

5.25 In terms of demand, there are 76 individuals on the Self-build and Custom Housebuilding Register that have demonstrated a local connection, so there is adequate supply identified in the table above to meet this demand and also additional potential demand as people are added to the register over the Plan period.

Elderly persons accommodation

5.26 Older people (including those who require retirement housing, housing with care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. Nationally, the population is ageing, and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8 in the South East, 2024, ONS), the population of those 65+ in Oxford is expected to grow by around 35.9%-38.7% by 2045 (representing 7,336-7,905 additional people in this age range).

5.27 Specialist housing for older people is provided in a range of formats and can include:
- Age-restricted general market housing, generally aimed at those over 55, potentially with some shared amenities but without on-site support or care services;
- Sheltered housing, typically purpose-built flats with some communal facilities, a warden and some support such as on-site assistance via alarm;
- Enhanced sheltered housing/assisted living, which will have additional services to enable people to retain independence such as some meals provided;
- Extra care housing, which has access to medium to high level of care with 24-hour access to support services and registered care staff and meals available; and
- Residential care/nursing homes, for those with a high level of dependency and which have rooms within a residential building and provide a high level of care for daily living.

5.28 The Oxfordshire County Council Specialist Housing Need Assessment 2024 and the Oxford Updated Specialist Housing Needs Evidence (Iceni, 2025) give a recent picture of the need for supported housing in Oxford. There is an anticipated net need for sheltered/retirement housing in Oxford to 2045 of 1,029 units, 515 of which are market and the rest affordable. For extra care housing, the net need to 2045 is 322, with 152 of

those market, and for care homes the need is 570. For market accommodation, it is expected that the market will respond by bringing forward specialist housing types, if there are available sites to bring forward.

5.29 Many sites are potentially suitable within the given criteria of Policy H12. Consideration was given to other approaches, such as requiring a certain proportion of sites to provide specialist accommodation, or requiring it as part of the affordable housing provision. However, this kind of accommodation can only feasibly be provided at scale. 135 units is considered roughly what is needed to make it feasible to run, because at that scale there are enough units to support the amount of specialist features, care facilities and servicing (such as cooking, cleaning and laundry) that are needed. This could not be provided as a small proportion of any site in Oxford and will only realistically come forward if a landowner is interested in using the site, or a fairly large portion of one of the larger sites, for this use.

5.30 The criteria set out in Policy are intended to ensure accommodation is well designed and located, so it is suitable for residents' needs and does not create traffic implications. It is important it is well designed, with good access to local facilities, and that it is well integrated into a mixed community.

5.31 Another aspect of Policy H12 is that existing specialist care accommodation should be protected unless it is to be replaced elsewhere or unless it can be shown that it is surplus to requirements. Given that there is additional need for this accommodation over the plan period, and limited sites where it can be delivered, this is important, and existing sites offer potential for intensification, which may also help to meet needs.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

5.32 To support the travelling community, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

5.33 To support those people who wish to live on boats, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Boarding School Accommodation

5.34 The preferred approach for the Local Plan 2045 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sies or

adjacent to them. This approach limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applications against, only the locational restriction.

Houses in Multiple Occupation

5.35 In some areas of the city the concentration of HMO has resulted in changes to the character of the local area and has led to local parking problems and large numbers of transient households. This has been successfully managed by the threshold approach in the current and previous planning policy documents. There is therefore a clear case for continuing our existing threshold-based approach of development management for HMO of all sizes in Oxford. The policy approach therefore sets criteria to manage how and where new HMO are allowed and to restrict HMO numbers where there is already a high concentration of existing HMO.

5.36 The preferred approach for the Local Plan 2045 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them, yet sets criteria to manage them in a way that prevents and over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become a worsening overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.

5.37 The Oxford Local Plan 2036 introduced a policy approach allowing new purpose-built HMO, when these had previously not been prevented. This was to acknowledge that HMO do have a role in ensuring a range of housing provision. However, the vast majority of new HMO are traditional conversions. Where purpose-built HMO have been proposed these have been very large, and are generally aimed at students. There is a high risk that this policy approach will be used to circumvent other housing policies, e.g relating to student accommodation location. Therefore, the Oxford Local Plan 2045 does not allow for new purpose-built HMO.

Appendix A: Options considered at Regulation 18

Policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO)

The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. For many, Houses in Multiple Occupation (HMO) offer the only available and affordable solution as renting individually or buying a property in Oxford is often too expensive. However high concentrations of HMO can result in changes to the character of the local area and it is therefore important that the supply of this type of home is monitored and controlled.

Table 1 - Policy options set 003a: Houses of Multiple Occupation (HMO)

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Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).	This option would slow down the increase in the number of HMOs in specific areas where there are already significant numbers.	This restriction could lead to higher rents if it restricts the availability of private rented accommodation across the city.
Option b Allow new purpose-built HMOs in appropriate	Purpose-built HMOs could help to reduce some of the potential management issues or neighbourly tensions that can occur because issues such as car and bike parking	It is less likely that purpose-built HMOs could be converted to single dwelling houses in the same way as traditional HMOs. It is possible that large purpose-built HMOs will be put forward in locations not suitable for student accommodation, with the

locations, (potentially restricting the size of these in particular areas).	and bin storage can be integral to the scheme rather than retrofitting an existing building. This approach helps to address the unaffordability issues for people living and working across the city, offering another option to those who would struggle to access housing otherwise.	intention that they will house students and act like student accommodation.
Option c Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.	This approach would acknowledge that the character of some areas is already influenced by the presence of HMOs.	It would be difficult to select an area for the concentration. It may lead to difficulties in building and maintaining a strong community, although HMOs do not always mean transient populations.
Option d Do not have any restriction on HMOs.	HMOs can be an important part of the housing market; meeting needs of those who can only afford to share but who wish to live in the city. In that sense it can help contribute to a balanced community.	HMOs can lead to pressures on services and streets for example with more bins and parking pressure. Homes do not always have sufficient amenity space for multiple households. HMOs are often a more short-term solution for people, so can create transient populations.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - various options/combinations (e.g. option a, b, c or d, or a+b, c+b, d+b) **High-level screening conclusion? -** the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes

Rationale: In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Options a and c represent alternative ways of addressing HMO proliferation, option a seeks to prevent a concentration anywhere above a threshold of 20% frontage, meanwhile option c instead defines geographically where HMOs would be accepted and where they would not. Option d is to not set any restrictions at all via the Local Plan. Option b could be carried forward on its own, instead relating to allowing new purpose-built HMOs but with restrictions on size, however it could also be combined with one of the other options.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly **criterion 4. Housing Need** in how they impact supply of new housing and deliver upon densification, as well as how they meet the particular needs of people on lower incomes. The options also impact on local amenity and street scene, as well as potentially the demand upon local services/facilities, which most closely matches **criterion 5. Inequalities**, **criterion 11. Urban design** and **criterion 6 Essential services**. Whilst options a, b and c are all likely to have positive impacts against housing need and inequalities as they serve to allow additional HMOs in varying ways to meet the needs of particular demographics, options b and c have the potential to have negative impacts against criterion 5, 6 and 11 where they could lead to additional harm to local amenity, character of the neighbourhood and additional demand on services locally (which option a seeks to avoid by ensuring the proportion of HMOs does not go above a certain threshold). Option c could lead to significant sustainability impacts particularly in relation to amenity and living environment in the areas that are designated as having no restriction, option d would further increase this impact by expanding the area of effect city-wide. Due to the varying level of sustainability impact arising across the potential options, it is considered justified to scope this option set in for detailed appraisal.

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The preferred approach for the Local Plan 2045 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them yet sets criteria to manage them in a way that prevents and over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.

The preferred option is **Option A** which will provides an opportunity for this type of housing to come forward to meet needs, in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing. Option B relates to purpose-built HMO and is not a preferred option as provision of this type of accommodation reduces potential for delivering housing that meets greater needs (such as social rented housing). There is also potential that under option B large purpose-built HMOs may be put forward with the intention of them housing students, in locations where purpose-built halls of residents would not be permitted. Option D does not set any restrictions at all via the Local Plan and

whilst the lack of any restriction may not make a difference in some areas of the city, there is potential for a significant amount of HMOs to come forward in other areas at the expense of meeting other housing needs. It is for this reason that option D is not a preferred option.

The options set was tested through the Sustainability Appraisal with Option A and C scoring more positive than Option D. Option D scored negatively against SA objective 4 whilst options A and C had some positive and some negative. Option D also scored negatively against SA objective 11, whilst Option A was neutral and Option C potentially could have negative impacts, depending on implementation. Option B, which is an additional element to the policy that could be combined with the others, rather than an alternative approach to them, might have additional positive sustainability impacts, for example for SA objective 5 if it was to be taken forward, however, Option B is not proposed as part of the preferred approach as discussed above.

Policy options set 003b (draft Policy H10): Location of new student accommodation

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It is important to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing. The policy options below consider the different types of approaches to locating student accommodation and the potential consequences of each option.

Table 2 - Policy options set 003b: Location of new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student	This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential issues with unneighbourly behaviour. Student accommodation may be particularly suited to these locations, possibly more than	Limiting locations does mean institutions may be less able to meet their needs. Concentrating student accommodations in these areas may mean that district centres and the city centre could be dominated by these accommodation types.

accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.	general market housing, and it should help to achieve the high densities that these locations provide the opportunity for.	
Option b Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.	This approach widens the suitable locations for student accommodation and opens more potential sites. However, it still means that students would not be accessing student halls along quieter residential streets.	The definition of arterial roads and when a development is 'on' them needs to be clear (i.e. how much of a setback is acceptable, what if the entrance is on a side road?). However, it may mean that arterial roads change in character and become dominated by student accommodation for long stretches. The character of many arterial roads currently is that of quiet residential streets and student accommodation can be reported as having a negative impact on neighbours in these areas.
Option c Have no locational restriction on student accommodation but a criteria-based policy.	This would maximise the opportunity to meet student accommodation needs.	This approach would not help to address the competition between student accommodation and other housing types, potentially creating an imbalance within communities and drawing student accommodation into unsuitable areas.
Option d Allow new student accommodation only on existing campus	This would significantly reduce competition between student accommodation and other housing types, maximising delivery of other housing types. It would limit	This approach would not allow us to meet the requirements of the NPPF because it would not provide for enough student accommodation to come forward to meet the needs. This would mean a greater number of students

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sites and on existing student accommodation sites.	feelings of disruption to communities of student accommodation that are sometimes reported.	in private rented accommodation, limiting its availability on the open market for others
Option e Restrict occupation of new student accommodation to full time students enrolled in courses of one academic year or more (with potential to allow other occupiers outside of term-time if a management plan is agreed).	Full time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. Policy flexibility for outside of term time maximise occupation of the developments.	Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.
Option f Require a management regime to be agreed with the City Council to ensure the development complies with parking standards that allow only operational and disabled parking, with the developer providing a mechanism to prevent	This supports the policy approach to put downward pressure on parking in the city. The location of new student accommodation will be in sustainable locations with good accessibility to public transport, walking and cycling routes offering a realistic alternative to using a private car.	Will require appropriate monitoring and enforcement and if that is not in place could result in more cars in the city putting parking pressure on adjacent streets.

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residents from parking their cars anywhere on the site, (except for disabled residents).		
Option g Do not have any management restrictions on new student accommodation.	Would give opportunity to maximise occupancy if demand dropped from full time students enrolled on courses.	Without proper management of student accommodation all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b, c or d, in combination with Options e, e+f or g **High-level screening conclusion? -** Some of the options are similar to each other from a sustainability perspective. However, where there are differences, such as between Option a and Option d, there is the potential to have significant sustainability impacts, therefore the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes, but only options A, B, C and D **Rationale:** Options a, b, c and d are all alternatives. Options a, b and d discuss restriction but to differing types of areas, whilst Option c has no geographic component and instead sets criteria. Option e could be taken on its own. It seeks to restrict occupation of new student accommodation to full time students enrolled in courses of at least one academic year or more. Option f could be taken in conjunction with Option e, as it requires a management regime to be agreed which ensures that the development complies with parking standards that only allow operational parking and not

residential parking. Option g is an alternative to Option e and Option e +f as it proposes not to have any management restrictions on new student accommodation.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly the impact of this particular type of accommodation on local amenity, which most closely matches **criterion 11. Urban design** (particularly in relation to street scene). The options also contribute to meeting the housing need of a particular community (students) so are relevant to **criterion 4. Local housing needs**. Option b is more negative for local amenity than options a or d because allowing student accommodation along arterial routes, has the potential to significantly change their character. Many of these routes are quieter residential streets which could then become dominated by student accommodation for long stretches, which could have a negative impact on the local community. Option b is slightly more positive for housing as it its less restrictive than options a and c, as it would allow more locations for student accommodation, albeit the positive is a minor one as it is only meeting the needs of one particular group. Option a would score lower than this due to geographical restrictions, these are less restrictive than Option d, which limits student accommodation to existing campus and student accommodation sites. This might result in this type of need not being fully met which would score a minor negative. Ultimately, due to the differences in the likely significant effects on restricting or not restricting the location of student accommodation, we have scoped this in for detailed SA appraisal to fully explore the potential impacts.

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Options e, f and g also strongly relate to **criterion 8. traffic and associated air pollution** because they are about managing impacts of students on car parking and the impacts of vehicles on general amenity, because of the increased numbers of residents typically in student accommodation. Options e and e+f would have a minor positive effect on criterion 8 as restricting parking to operational (and disabled) use would reduce the amount of traffic and associated air pollution in the area as students would be using other modes of transport or active travel. Option g would have either a neutral or minor negative impact, depending on implementation. However, Options E, F and G, are not considered necessary for testing through the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach, which is considered to be the area where there could be significant effects that need to be investigated further.

Location of New Student Accommodation – Draft Policy H10

The preferred approach is a combination of **options A, E and F**. Options A, B, C and D were tested through the SA in order to further explore their potential sustainability impacts. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. Option A is supportive of locating student accommodation in the most suitable places adjacent to existing institutions or student accommodation sites to avoid potential issues with unneighbourly behaviour, and in sustainable locations such as city and district centres. Student accommodation may be particularly suited to these locations, possibly more than general market housing, and it should help to achieve the high

densities that these locations provide the opportunity for, whilst ensuring that other sites that are most suitable for general market and affordable housing can be developed for those purposes. Options E and F ensure that full-time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. It also allows for policy flexibility for outside of term time to maximise occupation of the developments, whilst supporting the policy approach to put downward pressure on parking in the city.

Policy options set 003c (draft policy H11): Ensuring there is enough student accommodation to meet needs

The NPPF (paragraph 63) lists students as a group whose housing needs should be understood and attempted to be met. The PPG also notes that there is a need to plan for sufficient student accommodation and that there is an expectation that options which support both the needs of the student population as well as the local population should be considered. The policy options below detail the different types of approaches.

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Table 3 - Policy options set 003c: Ensuring there is enough student accommodation to meet needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set thresholds for university students living outside of university provided accommodation and prevent expansion of academic facilities if the threshold is breached. The details of the threshold will include the level set (which would reflect what is achievable)	This is a long-standing approach which has been successful in ensuring the universities continue to strive to provide accommodation for most of their students and that this is considered in their wider development plans.	This policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. To be fair and reasonable, this must be related to the development and any related growth in students.

and the types of students it applies to (not all). The intention of the policy option is to see the student thresholds reducing in steps over the length of the local plan.		
Option b Only permit new academic facilities (of all types proposed by the universities or other institutions) that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option (b) is linked to option (a).	This could also be applied to all academic developments that create a need for student accommodation, not just the universities. It ensures the institutions act responsibly by only undertaking developments that create new capacity for students if they show how they will be accommodated.	This may be difficult to enforce and monitor and will not necessarily be easy to make a judgement about whether a development will create increased demand for accommodation from students. A lot will depend on the submissions of the institutions, and it will be important the policy makes it clear the level of evidence expected.
Option c Have no policy linking new academic facilities to student accommodation.	This would mean new institutions could be established in Oxford.	This could undermine the long standing and successful policy which ensures the universities continue to provide accommodation for most of their own students.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, a+b, or c

High-level screening conclusion? - The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale:

Option a could be taken on its own - it seeks to set a threshold for (certain types of) university students living outside of university provided accommodation and prevent expansion of academic facilities should the threshold be breached. Option b expands on Option a by only permitting new academic facilities that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option c is an alternative to option a and option a +b as it proposes not having a policy linking new academic facilities to student accommodation.

In relation to the sustainability impacts of the options, primarily they impact on **criterion 4. Local housing needs** in how the Local Plan meets needs for students, but also how we protect loss of other housing to students and achieve the required balance. Local amenity is also relevant, which most directly relates to **criterion 11. Urban design** and the approach to expanding academic facilities relates to criterion **12. Economic growth**.

Options a and a+b will have a similar impact on criterion 4 and criterion 12 as this policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. This could have a minor negative impact on both of these criteria, although it would also ensure that there is a policy framework in place to ensure that accommodation for other types of housing need is not all lost to student accommodation. Option c suggests not having a policy linking new academic facilities to student accommodation, which may result in new institutions being able to be established in Oxford and would score a minor positive for criterion 12. Equally, Option c would score a minor negative on criterion 11 as there is the potential for current market and affordable housing to be lost to student accommodation, reducing the supply of this much needed housing in Oxford which is already in short supply, and for quieter residential areas to be dominated by student accommodation, which could have a negative impact on the local community. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

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Linking New Academic Facilities with the Adequate Provision of Student Accommodation – Draft Policy H11

The preferred approach for the Local Plan 2045 is to include a policy which sets thresholds for university students living outside of university provided accommodation and also prevents expansion of academic facilities if the threshold is breached. The thresholds needs to be set at a level which is realistic for each institution, whilst ensuring it is still effective in minimising the number of students who are reliant on living outside of university-provided accommodation so that this housing can be retained for market and and

affordable housing which is a priority for this Plan. Of the three options considered, **Options A and B** in combination is the preferred approach which reflects this balance that needs to be struck.

Policy options set 003d (draft policy H12): Homes for travelling communities

The December 2024 update to the Planning policy for traveller sites made clear that the Government's overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community. The policy options below suggest different approaches to how this could be achieved.

Table 4 - Policy options set 003d: Homes for travelling communities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.	This approach would be flexible to respond to needs that may arise during the plan period, even if none are currently identified.	It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.
Option b Search for sites to allocate to meet an identified need.	This would ensure any identified needs were met within the city.	There is no justification to do this if no need within the city is identified. It might be that Oxford does not have any sites suitable for this use because of its compact urban character. Could unnecessarily preclude a site from other residential uses.
Option c Do not allocate sites or set out policy criteria – default to national policy	There may be no need to repeat national policy on this topic in the Local Plan. There would already be general policies of the plan that could be applied in these circumstances (for example on Green Belt).	In the event of a site coming forward there would not be any policy to help in the assessment of the impact, and there would be no guidance in the plan to suggest where that might go.

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(Planning Policy for traveller sites).		

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b and c are all alternative approaches to one another. **High-level screening conclusion? -** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** The three options are alternatives to one another, but Option a and Option c are similar. The former sets out locally based criteria which might be more appropriate to Oxford's context should sites come forward, whilst the latter relies on the criteria set out in national policy. Neither of these options proposes to search for sites, unlike Option b, which would allocate sites to meet an identified need. Primarily relates to **criterion 4. Local housing needs** (meeting needs for a particular group), but also addresses **criterion 6. Services** (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact as national policy is relied upon. Option a could also have a neutral impact as it doesn't allocate sites to meet this type of need, but the criteria included in the policy should any sites come forward, are more relevant to the local context of Oxford. Option a would score a minor positive in respect of criterion 6, as ensuring accessibility to local services forms part of the criteria to be met. Option b is potentially a minor positive in helping to meet housing need (criterion 4) (should one be identified) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6). Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

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Homes for Travelling Communities – Draft Policy H12

To support the travelling community, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for gypsy and traveller pitches and travelling showpeople yards to be assessed against should they come forward, where all criteria will need to be met, whilst not allocating sites.

Policy options set 003e (draft policy H13): Homes for boat dwellers

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Residential boats and their dwellers on both permanent and temporary visitor moorings contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable. There are several policy options below which suggest how this type of housing could be approached.

Table 5 - Policy options set 003e: Homes for boat dwellers

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.	Criteria can be developed to ensure that residential moorings have the facilities and services they need to make them safe and suitable homes and to direct them to the types of watercourses where they are suitable.	If proposals for residential moorings do not spontaneously come forward, then identified needs for moorings will not be met; this approach is not pro-active in trying to meet this need.
Option b	If a site could be found this site would help to ensure identified needs are met. Current site	This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable

Search for a site to allocate for new moorings.	allocation planning policy in Local Plan 2036 SP29 includes a proposal for some new residential moorings.	sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.
Option c Do not allocate sites or set out policy criteria.	None identified	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b or c are all alternative approaches to each other. **High-level screening conclusion? -** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** All the options are alternatives to each other. Option a proposes not to allocate sites but to have a criteria-based policy should applications come forward. Option b would allocate a site to meet identified need, whilst Option c would not allocate sites or set out policy criteria. Primarily relates to **criterion 4. Local Housing Need** (meeting needs for a particular group), but also addresses **criterion 6. Services** (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact although this may depend on implementation, especially should an application for residential mooring be submitted as there is little national policy guidance in respect of moorings, therefore no clarity on how these applications will be assessed could be given. Option a and b are potentially a minor positive in helping to meet housing need (criterion 4) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6) - either through the criteria as in option a or in the

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process for allocating the sites as in option b. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Homes for Boat Dwellers – Draft Policy H13

To support those people who wish to live on boats, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for residential moorings to be assessed against where all criteria will need to be met, whilst not setting out specifically where these moorings should be located.

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Policy options set 003f (draft policy H14): Elderly persons' accommodation and other specialist housing needs

The NPPF (paragraph 63) lists older people (including those who require retirement housing, housing with-care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. There are a number of potential policy responses that could be considered. There are a wide variety of different housing types to support the elderly and those with additional needs. The need for these housing types is set out in Oxfordshire

Table 6 - Policy options set 003f: Elderly persons' accommodation and other specialist housing needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is supportive of elderly persons' accommodation of all	This approach ensures elderly persons' accommodation is in the right locations to provide the best quality of life for residents, making sure they have good local access to needed facilities	This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.

types, but with criteria to be met that ensures it provides good quality living accommodation, is in accessible locations and is part of a mixed and balanced community.	and that they are not isolated and cut off from the wider community.	
Option b Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.	This would maximise the potential for proposals for elderly persons accommodation to come forward.	This would not require elderly persons' accommodation, so wouldn't necessarily result in its delivery. It could result in accommodation coming forward in unsuitable locations where the residents become or feel isolated.
Option c Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.	There are a range of specialist housing needs in the city, which are expected to increase over time. It is not feasible to require a whole site to be used to meet these needs. This approach provides a potential means of delivering housing to meet these needs. This approach would help deliver mixed and balanced communities and meet the widest range of needs.	This approach would reduce the amount of regular affordable housing provided to meet the needs of those on the housing list, which is the greatest need in Oxford. The need may still be too great to meet without too much harm to other aims, and it will be difficult to set a justifiable threshold for sites if it is not set at a level to meet all needs. It is important it does not over-burden developers and prevent sites coming forward. Ultimately, in Oxford this policy is likely to be ineffective because there are simply not large enough sites available for this approach to be feasible. That is because there is a critical mass of units that are viable to manage. This need may be met on strategic sites just outside the city, or on sites where the developer makes a decision to bring

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		forward a scheme wholly of this type of accommodation.
Option d Include a policy that is restrictive of types of elderly persons' or supported accommodation, for example private market flats available to older people but with limited onsite support.	This could prevent an imbalance in the type of elderly persons' accommodation, for example a large amount of expensive private accommodation with minimal care on-site.	An attempt to restrict elderly persons' or supported accommodation of any type generally is unlikely to be justified or beneficial, as some needs will be met by all types of elderly persons' accommodation. This would also limit opportunities to downsize and free up larger homes to the market.
Option e Do not include a policy relating to elderly persons or other supported accommodation	This would allow the market to respond to need spontaneously and without restriction.	It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs, it could lead to no new accommodation of this type or it may lead to unsuitable accommodation in unsuitable locations that does not help to address needs.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - the options are standalone options, rather than ones that could be combined. **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Only one of the options would actively require supported housing; the others are either supportive of it to a greater or lesser degree or would restrict particular types (in order to encourage others). Even the approach that actively requires supported housing could only apply to very few sites in Oxford, so would not have an impact significantly greater than the other options. PARA summarising the likely sustainability impacts (if any) in relation to the 12 SA criteria

Older Persons and Other Specialist Accommodation – Draft Policy H14

The preferred approach for the Local Plan 2045 is to have a local policy that sets criteria to guide where and how this type of accommodation comes forward. It is not proposed to set any kind of requirement for this housing type. That is because of the lack of opportunity to do so in the city, which lacks sites of a large enough capacity.

Whilst either of the four options, option A, B, C, D or E could be taken forward, the preferred approach is **Options A.** This option is supportive of elderly persons accommodation, but reflects both the fact that there is only a modest need in Oxford, compared to a significant need for other housing types, and that this housing type is likely to come forward in an unpredictable way, in response to a variety of factors that may influence the landowner, rather than being predictable enough to enable an allocation. It also reflects the fact there are no sites large enough for this to come forward as a requirement for part of a site over a certain size.

Policy options set 003g (draft policy H15): Self-build and custom house building options

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The NPPF lists people wishing to commission or build their own homes as groups whose housing needs should be understood and attempted to be met. It also states that local planning authorities should seek opportunities through policies and decisions, to support small sites to come forward for self build and custom housebuilding.

There are several policy responses that could be considered.

Table 7 - Policy options set 003g: Self-build and custom house building

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require a proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-	Gives an opportunity for being able to build your own home in a very constrained city. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	The size of site threshold and the proportion of the site would need to be matched to the housing trajectory to check enough plots would come forward through this approach to meet needs (as demonstrated by the self-build register). However, the rate of addition to the self-build register is likely to vary over time and the level of interest in plots is yet

build plots for large sites, for example all sites over 100 dwellings). Set threshold to meet identified need.		to really be tested so it could be that this does not meet needs or provides more plots than the level of interest and creates delays in delivery. Much residential development in the city involves flats to ensure efficient use of land, this type of development is much more complex to package up as self-build plots.
Option b Require a smaller proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-build plots for a larger number of smaller sites, for example all sites over 10 dwellings	This approach could give more certainty that sufficient plots will come forward, because it does not depend on large sites being delivered, and large sites are more easily delayed and the delay of one site when the policy only applies to a few would have a greater impact. Therefore, this may give a greater opportunity for those on the self- build register to gain land to develop their own property.	The more land given to self-build housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Marketing of singular self-build flats on multiple sites is likely to be very challenging and unlikely to be practical.
Option c Allow exceptions to the policy where this would not work well (e.g. only flats, student accommodation). Set thresholds to meet identified need.	Such a policy approach ensures that this type of housing is only made available on sites where it would work well.	Sites that would allow exemption would be developed with no self build opportunities.

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Option d Include a criteria-based policy which is positive towards but not requiring of self-build	Such a policy approach supports the delivery of other housing beyond self-build and custom build which is where there is the greatest need.	Without a specific policy there is potentially limited scope for people to find self-build plots, or custom housebuilding. This is not compliant with the Government's approach, which requires us to meet the need for self-build and custom housebuilding.
Option e Include in the policy that any self build plots that have been marketed but not sold over a specified time (e.g. 12 months) should be built and brought forward as dwellings in the usual way.	Such a policy approach gives an opportunity for those interested to gain land to develop their own property but acknowledges that if the plots have been marketed yet have not sold then they should be made available for the delivery of non self build housing as this is where there is greater need.	Demand for self build plots may vary over time and any new additions to the self build register would have reduced opportunities to develop their own properties as these plots would be lost.

1039

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? – various combinations (e.g. either a, b, c or a combination of a+b+d or a+d or b+d). **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The self build register demonstrates that there is local demand to support the NPPF requirement for opportunities to be given for small sites for self build housing to come forward. The local context in Oxford leads to several potential options for how best to formulate a policy. Options a and b represent different levels of scope over which to apply a requirement (applying to either large sites only or sites over a smaller size threshold), whereas option c allows an exception to the prescriptive policy in

circumstances where the provision of self built plots could undermine the delivery of other types of housing. Option d represents a more influential as opposed to prescriptive approach. Option e represents an additional dimension that could be incorporated with both options a and b or alongside option a or b.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community. The high land values in Oxford however mean that the provision of self build plots isn't really an affordable housing model/ affordable way to access housing.

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and whilst focusing on larger sites (option a) concentrates delivery, focusing on smaller sites (option b) means that there is more dispersal geographically which could increase delivery times. Potentially option a could have a greater risk of homes not getting finished/ delivered as more smaller sites are likely to come forward than larger ones. Option c would likely have positive impacts. Option d of not having a prescriptive approach would likely be neutral impact. Option e could have either a neutral or more positive impact, more positive if the plots are built out for self build but neutral if they are built out as non-self build. Overall the differences between the likely impacts of the options are not considered to be significantly different, none of the options have major impacts on sustainability.

1040

Self-Build and Custom Housebuilding – Draft Policy H15

To support people wishing to build their own homes, the preferred approach for the Local Plan 2045 is to include a policy that requires self-build/ custom built plots to be made available.

Of the five options, either option or various combinations of these could be taken forward. The preferred approach is a combination of **Options A, C and E** which will provide an opportunity for this type of housing to come forward on sites that are suitable and where

it would work well, yet also ensures that any plots marketed for self build that have not sold after a certain period of time can be made available for other housing as this is where there is a greater need.

Policy options set 005h (draft policy H15): Community-led housing options

The NPPF indicates that local planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing. There are several potential policy responses that could be considered.

Table 8 - Policy options set 003h: Community-led housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is generally supportive of community-led housing but does not have any requirements.	Gives an opportunity for being able to build your own home in a very constrained city, or develop community led housing schemes that could continue to provide more affordable accommodation in perpetuity. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	This approach would actively ensure this housing type comes forward, so would not necessarily result in it being delivered.
Option b Require a proportion of the total site area to be available to groups wishing to develop community-led housing (for example of over 100 dwellings).	Gives a greater opportunity for community-led housing groups, to gain land to develop their own property.	More land given to community-led housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Delivering this in combination with any requirement for self and custom housebuilding could lead to a significant decrease in the delivery of other housing types for which there is a greater need, including all tenures of affordable housing.

1041

Option C Do not have a policy that is supportive of community-led housing schemes.	Such a policy approach supports the delivery of other types of housing for which there is greater need.	Without a specific policy there is potentially limited scope for people to join community-led housing schemes.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, or b, or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -** No **Rationale:** The local context in Oxford leads to several potential options for how best to formulate a policy. Option a shows general support but would contain no requirement for this housing type, which is probably appropriate given that whether it comes forward would be out of the control of developers. Option b would set a requirement for a certain amount of this housing type on large sites, although it would not be expected that there would be community housing groups necessarily ready to take up opportunities. Option c would have no policy support for this housing type. Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community. The high land values in Oxford however mean that community housing isn't necessarily likely to be an affordable housing model/ affordable way to access housing.

1042

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and opportunities could be taken to delivery this housing type by community housing groups if they are in a position to. The options would all be likely to have only a neutral effect on criterion 4.

Community led housing – Draft Policy H15

To support community-led housing schemes, the preferred approach for the Local Plan 2045 is to include a policy that supports this type of housing. Of the three options, either option could be taken forward. The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward on sites that are suitable. Although acknowledged that community led housing will not necessarily meet the requirements for self-build or custom build housing, community-led housing has been incorporated within policy H15 rather than a standalone policy, with wording intended to show how it could meet the need for self-build or custom build housing.

1043

Policy options set 003i (draft policy H16): Boarding School Accommodation

There is no national policy or guidance regarding the development of boarding schools. However, the context of Oxford would encourage a policy as Oxford has a very large housing need with significant competition for land and sites. There are several policy options that can address the development of boarding schools.

Table 9 - Policy options set 003i: Boarding School Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that allows this accommodation type in most locations, with some criteria guiding how they come forward.	This still accommodates for expansion of boarding accommodation but sets out a clear criterion which will protect the loss of C3 dwellings.	This approach would likely do little to prevent the competition of this accommodation type with other housing types tha meet housing needs.
Option b Include a more restrictive policy that limits the locations where this type of	This restricts boarding school accommodation to the locations where it is most suitable for students and tries to	Boarding schools may find this approach too restrictive if they have significant growth plans.

accommodaion would be permitted, for example to allow it only on existing school sites.	avoid potential issues with surrounding neighbourhoods.	
Option c Do not include a policy relating to boarding school accommodation.	Boarding schools would have no restrictions on developing accommodation to meet their own needs.	This may cause the loss of C3 dwellings or compete with opportunities to delivery C3 dwellings, and may also cause harm to local neighbourhood and character of the area.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - **High-level screening conclusion? -** The options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, it would be appropriate to consider having a policy as there is no specific NPPF guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy. There have been several recent planning applications for boarding school accommodation, demonstrating local demand. This type of accommodation is not classed as residential and does not form part of Oxford's housing need. The inclusion of a policy would enable the monitoring of growth and ensure that boarding school accommodation is granted where appropriate and not competing for much needed residential dwellings and development. In terms of sustainability impacts, the different options all score against **criterion 4. local housing need** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a neutral impact as this policy won't necessarily create or bring forward any new residential homes. Option b would have a neutral impact as it would be permitting limited development but still not bringing forward new residential development (although does the most to avoid competition with it). Option c could potentially have a minor negative impact as without a policy it could reduce sites available for residential development. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option.

1044

Boarding School Accommodation – Draft Policy H16

The preferred approach for the Local Plan 2045 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sies or adjacent to them.

Whilst either of the three options, option A, B, or C could be taken forward, the preferred approach is **Options B.** This option limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applications against, only the locational restriction.

1045

Background paper 004

Title: Employment and Inclusive Economy

This paper addresses jobs (including knowledge-based jobs, jobs for unskilled residents, apprenticeships and jobs to support a diverse economy) and considers how best to use land to support and diversify the economy. **It addresses how the Local Plan can best use land to support and diversify the economy while fostering growth in key sectors including science and innovation.** **It considers how best to support local people and businesses access the training and opportunities they need to enable them to prosper.**
Relevant Local Plan 2045 Objective(s): • Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
Relevant SA Objective(s): 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.
SEA theme(s): Population and material assets.

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1. Introduction

1.1 This topic paper focuses on Oxford's economy, employment and the importance of research and development, education and skills. Oxford is recognised as a globally known brand. It has major assets which include two leading universities, and cutting-edge research in areas including bio-tech, data science, quantum technology and robotics. The city is home to diverse international enterprises including BMW Mini, Oxford University Press, Unipart, Centrica, Amey, Nielsen and TripAdvisor among numerous others. The city's economy plays a key role within both a wider regional and national context. Despite this, Oxford's level of unemployment is higher than the national average. Although it is a city renowned for education, disparities in education levels do exist and there are examples of areas where there is a deprivation of skills.

1.2 This topic paper provides a brief summary of the relevant national, sub-regional and local plans, policies and programmes that currently exist and are likely to influence change in the future. There is a section on Oxford's economy and its importance to the national economy, which includes some headlines that help to define the economy of the city, its job growth, key and potential emerging sectors. There is also a section on Oxford's existing education facilities. This includes some key indicators identifying the importance of these education facilities to both Oxford and Oxfordshire. As part of an assessment of the current situation some of the key challenges and future trends that impact the local economy are identified. The next section explores what would happen without a new plan and the potential issues that the city would face. The final section provides some conclusions and sets the key issues which the plan addresses, drawing conclusions from the evidence in relation to each of the policy approaches.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Industrial Strategy: Invest 2035

2.1 The publication of Invest 2035: the UK's modern industrial strategy, sets out this administration's "commitment to develop a modern, targeted industrial strategy, with the objective of long-term, inclusive, and resilient growth, by spurring investment into all parts of the UK".

2.2 The National Industrial Strategy focuses on "stimulating investment and activity in sectors with the highest growth potential". It identifies eight growth-driving sectors to be prioritised across services and manufacturing. These sectors are based on both existing and emerging strengths and are as follows:

- Advanced manufacturing
- Clean energy industries
- Creative industries
- Defence
- Digital and technologies
- Financial services
- Life sciences
- Professional and business services

2.3 Oxford and Oxfordshire are home to the majority of these identified growth-driving sectors. Driven by the existing presence of two successful universities, and their close ties to research and industry, there is significant potential for Oxford and Oxfordshire to further develop and deliver these nationally important growth-driving economic sectors.

Industrial Strategy Zones Action Plan (June 2025)

2.4 The Industrial Strategy Zones Action Plan sets out twenty-two locations across the UK which aims to create successful places that can deliver their full potential, supported by specific funding initiatives. The Government wants to ensure that these specific locations can seize opportunities and develop industries of the future. It is worth noting, all Industrial Strategy Zones are located outside Oxfordshire, however.

AI Growth Zones

2.5 The Government wants to accelerate efforts to build the necessary infrastructure needed to support AI growth. It sees AI Growth Zones as important as their creation will help to unlock investment in these areas by improving access to power and providing planning support. The Government has (to date) announced four AI Growth Zones, the first of which, at Culham in Oxfordshire was announced in April 2025.

National Planning Policy Framework (December 2024)

2.6 The NPPF gives a clear steer towards supporting economic growth through planning policies and it is clear significant weight should be placed on the need to support sustainable economic growth and productivity.

2.7 The NPPF sets out a requirement for a clear economic vision and strategy, which positively encourages sustainable economic growth having regard to the national industrial strategy and any relevant Local Industrial Strategies and local economic development and regeneration policies. It also sets out that Local Plans should develop policies that help to create the conditions in which businesses can invest, expand and adapt to meet anticipated needs over the Plan period.

2.8 The NPPF sets out a key economic objective which requires policies ‘to help build a strong, responsive and competitive economy’. This aims to ensure 'that sufficient land of the right

types is available in the right places and at the right time to support growth, innovation and improved productivity.' Planning policies are also required to 'create the conditions in which businesses can invest, expand and adapt' and to positively respond to the 'need to support economic growth and productivity'.

2.9 The NPPF highlights the importance of meeting the specific locational requirements of networks and clusters including the knowledge and data driven sectors, creative or high technology industries. National advice also requires a policy approach that 'should allow each area to build on its strengths, counter any weaknesses', and address 'the challenges of the future'. This is considered particularly important where 'Britain can be a global leader in driving innovation' and in 'areas of productivity' which should 'capitalise on their performance and potential.'

Draft NPPF Consultation (December 2025)

2.10 In December 2025, the Government announced a consultation on a revised NPPF. While not directly applicable to the Oxford Local Plan 2045, the consultation material highlights some revisions to current national policy, which indicate the likely direction of travel for future development plans.

2.11 In relation to the national economic policy position, some of the changes are largely editorial in nature. Notable changes include the introduction of national decision-making policies, and a new policy setting out the specific planning considerations for freight and logistics development, and associated infrastructure.

2.12 The consultation material highlights that elements of paragraphs 86 and 87 of the current NPPF are proposed to be redrafted, while notable changes include the expectation for plans to include explicit references to Industrial Strategy Zones, AI Growth Zones and Industrial Strategy itself. Additional text is also proposed to enable flexibility to respond to changing commercial property circumstances, which seek to ensure that site allocations for economic purposes are not overly prescriptive (unless there is a clear and justified rationale for doing so).

Planning Practice Guidance (PPG)

2.13 The PPG includes guidance about how local authorities should prepare and maintain an evidence base regarding the economic needs of their area. In working out the business needs for an area, consideration should be given to a range of factors including evidence of market demand; wider market signals relating to economic growth, diversification and innovation; the existing stock of land for employment uses and the recent pattern of employment land supply and losses. It also sets out a method for assessing economic land availability.

Oxford-Cambridge Growth Corridor

2.14 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxford Cambridge Pan-Regional Partnership

2.15 In January 2023, the previous Government confirmed support for the establishment of an Oxford to Cambridge Pan Regional Partnership following a proposal by leaders from local councils, local enterprise partnerships, the Arc Universities Group and the area's transport body – England's Economic Heartland. However, following an announcement in the Autumn Budget 2024, a decision was made by the new Government not to fund the Oxford to Cambridge Pan-Regional Partnership from 2025-26. The partnership was formally closed in May 2025, and some of its work and assets were transferred to the Cambridgeshire and Peterborough Combined Authority, and England's Economic Heartland (EEH), the geographical extent of which includes several counties including Oxfordshire.

PwC Good Growth Cities Index 2025

2.16 PricewaterhouseCoopers (PwC) produce an annual Good Growth for Cities Index. The most recent version of this Index, published in September 2025, which compares 50 UK cities using a number of different metrics. The 2025 edition saw ranked Oxford in nineteenth place, having previously been the top performing city from 2017-2023.

2.17 PWC's research indicates that the continuing shift in the public interest from the 2024 edition has resulted in financial priorities less dominant in favour tangible, local and essential concerns such as high streets and shops, skills, housing and transport. Below average comparative scores in the housing and transport indicators are therefore likely to explain Oxford's 2025 ranking. By comparison, Cambridge also had below average comparative scores in the housing and transport indicators, and overall was ranked a couple of places lower the Oxford.

2.18 The report showed that cities across the South-West region continued to perform well this year (Bristol Swindon, Exeter and Plymouth all ranked within the top ten). York topped the index in 2025. Scoring highly across high streets, skills and jobs – key indicators of prosperity that the public increasingly values.

Fast Growth Cities – 2021 and Beyond – Centre for Cities

2.19 The Fast Growth Cities Report 2021 provided an update to a report from 2016. The cities that make up the Fast Growth Cities group (comprises of Oxford, Cambridge, Milton Keynes, Norwich, Peterborough and Swindon) were considered as some of the most successful and innovative places in the UK. The Fast Growth Cities Report focused on six key areas:

- Labour markets, skills an education;
- Businesses and growth;
- High Streets and city centres;
- Housing and planning;
- Transport; and
- The economic impact of the pandemic.

2.20 The report recognises that the Fast Growth Cities group contains some of the UK's most successful cities, many of which (including Oxford) have a significant impact beyond their boundaries.

Oxford Growth Commission: Interim Report (December 2025)

2.21 Published in December 2025 by the Government on behalf the Oxford Growth Commission, this Interim Report sets out the views of the Chair (Neale Coleman – appointed in May 2025) on how best to unlock and accelerate growth in Oxford and the surrounding area. The Interim Report includes 47 recommendations for central and local partners with a focus on maximising the benefits of growth for the local area, and for the UK as a whole.

2.22 The final report, scheduled for Autumn 2026, will set out a series of recommendations to Ministers on priorities and actions to support growth in Oxford and Oxfordshire.

Enterprise Oxfordshire

2.23 Oxfordshire's wider economic vision and strategy are contained within several documents produced by the former Local Enterprise Partnership (LEP) for Oxfordshire. The county council (from April 2025), through Enterprise Oxfordshire, is now ultimately responsible for this work and acts as the sole shareholder for Enterprise Oxfordshire.

Prior to the creation of Enterprise Oxfordshire, the Oxfordshire LEP created a range of key economically focused documents including the Strategic Economic Plan (SEP), and its supporting Action Plan, the Local Industrial Strategy (LIS), and Local Investment Plan (LIP). The SEP was first produced in 2014 and was refreshed in 2016. More recently (December 2023) a refreshed SEP was published to help drive productivity, prosperity and wealth for all whilst accelerating Oxfordshire's transition to net-zero.

2.24 The SEP aims to champion good, sustainable growth that realises a shared ambition that by 2033, people and communities across Oxfordshire will be benefiting from new

opportunities which are created sustainably through local enterprise and innovation.

2.25 The LIS, published in July 2019, described Oxfordshire as a global centre of research and innovation, home to a number of world-leading science and technology companies located across business clusters and hubs, forming a hive of knowledge-intensive economic activity. It describes how cutting-edge products and services are solving challenges in healthcare, mobility, energy and communications, meaning Oxfordshire's success is critical to the UK.

2.26 The key sectors and technologies that Oxfordshire excel in have 'global reach', meaning we are a critical driver for UK economic growth. A primary aim of the strategy is to build a global innovation ecosystem in Oxfordshire by 2040. Existing and proposed developments in Oxford are central to this, including the West End.

Oxfordshire Leaders Joint Committee (OLJC)

2.27 The joint committee's purpose is to deliver the aims of the Oxfordshire Strategic Vision, adopted by all six councils. The Oxfordshire Strategic Vision aligns with the ambitions of the Strategic Economic Plan (2023) and sets out a set of guiding principles, a set of outcomes to be achieved by 2050, and a definition of "good growth". Taken together, these form an overarching approach to long-term sustainable development in Oxfordshire.

2.28 The OLJC consists of all six Oxfordshire authorities and makes several commitments, including to:

- Coordinate local efforts to manage economic, housing and infrastructure development in a way that is inclusive and maximises local social and environmental benefit.

Oxfordshire's Innovation Engine 2023 – Advanced Oxford

2.29 Oxfordshire's Innovation Engine 2023 reassesses the Oxfordshire's Science and technology ecosystem providing an update from the 2013 Innovation Engine Report – Realising the Growth Potential. The report looks forward, but also back over the past decade to see whether the growth potential has been achieved. The report recognises that despite the challenges associated with collecting reliable economic performance data that Oxfordshire appears to have a thriving and diverse innovation ecosystem. It sets out that while the region's knowledge economy has grown, high and medium-tech manufacturing has declined (although this may be more down to a more mature ecosystem).

2.30 There is a growing stock of innovation space with many new developments in the pipeline which will add much needed capacity into the system in the next five years. Housing and transport continue to be key challenges and need to be addressed. Other infrastructure needs investment too, particularly data connectivity and supply of power.

2.31 The report makes six recommendations if Oxford's innovation ecosystem is to continue to flourish, strengthen and play a pivotal role in making the UK a beacon for science, technology and innovation:

- Strengthen leadership across the region in relation to innovation;
- The City Council and County Council need to work together to develop a much- needed future-looking transport system which is Oxfordshire wide, not just focused on the city of Oxford;
- Grow and diversify the number of risk capital investors operating within the region;
- Develop a new, clear strategy, with collective buy-in, for inward investment into the region. Different players within the ecosystem need to work together to ensure that Oxfordshire is open, coherent and can respond to potential investors;
- Join up nodes of innovation across the region and help internal and external stakeholders to navigate the landscape through better defined pathways and connectors; and
- Develop a suite of communication tools and assets, tailored to the needs of different audiences, which can be used by all players, to tell Oxfordshire's innovation story.

Oxford City Council – Our Strategy 2024-28

2.32 The Council's corporate plan entitled, Our Strategy 2024-28 sets out five key priorities to support Oxford's ambition to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. One area of focus for the strategy is to support a strong fair economy under which the three priorities for the Council to deliver are as follows:

- Secure, fairly paid, local jobs for Oxford's residents and access to skills and reskilling training
- Using Oxford's unique strengths in a global economy to attract high quality investment
- Supporting development to boost economic activity and deliver benefits for all

Oxford City Council Economic Strategy 2022-32

2.33 Oxford's Economic Strategy seeks to establish a new standard for economic inclusion in the city, underpinned by the strength of an impactful global city, evolving in a way which recognises environmental limits and harnesses the opportunity of a zero-carbon economy. The Economic Strategy highlights Oxford's significant specialisms as:

- Health and Life Sciences; Technology and Digital; Creative Production; Green and Low Carbon; the Visitor Economy; and Social Enterprises and co-operative businesses

2.34 Oxford's Economic Strategy recognises that Oxford's economy has a positive global impact and as a hub of education and knowledge, it has a clear purpose to address many of societies' challenges through science and technology. Oxford City plays a key role developing research and incubating early-stage companies. It is one of Oxfordshire's most sustainable locations to locate employment, due to its critical mass, and connectivity to transport and research assets. It recognises Oxford's physical capacity constraints, and the need to deliver commercial floorspace in such a way that does not compromise wider placemaking, zero carbon and green and sustainability objectives.

2.35 The City's ambition is to ensure that the anticipated growth is of good quality, in the right location, supported by appropriate infrastructure and contributes to an inclusive economy.

Oxford City Centre Action Plan 2021-2030

2.36 The City Centre Action Plan (CCAP) sets out four workstreams, each intended to focus on a different thematic area of work. Each workstream is defined by a series of objectives, under which projects are identified. The four workstreams are:

- Connectivity and access:
    - To be delivered by limiting private vehicles, reducing conflict and congestion and creating spaces for buses, bikes and people;
- Public realm and animation:
    - To be delivered by improving the public realm and providing events and experiences to animate it and boost dwell times;
- Getting the mix right:
    - To be delivered by building on Oxford's world-class innovative and creative spirit, enhancing the city centre as a place to live, start and grow a business, visit, and play; and
- Get the basics right:
    - To be delivered by creating an inclusive, safe, and attractive city centre that mediates and promotes a diverse range of activities and uses.

2.37 The City Centre Action Plan also includes a series of objectives under each workstream. Not all of these can be directly influenced by the Local Plan 2040 as some need to be undertaken in partnership with colleagues, for instance, at the County Council.

Oxford Local Plan 2036 (Extant plan)

2.38 The policy approach for the city's economy seeks to build on Oxford's strengths and ensure the delivery of prosperity and opportunities for all. Oxford is home to many jobs with particular concentrations in the higher education, research and science sectors. The economic performance of the city is influenced by wider sub-regional and national plans. These include Oxfordshire's Strategic Economic Plan (refreshed in December 2023), the Local Industrial Strategy (2019) together with the Oxford Cambridge Pan Regional

Partnership (confirmed by Government in January 2023) and the Oxfordshire Housing and Growth Deal (2017).

2.39 Oxford's employment strategy in the Local Plan 2036 seeks to protect the city's existing network of well-performing employment sites, while supporting the release of poorly performing sites to other uses (including housing). Policy E1 categorises the city's network of employment sites according to their importance to the national and local economy. Category 1 employment sites are the city's most important employment sites supporting the national economy or are significant local employers or sectors. Category 2 employment sites provide local services and facilities, whilst Category 3 are generally smaller, less well-performing sites.

2.40 Policy E1 supports the modernisation and intensification of any category of employment site. The modernisation and intensification of any employment site will be supported in principle where it can be shown that the new development makes efficient use of land and does not result in adverse environmental issues. Generally, the approach taken is to resist the loss of employment floorspace at category 1 or 2 sites, but it in the case of poorly performing Category 3 sites, a criteria-based approach is taken which, if satisfied, may allow the release of some or all of the site to other uses such as housing.

2.41 The Local Plan 2036 also provides policy support for the sustainable growth of the city's two universities - Oxford Brookes University and The University of Oxford. This support allows these institutions to maximise the economic, social and cultural benefits they both bring to the city.

2.42 Oxford is also a major centre for teaching hospitals and home to a number of acute and specialist medical research organisations. These medical research organisations link closely with healthcare research undertaken at the two universities. Research and development and teaching uses associated with health and the hospitals is supported in principle given their role as one of Oxford's key sectors. Proposals for new educational, teaching and academic institutions need to show how they support the objectives and wider policies in the Plan.

Employment and Skills Plans:

2.43 The Oxford Local Plan 2036 encourages the use of Employment and Skills Plans or Community Employment Plans to help mitigate the impact of development and support an inclusive economy. Employment and Skills Plans seek opportunities including ensuring local people can access job opportunities arising from development at both the construction phase and once development is in operational use.

Development opportunities

2.44 There are limited remaining vacant plots at the Oxford Science Park and at ARC Oxford (formerly Oxford Business Park). Both these "Category 1" employment sites have seen

major development recently bringing forward a large amount of employment floorspace supporting Oxford's key strengths. A number of these recent development proposals are now under construction and due to be completed in the short-term. Some of the city's employment sites contain older buildings that are currently in employment uses. These sites cumulatively have significant redevelopment potential for modernisation and/or intensification within the plan period.

2.45 Development opportunities are also being realised at Oxford North with a sizeable amount of floorspace being built out under a series of reserved matters planning applications that support an outline granted in 2021. In Autum 2025, the recently completed Phase 1A was officially opened by Lord Hague of Richmond, Chancellor of the University of Oxford.

2.46 The Plan also recognises that significant scope for the redevelopment of brownfield sites exists in Oxford, particularly those in and around the wider West End of the city centre. Such sites include Oxpens, the 'Island Site', Oxford Station, longer-term opportunities at Osney Mead, and the more immediate opportunities involving the transformation of Botley Road Retail Park.

Oxford Employment Land Needs Assessment (2026)

2.47 Oxford City Council commissioned Rapleys to undertake an Employment Land Needs Assessment (ELNA) in early 2025. This report looks at the employment land need generated by Oxford city. The study assesses Oxford's economic need in quantitative and qualitative terms. It follows the three prescribed quantitative approaches set out in the PPG – a labour demand approach (drawing on an economic forecast), a labour supply approach (aligning the Standard Method (NPPF, December 2024) housing number with labour and jobs supply), and an assessment of a range of past trends in new floorspace completions and past jobs delivery. The consultants, in producing the ELNA also (as suggested in the PPG), engaged at length with the commercial property market, and this provides a qualitative view of the future needs assessment.

2.48 This final version of the ELNA Report builds on the Interim Report, which was published in June 2025 to support the Regulation 18 consultation. It provides relevant updates to the various sections of the Interim report, taking into account the change in base date of the plan period, and sets out conclusions and recommendations based on the findings.

Employment Land Supply

2.49 Oxford City Council monitoring data provides a useful context in relation to the changes to the city's economic landscape that have been taking place over the years preceding the start of the plan-period from 2025-2045.

2.50 This monitoring data was used to inform the city's Employment Land Needs Assessment (ELNA), which provides a comprehensive supply side assessment of employment land. Table 2.1 (below) provides a summary of Oxford's committed supply. A more detailed analysis is presented in the ELNA.

2.51 Table 2.1 shows total floorspace of committed supply based on the most up-to-date plan monitoring data (as at 31 March 2025), and also includes additional analysis of applications and planning permissions granted as at 17 October 2025).

2.52 The consultants' analysis recognises that while R&D/ lab space is the main form of employment space coming forward in the city, the floorspace under construction (approximately 165,000 sqm of R&D/ lab space) will increase the current office/R&D space available in Oxford by almost 50% (based on VOA (2023) data).

Table 2.1 - showing extant planning permissions involving employment-generating uses. All figures expressed as net increases in sqm (GIA)

Floorspace permitted (sqm GIA)	Office	R&D	Flexible B Class	Light Industrial Uses	General Industrial (B2)	Storage/ Distribution (B8)	Total
	1,877	352,180	2,940	57	-	123	357,177

(Source: Employment Land Needs Assessment, Rapleys, January 2026)

2.53 The ELNA also considered the development pipeline. This analysis included consideration of sites with known developer aspirations, the majority of which have submitted a planning application. The total known net additional floorspace (GIA) at the time the analysis was undertaken was 185.040sqm.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Oxford's Economy

3.1 According to the Labour Market Profile for Oxford, the city was home to 4,915 businesses, collectively employing approximately 126,000 people in 2023. A high proportion of businesses in the city are micro or SMEs (small or medium sized enterprises). In fact, 96.2% of all businesses in Oxford are micro- (less than 9 employees) or small- (10 to 49 employees) businesses (UK Business Counts, 2025).

3.2 Oxford also has the highest employment rate in the county. The city's importance as an employment location is demonstrated by its job density ratio of 1.19 (2023), which is above the South-East (0.86) and Great Britain (0.86). According to the City Council's Economic Strategy, in 2019 it was estimated that Oxford contributed £6.8bn to the national economy annually.

3.3 The University of Oxford generates more spin-outs than any other university in the country. According to the Oxford University Innovation and University of Oxford Impact Report 2024 - Shaping the Future: Oxford's Innovation Impact, the University has been involved in the creation of more than 300 companies. Research and development, (R&D) is one of the

current growth sectors in Oxford linked directly to the Universities and hospitals. The Covid-19 Pandemic and the ground-breaking research on vaccines with the development of the Oxford AstraZeneca vaccine has helped to highlight Oxford's global importance and its contribution to both the national and local economy. The strong links between healthcare in practice and research are critical.

3.4 A Research Report published in 2021 by the Centre for Cities, entitled Fast Growth Cities – 2021 and beyond showed the importance of a section of fast-growing cities, such as Oxford, and the need to build on their respective strengths as a crucial means of achieving future growth. Innovation systems, such as those established within the city comprise business dynamics, skilled labour and innovative outputs such as patents which together provide the platform for delivering economic growth. The 2021 study confirmed that innovative places, such as Oxford, are likely to be the first places to benefit from the ongoing change in the economy, since they are directly involved in the development of solutions or have the right dynamics to adapt their business models.

3.5 Oxford is therefore well placed to help to drive forward national economic growth by supporting the nationally identified growth driving sectors through the ground-breaking research and development undertaken within the city, which benefits from its strong links between the University of Oxford and the hospitals together with key related commercial firms that are established in the city.

3.6 In 2023, the importance of "Innovation Hotspots" was highlighted by the Centre for Cities in a report entitled Innovation hotspots – clustering the new economy. Hotspot areas, such as Oxford, involve the clustering of businesses and cutting-edge industries. These areas have been more productive and have grown faster since the financial crisis than those areas that do not benefit from clustering.

3.7 The Labour Market profile for Oxford (produced by Nomis) indicates that the total number of jobs in the city peaked in 2018 at 144,000. Since then, the total number of jobs in Oxford had fallen each year to a low of 127,000 jobs in Oxford in 2021. The number of jobs fell most rapidly between 2019 and 2020, where the number of jobs in the city reduced by 9,000. The most recent figures report a total of 143,000 jobs in Oxford (2023).

Availability of broadband

3.8 Oxfordshire County Council's Digital Infrastructure Programme aims to improve digital infrastructure across the county and their work includes bespoke projects such delivering GigaHubs with Full Fibre broadband including at more remote locations including village halls, GP surgeries, schools and other public buildings. Other important work involves the delivery of gigabit-capable broadband to around 10,000 premises in Oxfordshire and driving to deliver 5G technology in Oxfordshire as part of a wider regional project across England's Economic Heartland.

3.9 Good broadband connections are essential for many highly skilled jobs. Oxford is well covered by superfast broadband connections (speeds of >24Mps).

Employment by type

3.10 Official census and labour market statistics from the Office for National Statistics are provided by Nomis. Nomis provides labour market profiles for local authority areas. Oxford City's labour market profile is available on the Nomis website. The statistics for "Employee jobs" shows a sectoral breakdown of employees in Oxford by Industry. At the time of writing the most recent data is for the year 2024.

3.11 This dataset shows a large number of people are employed both in "education" (39,000) and in the "human health and social work" sector (25,000) in Oxford. These two sectors make up 51.7% of all employee jobs in the city. By comparison, these two sectors represent 23.5% of all employee jobs across the South East and 22.8 of all employee jobs nationally. This is significantly more people than are employed in the next two largest sectors. Employee jobs in "wholesale and retail trade; repair of motor vehicles and motorcycles" (9,000) and "professional, scientific and technical activities" (11,000) together account for 16.2% of total employee jobs Oxford, while "information and communication" has dropped from 11,000 in 2023 to 7,000 in 2024.

Employment levels

3.12 The Nomis website provides statistics about both employment and unemployment levels within Oxford's labour market profile. At the time of writing the most up-to-date information presented on the Nomis website was for the time-period between July 2024-June 2025. This showed that Oxford's unemployment rate at 4.1% (this is model based due to a small sample size), was slightly higher than the national average of 4%.

3.13 The Nomis website also provides information on the number of Jobseekers' Allowance (JSA) claimants. This information is also found within the Oxford's labour market profile. It shows that as of November 2025 there were 3,085 people claiming Job Seeker's Allowance or Universal Credit (UC). This represents 2.6% of the working population. This shows a reduction since March 2021 when there were 5,040 claimants representing 4.3% of the working population (i.e., people aged between 16-64 years old).

Micro, Small and Medium Sized Enterprises (Micro SMEs)

3.14 Micro SMEs represent a significant proportion of the city's employment ecosystem. According to UK Business Count data for Oxford (2024), 96.2% of the city's businesses are micro- (employing up to 9 people – 83.9%) or small- (employing between 10-49 people – 12.3%) businesses.

3.15 Recent increased and sustained high-demand for state-of-the-art research and development (R&D) uses including high-value laboratory and office space, has meant that

certain Micro SMEs (including social enterprises, creative and co-operative businesses and local start-ups) have experienced increasing difficulties finding or affording suitable workspaces or premises in Oxford.

3.16 Where suitable premises for these types of Micro SMEs do exist, they are increasingly coming under pressure for redevelopment, and from rising commercial rents across the city. According to Advanced Oxford's Innovation Engine Update (2023), commercial rents have more than doubled since 2016 when prime office rents were £30/sqft (see Figure 4.1 below for more details). Commercial rent increases are currently being driven by very strong prime laboratory and office markets. According to Bidwells Oxford Office and Labs Databook (August 2025), prime city centre office rents were reported at £63/sqft in June 2025. While prime rents for larger fitted lab space remained constant at £78.50/sqft. Both prime office and laboratory rents are expected to continue to rise at steadily over the next five years.

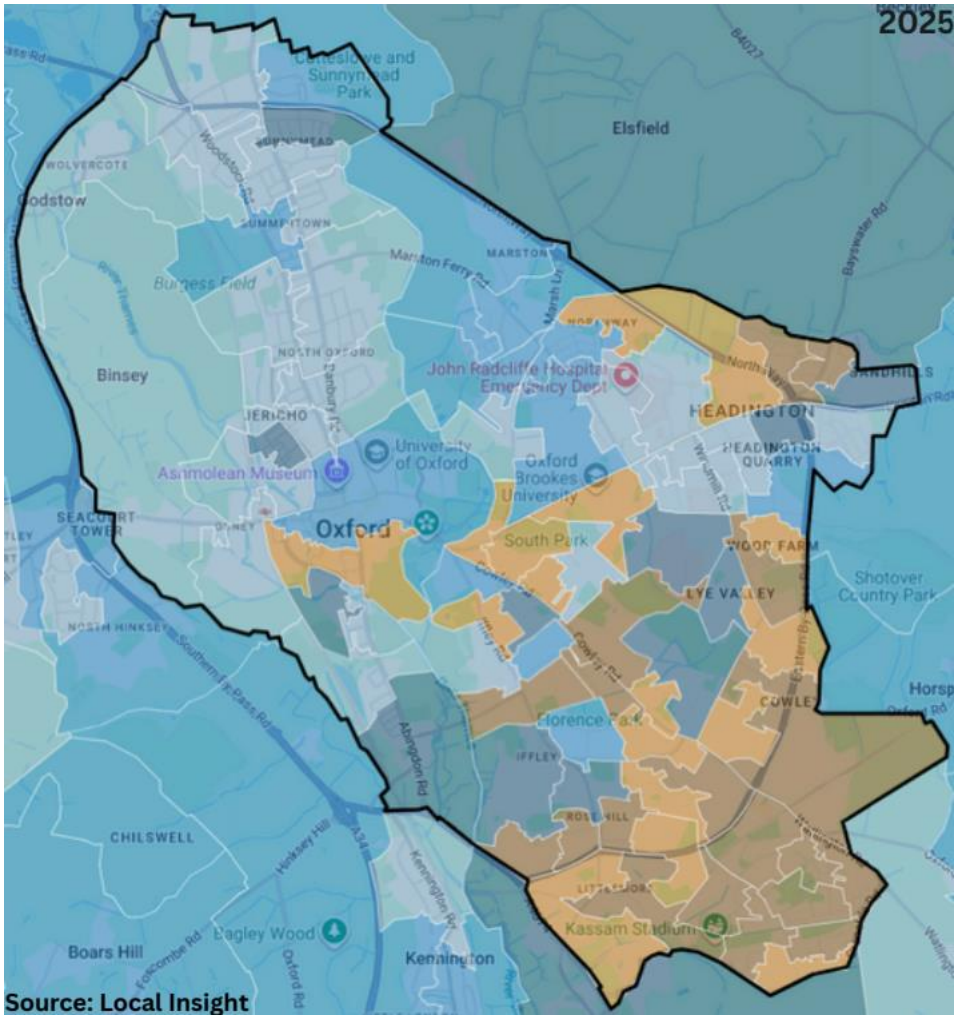
3.17 The dominant type of employment floorspace being proposed and delivered across the city frequently has a large floorplate, which in combination with the prime commercial rents that can command, excludes many business typologies from accessing it. Opportunities to create new premises to support the growth and development of Micro SMEs more generally in the city are restricted by overall land availability and from pressure to deliver other priority uses (e.g., housing) on any sites that do become available. This lack of suitable and affordable premises and workspaces in the city (both existing and proposed) means that many Micro SMEs are at risk of being priced out of the city.

3.18 This is likely to have a negative impact on innovation opportunities, productivity and the overall diversity of jobs in the city. The resulting loss of economic diversity neither benefits the end-users of the high-value, large floorplate uses that are currently dominating provision, nor local people, who many need to travel further (possibly outside of Oxford) to find suitable and affordable premises and workspace.

Education and skills

3.19 Oxford can be described as a well-educated city, with a high number of jobs in knowledge-intensive industries attracting workers with higher levels of qualifications. According to the Nomis website, data from the annual population survey (2024), is presented within Oxford's labour market profile. It shows the number of people aged between 16-64 with different levels of qualifications. The highest qualification level on the Nomis website is described as RQF level 4 and above. RQF level 4 is a higher education qualification and, according to the UCAS website, equivalent to the first year of an undergraduate degree, or a Higher National Certificate (HNC). While an RQF level 3 qualification represents A levels or equivalent. The Nomis data shows that 78,100 or 72.9% of Oxford's resident population aged 16-64 has been educated to RQF level 4 and above.

Figure 3.1 - Map showing levels of education and skills deprivation in Lower Super Output Areas of Oxford – (higher deprivation is marked by darker organge, lower deprivation in light blue)



(Source: https://www.oxford.gov.uk/downloads/file/3851/indices-of-deprivation-2025-oxford-report)

3.20 In 2025, the Government published the latest Indices of Multiple Deprivation. A detailed report, which discusses Oxford's rankings in the Indices of Multiple Deprivation is available on the City Council Website. This report sets out that since 2015 children and young people's attainment in Oxford has been improving, and Oxford has become relatively less deprived. The city is, however, the most deprived of the five Oxfordshire Districts and has one Lower Layer Super Output Area (LSOA) within the 10% most deprived areas nationally. There are 9 areas in total within the city that fall within the 20 per cent most deprived areas nationally. A further 9 areas within the city fall within the 20 per cent least deprived areas nationally. This inequality affects parts of the city more than others.

3.21 The Indices of Multiple Deprivation can be broken down into various categories. The report sets out regarding the Educational Skills and Training Deprivation category - which measures the lack of attainment and skills in the local population - the average score ranking for Oxford was 129 in 2025 compared to 206 in 2019 (the last time the Indices of Deprivation were prepared). This shows Oxford has become relatively more deprived in the Education domain, with 19 LSOA across the city within the 20% most deprived nationally. State

schools across Oxford, particularly in deprived areas, have under-performed compared to regional and national averages.

3.22 Further analysis of the Educational Skills and Training indictor (see Figure 3.1) shows it can be broken down into two sub-domains. These two sub-domains are designed to reflect the 'flow' and 'stock' of educational disadvantage within an area respectively. That is, the 'children and young people' sub-domain measures the attainment of qualifications and associated measures ('flow'), while the 'skills' sub-domain measures the lack of qualifications in the resident working-age adult population ('stock'). In 2019 there were 11 areas in the most deprived 10% nationally for Children and Young People educational attainment compared to only 4 for Adult Skills. Conversely, there were 36 areas that fell within the 10 per cent least deprived nationally for Adult Skills in Oxford compared to 16 for educational attainment for Children and Young People.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 In the absence of a new Local Plan, the importance of the role that Oxford plays to the national economy is likely to continue. This is due to the close ties between research and development (in particular, those associated with the University of Oxford and the Hospitals) and the spin-out companies that are generated because of this close relationship. These innovations through research and development are an essential part of Oxford's economy, both locally and nationally. While it is likely that Oxford's key employment sectors (i.e., education and health) would continue to be linked with innovative research and development, the comprehensive redevelopment and regeneration of certain key sites may prove more difficult.

4.2 The new Local Plan provides an opportunity to ensure that sites allocated for employment uses make the best use of land and contribute to wider plan objectives such as sustainable travel, zero-carbon and enabling the co-ordinated delivery of infrastructure to help mitigate the impact of development. However, without a new plan, there is less certainty that these objectives would be realised in a timely and co-ordinated manner. As such there is a risk that the growth of the city may be prevented or delayed from realising its full potential.

4.3 Given Oxford's global status and international recognition, the city would still be likely to continue to attract direct investment projects. However, external uncertainties created by world events such as the on-going war in Ukraine and the recent introduction of Tariffs by the US, and the impacts of Brexit would be likely to continue to have consequential adverse supply-chain impacts.

4.4 Without a new plan in place, it is likely, providing market conditions remain favourable, that demand for significant additional employment floorspace in the city would continue. This

floorspace has been coming forward at pace on numerous sites across the city. Indications are, that the market remains relatively strong, and that supply has not previously, and is not currently, keeping pace with that demand. This mismatch between supply and demand has led to higher rents across the city. With significant demand for floorspace, there is a risk that sites allocated for other uses (e.g., housing) may come under pressure to be developed for employment uses.

4.5 There is also a risk that the benefits of economic growth may not be felt by all. For instance, it is less likely that the development of Oxford's economy would be able to deliver benefits to all without policies in the new plan being in place. This is because there could be less opportunity for local people to improve their skills and training. It is also likely that there would be fewer prospects for SMEs and start-ups to find affordable workspace in the city.

Balancing economic uses, housing and supporting infrastructure

4.6 Ensuring economic growth is sustainable requires the delivery of sufficient new homes; the timely delivery of effective infrastructure; alongside the creation of new jobs. Striking a balance between delivering new homes and employment floorspace is a key strategic issue. Oxford is a small compact city. According to the City Council website, the Geography of Oxford statistics page sets out that Oxford has a total area of 46sq km (17.6sq miles). It is well-documented that there is a shortage of land for housing in the city as well strong demand and the associated impacts on affordability. As such, Oxford is one of the most unaffordable places to live in the country. This lack of suitable housing acts as a barrier to further economic growth.

4.7 The balance between the demand for housing and employment land has changed since the previous plan was being drafted. Since then, demand for certain types of employment uses have increased and current indications are that this is likely to continue. The current mismatch between employment land supply and demand is helping to maintain high prime rents for lab and office space both inside and outside the city centre.

4.8 Commercial rents are predicted to continue to rise, over the coming years. Advanced Oxford's Innovation Engine Report 2023 provided data from key local agents on how rent levels have increased in Oxford since 2016 to 2022 and then forecast future rent levels from 2023-2027. Figure 4.1 shows the change in rent levels (per sqft) comparing prime office rents with science parks and fitted laboratories.

4.9 Bidwells "Oxford Offices and Labs" Databook (August 2025) showed rent rises in the prime office market from the reported £61/sqft in December 2024 to £63/sqft in June 2025. Prime lab rents however, remained constant at £78.50/sqft, showing no change between December 2024 and June 2025.

Figure 4.1 - showing changes in rent levels (per sqft) comparing city centre office with science parks and fitted laboratories

Year	City Centre Office rents	Science Park rents	Fitted Labs rents
2016	£30.00	£27.00	–
2017	£30.00	£30.00	–
2018	£32.00	£32.00	–
2019	£37.50	£35.00	–
2020	£37.50	£35.00	£55.00
2021	£38.50	£45.00	£60.00
2022	£49.50	£55.00	£75.00
2023(f)	£60.00	£55.00	£76.50
2024(f)	£61.08	£55.99	£77.50
2025(f)	£62.48	£57.28	£78.50
2026(f)	£64.17	£58.82	£79.00
2027(f)	£65.97	£60.47	£79.50

Source: Advanced Oxford Innovation Report 2023

4.10 Oxford is currently in a somewhat unusual situation (outside of Central London), where the delivery of certain commercial floorspace typologies appears to be more profitable than other traditionally higher value uses, such as housing. As such maintaining a blanket protection of employment sites may not deliver the required outcome to boost the supply of housing over the course of the plan period. This is because the extant employment strategy (as set out above) seeks to protect the city's existing locally and nationally important employment sites for further employment uses, as it was written within the context that these sites were under threat from loss to other higher value uses. Considering the current future without the new plan, it is likely that employment sites would continue to receive protection. A new plan provides an opportunity to investigate the potential for new policy interventions that reflect the evolving economic context in which we find ourselves.

4.11 Employment growth should be appropriately located to take advantage of the city's strengths and help to provide a sustainable distribution of business premises and employment land, to help maintain a range of potential job opportunities throughout the city. Oxford's contribution to the national economy and importance to research and development, e.g., health, makes the city's economy particularly important to protect in these times of on-going uncertainty resulting from wider economic factors including Brexit, the longer-term impacts of Covid-19, and the war in Ukraine.

4.12 It may be necessary to safeguard and protect land to deliver sufficient school places; and to control where educational institutions build more student residences, which could result in the loss of land to other non-residential uses.

Affordable Workspaces

4.13 As set out above, Micro SMEs represent a significant proportion of the city's employment ecosystem. According to UK Business Count data for Oxford (2025), 96.2% of the city's businesses are micro- (employing up to 9 people – 83.9%) or small- (employing between 10-49 people – 12.3%) businesses.

4.14 Without the Local Plan 2045, any provision of suitable and affordable workspaces and premises for key Micro SME sectors would rely solely on voluntary provision by developers on a site-by-site basis. It is likely that this would result in a continuing erosion of opportunities for certain Micro SMEs to start-up and remain in the city. This could lead to an increase in the number of Micro SMEs at risk of being priced out of Oxford and the associated negative impacts on innovation opportunities, productivity and a reduction in the overall diversity of jobs in the city.

4.15 Recognising the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity and helping to create the conditions in which all businesses can prosper is one of the objectives of the Local Plan 2045. This objective supports the council's ambition to enable a strong, fair economy – one of the priorities set out in Our Strategy 2024-28. Oxford's Economic Strategy 2032 recognises the importance of affordable workspaces in supporting creative activity, social enterprise, co-operative businesses and local start-ups. It sets out that the creation of affordable workspace in the city would enable a more diverse employment base and give opportunities for evolving sectors (including creative production, low-carbon, technology and digital) to develop and grow.

4.16 The production of the Local Plan 2045 offers the opportunity to consider how the introduction of a policy could support Micro SMEs by enabling the creation and delivery of suitable premises and workspace in the city. The Local Plan 2045 therefore can help to address a failing in the market to deliver suitable premises and/ or workspaces for a significant proportion of the Oxfords' business community.

Economic impacts of the Covid-19 pandemic

4.17 The Local Plan 2036 did not anticipate the Covid-19 pandemic. As such it did not contain any directly relevant policies. In the short-term the pandemic affected people's health, well-being and safety. National lockdowns resulted in the closure of schools and Universities and these closures impacted the quality of children and young people's learning experiences.

4.18 The longer-term economic outlook for Oxford remains positive with on-going investment in key sectors supporting life sciences and the knowledge economy at a variety of locations, such as Oxford North, the West End and Botley Road, and in the south of the city, including at The Oxford Science Park and ARC Oxford. Now looking to the future, Oxford appears set to continue to deliver on its key economic strengths and ambitions.

4.19 However, there are on-going social and economic costs of the pandemic which were presented in research undertaken at University College London (published in November 2024). This research presented the health implications of long-covid using a financial metric to understand the economic impacts and potential severity of the issue. The researchers calculated the economic burden of long-Covid, was primarily driven by productivity losses, which averaged £931 per patient over the six-month period. As the ONS recognised that around two million people in the UK have long-Covid the costs associated with days lost could potentially add up to £20billion a year.

Future role of the city centre, office space and home-based working

4.20 Oxford's city and district centres continue to play an important but evolving role in the city's economy. Encouraging people into the city's network of centres will help to preserve and enhance their vitality and viability. A mix of uses, alongside retail, including employment, community uses, residential and student accommodation is likely to help re-vitalise the city's centres and ensure that these areas are re-energised by activity.

4.21 Pressure on city's office stock remains driven by the accelerated growth in science and technology employment. This sector typically takes up more floor space than other sectors – but evidence suggests that the science sector can adapt to all property types. Existing industrial and retail units can be a more flexible and cost-effective solution for a low-cost fit-out. Recent redevelopments along the Botley Road are an example of this where some of the older retail units have been repurposed as flexible lab-enabled office space offering a flexible mix of office and R&D workspaces.

4.22 There is also potential for repurposing vacant spaces within the city and district centres. This brings social benefits in terms of increasing activity and footfall within the city and district centres as well as helping to drive innovation and economic growth. This approach may benefit vacant spaces in the city and district centres. In the city centre, regular surveys are undertaken of vacant units. The most recent survey data (2025) showed that out of 377 surveyed units 79 were vacant (20.95%). In 2024, out of 383 surveyed units, 75 were vacant (19.5%). In 2023, out of 383 surveyed units, 77 were vacant (20.1%). Redevelopment opportunities do account for some vacancies however the percentages broadly align with a national post-Covid picture that shows higher city centre vacancy rates than were experienced before the pandemic.

Retention and recruitment of staff

4.23 One of the biggest challenges Oxford faces arises from a mismatch between new homes and jobs. The city's growing economy and associated jobs growth in key sectors such as R&D and labs is resulting in an increased pressure on the availability of housing and services (and on Oxford's already constrained transport network). This homes/ jobs mismatch has also led to affordability and housing issues in the city. These issues represent

the concerns most consistently raised by Oxford's businesses in relation to staff retention and recruitment.

4.24 As Oxford is one of the most unaffordable cities in the UK, housing affordability issues also result in over-crowding issues and poor health outcomes. Opportunities to build sufficient new homes within Oxford itself to address this mismatch are limited by the city's size (Oxford is only 46sqm/ 17.6sq miles); its natural and heritage assets (including over 1,500 listed buildings); flood plain; and Green Belt (which covers more than a quarter of the city's total area).

4.25 The mismatch between homes and jobs has resulted in Oxford having the highest net inflow of commuting workers in the Oxfordshire region. The Office for National Statistics has produced an online visualisation tool for origin-destination data entitled Visualising People Flows available on the Office for National Statistics website. This shows that for the Census 2021, there were 28,342 workers recorded as commuting into Oxford out of a total of 92,047 workers aged 16 and over.

4.26 The Census 2021 figures reflect working from home patterns under restrictions imposed by the Covid pandemic. As such, the data does need to be treated with a degree of caution. However, a direct comparison with the Census 2011 data shows a reduction in in-commuting since 2011. The 2011 Census recorded 45,852 workers commuting into Oxford for work out of a total of 88,258 workers living and working in the city. Besides the obvious environmental pressures, commuting generates its own costs which can be significant particularly when they involve long journeys. These are often borne directly by the employee, particularly if they are on temporary or agency-based contracts.

4.27 Oxford City Council's website provides some additional transport statistics from the 2021 Census. This data shows that within Oxford, the most popular mode of transport was active travel (walk or cycle) with 38.8% of commuters choosing this method, while 38.2% of commuters arrived by car or van. This is significantly lower than the 2011 Census figure of 66.8%.

4.28 Finding a way to assist employers with recruitment and retention problems can support the Local Plan objectives in three ways: economically (helping productivity of employers and local investment); through housing (including by providing affordable housing); and sustainability (giving people the opportunity to live closer to place for work; through increased energy efficiency measures; and by through the associated reductions in emissions).

5. Key issues addressed through the Local Plan

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to employment land as well as sustainable and inclusive economic growth objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Meeting Employment Needs

5.3 The NPPF (December 2024), is clear (e.g., paras 20, 86) that local authorities should seek to meet the objectively assessed needs for their area by setting a clear economic vision and strategy, setting criteria and identifying strategic sites to meet anticipated needs over the plan period.

5.4 This section begins by reviewing evidence presented in the ELNA (in particular, in relation to employment need and supply). It then looks at the overall balance, drawing again, on the findings from the ELNA. Moving on to draw conclusions, based on the evidence, about in relation to the plan's employment strategy and how it will deliver the employment needs of the city over the plan-period.

Identified Floorspace Need

5.5 The Employment Land Needs Assessment (ELNA) identifies a total employment floorspace need of 412,460sqm for the plan period 2025-2045. In coming to this global floorspace total, the ELNA considered each of the following broad employment land uses:

- Office (Use Class E(g)i)
- Research & Development/ Laboratory Space (R&D) (Use Class E(g)ii)
- Industrial (Light and General) (Use Classes E(g)iii and B2)
- Warehousing (Use Class B8)

5.6 In coming to the conclusions for each of the four identified sectors, the ELNA considered a number of scenarios, in accordance with the PPG, which have been compared to determine which is the most appropriate for plan-making purposes both to support economic development in the city and to avoid constraining growth.

5.7 Table 5.1 sets out the floorspace identified in the preferred scenarios as set out in the ELNA. This table presents the findings in relation to each of the four land use categories (as described above).

Table 5.1 - Oxford's employment floorspace need 2025-2045

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Warehousing (sqm)	TOTAL sqm
Identified need	21,370	345,004	0	46,086	412,460

Source: Oxford Employment Land Needs Assessment (January 2026)

Employment land supply (floorspace)

5.8 A summary of Oxford's known employment land supply position is included in this Background Paper at paragraphs 2.47-2.51 (above). It is also documented in more detail in the ELNA itself.

5.9 The employment land supply position (as documented in the ELNA), is based on known floorspace figures from extant commitments, submitted planning applications, and sites with known landowner/developer floorspace ambitions. Table 5.2 (below) sets out the known planning commitments (i.e., extant permissions). These have been separated into four main land use categories.

The ELNA has also considered the additional potential supply/ capacity for the city. This was based on an analysis of current major planning applications for employment land uses and known landowner/developer interest. This analysis uncovered circa 185,000sqm of additional employment floorspace.

Table 5.2 - Planning commitments 2025-2045

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Warehousing (sqm)	TOTAL (sqm)
Extant permissions	1,877	352,180	2,997	123	357,177

Source: Employment Land Needs Assessment (January 2026)

5.10 The ELNA also recognises that there are other sites in Oxford with potential to deliver employment floorspace in the plan period. However, while an awareness of these sites is acknowledged, the ELNA sets out (as at October 2025), that relevant site owners/ developers were yet to quantify the scale of opportunity.

Oxford's Employment Floorspace Balance

5.11 The ELNA also looked at the balance of employment floorspace need and supply, providing observations about how the identified employment need (within the four land use categories), could be met within the plan-period.

5.12 Table 5.3 shows the employment floorspace balance for each of the four land uses categories.

Table 5.3 - Balance of employment floorspace need and supply

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Ware-housing (sqm)	TOTAL (sqm)
Identified need	**21,370**	**345,004**	**0**	**46,086**	**412,460**
Planning commitments (supply)	1,877	352,180	2,997	123	35,177
Balance to find (rounded)	**19,000**	**-7,000**	**0**	**46,000**	**55,000**
Potential additional supply/ capacity*		185,000			
BALANCE		**192,000**			

Source: Employment Land Needs Assessment (January 2026)

5.13 The ELNA did not recommend there was a need to identify land for the modest office, industrial and warehousing needs that were identified through each of the preferred scenarios. This is because the ELNA considered that the growth identified within these employment land uses could all be absorbed within Oxford's existing employment portfolio.

5.14 In relation to the considerable identified need for R&D space, the ELNA notes that this can be met from within the committed and potential additional supply/ capacity that has already been promoted to the Council.

Employment land need vs Employment Floorspace need

5.15 Before going on to consider how the plan addresses employment needs, it is worth noting that the phrases "employment land need" and "employment floorspace need" are two different ways in which the objectively assessed needs for employment uses can be expressed. Employment land need expresses the employment floorspace need in terms of land ((i.e., hectares), rather than floorspace (i.e., square metres).

5.16 Expressing employment need in terms of floorspace is particularly useful in Oxford as the amount of land available for employment uses is not being increased. Instead, as will be shown below, the employment strategy proposes intensification (i.e., an increased density) of development across the employment site network with a specific focus towards the city's best performing (or "key") employment sites.

How the plan addresses employment land needs

5.17 At the Reg. 18 consultation stage, the preferred approach was selected because, while it sought to meet objectively assessed employment needs, it prioritised the delivery of much-needed housing (for which an unmet need has been identified). The evidence set out in paragraphs 5.5-5.15 (above) demonstrates that Oxford is capable of meeting all identified employment floorspace needs within the plan period. As such, the plan's employment strategy aligns with the overarching strategy (Policy S1) which seeks to prioritise housing.

Making the best use of employment sites

5.18 Historically, Oxford has needed to protect its employment sites to prevent their losses to other higher value uses (including housing), even resorting to the introduction of an Article 4 Direction in 2014 (now lapsed) to prevent their loss to housing (through permitted development).

5.19 However, as set out above, Oxford now appears to be in an unusual situation (outside of Central London). This is because, currently, delivering certain commercial floorspace typologies appears to be more profitable than other traditionally higher value land uses, including housing.

5.20 As set out above, Oxford is capable of meeting all identified employment floorspace needs within the plan period. In fact, additional analysis of the supply position has shown that 87.6% of total supply of employment generating uses as being put forward within the network of Local Plan 2045 Key Employment sites, or within the city and district centres.

5.21 Further analysis of planning commitments (only) shows the percentage of employment generating uses proposed at Key Employment sites or located within the city and district centres, rising to 97.9%.

Key Employment Sites

5.22 This analysis shows the importance of having a Key Employment Site network within the wider employment site ecosystem. Given its importance, the Key Employment Site network warrants protection to ensure that, should the economic circumstances change during the plan period, the city's most important employment sites are retained to provide support for Oxford's local economy as well as making a continued contribution to the regional and national economy. The Key Employment Site network was established using the methodology included in Background Paper 004a: Key Employment Site Methodology. This process established the designation of 34 Key Employment Sites across the city.

5.23 Policy E1: Employment Strategy therefore includes a presumption against the net loss of employment floorspace at Key Employment sites unless it can be fully justified by meeting set criteria that are designed to protect the wider employment use as well ensuring that the number of jobs in employment generating uses are retained.

Key Employment Sites in the city and district centres

5.24 Outside the city and district centres, all the qualifying Key Employment Sites warrant protection for the reasons outlined above.

5.25 However, within the city and district centres, the extant Oxford Local Plan 2036 offers protection for a range of employment sites. However, analysis of the city centre office

market undertaken as part the ELNA, highlights that some of the office stock is dated, is on small floorplates and is not considered suitable for modern occupier requirements. This alongside permitted development rights within Use Class E, and the need to maintain and encourage the vitality and vibrancy of centres all supports the use of a higher Key Employment Site threshold within the city and district centres.

5.26 It is worth noting that there have also been several recent examples where currently protected employment sites including larger sites (i.e., 0.25ha or more) located within the city and district centres have sought increased flexibility in relation to the planning use class of their future occupiers given the wide range of suitable uses (e.g., housing, student accommodation, retail and hotels) all of which are appropriate to the city and district centres. This reinforces the use of a higher protection threshold for Key Employment Sites located within the city and district centres.

5.27 Background Paper 004a: Key Employment Sites methodology describes the process by which the site size threshold for city and district centres, was reached.

Location of new employment uses

5.28 As set out above, a significant proportion of Oxford's future supply of employment floorspace is being put forward either within the city and district centres, or across the Local Plan 2045 network of Key Employment Sites. However, within the city there are a large number of employment sites (many of them smaller than 0.25ha), on which employment-generating uses already exist (or they are in lawful use for the proposed employment uses class). These sites form part of the wider employment ecosystem, and as such Policy E1 describes these sites as *Existing employment sites not designated as Key Employment Sites.*

5.29 These (generally smaller) employment sites often provide small scale local employment opportunities. As these are sites that are considered to be within a lawful use, Policy E1 introduces criteria to support their regeneration for employment generating uses, which include, making better and more intensive use of the site.

5.30 The Local Plan 2045 therefore seeks to support, the intensification of existing employment sites across the wider ecosystem, specifically focusing redevelopment opportunities towards the network of Key Employment Sites, and within the city and district centres.

5.31 As highlighted in the ELNA, Oxford's modest employment floorspace needs for Office, Industrial and Warehousing uses, can be met within the existing employment portfolio, while the considerable need identified for R&D uses can be met from within the committed and potential supply that has already been promoted to the Council. As such, the there is no need for the plan to identify additional land within the city for employment uses.

5.32 The employment strategy sits within the plan's overarching strategy, the focus of which is to deliver housing (for which there is an unmet need identified). The employment strategy therefore seeks to focus the location of new employment generating uses to the identified Key Employment Sites, the city and district centres, and existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class).

5.33 Ensuring that the city maximises housing delivery is therefore crucial (along with the provision of infrastructure) to helping address associated staff recruitment and retention issues highlighted in paragraphs 4.23-4.28 above, including affordability issues and commuting pressures.

5.34 The next section considers the additional measures the Local Plan 2045 has incorporated within the employment strategy to support housing delivery.

Housing on Employment Sites

5.35 In additional to the locational requirements for new employment generating uses set out in Policy E1, the plan's employment strategy also allows for the complete loss of *employment sites not designated as Key Employment sites*, while supporting their complete loss to housing. In fact, the plan, in recognition of the city's acute housing need, allows for an element of housing delivery across all employment sites in the city. The same objectives exist for all sites. On Key Employment Sites, where housing is proposed that involve a net loss of floorspace, those specific criteria should also be applied.

5.36 It is important that the delivery of housing is prioritised within the city boundaries to help to meet the acute shortage. Without the continued delivery of housing in the city, the key sectors of the economy will not be able to continue to contribute to the economy.

Warehousing, Storage and Distribution Uses

5.37 Given the limited available land in the city, it is important to make the best and most efficient use of that land. As set out above, the plan's employment strategy focuses new employment generating uses towards the existing employment site ecosystem, specifically the larger named Key Employment Sites.

5.38 Large scale warehousing, storage and distribution (B8) uses often have very specific operational requirements, often needing large areas of land in close proximity to key junctions on the strategic road network. It is precisely these operational requirements that dissuade large-scale B8 uses from locating within Oxford. However, small-scale B8 uses, which can be provide useful support for both local and key employers in the city.

5.39 As such, Policy E2 recognises the importance of allowing the city's larger Key Employment Sites to bring forward B8 uses, subject to certain criteria being met, which include residential amenity criteria.

5.40 Given the premium land values associated with the prime city centre office and R&D market, it is not expected that B8 uses would be sought in these locations. However, the potential for Key Employment Sites located within the city and district centres to bring forward an element of small-scale B8 uses was an important consideration in determining the site size threshold for Key Employment Sites located within the city and district centres. It was considered that sites above the threshold were generally large enough to accommodate an element supporting B8 uses.

5.41 This policy would also enable the city to meet its identified floorspace need for B8 uses.

Community Employment and Procurement Plans

5.42 As set out above, Oxford's 2025 Indices of Multiple Deprivation ranking for Education and Skills has fallen since 2019, indicating that the long-standing educational disparities across the city are still prevalent.

5.43 The introduction of a policy requirement for Community Employment and Procurement Plans for qualifying development proposals would solidify the extant approach, which encourages their submission alongside major planning applications.

5.44 This policy will help support a range of opportunities be delivered in the city, including helping to secure training, construction and operational jobs for local residents. This policy also aligns with the City Council's Economic Strategy 2023-32. It would also contribute to wider economic, social and community objectives, and support the city in delivering an 'inclusive economy'.

Affordable Workspaces

5.45 Underpinning the need for affordable workspaces in Oxford are a range of factors which together contribute to the need for intervention. The following factors have been identified through a range of different sources, including the Employment Land Needs Assessment (January 2026), and the Local Plan Viability Assessment (December 2025), the City Council Economic Strategy 2023-32 and the Reg. 18 Background Paper 004: Employment and Inclusive Economy (June 2025). These factors, as set out below, can be summarised as follows:

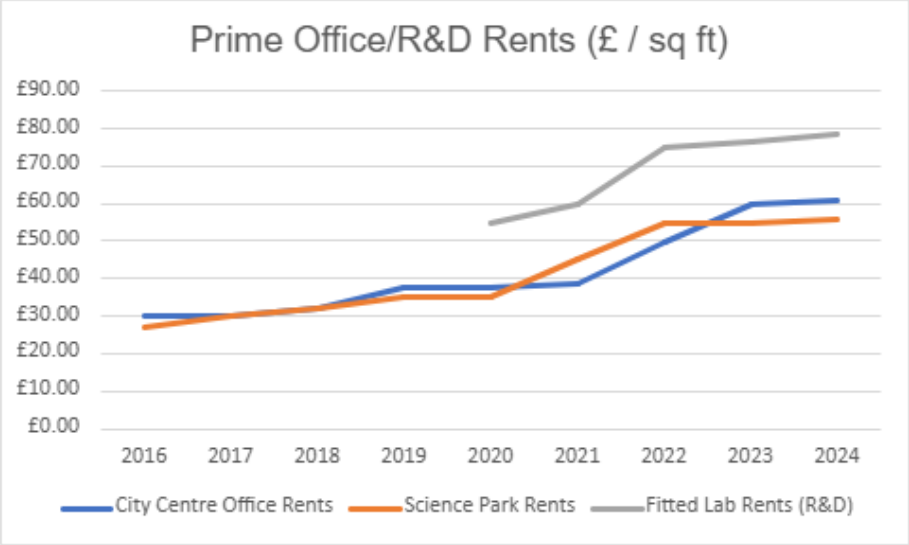
- Affordability
- High demand
- Constrained supply
- Regeneration pressure

Affordability

5.46 Prime office rents in Oxford have been steadily increasing from between £27-£30 per square foot (sqft) rising in line with predicted (2024) rents to, between £61 per sqft. Figure 5.1 (below) shows the changes to Oxford's Prime Office/ R&D rents between 2016-2024. This data is shown above in Figure 4.1, however, the rents for the forecast years 2023 and 2024 have been supplemented with actual reported rents from Bidwells Oxford Offices & Labs Databook (2024, 2025).

5.47 Figure 5.1 shows a step change in prime city centre and science park rents respectively from 2020 onwards. This shift seems to correlate with the introduction to the market, of fitted laboratory space/ R&D.

Figure 5.1 - Oxford Prime Office/ R&D Rent Changes 2016-2024

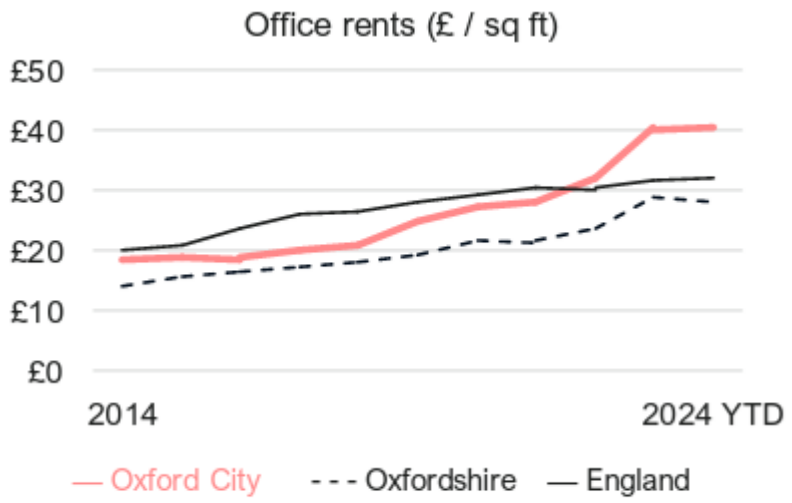


Source: Advanced Oxford (2023) and Bidwells Oxford Offices and Labs Databook (2024, 2025)

5.48 Data from CoStar database for the ten-year period between 2014-2024 (for the 'wider' office market) shows a similar picture post-2020. Average 'wider' office market rents in Oxford (CoStar does not distinguish between office, R&D/ laboratory spaces), seem to rise sharply around 2020. In fact, the data shows that average 'wider' office market rents in Oxford have almost doubled in the period between 2018-2024.

5.49 Figure 5.2 (below) shows the change in average office market rents between 2014-2024 comparing rents achieved in Oxford, with those achieved across the county, and nationally. Office rents in Oxford exceeded the national average in 2022, reaching an average of £40 per sqft in 2023.

Figure 5.2 - Oxford Average Office Market Rent Changes 2014-2024



Source: CoStar (2024)

5.50 The city's industrial/ warehousing market has, however remained static, with the ELNA reporting no new build development for around 25 years. As such, there is likely to be limited evidence of new build prime rents in this sector, which could result in a suppression of rents as they would most likely focus on the secondary market. However, as is set out in the ELNA, static growth in floorspace within these sectors has constrained its supply, which could counteract, to some extent, the impacts of rent suppression.

High demand

5.51 The ELNA notes that when considering the wider office market (i.e., office/ laboratory/ R&D) as a whole, the indications suggest an overall balanced market. However, the qualitative analysis (undertaken through consultation undertaken by the ELNA consultants with local property agents) has highlighted strong demand not only for R&D and lab space, but also for offices (as the market grows into AI).

5.52 The ELNA consultation uncovered that occupiers across the wider officer market (including funders) are looking for high quality space with high levels of sustainability. The demand for office space in the city is from a mix of professional services, servicing the local market, but also those servicing the lab and R&D market, e.g., specialist legal firms. Agents also report strong demand for offices in the city centre.

5.53 The ELNA reports very low vacancy rates within Oxford's industrial/warehousing market. Apart from Osney Mead, the main 'industrial' area is located in the south of the city and comprises of several smaller industrial estates, alongside MINI Plant Oxford and the Unipart site.

5.54 While the city's industrial/ warehouse market is small, there is demand for new units. The ELNA recognises that if new units were to be made available, they would likely to be occupied quickly due to the tight nature of the market. However, any new supply that does comes to the market is likely to be focused towards servicing the R&D market.

Constrained supply

5.55 While the analysis of the wider office market (as whole) suggests a generally balanced market, the supply-side analysis shows that Oxford's planning commitments are almost exclusively R&D-related. In fact, a large number of planning commitments involve the re-purposing or wholesale redevelopment of older secondary office accommodation to create modern flexible lab/R&D workspaces.

5.56 What the boost in supply of R&D masks, however, is a lack of delivery of smaller office spaces some of which are being lost as part of the redevelopment of secondary office space help meet the high demand for R&D in the city. While office space has been previously, and continues to be, lost due to office to residential conversions.

5.57 The lack of additional smaller office spaces, and the losses to other uses, means that the existing secondary stock has become more valuable even though most secondary stock (particularly in the city centre) lacks the quality to meet modern occupier requirements.

5.58 As set out above, the industrial/ warehouse market has seen very little new stock over the past 25 years. The current lack of planning commitments in the industrial/ warehousing market means that many units are fully let, with limited options for upsizing, this can result in occupiers remaining in premises which can lead to slower business growth.

5.59 However, any new future supply of floorspace within these sectors is likely to be high quality flexible space with high sustainability credentials (e.g., Nova, Cowley – a mid-tech building focussed towards servicing the R&D market by providing a flexible space suitable of catering for a range of uses including R&D but with a focus on high-tech, and manufacturing uses).

Regeneration Pressure

5.60 The biggest regeneration pressure facing the city's secondary office and industrial/ warehousing stock is through its loss to R&D and associated servicing sectors.

5.61 This could lead to further erosion of the city's smaller office stock (as well as through its loss through office to residential conversions). Without suitable replacement, the loss of existing smaller office space could increase the demand for, and value of, the secondary office market, even though much of it lacks quality (particularly in the city centre, where post-Covid, modern occupiers have been seeking smaller, high quality spaces with good sustainability credentials).

5.62 Similarly, the industrial/ warehousing market is under pressure, most notably at Osney Mead, for which there is an ambition to convert the industrial estate into an innovation district within the plan period.

5.63 Advice in the ELNA is that to mitigate displacement caused by rising rents and to support a balanced economy, the Council should progress its affordable workspace policy.

Benefits of Affordable Workspace

5.64 The provision of affordable workspace is important to ensure that individuals, organisations and businesses can access a range of employment spaces at affordable rates and on flexible terms for economic, social and cultural purposes.

5.65 Ensuring such spaces are available alongside more traditional employment space can help boost the city's economic strength and diversity. Affordable, accessible workspace provides opportunities to create places of innovation and enterprise that will support the evolution of Oxford's economy, including its social enterprises and priority sectors as they emerge and are identified. In addition to delivering community benefits, such spaces can be key to placemaking from early stages of mixed-use development.

Financial implications of delivering Affordable Workspaces

5.66 The Oxford Local Plan Viability Study (December 2025) provides an assessment of the financial implications of delivering affordable workspaces using a variety of employment typologies. This evidence tests two main approaches.

5.67 The first considers the viability implications of providing 10% of the floorspace at a variety of discounted rents. The second approach considers the implications of delivering 1,000sqm of floorspace (again, at a various rental discounts). According to the West London Alliance Affordable Workspace Study (June 2021) where (affordable) workspace is delivered that requires an operator to manage it, 1,000sqm is generally considered to be the minimum floorspace required to operate a sustainable business model.

5.68 Generally, the study showed that the larger typologies could support a degree of delivery of affordable workspaces. Sites located within the city centre being less impacted than those outside it. Overall, the viability study indicated that the larger typologies (i.e., those sized at 5,000sqm or more) were less impacted by the two main approaches.

5.69 As expected, as rent reductions increase, residual land values do fall, but depending on which typology applied to which approach, there are variations in the scale of impact on residential land values.

5.70 Overall, the viability testing supports the threshold within the policy and the policy requirement to produce an affordable workspace strategy. The sites listed within the policy

are all those capable of bringing forward larger developments (i.e., a net gain of 5,000sqm GIA or more floorspace) within the viable typologies for employment generating uses.

Delivering affordable workspaces through Policy E4

5.71 Policy E4 does not set an a floorspace requirement to be delivered as affordable workspace. Instead, it includes a requirement to produce an affordable workspace strategy and provides details of what to include within said strategy. The supporting text provides that affordable workspaces should be delivered on-site and this is supported by the viability testing.

Hotal and Short-stay accommodation

5.72 The Hotel and Short Stay Accommodation Study (2023), shows that Oxford has a good range of hotels and serviced accommodation within the city, noting that there has also been some growth in short-stay accommodation. The study also recognises that there is a need for further hotel accommodation within the plan period.

5.73 The study supports the spatial approach to the accommodation of future growth this sector, both in terms of new, and expanded short stay accommodation in Oxford. It clearly articulates support for the locational approach taken within the plan to direct new hotels towards the city and district centres, and the main arterial routes into and out from the city centre. It also sets out support for the approach to existing sites.

5.74 The study also highlights that, in some cases there may be some crossover, between the city and district centres/ arterial roads, and Key Employment Sites, such as in Headington and Cowley.

5.75 The study also acknowledges that there are likely to be some ‘business aspects of tourism’ resulting from the additional employment floorspace and emerging clusters that are identified in the ELNA. This will help to ensure that any overnight visitors to these businesses would not need to travel.

5.76 The study also recommends the use of policy thresholds and accompanying criteria (including viability) in order to protect larger properties. However, the study also reflects on how the sector can support housing delivery further, within the context of its locationally focused policy approach. As such the study recommends an approach whereby smaller premises (i.e., those below the threshold) should be allowed to change their use to residential without the need to undergo a viability assessment.

5.77 The study provides a detailed short-term assessment of likely need for future bedspaces and then assumes a longer-term average (post-2030). For the 2025-2045 plan-period this equates to just over 3,800 bedspaces in total (circa 190/year).

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Appendix A – Policy options and preferred approaches

Policy options set 004a-1:(draft Policy E1) Addressing employment land needs

1. The city's current employment strategy for meeting identified employment land needs (as set out in the Oxford Local Plan 2036) sought to protect the city's most important existing employment sites and supported the development of additional land for employment uses as part of a mixed-use strategic allocation at the city's northern gateway. Now known as Oxford North, this site is delivering 87,300sqm of commercial floorspace to support the knowledge economy, alongside residential development, at the northern edge of the city. Previous economic evidence showed that Oxford's continued policy of economic restraint was appropriate.

2. Post-pandemic, the city has seen increasing demand for high-value employment floorspace (such as R&D, lab-space and flexible lab-enabled office accommodation). Oxford's employment land supply is in a strong position with a significant amount of high-value, high-demand floorspace permitted in the last five years. The majority of this permitted floorspace is coming forward at pace and likely to be delivered in the early part of the plan period. This strong supply position aligns with the established and escalating demand for this type of floorspace. The employment strategy option set considers several approaches as to how Oxford could address its identified employment land needs for the plan period.

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Employment Strategy – Draft Policy E1

3. Draft Policy E1 combines the preferred approaches from four the following four options sets. Each options set considered a discrete element of the policy. The four options sets are as follows:
   - 004a-1: Addressing employment land needs (see table A1.1 conclusions)
   - 004a-2: Making the best use of employment sites (see table A1.2 conclusions)
   - 004a-3: Housing on Employment sites (see table A1.3 conclusions)
   - 004a-4: Location of New Employment Uses (see table A1.4 conclusions)

4. The preferred approach for each option set is set out below and includes a brief commentary about how that particular option was chosen.

Table A1.1 - Policy options set 004a-1: Employment Strategy – how the plan addresses employment land needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Attempt to meet employment needs, but prioritise other uses, in particular housing, rather than employment, even if employment needs cannot be met in full within the city, recognising that existing sites in lawful commercial use cannot be changed from that use against the landowner's will, so intensification on those sites is appropriate.	It is not possible to truly 'balance' housing and jobs, because it is not realistic to assume the majority of people will live their lives confined by Oxford's boundaries, there are benefits to an overall approach focusing on allocating new sites for housing and focusing on an approach of intensification and modernisation at existing employment sites (as opposed to allocating new employment sites through the Local Plan) in the city at the current time. This would help reduce problems created by significant in-commuting. Also, employers have reported significant difficulties attracting and retaining staff because of a lack of housing and its expense. To help current employers maintain their success may require a focus on new site allocations for housing and potentially allowing elements of existing employment sites to be converted to housing.	This approach could mean that some employment needs might need to be met outside the city. If this was the case a strategy for meeting those needs across Oxfordshire would ideally need to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.
Option B Focus employment strategy on meeting all identified employment land needs within	Oxford's economy makes an important contribution locally, regionally and	This strategy could result in schemes for employment land being promoted across

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Oxford's boundary. Do not seek to prioritise other uses if employment need cannot be met. Actively investigate ways to meet employment land needs within the city through providing appropriately located employment land/ new sites (if required).	nationally, and this approach acknowledges that strength and focuses on it. Meeting our identified employment land needs within the city boundary would mean that there would be no cross-boundary issues for employment land. A wide range of jobs would be supported under this approach. This is because the Plan would actively seek to meet all employment land needs (not just focusing on Oxford's key strengths but This would allow a wide variety of entry points into the labour market, helping to overcome issues such as labour market exclusion, both actual and perceived.	the city. Such schemes could come forward at the expense of other priority uses (e.g., housing). A shortage of housing in the city, and its expense, has been previously reported by employers as one of the key reasons that they have for having difficulties attracting and retaining staff. Depending on the level of need identified, this approach could have adverse impacts on housing delivery, which may have cross-boundary implications requiring a strategy to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs. There are also implications for transport and travel. This option could potentially result in increased in-commuting.
Option C Let the market decide the most appropriate employment land uses to deliver and actively support new locations for employment development if there is market demand for these spaces. Rely on the Framework (NPPF) and other policies in the plan to determine	Oxford's economy makes an important contribution locally, regionally and nationally, and this approach acknowledges these economic strengths and would focus on them by supporting key sectors (such as laboratories/ flexible lab-enabled office accommodation).	This approach could result in schemes for employment land being promoted across the city. There is a risk that schemes could come forward at the expense of other priority uses (e.g., housing). As such, this approach could have potential cross-boundary implications for housing.

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applications for employment land in the city.	The office/ lab market is generally considered to be strong and resilient in Oxford. Current market conditions support delivery across the city. A market-led approach would provide flexibility to changing market conditions which could respond quickly and enable other land uses to be delivered (e.g., housing) across the city if market conditions were to change.	It is likely that lower-value, lower density employment-generating land uses (e.g., industrial/ warehousing) would not be able to afford to be in Oxford. As such, these uses may not be brought forward within the city. It is likely that these uses would be delivered outside the city boundary, which may have cross-boundary implications requiring a strategy to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** Unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options have already been considered holistically as part of the wider growth strategy alternatives appraisal. While there are some minor negative effects likely on the SA objective for green spaces resulting from Option B, and potential uncertainties around whether homes or employment land would be delivered resulting from Option C, any likely effects are not considered significant.

Table 004a-1: Addressing employment land needs - conclusions

5. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. This is because it was considered important to align the employment strategy with the plan's strategic focus to prioritise housing delivery (which supports the economy by helping to address long-standing barriers to economic growth relating to housing supply and associated affordability issues in

the city). This option would enable employment development to take place on existing sites which would help meet identified employment land need while also supporting the delivery of much needed housing.

Policy options set 004a-2 (draft Policy E1): Making the best use of employment sites

6. Traditionally, Oxford has protected its employment sites to prevent losses to higher value uses. In the past such uses have been residential in nature. More recently, higher value land uses in the city have been related to research and development and the importance of delivery of these uses has been prioritised nationally through incentives and linkages to increases in productivity. Oxford's economic strategy encourages the city to build on its key strengths in life sciences, research and development, while aiming to meet the city's overall employment needs in a way that enables a diverse economy.

7. Given the high demand for high value floorspace in the city, well-performing employment sites that support the city's local economy or provide important local services may come under pressure for redevelopment. Given the permissive changes outlined within Use Class E of the Use Classes order, there may be limited protection that can be afforded to these sites through the planning system. However, there is an opportunity to provide protection for locally important employment sites outside of Use Class E (i.e., those in Use Class B2).

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Table A1.2 - Policy options set 004a-2: Making the best use of employment sites

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – existing OLP2036 approach Seek to meet employment land needs through appropriate modernisation and intensification of the city's employment site network. Protect the city's most important employment sites, which are named in the plan, from loss to other uses.	Continuing to provide protection for the city's most important employment sites is likely to continue to support a focus that aligns with Oxford's key strengths and support the local economy. Has the potential to support the delivery of sustainable transport solutions as intensification opportunities are at known locations.	The continuation of this policy approach could result in a lack of support for the some of the city's Category 3 employment sites. Although poorly performing in economic terms, some of these sites can provide a social value by adding economic variety, diversity and low-cost/ affordable workspaces which can benefit Oxford's economy.

Allow the loss of poorly performing sites to other priority uses e.g., housing).	This approach allows the loss of poorly performing employment sites to other uses (e.g., housing). Supporting housing delivery can help to reduce barriers to economic growth.	
Option B Seek to meet employment land needs through appropriate modernisation and intensification of the city's employment site network. Outside the city and district centres, protect a range of important employment sites that support the local and regional/ national economy. Include criteria-based approach to the loss of employment sites. Take a flexible approach to the continued use of existing employment sites in highly sustainable locations (i.e., city and district centres). Consider inclusion of criteria to support decision-making process.	Continuing to provide protection for the majority of the city's network of employment sites is likely to help to ensure a continued diverse network of employment sites remain in the city. This can help maintain a range of employment opportunities are available. Taking a flexible approach to the continued of employment sites in sustainable locations could enable the delivery of other appropriate uses (e.g., housing/ other town centre uses) in some of the city's most sustainable locations.	Not protecting employment sites inside the city and district centres would let the market decide on the most appropriate uses in these locations. This could potentially lead to uncertainty and potential difficulties in planning for and meeting employment land needs in these areas.
Option C Rely solely on national planning policy/ other policies in the plan	This option would provide flexibility for landowners/ developers to respond quickly to market conditions and is likely to support the continued growth of high-value, high-demand uses such as R&D.	Important sites that contribute to the city's economy could be lost as this approach would not actively protect employment sites. The market would ultimately decide on the most appropriate employment uses for the city.

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		This could result in more high-value, high-demand employment uses being delivered and would ultimately lead to uncertainty and increased difficulties in planning to meet the city's identified employment land needs.
Option D Protect all employment sites to support meeting identified employment land needs. Do not support the loss of employment uses on any existing employment site. Encourage intensification and modernisation of employment sites across the network.	Continuing to provide protection for the city's network of employment sites is likely to help to ensure a continued diverse network of employment sites remain in the city. This would help to deliver a broader selection of employment sectors than those associated and aligned with Oxford's key strengths.	As all employment sites would benefit from protection under this option, there would be no scope for their loss to other uses other than through permitted development. Including protection for all existing employment sites could result in employment opportunities coming forward on poorly performing or poorly located employment sites which could otherwise be redeveloped for other uses (e.g., housing)

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Options a) - d) **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** No – all options align broadly with national policy. The effects of Option A on the SA Objectives are likely to be broadly neutral as this option takes forward the current Local Plan 2036 approach. Option B, while similar to option A could enable a wider range of uses, including priority uses such as residential development to come forward in sustainable locations such as the city and district centres. This could have minor positive impacts on certain SA objectives (e.g., housing), but would ultimately depend on the implementation of specific sites based on landowner interests. Option C could have minor positive or negative impacts on certain

objectives such as different aspects of economic growth and housing. This option would ultimately lead to the determination of development proposals being guided solely by national policy which may cause increased uncertainty in the decision-making process. Finally, Option D would broadly strengthen the protection of all employment sites across the city which could have minor negative impacts on housing delivery.

004a-2: Making the best use of employment sites – conclusions

8. The preferred approach for the Local Plan 2045 policy is to take forward **option B**. As set out above, the plan's strategic focus is to prioritise the delivery of housing as it helps to address barriers to economic growth. However, in a compact, constrained city, such as Oxford, with current strong demand for certain employment types, protecting the city's most socially and economically important or "key" employment sites for continued employment use and supporting their appropriate intensification and modernisation forms a key element of the preferred approach. In highly sustainable locations (i.e., the city and district centres), flexibility is important to ensure the on-going viability and vitality of the city's centres. This means that smaller sites in the city and district centres will not be protected for on-going employment uses.

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Policy options set 004a-3 (draft Policy E1) - Housing on Employment sites

9. Given Oxford's long-standing housing availability and affordability issues, which have often been cited by employers as key barriers to attracting and retaining staff, we are considering the introduction of a permissive approach to housing delivery across the city's employment site network. Delivering new homes in Oxford is an important aspect of addressing these known barriers to economic growth.

10. It is important to ensure that any approach that supports new homes on existing employment sites does not need lead to situation where it undermines the ability of sites to deliver employment floorspace required to meet the Oxford's identified employment land needs.

Table A1.3 - Policy options set 004-a3 - Housing on Employment sites

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach

Option A – existing OLP2036 approach Does not specifically allow an element of housing delivery on existing employment sites.	If Oxford was unable to meet its identified employment land needs in the city, it would be important to ensure that existing employment sites were not further diversified for other uses.	Not all landowners/ developers of employment sites would necessarily want to bring forward housing on their sites, however some large key institutions representing significant employers in the city (e.g., hospitals – 19.8% of the city's workforce was employed in the health sector in 2023 according to Nomis). This approach could undermine efforts to house hospital staff on their own sites, which enables the recruitment and retention of key workers, some of whom would otherwise struggle to live in the city.
Option B Allow an element of housing delivery on existing employment sites (if other policy requirements are met (e.g., around flood risk).	Locating housing and jobs in close proximity to one another can bring benefits for local services and facilities. It also has the potential to deliver more homes within Oxford city. This may help Oxford to meet its housing need and provides flexibility to respond to changing circumstances and values over time (even if owners/ developers are not interested in delivering housing to their sites at the present time). Certain sites, such as Old Road Campus (where important research linked to science and innovation takes place), and	It will be important to ensure that any housing that does come forward on the city's employment site network does not prejudice Oxford's ability to meet its identified employment land needs otherwise a strategy for meeting those needs across Oxfordshire would ideally need to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs. It will be important to ensure that, if housing is allowed to be delivered (through a permissive approach) across the city's employment site network, that it is not to

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	the hospitals (which are important for health care treatment and research), need to be supported to both continue to contribute to the economy, and where appropriate, to investigate opportunities to house key workers who may otherwise struggle to remain in the city.	the detriment of the important contribution that Oxford's economy makes locally, regionally and nationally.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects **Screened in for detailed appraisal? -** No **Rationale**: These options have been assessed within the wider context of the growth strategy alternatives appraisal. They do not require further detailed appraisal as they are only likely to have minor positive or negative neutral or negligible effects. Option A is likely to have broadly neutral effects on all SA objectives as it would maintain the current Local Plan 2036 policy approach. Option B could have some minor positive effects on SA objectives such as housing and transport-related objectives as supporting additional homes in the city across all employment sites could help to address housing and commuting issues however the amount of new homes that could be delivered would likely depend on implementation as it would not be possible to mandate new homes without landowner agreement.

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Table 004a-3 Housing on Employment Sites - conclusions

11. The preferred approach for the Local Plan 2045 policy is to take forward **option B**. This option aligns with the plan's strategic focus to prioritise housing. The preferred approach recognises the importance of housing delivery but also the value that existing businesses and sites bring to the city. As such, housing proposed on the city's network of key employment sites must not undermine the continued operation or integrity of successful businesses and employment sites. The preferred approach includes wording to that effect.

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Policy options set 004a-4 (draft Policy E1): Location of New Employment Uses

12. Given Oxford's limited land availability and the importance of delivering other priority uses in the city (in particular, housing), it is important to ensure that new employment uses are supported in appropriate locations across the city.

13. There are a number of areas of the city where business and innovation sectors are clustered. These sites play an important role individually, and collectively they contribute to economic growth nationally, regionally and to the local economy. These include the Oxford Science Park; ARC Oxford (formerly Business Park); Old Road Campus; the Hospital sites; Oxford Science Area and Keble Road; the Radcliffe Observatory Quarter; Oxford North (which is now being built out); and the West End regeneration area.

Table A1.4 - Policy option set 004a-4: Location of New Employment Uses

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Support new employment uses (through modernisation and intensification) at existing employment sites and sites specifically allocated for employment uses in the plan only. Do not allow any new employment-generating uses outside of these locations (i.e., do not allow the loss of existing housing sites to employment-generating outside the city and district centres). Allow new employment uses in the city and district centres (subject to their role and function).	This option would retain the geographic focus of locating new employment-generating uses in existing centres and specified employment locations. Continuing to focus new employment-generating uses in existing employment locations can bring connectivity and infrastructure benefits. Restricting new employment-generating uses to existing employment sites can support housing delivery in the city by limiting pressure to bring forward housing sites for high-value, high demand employment uses (e.g., R&D)	This approach would continue to support employment-generating uses within existing sites only. This could result in more development being pushed towards the southern edge of the city which includes the locally important Garsington Road cluster as well as key city employers such as the Science Park, ARC Business Park, Unipart site and Mini Plant Oxford. While significant strides have been made towards re-opening the Cowley Branch Line to passenger trains, this area is currently poorly served by public transport, and active travel routes. If by restricting the locations where new employment-generating uses are

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		acceptable in the city, this results in constraints to its future supply, this could increase the demand for high-value employment uses. This could result in pressure to redevelop lower-value employment sites to try and keep up with the demand for higher value uses.
Option B As Option A (above) but rather than restricting new employment-generating uses to existing sites, instead allow new employment uses, in a limited number of suitable specified locations (e.g., adjacent to exiting employment sites) Depending on the location, there may be merit in requiring certain sites to bring forward a mixed-use expansion including residential).	As above except this approach would enable key clusters to expand and continue to support Oxford in building on its economic strengths. If Oxford is unable to meet identified employment land needs in the city, this approach may provide a pragmatic way forward which could help support the delivery of additional housing and employment land.	Given Oxford's small size and limited opportunities for new development, actively supporting the creation of additional employment land in the city could negatively impact the delivery of other uses including housing and much-needed affordable housing.
Option C Rely solely on national policy and other policies in the plan (e.g. hierarchy of centres) to determine proposals for new employment floorspace in the city.	Recent changes to the NPPF strengthen support for economic growth and specifically mention laboratories as a key sector to stimulate the economy. This market-driven option is likely to support the delivery of high-value, high demand uses (e.g., R&D/ lab). This is an important sector, which would support national economic objectives.	Outside of the city and district centres, where Class E employment uses would be supported as "town centre uses", the plan would not provide any policy guidance on the location of new employment-generating uses. As a small, compact and constrained city, although Oxford is an inherently sustainable location for development and there could be increased pressure to deliver employment-generating uses in the city. However, this increased

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		pressure would be likely to be limited to unallocated sites that would need to comply with national policy. An absence of local policy in this instance could potentially increase uncertainty over where new employment uses could be delivered, if the strength of the commercial market was to soften in relation to the housing market over the plan period.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects. **Screened in for detailed appraisal? -** No **Rationale:** These options have been considered more widely within the context of the growth strategy alternatives appraisal. Detailed appraisal of these options is not required. Options A and B are similar. The effects of Option A are likely to be neutral against all SA objectives as this option would carry forward the current (LP2036) approach. Option B could have potential minor negative effects depending on the precise location of any expansion and factors such as the environmental quality of any land taken for development, but the precise nature of any effects undertaken at this stage would depend on implementation and would ultimately require more detailed site-specific assessment, which would be subject to a separate appraisal against the SA Framework. Option C would be likely to result in uncertainty in the decision-making process which could result in some minor negative effects on certain SA objectives (e.g., certain aspects of economic growth could be weakened but it is unlikely this objective would be significantly impacted upon by these locational uncertainties. It could ultimately involve more resources at the development management stage as each site would need to be assessed on a case-by-case basis to work out whether the location was suitable for employment uses.

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Table 004a-4: Location of New Employment Uses - conclusions

14. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. Limiting the acceptable locations for new employment-generating uses in a constrained city such as Oxford broadly aligns with the plan's overall strategy to prioritise housing. Focusing new employment-generating uses towards existing areas of employment can help to overcome existing accessibility issues and bring connectivity to support existing employment clusters through the delivery of key infrastructure projects (e.g., re-opening of the Cowley Branch Line to passenger trains).

Policy options set 004b (draft Policy E2) Warehousing and Storage Uses

15. New large scale B8 uses are usually low-density and do not generally make an intensive land-use. As a small, compact and constrained city, there are numerous competing pressures for land in Oxford. This means that there is often a need to make the best, or most efficient use of any land that comes available. As such, new B8 uses are not always the most appropriate use for land within the city. Freight consolidation can support Oxford's transition to a zero-carbon future. One of the actions highlighted in the Zero Carbon Oxford Partnership roadmap and action plan was to pilot freight consolidation around the edge of Oxford. This is to help deliver a successful transition to Zero Carbon living. It is important that the Local Plan 2045 does not prevent this taking place.

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Table A1.5 - Policy options set 004b: Warehousing and Storage Uses

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – Existing approach New B8 uses on sites not already lawful use are only allowed where the use is essential to the operation of a Cat 1 site Loss of B8 uses generally supported unless B8 use is essential for the ongoing support of a Cat 1 site.	This option would prioritise employment land in the city for more efficient and intensive land uses. By restricting B8 uses to support the operational requirements of the city's most important (Category 1) employment sites ensures that new B8 uses are delivered in way that supports and enables the continued or enhanced operation of employment sites with clear links to wider	Limiting B8 uses to Category 1 sites can preclude the legitimate expansion needs of suitably located local businesses that make a positive contribution to the economy by providing jobs to local people.

	economic aims as set out in national policy.	
Option B Where new B8 uses are allowed would be widened to enable support for the continued operation of locally recognised employment sites and those that support the national economy. Loss of B8 uses would generally be supported unless the B8 use is essential for the ongoing support of sites on which new B8 uses are allowed.	This option would support a wider range of employment sites to deliver B8 uses which could enable local businesses to expand and remain in Oxford, which can provide key services and support local jobs. This would align with national economic objectives relating to the continued growth of existing employment sites.	This approach would reduce the priority given to other uses that support the local, regional and national economy. It could bring B8, which often generates transport by HGV and LGV, into unsuitable areas. It allows this use which does not make best use of limited land.
Option C (in combination with option a) or b)) Introduce a specific exemption to enable the pilot of a suitably located freight consolidation centre	This option would enable LGV/ HGV freight to be moved to electric delivery vehicles, e-bikes and cargo-bikes at the edge of the city, rather than petrol and diesel LGVs and HGVs moving into residential areas and the city centre for deliveries. This would help to deliver City Council and partners' zero carbon partnership aims to decarbonise last mile deliveries in the city.	Any relaxation would need to be carefully managed to ensure it does not open up the potential for significant new storage facilities that do not make efficient use of land and that may not be well located in terms of the road network and avoiding congestion.
Option D Further restrict new B8 uses so they are generally not supported at all.	Further restriction of this inefficient land use could provide more land for priority uses.	Restricting B8 uses further in the city may result in potential difficulties for employment sites that rely on some B8 for their continued operation.

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Option E Rely solely on national policy and other policies in the plan to assess applications for B8 uses in the city.	Could see an increase of B8 uses on a range of sites in the city, providing services and jobs.	Would neither actively restrict nor promote B8 uses in the city and would allow market forces to dictate the demand for B8 uses. This approach could reduce the priority given to other uses that support the local, regional and national economy.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b (in combination with c) or d or e **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects. **Screened in for detailed appraisal? -** No **Rationale:** Two of the options (Option A and B) seek to restrict the location of new B8 uses to certain existing employment sites, while one option (Option D) does not seek to support new B8 uses at all in the city. Option D (further restriction) is likely to have a minor negative impact the SA objective for economic growth as not supporting new B8 uses at all in the city may result in difficulties for sites that rely on an element of B8 for their continued operation. While not having a policy could lead to uncertainties about future delivery of B8 uses on sites where they may be needed, this is unlikely to have a significant effect. Option C is a supplementary option and is considered in-combination with Options A and B. This option would be likely to deliver minor positive benefits which wider carbon reduction objectives. Option A would have a likely minor negative effect on economic growth as far as local supporting locally recognised employment sites, but this would be balanced out by a likely minor positive effect supporting nationally important sites and significant local employers. Option B (in combination with Option C) would be likely to have a minor positive effect on economic growth as it would support the widest selection of employment sites and could support existing businesses to expand, while remaining in Oxford. This can support local jobs and services.

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Warehousing and Storage Uses – Draft Policy E2

16. The preferred approach for the Local Plan 2045 policy was based on the options set out in the above option set only. The preferred approach was to take forward a combination of **options B and C**. New warehousing and storage (B8) uses often involve large-scale developments that do not make an intensive land-use. As they do not always make the best use of available land, they are not always the most appropriate use for land within the city. It is important to support appropriately located B8 uses where they support the ongoing needs of businesses in the city. Option B supports B8 uses at a slightly wider range of employment sites than is currently allowed through the extant Oxford Local Plan 2036. This means that local businesses who operate on important locally important employment sites will also be able to deliver small-scale B8 uses to support jobs and continued employment-related uses on identified sites. Option C helps support the Council's wider net zero ambitions to decarbonise 'last mile' deliveries in the city.

Policy options set 004c (draft Policy E3): Community Employment and Procurement Plans

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17. Community Employment and Procurement Plans (CEPPs) have an important role to play in securing opportunities that arise from new development. In the operational phase of development, agreements to secure a proportion of the longer-term workforce or supply chain locally or commitments to community education and outreach can ensure ongoing benefits. In the construction phase they can provide opportunities for local people to be employed in the building industry (e.g. through apprenticeships/ training/ making links to local schools and colleges) or secure commitment from the developer to procuring material and labour locally. Another option is to commit to paying employees the Oxford Living Wage and only using contractors who pay this higher level than the National Living Wage.

Table A1.6 - Policy options set 004c: Community Employment and Procurement Plans

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Introduce a policy requiring applicants to submit a Community Employment and Procurement Plans alongside major development proposals, which also looks	Would introduce a partnership mechanism for securing community benefits from major development projects. Would help deliver the aims of the Economic Strategy and implement part of the linked Action Plan.	This could be seen as an unnecessary or onerous requirement of developers.

at the potential for engagement with training and education.		
Option B Encourage applicants to submit a Community Employment and Procurement Plans alongside all major development proposals but do not make this a policy requirement.	A voluntary approach would be flexible but applicants could still be encouraged to embark on CEPPs to provide opportunities for local people as they saw fit.	The voluntary approach is limited in scope and potential contribution that could be made. Measures set out in TAN are only presented as advice and guidance, no obligation to implement and no mechanism to monitor or enforce.
Option C Do not encourage or require applicants to submit a Community Employment and Procurement Plans.	Increased flexibility for applicants.	Removing encouragement from supporting text of plan may actively discourage applicants to submit Community Employment and Procurement Plans.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects. **Screened in for detailed appraisal? -** No **Rationale:** The options most directly influence criterion 12. Economic growth, by providing for greater amounts of employment opportunities within the city. They are possible impacts on other criteria in the SA framework indirectly where these have a relationship to economic growth (e.g., accessible services/facilities, inequalities). Option a would be likely to have a minor positive impact by providing access to education and employment opportunities to local people. Option b as a continuation of the status quo, is likely to have neutral impact, whereas option c would be a retrograde step as the plan would not actively encourage skills and training opportunities. Overall, this option set is unlikely to have significant effects and therefore can be screened out from further assessment.

Community Employment and Procurement Plans (CEPPs) - Draft Policy E3

18. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. Community Employment and Procurement Plans (CEPPs) have an important role to play securing opportunities that arise from new development. CEPPs can help businesses by addressing skills shortages locally through supporting appropriate training, apprenticeships and providing other commitments local both at the construction and operational phases of development. The preferred approach is to include a policy requiring CEPPs to be submitted alongside applications for qualifying developments.

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Policy options set 004d (draft Policy E4) – Affordable workspaces

19. Oxford's economic successes have brought with them unforeseen challenges. Post-pandemic, the city has seen significant and increasing demand for high value employment land uses (such as R&D and flexible lab-enabled office development). This relatively new and high demand for these high-value land uses, coupled with a constrained land supply and a need to deliver other priority uses such as new homes in the city, has resulted in increased pressure to redevelop lower value premises across the city's employment site network.

20. A need for affordable workspaces to support certain identified sectors of Micro SMEs has been created by a combination of rising rents, high demand for larger-floorplate, high-value land uses, a lack of physical space in the city, and increasing land values have resulted in a failure in the market to provide suitable accommodation for a range of businesses and enterprises that can contribute to and support the economic diversity of an area. Oxford City Council's Economic Strategy highlights some of the key sectors that require these spaces. It also sets out the importance of providing affordable workspaces for the 'inclusive economy' i.e., to support creative activity, social enterprise, co-operative businesses and local start-ups in the city. The following options were considered.

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Table A1.7 - Policy options set 004d: Affordable workspaces

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Introduce a policy requirement to deliver affordable workspaces on larger commercial development sites (in use Class E)	Likely to be the approach which would secure the most affordable workspace and help facilitate an inclusive and diverse economy.	Depending on the requirements of any future policy, this approach may be considered onerous. It will need to be backed up by appropriate viability evidence.
Option B Introduce text in the local plan encouraging employers to deliver affordable workspace in the city.	Allows the market flexibility to determine the type of employment space provided.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city. Not providing support for affordable workspaces in the plan would not help to secure and deliver these types of spaces.

		As such the wider benefits from economic growth linked to Oxford's key sectors in science and innovation, would not be realised by all the city's residents.
Option C Do not incorporate the concept of affordable workspace in the Local Plan.	Leave the market to determine the type and amount of employment space to be provided across the city.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city and therefore to help secure the benefits of a strong, fair and inclusive economy.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** While the policy may have economic and social value benefits, in land-use terms, development is happening anyway and is likely to be needed to support the delivery of affordable workspace on qualifying sites.

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Affordable workspaces – Draft Policy E4

21. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. Including a policy requirement to deliver affordable workspaces helps key sectors (including those identified through the City Council's Economic Strategy), that make a vital contribution to the diversity of the economy. Suitable workspaces and premises to support the 'inclusive economy' can help foster creative activity, social enterprise, co-operative businesses and local start-ups in the city. Including a policy requirement to support the delivery of affordable workspaces in the Oxford and help facilitate an inclusive and diverse economy.

Policy options set 004e-1 (draft Policy E5): New Tourism and Short Stay Accommodation

22. Oxford's visitor economy makes an important contribution to jobs in the city. It is therefore important to support new and existing tourism and short stay accommodation in appropriate locations so that visitors to the city are encouraged to spend more time (overnight stays) and increase spend to support the local economy. Longer stays can reduce the numbers of "day-trippers" as high volumes of these types of visitors adversely impact traffic congestion and associated air quality issues.

23. This option sets look at locations for new tourism and short stay accommodation

Table A1.8 - Policy options set 004e-1: New Tourism and Short Stay Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Allow new sites for tourism and other short-stay accommodation in the city and district centres, on allocated sites and on Oxford's main arterial roads only.	Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations. Likely to benefit Oxford's economy through supporting a higher percentage of Oxford's visitors to stay overnight. Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.	Potential for increases in traffic along arterial roads and potential risk that this use could become dominant in locations supported by the policy.
Option B Allow new short stay accommodation in the city and district centres, and on allocated sites only.	Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations and provide control over which sites outside of these areas were appropriate to deliver short-stay accommodation.	May increase pressure for town centre uses in city and district centres and reduce variety of uses in these locations. Would reduce the number of locations where tourist accommodation is deemed appropriate, and it may not be possible to meet needs.

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	Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.	
Option C Support new short stay accommodation anywhere in Oxford.	Would increase potential locations where short stay accommodation is deemed appropriate. This is likely to encourage overnight stays in Oxford which is likely to have positive benefits for the city's visitor economy.	Allowing short-stay accommodation across Oxford could result in sites being developed that are poorly located in terms of potential traffic impacts or could have negative impacts on residential amenity, for example. Could result in more accommodation being provided where other priority uses (e.g., housing) would have been appropriate.
Option D Outside of the city and district centres, seek to resist new short-stay accommodation anywhere in the city.	May support the delivery of other priority uses (e.g., housing) in locations outside the city and district centres	May increase competition for land for tourism and short stay accommodation with other main town centre uses within the city and district centres. This could lead to a less diverse offer of tourism and short stay accommodation as higher land values in some centres would lead to the delivery of higher value accommodation (e.g., hotels) only.
Option E Do not include a policy on new short stay accommodation in the city. Instead rely on national policy to delivery new short stay accommodation in the city.	Hotels are included within the list of 'Main town centre uses' set out in Annex 2: Glossary (NPPF, December 2024). As such	Hotels are included within the list of 'Main town centre uses' set out in Annex 2: Glossary (NPPF, December 2024). As such

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	impacts of this option are essentially very similar to Option B (above).	impacts of this option are essentially very similar to Option B (above). Short-stay accommodation is not generally considered a suitable use outside of the city and district centres unless identified need shows otherwise. This approach may lead to uncertainty regarding where new accommodation would be supported and could lead to applications outside of sustainable accessible locations.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or d or e **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option A maintains the current locational approach supporting new tourism and short stay accommodation in a variety of accessible locations across the city. This would be likely to result in a neutral effect on all the Sustainability Objectives. Option B proposes a more limited selection of locations. By reducing the acceptable locations for new tourism and short stay accommodation it could have a minor negative effect on the visitor economy although the overall impact on the SA objective for economic development would be likely to remain positive. Option C would enable new tourism and short stay accommodation opportunities to be delivered across the city. This option could result in this type of accommodation being delivered in less accessible locations which could have minor negative impacts on local amenity and transport-related objectives. Option D is the most restrictive option and would only support new tourism and short stay accommodation in the city and district centres. This would be likely to have minor positive effects associated with housing outside of these locations, but it would increase competition within the city and district centres where land values may be higher, which may result in a focus on high-value accommodation. This may not achieve wider aims associated with the visitor economy of encouraging longer stays and increased spend in the city. Finally, not having a policy

could lead to uncertainty over locations where new tourism and visitor accommodation would be supported. This may result in competition with other priority uses.

Policy options set 004e-2 (draft Policy E5): Existing Tourism and Short Stay accommodation

24. Short stay accommodation helps meet the needs of tourists and other visitors, including business travellers and travelling researchers. Availability of sufficient short-stay accommodation may help to encourage tourists to stay for longer and help contribute to the success of businesses and the economy, but it also has impacts, including that it competes with other uses, and travel impacts. There may be reason to protect it, but where it is located is important in managing impacts and not all existing provision will be optimal. This final option set considers whether to include a policy supporting the expansion of existing short stay accommodation and protecting existing accommodation or not.

Table A1.9 - Policy options set 004e-2: Existing Tourism and Short Stay Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Do not include a policy protecting existing short-stay accommodation in the city and instead rely on other policies in the plan and national planning policies.	This option would mean that Oxford is reliant solely on market forces to protect its existing stock of short stay accommodation. Whilst providing flexibility for developers, it would not necessarily help the city to achieve its wider tourism aims and objectives.	Could provide uncertainty for existing short-stay accommodation owners and occupiers. May not effectively promote Oxford's visitor economy by encouraging more overnight visitation.
Option B Allow the expansion of existing short-stay accommodation providing certain criteria are met.	Likely to provide support for Oxford's visitor economy by protecting existing facilities and allowing their appropriate expansion.	Inclusion of criteria which must be met before a loss will be permitted (such as viability, marketing etc.) would ensure that existing sites that function poorly are not prevented from being redeveloped.

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Seek to protect existing accommodation and allow loss only if specified criteria are met (i.e., by providing viability evidence or if the location is not one where new short stay accommodation would be allowed).	It is important to seek to prevent the loss of existing visitor accommodation to other uses because tourism is an important contributor to the day and evening economy of the city.	

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** As these are existing sites, from a sustainability perspective whether to include policy guidance supporting appropriate small-scale redevelopment or changes or use, or not, is unlikely to result in significant effects on the any of the sustainability objectives.

1109

Tourism and Short Stay Accommodation – Draft Policy E5

25. Draft Policy E5 combines the preferred approaches from two options sets. Each options set considers a discrete element of the policy. The two options sets are as follows:
    - 004e-1: New Tourism and Short Stay Accommodation
    - 004e-2: Existing Tourism and Short Stay Accommodation

26. The preferred approach for each option set is set out below:

004e-1: New Tourism and Short Stay Accommodation

27. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. This supports new tourism and short stay accommodation on allocated sites and at a variety of accessible locations across the city. It also helps deliver the city's wider visitor economy aims to encourage longer stays and increased spend in the city. The draft policy includes locational requirements that set out where new tourism and short stay accommodation in the city would be acceptable and supported through the planning process.

28. Focusing new tourism and short stay accommodation towards inherently sustainable highly accessible locations helps to reduce reliance on the private car and supports public transport and other non-car modes. It also aligns with the plan's overall strategy to prioritise housing as it reduces the pressure to locate new tourism and short stay accommodation on sites more suitable for housing.

004e-2: Existing Tourism and Short Stay Accommodation

29. The preferred approach for the Local Plan 2045 policy is to take forward **option B**. Supporting the appropriate expansion of existing tourism and short stay accommodation helps achieve the wider visitor economy aims and can also protect local amenity. The inclusion of criteria relating to the loss of tourism and short stay accommodation provides clarity about what is expected of applicants in a range of different circumstances.

1110

Background paper 004a

Title: Key Employment Sites Methodology

This paper sets out the approach and methodology that was undertaken in developing the city's Key Employment Sites.
Relevant Local Plan 2045 Objective(s): • Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
Relevant SA Objective(s): 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.
SEA theme(s): Population and material assets.

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1. Introduction

1.1. This background paper focuses on providing an explanation of the approach and methodology undertaken in developing the policy for, and identifying, the city's Key Employment Sites.

1.2. It does not seek to simply repeat the content of sections of *Background Paper 004: Employment and Inclusive Economy*. Instead, it supplements existing information. As such, it does not follow the same structure.

1.3. The aim of this Background Paper is to provide the reader with a clear understanding of the process that was undertaken in the selection of Oxford's Key Employment Sites.

2. Methodology for Site Selection

Development of the Employment Site Assessment Pro-Forma

2.1. The first step in the process was the development of Site Assessment Pro-Forma. The Pro-Forma (re-produced at Appendix 1) was developed in consultation with the consultant team employed by the City Council to undertake the Employment Land Needs Assessment (ELNA) – drawing on their many years of experience in undertaking Employment Land and Economic Need Assessments for Local Authorities.

2.2. The Pro-Forma consists of two sections. The first part is a desktop assessment and the second, an on-site assessment. City Council officers undertook the individual site assessments, using the guidance notes as set out at Appendix 2.

2.3. However, before the site visits were carried out, a list of employment sites that required assessment was compiled. The employment site identification process is discussed in the next section.

Employment site identification process

2.4. A range of sources was used to compile the list of employment sites that were assessed using the Pro-Forma including:

- Category 1 and Category 2 Employment Sites (Local Plan 2036 Policy E1)
- Oxford Local Plan 2036 site allocations for employment uses
- "Key Protected Employment Sites" which were the subject of the historic Article 4 Direction (2014)
- Local Plan 2045 Strategic Housing Land Availability Assessment and its predecessor, the Housing and Economic Land Availability Assessment, which considered the suitability of sites for housing and economic uses.

2.5. This identification process uncovered 172 potential employment sites for further consideration.

Identified employment sites: initial site size filter

2.6. The first step in the assessment process was the application of an initial site size filter. The Planning Practice Guidance (PPG) Paragraph 009 Reference ID 3-009-20190722 suggests using a site area of 0.25ha (or 500 square metres of floorspace) when undertaking assessments of economic land.

2.7. City Council Officers discussed the use of a threshold with the appointed ELNA consultants. The consultants confirmed that the use of a site size threshold was consistent with other work they had undertaken and considered the 0.25ha threshold suitable for application in this instance.

2.8. As site size information was readily available in hectares (as opposed to floorspace) for the sites, the City Council concluded that use of a 0.25ha minimum site size threshold was appropriate.

2.9. The site size filter was then applied to the 172 potential sites. 113 sites were below the threshold, leaving 59 sites for further consideration.

Employment site assessments

2.10. Prior to undertaking the site assessments using the Pro-Forma, a sense check was undertaken by City Council officers. This sense-check resulted in the removal of duplicate entries, for instance, where several individual but adjacent employment sites were listed in addition to the collective larger employment area (i.e. making sure that component parts were not double counted as part of a larger area). In this case, the smaller duplicate entries were removed.

2.11. Sites were also removed from the assessment where there was no reasonable prospect of employment-related uses coming forward in the plan period (i.e., where sites had previously been redeveloped for housing).

2.12. This process left 50 sites which were then assessed using the Pro-Forma. Appendix 3 provides a list of the sites assessed.

2.13. City Council Officers undertook site visits during Spring 2025.

2.14. Each site was scored using the Pro-Forma (Appendix 1) using the Guidance Note (Appendix 2) to ensure a consistent approach. The scores therefore reflect a snapshot of each employment site at the time the site visit was undertaken.

2.15. Appendix 4 provides a summary of the scores attained for each site.

How the Key Employment Sites were identified

2.16. Having collated the results from the site assessments, the next step towards establishing the Key Employment Sites involved the comparison of all sites assessed. The top scoring sites were generally larger, well-established employment sites. For instance, the top three ranked sites, Oxford Science Park, ARC Oxford and the Churchill Hospital, all have a site area of more than 20ha.

2.17. By contrast the lowest ranked sites, which include the Former Blanchford's Building Supplies site in Headington, the Dairy Depot site on the Old Abingdon Road, and the Storage Yards located on Binsey Lane, were all generally smaller sites (1ha or under) with limited, or single current or previous occupiers.

2.18. A degree of professional judgement based on the collected data and qualitative considerations was used in identifying which sites were selected as Key Employment Sites. A range of factors were considered in coming to the decision. These factors included (but were not limited to):

- Local Plan 2036 Employment site category status
- Site size
- The redevelopment potential of sites within the plan-period
- The ability of sites to support a broad range of jobs
- Timing of the assessment
- The contribution made by sites to the local and/or national economy
- The ability of sites to contribute to the social value of an area
- The ability of sites to accommodate a range of occupiers

2.19. After careful consideration, on balance and in the light of the above factors, it was proposed that those sites which scored 36 points or more had a more positive alignment with the qualitative decision-making criteria.

2.20. A sense check to this approach was also undertaken, where it was observed that sites that did not qualify as Key Employment Sites were generally smaller employment sites with a single occupier or limited occupancy. It was also observed that majority of sites scoring 35 or less were those considered within the extant Local Plan 2036 policy framework, to be Category 3 employment sites (i.e., smaller, less-well located, etc.). It is worth noting at this stage, that the Pro-Forma was specifically designed to consider the site characteristics at the time it was assessed. This enables a degree of parity to be applied when comparing and ranking the site scores.

2.21. The sense check also involved consideration of the characteristics and circumstances which gave rise to the scores attained for certain individual sites. For instance, Oxford North and the Unipart site both scored 36 points in the assessment. As these sites are recognised as "Category 1" employment sites in the extant Local Plan 2036 policy framework (i.e.,

nationally or regionally important to the knowledge economy or represent significant employers or sectors within the city). As such, these two sites were considered further.

2.22. The score, particularly in the case of Oxford North, reflected the timing at which the assessment was undertaken (i.e., Spring 2025, while Phase 1A of the site was still under construction). As such, the assessment resulted in certain criteria scoring lower than if the site was operational. Given the strategic nature of Oxford North, its extant employment site status (Category 1), the ability of the site to deliver a broad range of jobs throughout the plan period (both construction and operational phase) and timing of the assessment (i.e., spring 2025, while the site was under construction), set it apart from those sites that scored 35 or below.

2.23. In the case of the Unipart site, the score also reflected the assessment as at Spring 2025. Like Oxford North, this site also has Category 1 employment site status under the extant Local Plan 2036 policy framework. While there is redevelopment potential at the site within the plan period, the scale of opportunity is yet to be quantified. Given the site's former Category 1 status, its size (circa 30ha) and the redevelopment potential of the site within the plan period, Officers considered these aspects set the site apart from the smaller sites scoring 35 or more.

2.24. As such, the city's Local Plan 2045 Key Employment Sites consisted of larger sites, all of which were able to support a broad range of jobs, or occupiers; which made a contribution to the national, or local economy; and/ or were sites that contributed to the social value of their local area. This process resulted in a list of 38 sites.

2.25. For completeness, this approach resulted in the removal of the following twelve sites which scored below the threshold adopted:

- 474 Cowley Road (Former Powell's Timber Yard)
- 79-83 Temple Road
- A.W. Clarke (Engineering) Ltd, Sandford Road
- Bossom's Boatyard, The Towing Path
- Cowley Marsh Depot, Marsh Road
- Dairy Depot, Old Abingdon Road
- Fire Station, Rewley Road
- Former Builder's Yard (Blanchford's Building Supplies)
- Harcourt House, Marston Road
- Salter Brothers Ltd, Meadow Lane
- Storage Yards Binsey Lane
- Units 1-4, 385 Cowley Road

Key Employment Sites: consideration of emerging Local Plan 2045 policy framework

2.26. The emerging Local Plan 2045 policy framework contains certain elements that apply to development proposals within the city and district centres, and others that apply specifically to Key Employment Sites.

2.27. This section provides the qualitative analysis, considering the of potential implications of the application of other policies in the emerging plan, that was undertaken in arriving an appropriate site size threshold for Key Employment Sites located within the city and district centres.

2.28. The following policies were considered as part of the analysis:

2.29. Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development establishes the over-arching spatial strategy for the city. The policy sets out a number of measures to help achieve the vision and objectives of the plan.

2.30. Bullet point b) is specifically relevant to the city and district centres. It allows flexibility of uses within these locations, so that the city and district centres can respond quickly to changing needs and economic circumstances and ensure a wide mix of uses, including housing, are encouraged.

2.31. Policy E1: Employment Strategy introduces a set of criteria, designed to protect Key Employment Sites by ensuring that, where a loss of floorspace is proposed, that the employment use can be maintained, and the number of jobs in employment generating uses is retained.

2.32. Policy E2: Warehousing, Storage and Distribution Uses (hereafter 'B8 uses') focuses new B8 uses at the city's network of Key Employment Sites only, introducing specific residential amenity criteria to ensure that any B8 are delivered in a way that does not result in an adverse impact on residential amenity.

2.33. The following six employment sites (located within the city and district centres) scored 36 points or more. Table 2.1 (below) sets out the specific sites, their relative size, and the overall score achieved. All sites were located in the city centre. This table shows that that two of sites are very large (i.e., over 5ha), while the remaining four sites are all smaller sites of less than a hectare (three of which being 0.3ha).

2.34. The Plan's overarching strategy allows flexibility of uses within the city and district centres. This is so that the city and district centres can respond quickly to changing needs and circumstances and ensure that a wide range of uses, including housing, are encouraged. However, Policy E1 is designed to protect the city's network of Key Employment Sites from loss to other uses, thus reducing flexibility of uses within the city and district centres.

Table 2.1 List of employment sites located in the city and district centres

Site Name/ Address	Site size (ha)	Total score
Beaver House/ Hythe Bridge St	0.3ha	39
County Hall/ New Rd	0.3ha	40
Island site/ Park End St Hythe Bridge St	0.7ha	36
Osney Mead	17.8ha	38
Oxford Town Hall/ St. Aldate's	0.3ha	39
Oxpens/ Oxpens Rd	6.3ha	37

2.35. As such, in order to allow the flexibility of uses within the city and district centres (as set out in Policy S1) a larger site size threshold for Key Employment Sites located in the city and district centres is considered appropriate. A first stage filter was then applied.

2.36. Consideration was given to the implications of setting this initial site size threshold filter at 0.5ha or 1ha, as in reality allowing flexibility on employment sites either 0.5ha or less or 1ha or less within the city and district centres, was considered to be something that most landowners or agents would generally welcome.

2.37. If the initial site size filter is set to 0.5ha, the three smallest sites (all circa. 0.3ha) are removed from further consideration. However, if the initial site size filter is set at 1ha, one additional site (0.8ha) is also removed.

2.38. The 2ha site size threshold, however, was considered more appropriate for city and district centres. This is because Policy E2: Warehousing Storage and Distribution Uses only supports B8 uses Key Employment Sites.

2.39. Unfortunately, there is a drafting error in the first sentence of Paragraph 5.40 of Background Paper 004: Employment and Inclusive Economy, which should read as follows:

> *Given the premium land values associated with the prime city centre office and R&D market, it is not expected that <u>many</u> B8 uses would be sought in these locations.*

2.40. The ability of Key Employment Sites within the city and district centres to be able to accommodate an element of small-scale B8 uses was an important consideration in coming to the site size threshold of 2ha. It was considered that, the larger sites had more potential to support an element of B8 uses than the smaller sites. Examples of B8 uses that might be considered within larger Key Employment Sites in city centre locations include sustainable last mile delivery solutions (e.g., cycle/e-bike couriers/ hubs and innovations supporting the circular economy (e.g., "reverse logistics" hubs).

2.41. The potential contribution of each site to the city's employment land supply was also a factor in determining the threshold. The ELNA recognises the contributions or each of the three largest city centre sites. The Oxpens site is likely to deliver a minimum of around 60,000sqm GIA and this is recorded within the planning commitments. While the scale of opportunity at Osney Mead was yet to be quantified, the site currently performs an important role as an Industrial Estate providing space for a variety of local businesses. At 17.8ha, it is important that the employment use of the site is maintained and that the number of jobs in employment-generating uses retained. This site clearly performs an important role in the city now and will continue to do so in the future.

2.42. The Nuffield Sites (which include the 0.7ha Island site) is a mixed-use allocation across three separate parcels, two of which are likely to be for employment generating uses. Although the ELNA suggests 28,500sqm across the sites (based on landowner consultation). Assuming that any employment floorspace was split evenly across the two parcels, this would deliver 14,250sqm at the Island site. This represents a relatively small proportion of the city's overall employment floorspace need.

2.43. As set out above, the 2ha Key Employment Site size threshold for the city and district centres was arrived at using professional judgement. It has taken into account range of qualitative factors, which stem from the importance of allow flexibility of uses in the city and district centres.

2.44. The 2ha site size threshold was therefore considered to adequately capture the larger Key Employment Sites while also enabling a degree of flexibility to enable their redevelopment for a forward a wide mix of uses, including housing, in the city's most sustainable locations.

2.45. This approach resulted in a list of 34 sites. For completeness, the application of a 2ha site size threshold within the city and district centres resulted in the removal of the following four sites:

- Beaver House, Hythe Bridge Street
- County Hall, New Road
- Oxford Town Hall, St. Aldate's
- Island site, Park End Street

3. Oxford's Key Employment Sites

3.1. The above process results in 34 employment sites being identified as Oxford's Key Employment Sites for the purposes of the policies in the Reg. 19 Plan. These sites are therefore listed in Appendix 3.1 of the Reg. 19 Plan, are shown on the Policies Map. They are listed below:

- 496 Cowley Road
- ARC Oxford
- Ashville Way Industrial Estate, Watlington Road
- Botley Road Retail Park
- Chiltern Business Centre, Garsington Road
- Churchill Hospital
- County Trading Estate, Watlington Road
- Eastpoint Business Park
- Fenchurch Court, Bobby Fryer Close
- Horspath Industrial Estate, Pony Road
- Huw Grays (formerly Buildbase), Watlington Road
- John Radcliffe Hospital
- Jordan Hill Business Park
- Light Industrial Units, Green Road
- MINI Plant Oxford
- New Barclay House, 234 Botley Road
- Newtec Place, Magdalen Road
- Nuffield Industrial Estate, Ledgers Close
- Nuffield Orthopaedic Hospital
- Old Road Campus
- Osney Mead
- Oxford Bus Company, Cowley House, Watlington Road
- Oxford North
- Oxford Science Park
- Oxford Trade Centre, Harrow Road
- Oxford University Press, Great Clarendon Street
- Oxpens
- Radcliffe Observatory Quarter (ROQ)
- The Gallery, 54 Marston Street
- Trade City Oxford and Network Oxford
- Unipart site
- University of Oxford Science Area and Keble Road Triangle
- Warneford Hospital

3.2. Wood Centre for Innovation

Appendix 1: Employment Site Assessment Pro-Forma

Employment Sites Assessment Pro-Forma – Desktop Assessment (Part 1)	
Site name	
Site address	
Site area (hectares)	
HELAA reference number	
Site allocation (OLP2036 site reference)	
Employment Site Category	
Policy considerations	
Physical/ environmental considerations	
Current use (including use class(es))	
Planning Status (i.e., live application, under construction, permission granted, complete etc.)	
Proportion of site undeveloped/ underdeveloped with potential for intensification	

Site location plan:

	Accessibility
Q1	**Access to the Strategic Road Network (qualitative assessment)**
	Brief description of route/ describe the path from site to SRN (e.g. does it go through LTN or residential neighbourhood or is it fairly clear vehicular route):

Q2	**Public transport (including rail) access**
1	**Poor:** remote site, poor infrequent public transport access
2	**Fair:** more than 800m from a railway station or a frequent service bus stop
3	**Good:** between 400-800m from a railway station or a frequent service bus stop (4 buses per hour)
4	**Very good**: good access to one or more frequent service bus stops (less than 400m) / within walking distance of a railway station (less than 400m)
	Notes:

	Site characteristics

Q3	Contamination (qualitative assessment)
	Brief description about any known contamination or potential issues:

	Market Conditions
Q4	**Market Perception (sites over 0.5ha)**
1	**Poor:** low demand, difficult to attract occupiers even with heavy marketing
2	**Fair:** requires strong marketing/incentives to attract new occupiers
3	**Good:** good demand, units don't remain unoccupied for long
4	**Very good:** viewed as attractive by agents/occupiers; strong demand; units rarely available/appears to be all full
	Notes:

Q5	Marketing evidence: what evidence is there that the site has been actively marketed? (Sites over 0.5ha only) (qualitative assessment)
	Notes:

	Ownership and potential for development
Q6	**Ownership factors (qualitative assessment)**
	Include any known information about ownership, e.g., site promoter, etc.):

Q7	Availability for development/ redevelopment/ intensification
1	**Poor:** constraints on development or owner aspirations for other uses, history of non-take-up, unlikely to be available for additional employment within 5 years or more
2	**Fair:** no active discussions but no specific constraints to development either.
3	**Good:** landowner actively pursuing / discussing future investment (e.g., consultation events; known intentions to develop in short-term – i.e., within five years)
4	**Very good:** land likely to be available for development/ occupation within immediate term (i.e., 1-2 years) (recent grant of planning permission/ current 'live' planning application)
	Notes:

Q8	What development would the landowner/developer consider/propose (housing, employment, other commercial, mixed use or unknown)? (qualitative assessment)
	Notes:
	Supports regional economic objectives (e.g., Oxford Cambridge Growth Corridor/ Enterprise Oxfordshire)
Q9	**Regional economic development opportunities**

1	**Poor: s**ite does not have ability to deliver any regional economic development objectives
2	**Fair:** site has limited ability to deliver regional economic development objectives
3	**Good:** site has good ability to deliver some regional economic development objectives
4	**Very good:** site has excellent ability to deliver several significant regional objectives
	Notes:

	Wider economic factors (Social Value)
Q10	**Deprivation and Regeneration Areas (assessed under 2019 IMD)**
1	**Poor:** site within the most affluent neighbourhoods (super output area is in top quartile of least deprived (0-25% least deprived)
2	**Fair:** site within a neighbourhood ranked as average to affluent (super output area is 25-50% least deprived)
3	**Good:** site within a neighbourhood ranked as average to deprived (super output is in the 25%-50% most deprived)
4	**Very good:** site is within a neighbourhood ranked as deprived (super output area is 0-25% most deprived) and within a City Council Regeneration Area
	Notes:

Q11	**Local factors**
1	**Poor: s**ite does not deliver any local development objectives
2	**Fair:** site delivers limited number of local development objectives
3	**Good:** site delivers some local development objectives
4	**Very good:** site delivers majority of local development objectives
	Notes:

Sub-total score of desktop assessment (Part 1):

Employment Sites Assessment Pro-Forma – On-site Assessment (Part 2)	
Site name	
Site address	

	Accessibility
Q12	**Local road access**
1	**Poor:** difficult/narrow road access, via residential roads, difficult site junction, congested roads or restricted heights/weights
2	**Fair:** some access issues as outlined above
3	**Good:** generally good access with few issues for HGVs and limited congestion
4	**Very good**: via free-moving good roads, avoiding residential areas and difficult junctions
	Notes:

Q13	**Walking and Cycling**
1	**Poor:** no existing footpaths or cycle paths to the site
2	**Fair:** some footpath or cycle paths although limited provision/not continuous
3	**Good:** reasonable paths available but some limitations such as poor-quality surface/lighting/crossings etc.
4	**Very good**: good and attractive footpath and cycle links from residential areas
	Notes:

	General location and neighbours
Q14	**General location; proximity to amenities and facilities (and labour)**
1	**Poor:** remote site, no amenities or facilities easily accessible
2	**Fair:** limited facilities available although access may be more difficult (1-1.5 Km)
3	**Good:** good access to some facilities (within 0.5 -1 Km)
4	**Very good**: easy access to a range of amenities and facilities (within 0.5 Km)
	Notes:

Q15	**Neighbouring uses (qualitative assessment)**
	Describe neighbouring uses and any sensitivities they may have in relation to the site itself:

	Site Characteristics
Q16	**Topography; size; profile**

1	**Poor:** sloping/uneven site; under 0.5 ha. size; irregular/narrow shape; difficult access point
2	**Fair:** some of the above issues
3	**Good:** some of the advantages below
4	**Very good:** generally level site; regular shape; over 2ha. in size; good access point
	Notes:

	Quality of local environment
Q17	**Age of existing premises (tick as appropriate)**
	Pre-1980
	1980-2010
	Post-2010
	Notes:

Q18	**Condition of existing premises**
1	**Poor:** buildings and external areas are of very poor quality and condition / very restricted circulation and servicing facilities
2	**Fair:** generally, buildings and external areas appear adequate, although some aspects may be poor
3	**Good:** generally, buildings and external areas are of good standard
4	**Very good:** buildings/ external areas are of a very good quality and condition providing a good range of building type, size and tenure / good circulation and servicing facilities
	Notes:

Q19	**General attractiveness of location**
1	**Poor:** surrounding environment is of poor quality; low profile/visibility; poor/run-down/unattractive appearance; attracts lower end users
2	**Fair:** some of the above aspects are more attractive
3	**Good:** most aspects are attractive though some users would likely look for a better standard
4	**Very good:** quality of surrounding environment will likely be a positive factor to attracting occupiers; high profile/visibility; high quality appearance, environment and quality of occupiers
	Notes:

Q20	**Environmental quality**
1	**Poor:** the site is substantially exposed to noise, dust and/or smell which significantly affects the quality of the immediate environment
2	**Fair:** the site is exposed to some noise, dust or smell which somewhat affects the quality of the environment at certain periods of day

3	**Good:** occasionally, the site is exposed to some noise, dust or smell which can affect the amenity of the immediate environment
4	**Very good:** the site does not appear to be exposed to unreasonable levels of noise, smell, dust or other amenity factors
	Notes:

Q21	**Green and blue infrastructure (GBI) features** – *this could include areas of green space, trees and shrubs, ponds, canals/rivers, green walls or roofs*.
1	**Poor** – little or no GBI features on the site. If located on site, relatively disparate and/or of low quality, the area is entirely or predominantly artificial in surface cover.
2	**Fair** – there are some areas of GBI features on the site, or features which seem of average quality.
3	**Good** – GBI covers a fairly large area of the site, or forms some good connections to neighbouring areas, or includes features which seem of a good quality.
4	**Very good**- GBI makes up extensive parts of the site, or forms strong connections to neighbouring areas, or includes features which seem of a very high/exceptional quality.
	Notes:

	Market conditions
Q22	**Vacancy levels**
1	**Poor:** over 25% site/premises vacant
2	**Fair:** 15-25% site/premises vacant
3	**Good:** 10-15% site/premises vacant
4	**Very good:** under 10% of site/premises vacant
	Notes:

Sub-total score of on-site assessment:

Total score: Desktop (part 1) and On-site (Part 2) assessment:
Notes:

Appendix 2: Guidance Notes for Pro-Forma

Employment Site Assessment Pro–Forma – Desktop Assessment (Part 1)	
Site name	
Site address	
Site area (hectares)	
HELAA reference number	
Site allocation (OLP2036)	
Category of employment site	
Policy considerations (only applies to non-SHLAA sites 0.25ha or more)	
Physical/ environmental considerations (only applies to non-SHLAA sites 0.25ha or more)	
Current use (including use class(es))	
Planning Status (e.g. under construction, has a permission in place, etc.)	
Proportion of site undeveloped/ underdeveloped with potential for intensification	

Site location plan:
[Insert Site Location Plan]

Section/ Question(s)	Instructions
Accessibility	
1. Access to Strategic Road network	1. Describe access from the site to the Strategic Road Network.
2. Public transport (including rail) access	2. A frequent service bus stop is one with four or more buses per hour.
Site Characteristics	
3. Contamination	3. Description of any known contamination issues.
Market Conditions	
4. Market Perception (site size 0.5ha or more)	4. Use evidence from web-searches, etc. to inform judgement about occupancy demand.
5. Marketing evidence (site size 0.5ha or more)	5. What evidence is there that the site has been actively marketed? Make a note of any commercial property lettings (e.g., from web-search) at the time of the assessment.
Ownership and potential for development	

6. Ownership factors (site size 0.5ha or more) 7. Availability for development 8. What development would the landowner/ developer consider/ propose?	6. What publicly available information exists about ownership? Is there a site promoter, etc? 7. Has there been a recent, or is there a current planning application at the site? 8. Check call-for-sites response forms, for example.
Supports regional economic objectives 9. Regional Economic Development Objectives	9. Regional economic objectives - Supports investment, growth and expansion of key sectors such as Science (STEM, Life Sciences etc.), and knowledge-based industries - Supports existing businesses to "scale-up" - Helps to attract new 'high growth' companies to Oxfordshire; - Supports investment in transport infrastructure to improve connectivity within Oxfordshire and with other major economic hubs (e.g., Cowley Branch Line, Oxford Railway Station improvements); Regional Economic Factors scoring: 1 – no objectives met 2 – 1 objective met 3 – 2-3 objectives met 4 – all objectives met
Wider Economic Factors 10. Deprivation and regeneration areas 11. Local factors	10. Use IMD database (2019) to work out deprivation scores. A "regeneration area" in this context, is an area which scores in the top 25% 'most-deprived' areas in the country. 11. Local Factors: - Site likely to support mainly local jobs - Site likely to support mainly micro (0-9) and/ or small business(es) - Site offers opportunities for training and skills - Provides a local/ community service (i.e., repairs, recycling, etc.) Local Factors scoring: 1 – no objectives met 2 – 1 objective met 3 – 2-3 objectives met 4 – 4 objectives met

Employment Sites Assessment Pro-Forma – On-site Assessment (Part 2)	
Accessibility	
12. Local Road Access	12. Assess site using specified criteria
13. Walking and Cycling	13. Assess site using specified criteria
General location and neighbours	
14. General location; proximity to amenities and facilities (and labour)	14. Assess site using specified criteria
15. Proximity to incompatible uses	15. Describe neighbouring uses and any sensitivities they may have in relation to the site.
Site characteristics	
16. Topography; size; profile	16. Consider site size, shape topography and site access.
Quality of local environment	
17. Age of existing premises	17. Estimate the age of the premises. (Supplement with further desktop work if required)
18. Condition of existing premises	18. Assess site using specified criteria
19. General attractiveness of location	19. Assess site using specified criteria
20. Environmental quality	20. Assess site using specified criteria
21. Green and blue infrastructure features	21. Assess site using specified criteria
Market conditions	
22. Vacancy levels	22. Use existing on-site information to inform judgement (e.g., site board/ letting signs). (Supplement with further desktop analysis as required.

Appendix 3 – List of sites assessed using the Pro-Forma

A3.1 The following sites underwent a full assessment using the Pro-Forma:

- 474 Cowley Road (Former Powell's Timber Yard)
- 496 Cowley Road
- 79-83 Temple Road
- ARC Oxford
- A.W. Clarke (Engineering) Ltd, Sandford Road
- Ashville Way Industrial Estate, Watlington Road
- Beaver House, Hythe Bridge Street
- Bossoms Boatyard
- Botley Road Retail Park
- Chiltern Business Centre, Garsington Road
- Churchill Hospital
- County Hall, New Road
- County Trading Estate, Watlington Road
- Cowley Marsh Depot
- Dairy Depot, Old Abingdon Road
- Eastpoint Business Park
- Fenchurch Court, Bobby Fryer Close
- Fire Station, Rewley Road
- Former Builder's Yard (Blanchford Building Supplies)
- Harcourt House, Marston Road
- Horspath Industrial Estate, Pony Road, Horspath
- Huw Grays (formerly Buildbase), Watlington Road
- Island Site, Park End Street
- John Radcliffe Hospital
- Jordan Hill Business Park
- Light Industrial Units, Green Road
- MINI Plant Oxford
- New Barclay House, 234 Botley Road
- Newtec Place, Magdalen Road
- Nuffield Industrial Estate, Ledgers Close
- Nuffield Orthopaedic Hospital
- Old Road Campus
- Osney Mead
- Oxford Bus Company, Cowley House, Watlington Road
- Oxford North
- Oxford Town Hall, St. Aldate's
- Oxford Trade Centre, Harrow Road
- Oxford University Press, Greal Clarendon Street
- Oxpens

- Radcliffe Observatory Quarter (ROQ)
- Salter Brothers Ltd, Meadow Lane
- Storage Yards, Binsey Lane
- The Gallery, 54 Marston Street
- Oxford Science Park
- Oxford Trade City and Network Oxford
- Unipart site
- University of Oxford Science Area and Keble Road Triangle
- Warneford Hospital
- Wood Centre for Innovation

Appendix 4 – Final scores for assessed sites

Name/ Address	Ward	Site Area (ha)	Final Score
474 Cowley Road (Former Powell's Timber Yard)	Donnington	0.3	34
496 Cowley Road	Donnington	0.3	36
79-83 Temple Road	Temple Cowley	0.5	32
AW Clarke (Engineering) Ltd, Sandford Road	Littlemore	0.3	32
ARC Oxford	Temple Cowley	35.4	47
Ashville Way Industrial Estate, Watlington Road	Blackbird Leys	1.3	40
Beaver House, 28-38 Hythe Bridge Street	Carfax & Jericho	0.30	39
Bossoms Boatyard, The Towing Path, OX2	Osney & St Thomas	0.3	34
Botley Road Retail Park, Botley Road	Osney & St Thomas	8.8	41
Chiltern Business Centre, Garsington Road	Blackbird Leys	0.6	37
Churchill Hospital, Old Road, Headington	Churchill	22.7	46
County Hall, New Road	Osney & St Thomas	0.3	40
County Trading Estate, Watlington Road	Blackbird Leys	9.7	42
Cowley Marsh Depot, Marsh Road	Temple Cowley	1.7	34
Dairy Depot, Old Abingdon Road	Hinksey Park	0.8	32
Eastpoint Business Park, Sandy Lane West	Littlemore	1.5	38

Name/ Address	Ward	Site Area (ha)	Final Score
Fenchurch Court, Bobby Fryer Close, Watlington Road	Blackbird Leys	1.2	41
Fire Station, Rewley Road	Carfax & Jericho	0.5	35
Former Builder's Yard (Blanchford's) 59 Windmill Road, Headington	Headington	1.0	32
Harcourt House, Marston Road	Headington Hill & Northway	1.1	33
Horspath Industrial Estate, Pony Road	Blackbird Leys	8.3	40
Huw Grays (Formerly Buildbase), Watlington Road	Blackbird Leys	2.2	36
Island Site, Park End Street/ Hythe Bridge Street	Osney & St Thomas	0.7	36
John Radcliffe Hospital, Headley Way	Headington Hill & Northway/ Headington	27.8	37
Light Industrial Units, Green Road	Quarry & Risinghurst	1.5	36
MINI Plant Oxford	Blackbird Leys	82.1	38
New Barclay House, 234 Botley Road	Osney & St Thomas	0.3	41
Newtec Place, Magdalen Road	St Marys	0.4	36
Nuffield Industrial Estate, Ledgers Close	Littlemore	1.7	39
Nuffield Orthopaedic Hospital	Churchill	8.4	42
Old Road Campus	Churchill	6.4	44
Osney Mead	Osney & St Thomas	17.8	38
Oxford Bus Company, Cowley House, Watlington Road	Blackbird Leys	1.6	38
Oxford North	Cutteslowe & Sunnymead	16.4	38
Oxford Science Park	Littlemore	27.1	49
Oxford Town Hall	Holwell	0.3	39

Name/ Address	Ward	Site Area (ha)	Final Score
Oxford Trade Centre, Harrow Road	Blackbird Leys	0.8	38
Oxford University Press, Great Clarendon Street	Carfax & Jericho	2.1	42
Oxpens, Oxpens Road	Osney & St Thomas	6.3	37
Radcliffe Observatory Quarter, Woodstock Road	Walton Manor	4.2	45
Salter Brothers, Meadow Lane site	Donnington	1.3	35
Storage Yards, Binsey Lane	Osney & St Thomas	0.4	30
The Gallery, 54 Marston Street	St Marys	0.3	36
Trade City and Network Oxford, Sandy Lane West	Littlemore	2.8	37
Unipart site	Watlington Road	30.6	36
Units 1-4, 385 Cowley Road	Donnington	0.3	32
University of Oxford Science Area and Keble Road Triangle	Holywell/ Walton Manor	12.4	37
Warneford Hospital	Churchill	8.8	41
Wood Centre for Innovation	Quarry and Risinghurst	0.8	40

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Background paper 005a

Title: Green Infrastructure

This paper addresses the green infrastructure network, including the protection of green spaces and other features like trees, as well as the provision of new green infrastructure in development.
Relevant Local Plan Objective(s): • Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
SA Objective(s): 7. To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all. 10. To conserve and enhance Oxford's biodiversity.
SEA theme(s): Landscape, human health, biodiversity, flora, fauna.

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1. Introduction

1.1 The green infrastructure network is an important issue to be addressed in the new Local Plan. There are various definitions used for the term Green infrastructure (GI); however, the 2024 National Planning Practice Framework (NPPF) defines it as:

A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

1.2 The Planning Practice Guidance sets out that green infrastructure includes both green and blue spaces and can include:

A range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.

1.3 Green infrastructure forms an essential part of the city's natural capital which is the various elements of the natural environment which provide us with valuable goods and services. An important feature of GI is its multi-functional nature, which means that it can perform a range of services from which people can benefit and which can contribute positively to achieving various policy objectives. Such services include, supporting physical and mental health and wellbeing; encouraging investment and regeneration; building resilience to climate change; providing space for nature and supporting biodiversity; reducing flood risk; and contributing to improved air quality (Table 1.1). The Council must balance competing development needs in the city whilst also ensuring that it plans in a positive way for the creation, protection, and enhancement of Oxford's green infrastructure so that these various benefits can be maximised for the city in the future.

Table 1.1 - The various benefits that green infrastructure can provide to an area (source: Oxford Green Infrastructure study 2022)

Environmental
• Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones. • Provides climate change mitigation and adaptation, e.g., through providing flood and soil erosion protection, carbon sequestration and storage, urban cooling. • Improves air and water quality (pollution absorption and removal). • Enables food production and supports pollination. • Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking
Social/Health and Wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive safe spaces for people to enjoy and improve social contacts – a key component of 'liveable' towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land property values. • Supports sustainable homes and communities e.g., through providing local food, building materials, encouraging low carbon lifestyles e.g., through well-connected attractive travel walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaptation.

1.4 An important component of Oxford's Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network

is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework

2.1 Highlights that planning for green infrastructure can help deliver a variety of planning policy objectives. Specifically, **para 20** states that green infrastructure is an element which local planning authorities should address in their strategic policies. **Para 164 and 199** highlight that green infrastructure should be considered as important mitigation measures for the impacts of climate change and poor air quality. Further references are made to green infrastructure elsewhere in the document:

- **Para 35**: plans should set out the development contributions expected in association to green infrastructure and set out the levels and types required.
- **Para. 96**: Provision of safe and accessible green infrastructure is one example of a way that local authorities can enable and support healthy lifestyles.
- **Para. 135**: developments should optimise the potential of the site to accommodate and sustain an appropriate amount/mix of development including green and public space.

2.2 With regard to open space, **para 103** of the NPPF sets out that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and climate change, and that local plan should assess what open space is needed and make provision to accommodate this. **Para 104** sets out strict conditions for when loss of open space, sports land/buildings and pitches can be lost.

Planning Practice Guidance and National Design Guide/Model Design Code

2.3 The online Planning Practice Guidance has a dedicated page for the natural environment including green infrastructure and biodiversity considerations. Paragraphs 4 to 8 include guidance on why green infrastructure is important and how local plans should take a strategic approach to addressing it including use of strategic policies to identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement. Open space is addressed in separate guidance and sets out how this should be taken into consideration in Local Plans to support health and wellbeing.

2.4 In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and

habitats; ‘proportionate’ information and assessment required on biodiversity impacts at all stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

2.5 The National Design Guide is a material consideration and forms part of national planning guidance. The guide sets out ten characteristics of good design, of which designing to incorporate nature is one. It highlights the value that natural spaces can bring to people and encourages networks of green and blue infrastructure within the design of spaces as well as making space for biodiversity.

National Parks and Access to the Countryside Act 1949

2.6 Section 21 of this Act enables local authorities to designate Local Nature Reserves where they are of high natural interest in the local context.

Small Holdings and Allotments Act 1908

2.7 This places a duty on local authorities to provide allotment gardens where demand for them exists. Requests for allotments submitted by at least six local people must be taken into account when considering whether demand exists. Allotment provision is also subject to other legislation arrangements less related to the planning process, including the Allotments Acts of 1922, 1925 and 1950.

Oxford Local Plan 2036

2.8 The topic of green and blue infrastructure in the city is addressed in detail in chapter 5 of the adopted Local Plan, ‘Protecting and enhancing Oxford’s green and blue infrastructure network’, through policies G1 to G8. As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network.

Other relevant plans and programmes/strategies

Natural England Green Infrastructure Framework (2023)

2.9 The Green Infrastructure Framework was launched by Natural England in 2023. It is a collection of policy tools and documents whose purpose is to assist local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI in local plans and in new development. The framework is structured around a number of key components that include a set of national standards on quantity/quality of GI; mapping; planning and design guidance. Whilst the Green Infrastructure Standards have no statutory power, they are intended to support better planning for good quality GI and help to target the creation or improvement of GI, particularly where existing provision is poorest. When supplemented with local knowledge

and evidence, Natural England advise that they can be used to help set local targets for provision.

Oxford City Council Green Spaces Strategy 2013-2027

2.10 The strategy focuses on green space that is freely available to the public for informal recreation, allotments and play irrespective of who the land is owned by.

Oxford City Council Playing Pitch Strategy 2022-2036 (and emerging update)

2.11 This strategy is a needs and evidence-based document that is aligned with the adopted Local Plan, and it seeks to ensure that the city has a good supply of well-managed, well-maintained and efficient playing pitches and other outdoor sports facilities that would help to encourage residents to maintain healthy and active lifestyles. Whilst there was no legal requirement for a Playing Pitch Strategy, the Council had opted to develop one as one of the ways to promote healthier living and reduce inequality. The Strategy is intended to be reviewed every year and refreshed on a five yearly basis.

2.12 An update to the Council's Playing Pitch Strategy is currently in progress, which will cover the city to 2045. An interim update note to inform the new Local Plan, which brings together emerging analysis and findings from Strategy's development with an early picture of existing and future demand for pitches, has been published alongside the Regulation 19 consultation. The full strategy is expected to be completed later in 2026.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 The Green Infrastructure study (2022) identified that Oxford's green spaces are providing a variety of roles that support health and wellbeing of residents and ecosystems. With regard to publicly accessible green spaces, the analysis highlighted that whilst there is a fairly even distribution of green spaces across the city in general meaning that accessibility for residents to walk or cycle to green spaces was good, however, there are inequalities in distribution of certain types of green spaces resulting in gaps in accessibility for specific types of green space. Whilst it is very challenging to establish significant new green space to counter these gaps, additional loss of open space in certain areas could exacerbate these accessibility problems or establish access deficits for other types of green space like parks or outdoor sports. In summary, the report found that:

- Allotments: Gap in access in the eastern part of the city centre (low deprivation) (however much of this area is university land), and smaller gaps in the north (low deprivation) and west (pocket of high deprivation) of the study area.
- Amenity green space: large gaps in access in the north and east of the city (low levels of deprivation, and small gaps in the south in Littlemore and Temple

Cowley (high levels of deprivation). However, the good access to parks and recreation grounds across the city mitigates this.

- Parks and recreation grounds: Good access across the city. Small gap in the north in Wolvercote (low levels of deprivation) but there is access to amenity green space and accessible natural green space in this area, which helps to mitigate this gap in access (although it is acknowledged that these types of spaces do not typically offer the same level of facilities that a park might).
- Accessible Natural Green Space (15-minute walk time buffer): large gaps access in Cowley/Temple Cowley in the south and in the North (around Sunnymead), both in areas with relatively high levels of deprivation.
- Play space: for children's play spaces, gaps in access in the city centre (although much of this area is university land) and North Oxford (low levels of deprivation). There is also a gap in the south in Iffley (IMD decile of 6). For youth play spaces, small gaps in access in the centre and north of the city centre (in areas of low deprivation).

3.2 Informed by more than 200 site visits, the report also looked at quality and multi-functionality of the open spaces (helping to assess wider benefits they play to the local areas). It found that:

- The majority of public open spaces in the city (84%) were currently of good or excellent quality, however there are opportunities to improve quality on some spaces, with 16% assessed as fair or poor quality.
- Generally, the highest quality sites fall within areas of lower levels of deprivation, however there are exceptions to this. The wards with generally higher numbers of poorer scoring sites are Marston, Headington Hill and Northway, Quarry and Risinghurst, Barton and Sand Hills, Churchill and Lye Valley.
- Larger/destination parks within the city are high quality sites providing multiple functions and are important sites for tourism and built/natural heritage.
- Sites delivering very low numbers of functions tend to be private spaces and amenity green spaces. Smaller sites, including other typologies, typically delivered fewer functions (though not in all instances) and there are areas with lower levels of multifunctionality in the south and east of the city (which generally corresponds with areas of high deprivation).
- For lower scoring sites, common issues appeared to be low biodiversity value, poor access (e.g. path quality and overgrown vegetation), management of soft landscaping, dog fouling, litter and lack of signage.

3.3 A particular type of open space that provides an important role for health and wellbeing is that of playing pitches. The Council's existing strategy identified the importance of protecting pitches and indicated that any losses need to be sufficiently mitigated through sufficient reprovision as there is not generally considered to be a surplus in the city. A

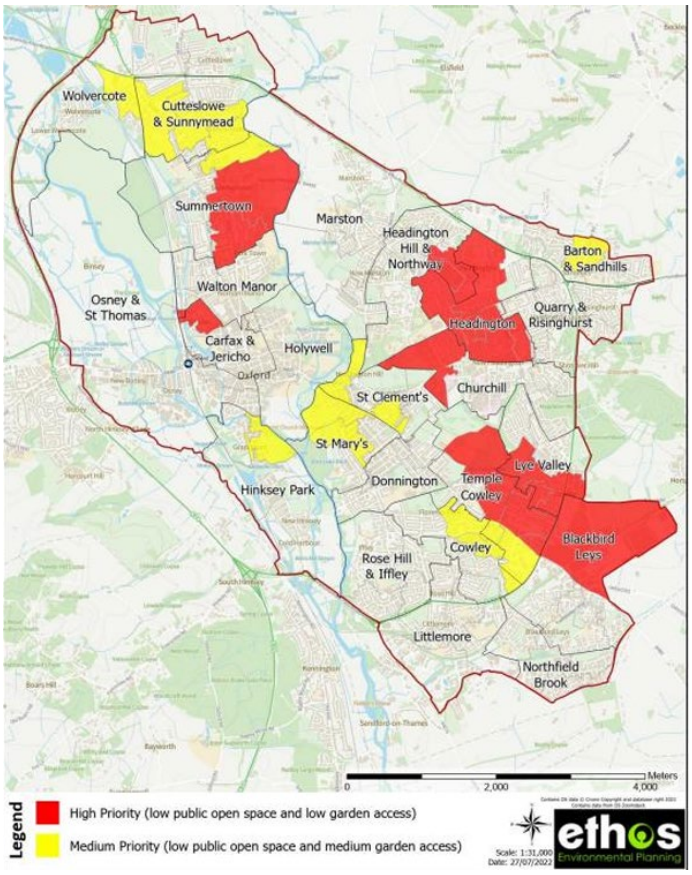
similar picture is emerging from the ongoing update to the Council's Playing pitches strategy when existing provision is considered against current population demands and future demands. Other mechanisms could also play a role in improving access such as enhancing existing pitches and associated facilities, as well as community use agreements.

3.4 Beyond public open spaces, there are a variety of greenspaces in the city which are not freely accessible to public, yet still make an important contribution to the overall green infrastructure network. For example, many of the schools and colleges in the city have their own playing fields and outdoor spaces which play an important role in the health and wellbeing of the young people and children in attendance and add to the sense of place locally (sometimes playing an important role in heritage setting particularly around the colleges).

3.5 According to land use data (2018), around 19.9% of Oxford's land use is classified as residential gardens. There is diversity in the amounts of green infrastructure that is present across Oxford gardens and policy has little control over how they are managed but many of these spaces nevertheless are an important location for green assets like trees in the city. Whilst only being accessible to individuals within the home, private gardens offer an important outdoor space for socialising and being active. Of course, there is not an equal distribution of this type of space across the community, and many individuals, particularly those living in flatted developments or house shares, may not have any privately accessible green space at all.

3.6 The GI study found that some of areas of the city with the lowest amounts of private garden are located in areas with lowest access to public open space. In these locations (highlighted in red and yellow in Figure 3.1), there is potential for existing open space to be under greater pressure from local residents. Notably, some of these locations are also areas of higher deprivation which could exacerbate existing health inequalities where residents are not able to benefit from sufficient outdoor space.

Figure 3.1 - Bivariate map showing areas of the city with lowest public open space in combination with lowest garden access (red are lowest)



3.7 Beyond green spaces, the city hosts a range of other important green infrastructure features such as trees. Trees are present in our greenspaces but also help to break up the urban fabric of roads and streets throughout the city. Many of these trees have been protected for their high amenity value through Tree Preservation Orders (TPOs) however there are a greater proportion that have not (and TPO designation is not the only determiner of high-quality trees). Oxford is also home to several areas of ancient woodland, including Brasenose Wood and at Shotover Country Park. The Oxford Urban Forest Strategy estimates that the urban forest in Oxford contains approximately 248,000 trees which equates to a total canopy cover of 22.3%; meanwhile separate analysis that used a slightly different methodology conducted for the GI study concluded with a similar figure of 21.02%. This is above the 20% minimum recommended by Forest Research for urban areas which is a positive, however, as Table 3.1 shows, canopy cover does vary across the city with some of our more deprived wards featuring some of the lowest amounts of coverage (e.g. Blackbird Leys).

Table 3.1 - Canopy cover % and Indices of Multiple Deprivation score per ward as shown in the Oxford Green Infrastructure Study (2022)

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived)
Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	1
Churchill	28.1	3
Cowley	19.71	4
Cutteslowe & Sunnymead	31.02	4
Donnington	22.28	2
Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	4
Lye Valley	22.74	5
Marston	22.59	3
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	2
Summertown	26.26	6
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

3.7 The GI network also includes a range of blue spaces including the two rivers (Cherwell and Thames), a number of streams and smaller water courses, as well as the canal and other waterbodies like ponds and lakes. These features act as important corridors through the city and in between green spaces, providing habitat for wildlife and connectivity for people. The Water Cycle Scoping Study will discuss the current environmental conditions of the main water courses, which continue to be challenged by a range of pollutants such as from agriculture, urban runoff and sewer discharges.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 The currently adopted Local Plan 2036 will maintain protection of the network of green infrastructure across the city, alongside national policy (which affords its own strict protections for open space). Other legislation outside of planning that protects certain green spaces like allotments, as highlighted in section 2, will also continue to apply.

4.2 Nevertheless, a growing population means that there is likely to be increasing demand for outdoor sports provision and public open spaces in the long term. Ongoing development pressure as the city grows means that these spaces will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this can lead to a deterioration of these spaces. The quality of existing spaces already varies across the city, without additional investment, facilities associated with some green spaces may deteriorate further, exacerbating this uneven distribution in quality.

4.3 Different types of green spaces could face different challenges. In areas of the city where access to private gardens is reduced, there is likely to be particular demand on public spaces like parks and smaller amenity green areas for people to socialise and undertake physical activity, as well as allotments (many of which already have waiting lists).

4.4 Some types of GI will continue to be protected from inappropriate development through other mechanisms outside of the Local Plan, for example some trees benefit from Tree Preservation Orders (TPOs) and conservation area protection. Formal allotments benefit from protection that can only be removed via application to the secretary of state. Some of our parks and gardens benefit from heritage protection as Registered Parks and Gardens.

4.5 Blue spaces like the rivers and streams are already facing pressures from pollution as well as historic development of their banks. It is likely water quality issues relating to sewage pollution will continue without additional investment from Thames Water into the Wastewater Treatment Works, although with sufficient upgrades as are proposed, these issues could then improve. Other sources of pollution that are not within the control of the Local Plan are likely to continue without separate actions in the relevant areas such as changes to agricultural practices. Without a new Local Plan there could be additional pressure for developing on open spaces along embankments, particularly beyond 2036, which could have impacts on the water courses and exacerbate the challenges they face.

4.6 Climate change is also likely to put pressure on many green spaces, particularly ecological sites (discussed further below). Increases in summer temperatures, milder winters, changes in rainfall distribution and seasonality, and more extremes of weather are anticipated long term impacts of climate change. The effects of these changes are uncertain and may occur as sudden and unexpected step changes. Potentially they could result in the need for additional management measures (e.g. to address risk from wildfires during drought seasons), or make spaces unusable due to additional flooding throughout the year. Indirectly, adaptation actions by other sectors that are key to land and water management may force changes in how certain spaces are utilised (e.g. to secure additional land for flood relief).

5. Key Issues addressed through the Local Plan 2045

Introduction

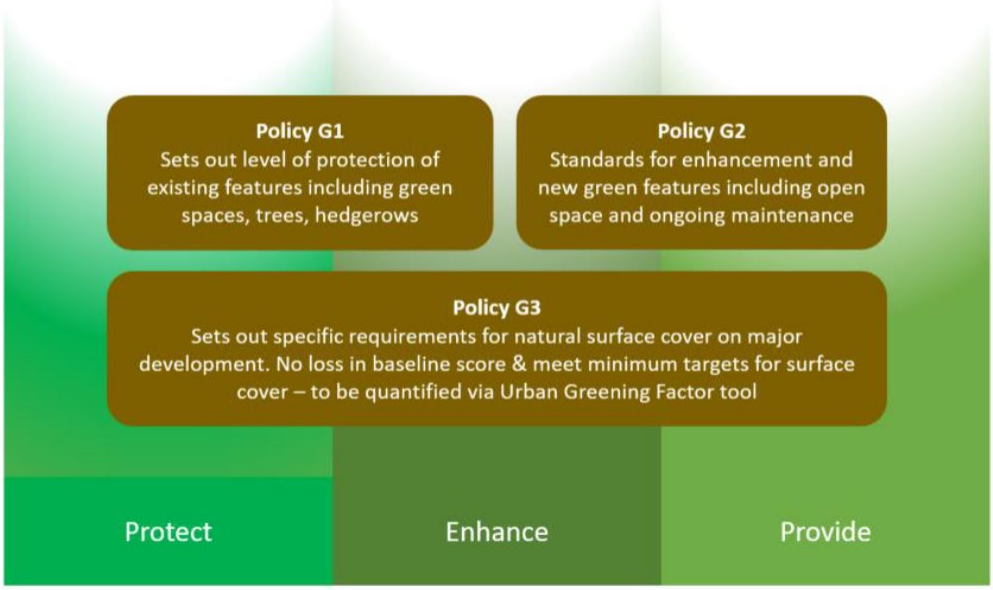
5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to green infrastructure. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Policy Approach to Green Infrastructure

5.3 The policy approach to Green infrastructure (GI) is guided by recognising and protecting a network of green features across the city and in order to harness the ability of GI to provide multi-functional benefits to the city's inhabitants and the wider environment. The intention is to ensure that new development preserves our highest quality GI and avoids unnecessary harm to it, whilst also ensuring that new GI is an integral component of the design of development. Three interrelated policies drive this approach as is shown in Figure 5.1.

Figure 5.1: The approach to green infrastructure in the new Local Plan



Establishing the Green Infrastructure network hierarchy

5.4 Oxford's Green Infrastructure (GI) network is made up of a variety of green and blue spaces across the city which provide multiple benefits to the wider natural environment and the health and wellbeing of the people of Oxford. Whilst national policy already includes protections for open space through the NPPF, which is expanded upon in the associated guidance, the Local Plan policy G1 includes additional protections and helps define the network.

5.5 Whilst the approach to all of the green spaces of the network is one of resistance to their loss or harm in line with national policy, the Local Plan assigns the spaces of the network to different levels of protection with the hierarchy set out in policy G1. The hierarchy is as follows:

- **Core**: Spaces within the highest level of the hierarchy benefit from the strongest level of protection meaning loss would not be deemed acceptable in any circumstance because their location is fundamental to the benefit they provide and to supporting the functioning of the wider network and addressing wider sustainability issues.
- **Supporting**: Spaces within the second level of the hierarchy which also play an important role in supporting the network and addressing sustainability issues; however, specific location is not as fundamental and loss could be acceptable where this is reprovided elsewhere in the network.
- **All other spaces**: Not identified through policy G1 and do not have additional

protections applied on them via the Local Plan. Applications would defer to the protections which already exist through national policy – e.g. meeting the tests for loss of open space as set out in the NPPF.

5.6 This approach is considered to be a reasonable and pragmatic way of responding to the constrained nature of the city and recognising the varying clusters of functions different spaces provide to supporting the city-wide network. It takes a strong line on protection of many spaces across the city, affording higher levels of protection to those areas whose value derives significantly from their current geographic location in order to perform these functions – value which could not be easily replicated elsewhere were they to be lost.

5.7 Equally, it acknowledges the demands on space that the city is constantly subject to and it recognises that to meet the wider vision for the city in 2045 and meeting the other Local Plan objectives, sometimes other types of uses may be necessary. Whilst the protection of the supporting tier also exceeds national policy, it recognises that these spaces can provide more limited value to the overall network where they currently preside and that these could potentially be reprovided in another part of the network without irreparably reducing quality of GI in the city where a more fitting use can be demonstrated for the site.

Identifying spaces within the Core Network

5.8 Several typologies of green spaces which were automatically assigned to the core network because these typologies provided a clear role or unique set of functions/benefits that other typologies could not and in a location that would be challenging to reprovide in the short term as part of the development process. These typologies included:

- allotments for their role in food growing and social interaction, particularly for those without private gardens (also protected through additional national legislation),
- churchyards/cemeteries because of their important setting for heritage assets and burial spaces.
- ecological sites protected under a local or national designation due to their specific ecological value for the habitats in these areas to supporting biodiversity.

5.9 Access to a park that can provide multiple types of facilities and functions to meet recreational needs was also considered to be an important component to the GI network, particularly in supporting the needs of residents with limited private open space but also more generally for meeting a range of health needs. The GI study identified a number of ‘destination’ parks which are of a significant size (varying from 7ha to 122ha), which formed the basis of a list of sites to be included in the core network. Council officers subsequently reviewed and added to this list to ensure some additional parks were protected across the city including where they were part of a limited offer of alternative green spaces in areas of significant deprivation.

5.10 Other typologies of open space with a more heterogenous character required a more nuanced approach, particularly where they were more variable in the types of functions they provide. Unlike spaces with a more singular or primary function such as an allotment, or cemetery, other spaces such as the remaining parks as well as areas of natural green space can vary more greatly in character and the role they play in the network sometimes. There are a range of parks and gardens in the city for example and some have an important heritage status being designated as Registered Parks and Gardens; whilst some are particularly large and serve a wide area of the community; others are much smaller with limited features and potentially congregated in areas with an abundance of other types of green space. This variation necessitated further analysis to designate certain spaces into core and others into supporting.

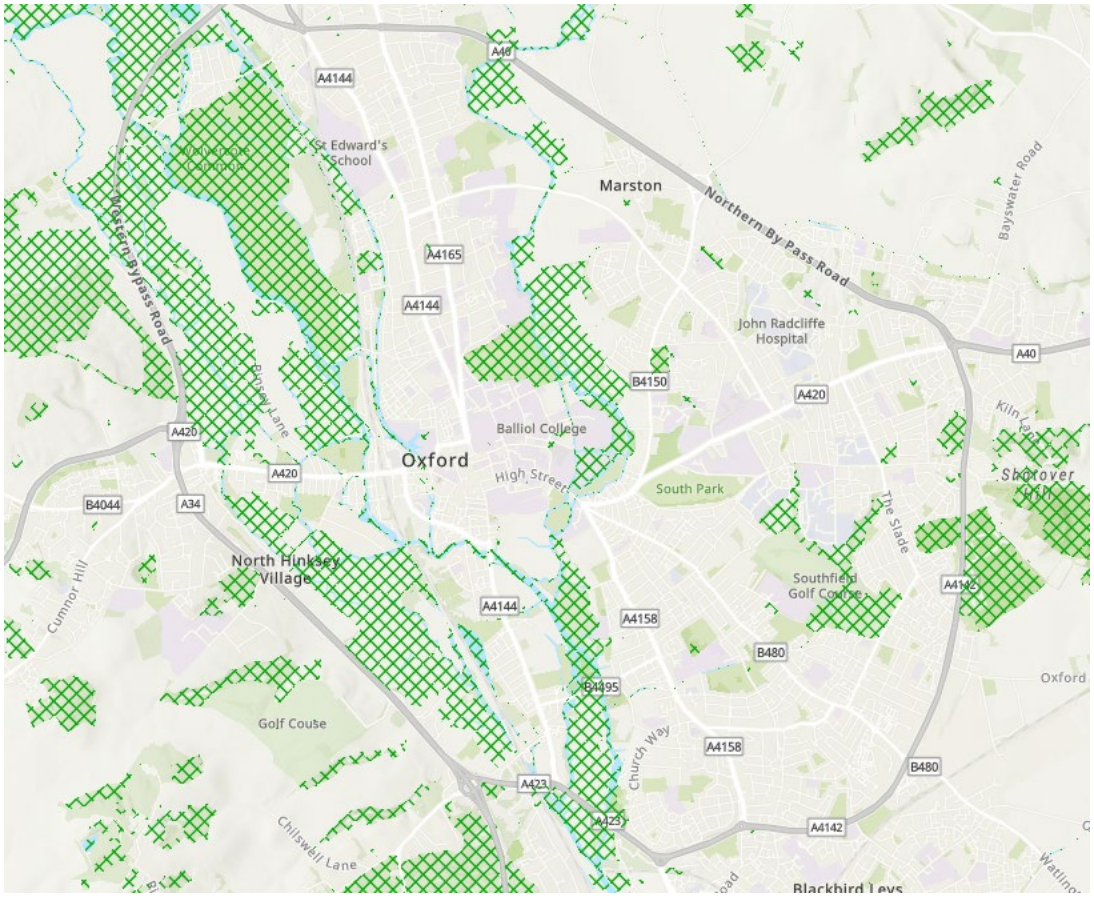
5.11 A key driver in identifying and protecting a network of core spaces across the city was the understanding that many of their benefits need to be retained in situ and are very challenging to relocate. In this context, officers have considered a number of specific factors relating to key multi-functional benefits that arise from the situation of certain spaces and broadly fall under three topics: heritage, biodiversity and climate change. The remaining spaces not already within core network were assessed in terms of their contribution to these benefits and allocated to core where they met the following criteria:

- Biodiversity – has the space been identified as containing a significant amount of core habitat (more than 50% of the site) within the Oxfordshire Nature Recovery Network and is it also connected to other spaces and clearly forming part of a wider wildlife corridor through the city?
- Heritage – is it a Registered Park and Garden or has the space been identified on the Oxford Heritage Asset Register as a local green feature of significance?
- Climate change – has the space been identified as containing a significant amount of land within flood zone 3b (more than 50% of the site) and therefore acting as important source of flood storage?

5.12 Appendix B of this background paper (contained in a separate document) details all sites added into the core network and the rationale for why they have been assigned to this level of the network.

5.13 For reference, the Oxfordshire Nature Recovery Network (Figure 5.2) was identified in advance of work on the Local Nature Recovery Strategy and the Council has utilised it in informing core designation in the GI network because it takes into account a wider variety of biodiversity considerations than the LNRS, including areas of ecological interest such as Sites of Special Scientific Interest, Local and National Nature Reserves, Wildlife Sites (Local, District, and City), as well as various reserves, woodlands, TVERC's priority habitat mapping and other protected sites. The Council has cross-referenced with the Oxfordshire County Council LNRS mapping to ensure any identified existing sites of particular importance for biodiversity are also incorporated.

Figure 5.2: TVERC Nature Recovery Network (NRN) core zones – which contribute to designation of some 'core' spaces (where they also clearly form part of a wider ecological corridor), where the core zone exceeds 50% of the site Council (© Crown Copyright and database right 2025. Ordnance Survey AC0000808820.).



Identifying additional supporting spaces in the GI network

5.14 There were a number of other types of green space which did not meet the standards for core protection set out in the preceding paragraphs but were still deemed important enough to be classified as supporting spaces to the network. Typically, these were spaces which could feasibly be reprovided to another part of network if necessary and were typically of a more limited wider benefit to the area in terms of functionality or public access but still played some function that supports the wider area and that would need to be replaced.

5.15 Sports pitches, for example, are an important asset to supporting health and wellbeing through providing formal spaces for recreation. Whilst reprovision of any losses will often be an important consideration (which the supporting tier of the network would require),

these spaces typically offer fewer wider benefits to warrant core protection (unless they met one of the additional considerations in para 5.11).

5.16 A number of spaces with no fixed role, including amenity spaces and private outdoor spaces, were also added to the supporting tier where they were of a significant enough size. As was found in the 2022 GI study, typically larger areas of green space are able to perform a wider variety of positive functions for the city than smaller ones, though there may be exceptions. These spaces can make a valuable contribution to greening the urban realm in general and can have potential for enhancement in future.

5.17 Amenity green space (areas of informal grass with limited features) were included within the supporting tier where they exceeded a size threshold of 0.15ha, which was deemed significant enough to be of benefit to the local environment. Private green spaces were included within the supporting tier based upon a size threshold, however, due to their restricted public access benefit this was only where they exceeded a size threshold of 0.3ha.

Enhancing and providing new Green Infrastructure in Oxford

5.18 A key driver behind the policies of the new Local Plan is encouraging green and blue infrastructure to be considered with equal importance and value to more traditional grey infrastructure provision. Whilst policy G1's hierarchy of protection seeks to ensure that we retain our highest quality GI in the city and supports the objective of retaining opportunities to enhance what we have, policies G2 and G3 then set out the framework for how we expect to see enhancement and new provision take place.

5.19 Principally, policy G2 requires applicants to consider not just the provision of features on the site but also how they connect in with features around the site to deliver greater interconnectedness with the wider GI network. This is important for building resilience into the GI network, reducing fragmented landscapes and supporting movement of people and wildlife across the city. Equally, policy G2 sets out the importance of a design rationale which looks for ways to secure multi-functionality. It sets out various functions that are considered important such as supporting biodiversity, building climate resilience and providing spaces for people, which should guide design beyond purely aesthetic concerns. To be most effective at fulfilling multi-functional roles, these have to be taken into account in informing the design of green spaces/features from the beginning, rather than as an afterthought. Where reprovision is required to accord with loss of protected space under policy G1 – the requirements of G2 guide how we expect the reprovided GI to be delivered.

5.20 There are some other elements to the policy that address more specific situations. For example, recognising that our blue spaces are an integral component to the city's landscape and that in places the connection with our watercourses has been degraded over time which can lead to negative impacts for the water environment, Policy G2 also

sets out specific expectations in relation to development that occurs adjacent to watercourses. It sets out that new development adjacent to these spaces incorporates a sufficient buffer to mitigate negative impacts on them and also help to enhance the environment in these areas. Where the land alongside our watercourses has already become urbanised the policy requires that buffers ideally be reinstated.

5.21 The policy also sets out requirements for new open space on larger developments. Whilst our analysis of the city through the GI study 2022 and of the existing development sites over the Local Plan period suggest that opportunities for the creation of large-scale new open space is limited by various constraints, open space is an important component of healthy, well designed development and where possible this needs to be incorporated within the site layout of larger schemes. The new Local Plan therefore retains the existing requirement for 10% open space to be delivered on larger developments of 1.5ha and above.

5.22 Where green features are included in a development, it is important to recognise that these are live components of a design which are subject to varying levels of ongoing care and maintenance. A successful development is one that considers these longer-term needs and plans accordingly for them as part of the design process. Certain features like trees have a crucial establishment window which requires more intensive care and attention in terms of watering to ensure the longevity of these features going forward. Meanwhile, other features like green walls and roofs require more regular watering and maintenance throughout their lifetime to avoid failure due to their more exposed and unnatural planting location. With climate change and longer hot/dry conditions in future these demands are likely to increase. The policy therefore sets out specific requirements for ongoing maintenance/management arrangements which need to be included as part of the applications, along with conditions that will be set for replacement of failed specimens during the establishment period post- construction.

Urban Greening Factor for major development

5.23 As has already been identified, Oxford's constrained nature makes the delivery of new green spaces of notable size within the city boundary challenging to achieve. There are also parts of the city that are more densely developed and deficient in green spaces in terms of their size, accessibility and quality. It is therefore crucial that in areas where new development comes forward, all opportunities are taken to maximise the amount of greening within the site. This also supports other objectives such as making space for nature and building resilience to climate change (through reducing surface water flood risk and risk of overheating in summer). Whilst the scope of policy G2 sets out principles and requirements in this regard that apply to all scales of development, policy G3 introduces additional requirements of major development in the city in the form of the Urban Greening Factor (UGF) assessment.

5.24 The UGF assessment process produces a score for the proportion of urban greening in comparison to the total area of a given development site. The calculation focuses on the types of surface cover used within the landscape of the site and is measured for the existing situation and post development conditions following building and landscape proposals. Each surface cover type is assigned a weighting factor (between 0.0 to 1.0) that reflects its environmental and social value in urban greening; its functionality in providing ecosystem services, including improving permeability; and its benefit in supporting biodiversity and habitat creation.

5.25 The benefit of the UGF process is that it provides a simple means of quantifying the changes in amount and type of green surface cover delivered through a development in a transparent way. Whilst certain types of more natural surface cover are incentivised through the UGF, applicants have flexibility in how they meet the policy requirements for post- development score and can freely pick the proportions of different surface cover types to best fit their site's constraints. This is particularly important in addressing the constrained nature of many sites in the city, balancing out the space demands of various policy requirements in the Local Plan, and viability challenges of delivering development.

5.26 Whilst the UGF process involves the use of an area-based metric which has similarities to the Statutory Biodiversity Net Gain metric that applicants will be required to complete as part of Biodiversity Net Gain (BNG), the two tools have different roles in meeting the Local Plan's objectives. The BNG metric works as an uplift in score for a site (a 10% improvement on current score) and is focused primarily on habitat creation for biodiversity. Meanwhile, the UGF sets out a minimum target and is focused on delivering multi-functional green features which could provide for biodiversity but also many other benefits. On particularly urbanised sites lacking in existing habitat, a 10% uplift in a low score as required by BNG may have relatively limited effect, whilst the UGF instead requires sites to meet a minimum score based upon the combination of surface covers as a proportion of overall site area. Meeting the UGF requirements can of course support biodiversity objectives of the Statutory BNG Metric (and vice versa).

5.27 In formulating the specific requirements of policy G3 the Council has adopted the list of surface cover types and individual scores recommended through Natural England's guidance, which applicants will be required to utilise in their assessments (Table 5). Natural England devised these different weightings in order to maximise multi-functionality of green infrastructure in urban areas and benchmarked them against their Environmental Benefits from Nature tool which assigns values to different habitats based on the ecosystem services they provide. As the intention is to provide a consistent approach across England and in discussion with Natural England, the Council deemed that it was unnecessary to amend the weightings further.

No.	Surface Cover Type	Facto
1	Semi-natural vegetation and wetlands retained on site (including existing / mature trees)	1.0
2	Semi-natural vegetation established on site	1.0
3	Standard / semi-mature trees (planted in connected tree pits)	0.9
4	Native hedgerow planting (using mixed native species)	0.8
5	Standard / semi-mature trees (planted in individual tree pits)	0.7
6	Food growing, orchards and allotments	0.7
7	Flower rich perennial and herbaceous planting	0.7
8	Single Species or mixed hedge planting (including linear planting of mature shrubs)	0.6

Table 5: A selection of the surface covers and their weightings from the Natural England UGF tool – the full list is included in the Appendix of the Local Plan – any updates will be published in the Green Infrastructure and Biodiversity TAN in future.

5.28 In relation to the specific targets new development will need to meet in Oxford, whilst Natural England also set out recommendations in this regard (e.g. 0.4 for residential and 0.3 for non-residential), an additional assessment of the local context and other aspirations in the Local Plan have helped informed the targets for policy G3. Sites in Oxford are particularly constrained by a variety of pressures whilst the Local Plan also includes a variety of policies which will put additional demands on the layout of development sites. As such, high level testing of the UGF assessment was carried out on proposed allocated sites in the Local Plan to understand how these sites currently score and what could practically be achieved. This testing process has led to slightly reduced targets for major development (0.3 for residential sites and 0.2 for non-residential), except for wholly greenfield sites. The policy also includes requires that proposals should not result in a reduction in the baseline score, meaning sites that already exceed these targets (e.g. greenfield), will need to maintain these scores as a minimum (no net loss).

5.29 On wholly greenfield sites, the policy does acknowledge that no reduction in baseline score may not always be feasible, particularly where there are limited opportunities to enhance parts of the site further to mitigate losses elsewhere on the site. Applicants will need to justify where this is technically not feasible, such as by setting out how they have tested different layouts of the site. These sites have a higher minimum target that must be met, however, in recognition of the higher level of greening they are starting from. Other policies, such as Policy G1 will also remain relevant, meaning higher quality elements on the site, such as

mature trees should be retained regardless (subject to the requirements of that policy).

5.30 The testing process on allocated sites enabled officers to identify existing natural features on site, particularly those that are of sufficient quality to contribute to the UGF score and compatible with the design-led approach to writing the allocations policies. Whilst the overarching targets of policy G3 apply to all sites, where applicable, such features have been highlighted in the allocation policy as part of the overall guidance on natural features and placemaking. They are written in such a way as to not be unduly prescriptive, which should give allowance for applicants to explore appropriate design solutions and engage with council officers.

5.31 The overall approach is considered to be most pragmatic for the local circumstances of the Oxford, given that it is a new policy addition which is based on relatively new UGF standards from Natural England. It will ensure that green infrastructure provision is appropriately considered in all major development (with encouragement for its application on other types of development), that provision is quantified helping to understand net change and achieves a realistic minimum baseline, whilst also leaving flexibility for applicants to tailor their approach to the particular circumstances of their sites. The approach can be tailored in future iterations of the Local Plan based upon how the new approach performs.

Appendix A – Regulation 18 Policy options sets

Policy options set 005a (draft Policy G1): Protection of GI network and green features

- The proposed options set out to protect a network of different open spaces. The options consider the protection of the open space network in a couple of ways, either assigning similar protection to all sites, or identifying a hierarchy of sites with different levels of protection. The options seek to protect the network through one policy, rather than having bespoke policies for each type of space in the network, but there is an option which considers whether additional policies could be applied to different types of spaces. There is also an option for protecting trees, hedgerows and woodland.

Table 1 - Policy options set 005a: Protection of GI network and green features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Identify a network of green and blue infrastructure for protection, informed by the green infrastructure study. Incorporate multi-functional green spaces of varying sizes, with clear criteria for inclusion in the network. All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of	Ensuring that we are protecting a network of spaces and features at various scales will help to ensure that the needs of local residents and the environment are met at various levels. Ensuring spaces are connected, and protected from further fragmentation, can help support quality of these areas and wider nature recovery.	The green infrastructure study has identified that some green spaces and features are of a higher quality than others – performing a more important role in supporting the city than others. Considering the high demands for space in the city in order to meet other objectives, such as providing affordable, quality housing for residents, it may be preferable to protect only the higher quality, strategic spaces, or those with practical opportunities to enhance. This would allow us to release poorer quality spaces for other needs, rather than treat all spaces with the same degree of importance. Careful wording will be needed to ensure this approach clearly fits in with the NPPF wording that protects all

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a network means that it would be challenging for them to be replaced elsewhere).	The city is limited in its green infrastructure, particularly open space. Once open space is lost, it can be very difficult to reprovide. Beginning from a standpoint that all spaces are valuable and should be protected in themselves helps to recognise this challenge. Protecting open space regardless of quality recognises that every space has the potential to make an important contribution to health and wellbeing as well as wider sustainability, particularly to the local area.	green spaces unless they are shown to be surplus or can be re provided.
Option b Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in	Gives further clarity than option a, and provides opportunity to identify higher quality, strategic and multifunctional sites and prioritise these for protection over sites that have less adverse impact if lost to development.	Categorising sites may be subjective exercise and run risk of depriotising spaces that may still bring about benefits.

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exceptional circumstances, to permitting development with reprovision of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy.		
Option c In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecologcial sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.	This option could allow bespoke policy approaches to specific types of green space and any unique needs/concerns.	This approach may add a level of confusion where there are protections of a particular category both within and outside of the network (for example some outdoor sports pitches may be a multifunctional part of the network and others may have protection only as outdoor sports).
Option d Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the	Trees perform several important functions such as helping to improve air quality, supporting biodiversity and contributing to the character of an area. It is important that, where possible, developments are designed to enable the retention of	Where high quality trees are already protected by Tree Preservation Orders, additional tree protections could be considered too onerous in the development of particularly constrained sites.

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retention of existing trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover. Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.	established trees and to incorporate the planting of new trees. Tree canopy cover often has the biggest impact on setting and as such that correlates to the benefits that trees can bring. Some high-quality trees are protected by Tree Preservation Orders (TPOs), but this relies on the City Council having been made aware of them and designating in this way. It is unlikely that all high-quality trees in the city are protected in this way however, thus many will not benefit from TPO protection.	
Option e Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and	This option recognises that there are key areas of open space with value to supporting health and wellbeing in the city. These larger spaces are likely to have more capacity	Green infrastructure works best when thought of as an interconnected network, which this approach would ignore. Smaller spaces and linear features contribute to and enhance larger spaces, as well having an equally important role in supporting day-to-day wellbeing – breaking up urban environment, supporting climate resilience, creating wildlife corridors and encouraging active travel.

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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.	for enhancement than smaller ones too. It would ensure that key areas are identified and protected across the city whilst diverting development pressure away to poorer quality areas or areas that provide less benefit overall.	
Option f Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.	National guidance on GI standards is developing, including the full launch of the Natural England GI Framework later in 2022.	Relying on national standards for green infrastructure provision could risk ignoring local contextual issue and priorities which a local policy can help to address.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options or combinations e.g. option A or B, A+C, B+C, A+B+C, A+B+C+D, A+D, B+D, E, F) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, **7. Green Infrastructure,** and to **10. Biodiversity**. There is also some relevance to criterion **3. Efficient use of land,** as the use of designations and protections that restrict development on greenfield land. All options are going to score positives for criteria 2, 3, 7 and 10, apart from option g (no policy – defer to national policy/standards) which would score neutral. All other options seek to put in place some form of baseline level of protection on all green spaces, creating designations dependent on the function or type of green space, and restrictions. The differences between

the policies are of degree and extent. The extent of the positive impact of these options will depend largely on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Protection of Green Infrastructure network and features – Policy G1

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of aspects from options **A, B, C** and **D.** This combination of options establishes the principle of a city-wide connected green infrastructure network made up of spaces and features of different scales and type, that will be subject to varying levels of protection. This approach is considered the most effective way of protecting all public and private green infrastructure in the city from inappropriate development and mitigating the impact on green spaces of development in general. Policy can establish a hierarchy of protection for all green spaces in the city, which can identify spaces that are particularly important to the city in terms of their function, historical significance or local amenity and where needed can ensure levels of protection that go beyond what is stated in national policy. This approach would allow us to set out the specific conditions under which certain types of green space may be lost to development, and measures to mitigate the impact of such losses including reprovision. The approach would also recognise importance of trees and set out expectations for developments that might impact them.

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Policy options set 005b (draft policy G2): Enhancement and provision of new GI features

- Green features on sites can be designed in ways that allow them to perform multiple benefits for the local area, e.g. making space for biodiversity, recreation, climate resilience. The policy options in this set consider how opportunities can be maximised for delivering new and improved green infrastructure and securing the various benefits associated with it, whilst cumulatively bringing about a greener and healthier city. They also consider options for securing new open space, though opportunities for this will likely be limited to larger sites.

Table 2 - Policy options set 005b: Provision of new GI features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require green and blue infrastructure features on all new development – guide expectations through tailored requirements in different areas of city or on different scales of site including: i. Compliance with Urban Greening Factor to demonstrate net gain ii. % new open space on larger sites iii. Bespoke guidance on greening within allocations policies.	More bespoke tools would align with the wider spatial approach to the Local Plan and such tools/approaches could be tailored to meet specific needs/challenges in different areas of the city (e.g. areas of deficit, deprivation, with poor air quality, highly urbanised sites). National policy encourages use of such tools as a standard. Such tools can allow for better analysis and more effective design of green infrastructure, assist in practical delivery and better quantification of benefits. With better quantification of green infrastructure, comes the potential for better	Quantifying green infrastructure provision and its benefits can be a subjective process which is not an exact science. There is the potential for any provision of green infrastructure by applicants to be tailored to meet only the bare minimum as required by any such policy (e.g. the minimum acceptable to meet policy), rather than striving to maximise provision or be more innovative. Potential for more complicated/onerous development management process which would need to be addressed with quality guidance.

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	monitoring of what is being delivered in a design proposal.	
Option b Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features. Set out principles for what should be included. Leave requirements flexible, to respond to the site's specifics.	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 to contribute to new open space provision. Smaller sites in the city are typically more limited in what green infrastructure features they can provide, as such, requiring new provision to be factored into their design, but leaving flexibility in how this achieved, would allow for different proposals to respond in the best way possible for the site. Requiring open space provision on smaller sites could lead to small, unusable	Many developments in the city have historically been on smaller sites and not of the scale large enough to meet the need for open space provision on larger sites. Asking for green infrastructure, without specifying more exact/quantifiable targets risks under provision and proposals not maximising the potential for green infrastructure on a site. In relation to smaller sites and requiring green infrastructure without setting more exact targets, historically, it has been difficult to monitor and therefore assess the performance of similar policies.

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	spaces that are costly to manage and maintain and offer little value to residents, as has historically been experienced in the city.	
Option c Set out a specific quantity standard of the number of hectares per 1,000 population for green space provision on all new developments in city	This would provide a simple target to monitor and report on.	Such a target would not necessarily be meaningful as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. It is more meaningful to measure and provide greenspaces on a more localised basis. Work on the Local Plan 2036 identified the challenge that it is increasingly difficult to manage the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites.
Option d Do not include a policy for providing new green infrastructure, defer to national policy/standards.	This would allow for greatest flexibility for applicants to work within the constraints of their site.	This option would be limited in influencing the amounts of greening undertaken on a site and would not set any minimum expectations on proposals. It could result in opportunities to maximise green infrastructure being missed and is likely to have less of a positive influence on the design of natural elements of designs.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B, A+B, C, D) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective. **Screened in for detailed appraisal?** No **Rationale:**

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, and **7. Green Infrastructure**. There is also some relevance to criterion **10. Biodiversity.**

All options are going to score positives for criteria 2, 7 and 10. because they seek to bring in additional greening as part of new development, apart from option g (no policy – defer to national policy/standards) which would score neutral. The differences between the policies relate to how the additional greening is delivered and how the amount is determined. The extent of the positive impact of these options will be dependent on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Enhancement and provision of new Green Infrastructure Features – Policy G2

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of options **A** and **B**. Policy would set out requirements for green and blue infrastructure features to be associated with new development schemes, and where there are existing GI features for these to be enhanced. The approach will allow for specific requirements for new or enhanced features as applicable to the parameters of the site and its context. Specific amounts of open space provision will only be required for large sites. The combined approach will allow for some degree of flexibility with respect to requirements depending on the parameters of the site, while ensuring that GI forms a fundamental element of development schemes coming forward.

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Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor

- At its most basic, the Urban Greening Factor (UGF) is a policy tool that provides a way of simply quantifying green surface cover on a given development site via a metric system. UGF schemes have been applied in several cities through planning policy including the London Plan and the Southampton Local Plan. The methodology is also one of the Headline Standards that form the basis of the Natural England Green Infrastructure Framework.
- The UGF can be used to quantify in simple terms the amount of green infrastructure being proposed as part of a development scheme. Policies that incorporate the UGF can require proposals to secure a certain target, or to simply demonstrate a betterment in score compared with the existing site. The use of the UGF is intended to achieve separate objectives to biodiversity net gain, though it will be mutually supportive. Instead, the key intent of the UGF is to help address a variety of

wider place-making and environmental issues, for example, making spaces that are more pleasant for people, as well as delivering resilience/adaptation to climate change (more green infrastructure can improve flood resilience and reduce urban heat).

- Requiring applicants to use an UGF could be a useful way of improving the way that green infrastructure provision on sites is quantified. The policy options below set out possible approaches for applying the tool in the Oxford context and have been developed with consideration of the strengths and weaknesses of the methodology.

Table 3 - Policy options set 005c: Provision of new GI features – Urban Greening Factor

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Incorporate the use of an Urban Greening Factor (UGF) into policy, requiring proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development	Would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. UGF tools are quick and simple to use and to be understood by a range of users, they can assist in discussing and visualising levels of greening on a site. Could be well suited to more constrained sites due to promoting use of often wasted spaces such as walls and rooftops.	The simplicity of UGF tools means they are fairly limited at distinguishing quality/condition of greening measures. Where designs incorporate more complex features, their suitability will still need relevant expert assessment for quality/management etc. as with any other application. They are not a replacement for ecological analysis and associated metrics such as DEFRA Biodiversity metric. The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, but it would be an additional ask of applicants.

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Option b The scale of application of the UGF tool could be across select sites/ areas of the city, whilst its use is encouraged but not mandatory elsewhere. Potential areas of application could be: • Major applications • Specific site allocations which are not already sufficiently green. • Retail/district centres • Areas of deficit of green surface cover and/or heightened climate risk.	This avoids unnecessary work by avoiding areas that are already particularly green. It is sensible to target the approach to areas in the city where the use of the tool and securing betterment would be required.	Could be missing out on opportunities to promote greening elsewhere in the city – encouraging the tool's use may not be strong enough to get applicants to use it elsewhere.
Option c Incorporate the use of an Urban Greening Factor (UGF) into policy with bespoke higher scoring for areas of the city identified as a priority greening area - determined by the level of deficit of green surface cover and/or heightened climate risk.	This can secure targeted betterment in areas where there is a clear deficit of green space and potentially reducing the greening requirement on developers for schemes in areas that are already particular green.	Oxford is highly constrained and has a high level of density in some areas. Desktop assessment already indicates what is likely to be an achievable threshold of UGF score, which is lower than the NE baseline. Development sites tend to be fairly small and compact particularly in dense areas where there is deficiency in green space. Achieving higher bespoke scores in areas where there is already deficiency will be difficult and potentially unviable – testing

L1967

Option d The scale of application of the UGF tool could be mandatory across all developments in the city.	The ease of use of the tool and the non-prescriptive requirement of simply achieving betterment (leaving a site greener than it started) could be quite easily applied to many areas.	Some sites in the city are already quite green and achieving betterment could be difficult to achieve/of little value. The tool is better suited to harder, grey areas with little greening at present. The tool does not distinguish between quality/condition in detail, therefore, there is a risk that on particular green sites, the policy requirement could promote replacement of existing established/quality features for other poorer quality features.
Option e Do not incorporate an UGF into policy	The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, however, it is an additional ask of applicants.	The tool is a simple and practical way of quantifying and better negotiating net gains in greening on sites which has a range of benefits including climate adaptation, mental and physical health and wellbeing and biodiversity.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? various options (A, A+B, A+C, A+D, E) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options relate to whether or not to include policy requirement for undertaking an urban greening factor assessment (option a) or not (option e), as well as various options for the scale of application to which such a requirement would be applied (options b, c and d).

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **7. Green Infrastructure,** and to **criteria 5. Inequalities** (some of the options address greening in areas that are below average for green infrastructure currently). All options are going to score a minor positive for criteria 7. because they seek to bring in additional greening as part of new development, apart from option e (no policy) which would score neutral. Option b and c seek to prioritise greening in areas which are lacking, (the difference is just which areas) so would also score a minor positive for inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

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

The preferred approach for the Local Plan 2045 draft policy is to take forward **option B**. This option will incorporate the use of UGF into policy and the use of the tool will be encouraged for all developments, however its mandatory use will only be required for a selected category of development. This approach will enable targeting application of the methodology to where the most benefits may be accrued, for example development types that present opportunities to secure significant betterment in green surface cover or areas of the city where there is a deficit in green infrastructure. A targeted approach is also less likely to be onerous to implement for developers or impact on the viability of schemes.

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Appendix B List of Core Spaces

Policy G1 Site ID	Policy G1 Site reference	Typology	Contains (partial or whole) Registered Park and Garden? Designated OHAR?	Contains (partial or whole) Designated ecological site?	50% or more of site contains TVERC NRN status - Core	50% or more of site contains Flood zone 3b?	Additional comments relating to rationale for core designation
1	St. Clements Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
4	Memorial Garden	Amenity Green Space	RPG				
5	Oatlands Recreation Ground	Parks and Recreation Grounds				Yes	
6	Oatlands Play Space	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
7	Botley Park	Parks and Recreation Grounds		OCWS		Yes	

8	Botley Road MUGA	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
9	Botley Road Tennis	Outdoor Sport (Fixed)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
10	Botley Road Bowls	Outdoor Sport (Fixed)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
11	Botley Road Play Space	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
12	Osney Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
14	Spragglesea Mead and Dean's Ham Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
16	Hinksey Park	Parks and Recreation Grounds - Destination Park				Yes	Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

17	Hinksey Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
18	Hinksey Park Tennis Courts	Outdoor Sport (Fixed)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
19	The Links Barracks Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
20	Bartlemas Close (Links) Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
21	East Ward Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
22	Sorrel Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

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23	Mill Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
24	Eden Drive Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
25	Elder Stubbs Gardens	Allotments/other food growing	OHAR				As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
26	Fairview Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
27	Pullens Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
28	Barton Fields Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions

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							that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
29	Town Furze Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
30	Court Place Farm Allotments +	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
31	Cripley Meadow Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
32	Upper Wolvercote Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
33	Cutteslowe Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access

							to private gardens, which are considered important to protect in situ.
34	John Garne Way Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
35	Ramsay Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
36	Osney St Thomas	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
37	Bullstake Close Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
38	New Hinksey Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

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39	Fairacres Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
40	Bartholomew Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
41	Richards Way Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
42	Kestral Crescent Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
44	Van Diemans Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
45	Barns Court Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions

							that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
46	Thomson Terrace Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
47	Minchery Farm Allotments (west)	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
48	Lenthall Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
49	Cowmead Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
50	Marston Ferry and Blackhall Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access

							to private gardens, which are considered important to protect in situ.
53	Gillians Park	Parks and Recreation Grounds					Whilst not an identified destination park, the park is located in an area of significant deprivation and supports wider wellbeing and access to open space in the local neighbourhood.
54	Gillians Half Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
55	Gillians Play Space 1	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
56	Fry's Hill Park	Parks and Recreation Grounds					Whilst not an identified destination park, the park is located in an area of significant deprivation and supports wider wellbeing and access to open space in the local neighbourhood.
57	Fry's Hill Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
58	Fry's Hill Skatepark	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
59	Fry's Hill MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

79	St Mary & St John CE Primary School	Outdoor Sport (Restricted Use)	OHAR				
88	Wolfson College	Private Open Space				Yes	
103	Magdalen College	Private Open Space	RPG	LWS, SSSI	Yes	Yes	
104	Worcester College	Outdoor Sport (Private)	RPG				
108	St Hildas College	Private Open Space		LWS			
109	Corpius Christi College	Private Open Space	RPG				
110	West Oxford Community School	Private Open Space				Yes	
123	Littlemore Brook	Accessible Natural Green Space		OCWS (Northwest edges)			
153	Furlong Close	Amenity Green Space				Yes	
154	Blackbird Leys Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

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155	Blackbird Leys Bowls	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
156	Blackbird Leys Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
157	Blackbird Leys Play Space 2	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
166	Linkside Lake	Private Open Space		OCWS	Yes		
168	Cutteslowe Park Park Volleyball	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
169	Cutteslowe Park Tennis Courts	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
170	Cutteslowe Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
171	Cutteslowe Park Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
172	Cutteslowe Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

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174	Wolvercote Green Play Space	Play Space (Child)		SSSI	Yes	Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
175	Wolvercote Common	Accessible Natural Green Space		SSSI	Yes	Yes	
178	Wolvercote Lakes	Accessible Natural Green Space			Yes	Yes	
182	Sunnymead Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
183	Sunnymead Park Skatepark	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
184	Sunnymead MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
185	Sunnymead Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
187	Alexandra Tennis Courts	Outdoor Sport (Private)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

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188	Alexandra Courts	Parks and Recreation Grounds					Whilst not an identified destination park, the park is located in an area with limited provision of similar facilities and provides wellbeing benefits for a larger proportion of the wider area.
189	Alexandra Courts Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
192	Trap Grounds	Accessible Natural Green Space		LWS	Yes		
193	Aristotle Lane MUGA	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
194	Aristotle Lane Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
195	Aristotle Lane Recreation Ground	Parks and Recreation Grounds				Yes	
202	St. Margaret's	Private Open Space	RPG				
203	University Parks	Parks and Recreation Grounds - Destination Park	RPG	OCWS and LWS	Yes		Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

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206	Fish Road Gardens	Amenity Green Space				Yes	
207	Oxpens Recreation Ground	Amenity Green Space				Yes	
209	King George's Field	Amenity Green Space				Yes	
210	Seacourt Nature Park	Accessible Natural Green Space				Yes	
214	Grandpont Nature Park	Accessible Natural Green Space	OHAR (partially located within site)				
215	Brasenose College Recreation Ground 1	Outdoor Sport (Restricted Use)				Yes	
216	Brasenose College Recreation Ground 2	Outdoor Sport (Restricted Use)				Yes	
218	University College and Corpus Christi	Outdoor Sport (Private)				Yes	

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	College Sports Ground						
219	South Oxford Bowls Club	Outdoor Sport (Private)				Yes	
223	Cold Harbour Nature Area	Accessible Natural Green Space				Yes	
239	Milham Ford Nature Park Play Area	Play Space (Child)		LWS	Yes		Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
240	Milham Ford Nature Park	Accessible Natural Green Space		LWS	Yes		
241	Headington Hill Park	Accessible Natural Green Space					Whilst not identified as a destination park, this is a park identified as making an important contribution to the character of the area including heritage. It is a remnant of historic parkland and has a wide variety of trees with some important specimen species.
248	Peasmoor Piece	Accessible Natural Green Space		OCWS	Yes		
252	Dunstan Park	Accessible Natural Green Space		OCWS			

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255	Bury Knowle Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
256	Bury Knowle Park Tennis Courts	Outdoor Sport (Private)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
257	Bury Knowle Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
264	Fettiplace Recreation Gound	Parks and Recreation Grounds		OCWS (partially)			
265	Fettiplace Recreation Gound MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
266	Fettiplace Recreation Ground Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
279	C S Lewis Nature Reserve	Accessible Natural Green Space			Yes		
284	Magdalen Quarry Local Nature Reserve	Accessible Natural Green Space		SSSI	Yes		

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286	Valentia Road Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
287	Valentia Road Park	Amenity Green Space				Yes	
289	Old Road Land	Private Open Space		OCWS	Yes		
297	Magdalen Wood	Accessible Natural Green Space		LWS	Yes		
311	Warneford Meadow and Orchard	Accessible Natural Green Space		OCWS	Yes		
312	Oxford Golf Club	Outdoor Sport (Private)		LWS			
313	Boundary Brook Wildlife Corridor	Accessible Natural Green Space		OCWS	Yes		
314	South Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
315	Angel and Greyhound Meadow Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

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316	Angel and Greyhound Meadow	Accessible Natural Green Space				Yes	
317	Bat Willow Meadow	Private Open Space	RPG			Yes	
319	Great Meadow	Accessible Natural Green Space		LWS	Yes	Yes	
323	University of Oxford Botanical Garden	Private Open Space	RPG				
324	Magdalen College	Outdoor Sport (Restricted Use)				Yes	
325	Meadow Lane Stakepark	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
326	Meadow Lane Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
327	Meadow Lane Park	Parks and Recreation Grounds				Yes	
338	Barracks Lane Meadow	Accessible Natural Green Space		OCWS	Yes		

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339	Cowley Marsh Recreation Ground Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
340	Cowley Marsh Recreation Ground	Parks and Recreation Grounds		LWS (Partly)			
341	Cowley Recreation Ground MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
342	Cowley Road Recreation Ground Tennis Courts	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
343	Florence Park Tennis Courts	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
344	Florence Park Play Area 1	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
345	Florence Park Bowling Green	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
346	Florence Park Play Area 2	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

347	Florence Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
357	Rivermead Nature Park	Accessible Natural Green Space		OCWS	Yes		
360	Aston's Eyot and The Kidneys	Accessible Natural Green Space	OHAR	OCWS	Yes		
361	Christchurch Meadow	Accessible Natural Green Space	RPG			Yes	Also, identified as a destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
362	Long Meadow	Private Open Space	OHAR	OCWS	Yes	Yes	
363	Iffley Meadows	Accessible Natural Green Space		SSSI	Yes	Yes	
364	Longbridges Nature Park	Accessible Natural Green Space		LWS (Partly), OCWS (Partly), SSSI (Partly)	Yes	Yes	
365	Pembroke College Sports Ground	Outdoor Sport (Private)				Yes	

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366	Willow Walk Meadow	Accessible Natural Green Space		LWS	Yes	Yes	
367	Osney Mead	Accessible Natural Green Space		LWS	Yes	Yes	
368	Almonds Farm and Burnt Mill Fields	Accessible Natural Green Space		LWS	Yes	Yes	
369	Victoria Arms Spinney	Accessible Natural Green Space		OCWS	Yes		
373	Wolvercote community orchard	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
374	Pasture by A34 Thames Bridge/Godstow Bridge Meadow	Accessible Natural Green Space		LWS	Yes	Yes	
375	Godstow Bridge Meadow	Accessible Natural Green Space		OCWS	Yes		

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376	Godstow Abbey Meadow	Accessible Natural Green Space		OCWS	Yes		
377	Port Meadow with Wolvercote Common & Green	Accessible Natural Green Space		SSSI, SAC	Yes	Yes	Also, identified as a destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
378	Cripley Island & Fiddler's Island	Accessible Natural Green Space		OCWS	Yes	Yes	
381	Lye Valley	Accessible Natural Green Space		SSSI, LWS, OCWS, LNR	Yes		
382	Spindlebury Nature Park	Accessible Natural Green Space		OCWS	Yes		
385	Dale Close Open Space (HELAA calls it Friars Wharf Open Space)	Amenity Green Space	OHAR				
387	OxGrow Community Garden	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access

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							to private gardens, which are considered important to protect in situ.
388	Hogacre Common Eco Park	Accessible Natural Green Space		OCWS (Partly)		Yes	
412	St Bartholomew's Chapel	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
413	St Mary & St John Church	Churchyards and Cemeteries	OHAR				As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
414	St Michael & All Angels Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
415	Summertown United Reformed Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
416	St Nicholas Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

417	Northway Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
418	St Andrews Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
419	Woodstock Road Baptist Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
420	St Mary's Indian Orthodox Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
421	Marston URC Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
422	St Andrew's C of E Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

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423	St Margarets Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
424	St Luke's Chapel	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
425	St Philip and St James Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
426	St Michael and All Angels New Marston	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
427	Corpus Christi RC Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
428	St Giles Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

429	All Saints Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
430	St Barnabas Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
431	Holywell Cemetery	Churchyards and Cemeteries		OCWS (Partly)	Yes		As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
432	St Mary Magdalen	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
433	St Michael at the North Gate	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
434	University Church of St Mary the Virgin	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

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435	St Aldats's Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
436	St Ebbe's Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
437	Wesley Memorial Methodist Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
438	St Thomas the Martyr Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
439	St Frideswide's Church	Churchyards and Cemeteries				Yes	As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
440	Greyfriats - St Edmund & St Frideswide RC	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

441	St Matthews Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
442	Catholic Church of Saints Gregory and Augustine	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
443	Church of the Holy Family	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
444	St Peter's Wolvercote	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
445	Our Lady Help of Christians Parish	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
446	St James Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

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447	Rose Hill Methodist Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
448	Blessed Dominic Barberi	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
449	St Mary & Saint Nicholas Littlemore	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
450	St Albans Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
451	St Lukes Church	Churchyards and Cemeteries				Yes	As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
452	St Mary the Virgin Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

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453	The Church of Jesus Christ of Latter	Churchyards and Cemeteries				Yes	As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
454	Oxford Salvation Army	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
455	St Mary C of E Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
456	Collingwood Road URC Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
457	Cornerstone Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
458	Holy Trinity Headington Quarry	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

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459	Elsfield Road Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
460	Headington Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
461	St Sepulchre's Cemetery	Churchyards and Cemeteries	RPG				As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
462	Rose Hill Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
463	Wolvercote Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
487	Brasenose Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

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492	Sandford Brake	Accessible Natural Green Space		LWS	Yes		
493	Bagley Wood	Accessible Natural Green Space		LWS	Yes		
494	South Ward Red Bridge Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
496	Showmans Field	Amenity Green Space		LWS			
501	Burgess Field Nature Reserve	Accessible Natural Green Space		OCWS			
502	Trap Ground Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
503	Lower Wolvercote Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

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505	Botley Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
506	South Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
510	Barton Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
511	Barton Park	Amenity Green Space		OCWS (partial)		Yes	
513	Wolvercote Picnic Area	Amenity Green Space			Yes	Yes	
515	Longbridges Nature Park	Accessible Natural Green Space				Yes	
518	Barracks Lane Community Garden	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
520	Magdalen College Fellows' Garden	Private Open Space	RPG		Yes		

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523	Abingdon Road Disused Allotments	Private Open Space				Yes	
524	Voco Oxford Spires	Private Open Space				Yes	
525	Arlington Drive	Accessible Natural Green Space		LWS	Yes	Yes	
526	Green Belt land to rear of Dragon School	Private Open Space				Yes	
527	Oxford Golf Centre	Outdoor Sport (Private)				Yes	
528	Parson's Pleasure	Amenity Green Space	RPG		Yes	Yes	
529	Elmthorpe Convent	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
530	Wytham Woods	Accessible Natural Green Space		SSSI	Yes		
539	Alexandra Courts Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

540	Aristotle Lane Basketball	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
543	Thames Walk	Accessible Natural Green Space				Yes	
545	Cutteslowe Park Minigolf	Outdoor Sport (Private)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
546	Cutteslowe Park Splash Park	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
547	Cutteslowe Park Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
549	Music Meadow	Accessible Natural Green Space				Yes	
553	Fettiplace Skatepark	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
554	Fettiplace Recreation Gound Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
556	Hinksey Splash Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

560	Florence Park Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
561	Florence Park Play Space	Play Space (Child)					Supporting features accommodated within boundary of Florence park and contributing to its wider wellbeing function.
567	Binsey Green	Accessible Natural Green Space		LWS	Yes	Yes	
568	Poplar Walk	Amenity Green Space	RPG			Yes	
573	New Marston Meadows	Accessible Natural Green Space		SSSI	Yes	Yes	
574	New Marston Meadows	Accessible Natural Green Space		SSSI	Yes	Yes	
575	Wolfson College Nature Reserve	Accessible Natural Green Space		SSSI	Yes	Yes	
577	Rock Edge Nature Reserve	Accessible Natural Green Space		SSSI, LNR	Yes		
578	Stansfeld Park	Private Open Space		OCWS	Yes		

579	Shotover Country Park	Accessible Natural Green Space	RPG	SSSI	Yes		Also, identified as a destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
580	Oriel Meadow	Private Open Space				Yes	
581	Denny Garden Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
583	St Johns College	Private Open Space	RPG				
584	St Johns College	Private Open Space	RPG				
585	Trinity College	Private Open Space	RPG				
586	Trinity College	Private Open Space	RPG				
587	Wadham College	Private Open Space	RPG				
595	All Souls College	Private Open Space	RPG				
597	New College	Private Open Space	RPG				

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599	Merton Field	Private Open Space	RPG				
600	Merton College	Private Open Space	RPG				
601	Christchurch College	Private Open Space	RPG				
602	Christchurch College	Private Open Space	RPG				
603	Christchurch College	Private Open Space	RPG				
604	Christchurch College	Private Open Space	RPG				
612	Wildlife Corridor at River Cherwell 11	Accessible Natural Green Space				Yes	
613	North of Marston Ferry	Accessible Natural Green Space			Yes	Yes	
614	Sunnymead	Accessible Natural Green Space			Yes	Yes	
616	Hook Meadow and Trap Grounds	Private Open Space		SSSI	Yes	Yes	

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617	Headington Hill Viewpoint OCWS	Accessible Natural Green Space		OCWS	Yes		
618	Scrub by Heyford Hill Roundabout (inc Littlemore Railway Cutting SSSI)	Private open space		SSSI (Western half of site)	Yes		
619	Land adj Seacourt P & R			OCWS (Partly)	Yes	Yes	
620	North of Botley Road/ around Binsey/ Cripley Meadow	Accessible Natural Green Space		OCWS,	Yes	Yes	
621	Pixey Mead SSSI			SSSI, SAC	Yes	Yes	
622	Wildlife Corridor South of Pixey Mead	Accessible Natural Green Space				Yes	
623	Wildlife Corridor Lower Wolvercote N Godstow Road	Accessible Natural Green Space				Yes	

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625	Wildlife Corridor Lower Wolvercote S Godstow Road	Accessible Natural Green Space				Yes	
626	Land North of Godstow Bridge			LWS	Yes		
627	Land at Wolvercote Viaduct (West of Canal)	Accessible Natural Green Space				Yes	
628	Land at Wolvercote Viaduct (East of Canal)	Accessible Natural Green Space		LWS	Yes	Yes	
629	Nixey's Field	Private Open Space			Yes		
631	Wildlife Corridor at River Cherwell 7	Accessible Natural Green Space				Yes	
632	Wildlife Corridor at River Cherwell 8	Accessible Natural Green Space				Yes	
633	Wildlife Corridor at River Cherwell 9	Accessible Natural Green Space				Yes	

636	Wildlife Corridor at Marston Brook			SSSI	Yes	Yes	
637	Park Farm with adjoining OCWS			OCWS	Yes	Yes	
638	Isis Farmhouse Pub w/surrounding OCWS			LWS	Yes	Yes	
641	Wildlife Corridor North of South Hinksey					Yes	
643	Land South of Ulfgar Road	Private Open Space				Yes	
647	Land behind Oxford Spires Hotel	Private Open Space				Yes	
648	Extension to HELAA site 127	Private Open Space				Yes	
650	Wildlife Corridor at West Godstow Road	Accessible Natural Green Space				Yes	

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653	Boundary Brook Nature Reserve	Accessible Natural Green Space		OCWS	Yes		
660	Land south of A40, Old Marston	Private Open Space			Yes	Yes	
662	Former Binsey Lane Allotments	Private Open Space				Yes	
663	Meadow North of Goose Green	Accessible Natural Green Space		LWS	Yes	Yes	
664	Minchery Farm OCWS	Accessible Natural Green Space		OCWS	Yes	Yes	
665	Field North of Osney Mead OCWS	Accessible Natural Green Space		OCWS	Yes	Yes	

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Background paper 005b

Title: Biodiversity

This paper addresses the protection of biodiversity, including designated sites, as well as enhancing biodiversity.
Relevant Local Plan Objective(s): • Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network.
SA Objective(s): 10. To conserve and enhance Oxford's biodiversity.
SEA theme(s): Landscape, biodiversity, flora, fauna.

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1. Introduction

1.1 An important component of Oxford's Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

2.1 In relation to Biodiversity, the NPPF sets out:

- **Para 187:** that plans should: recognise the wider benefits from natural capital and ecosystem services such as trees and woodland, and minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- **Para 188:** that Local Plans should distinguish a hierarchy of designated sites and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- **Para 192:** that local plans should identify, safeguard components of wildlife-rich habitats and wider ecological networks; promote the conservation/restoration/enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify/pursue opportunities for securing measurable net gains for biodiversity.

Planning Practice Guidance and National Design Guide/Model Design Code

2.2 The online Planning Practice Guidance has a dedicated page for the natural environment including green infrastructure and biodiversity considerations. In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and habitats; 'proportionate' information and assessment required on biodiversity impacts at all stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

2.3 The National Design Guide is a material consideration and forms part of national planning guidance. The guide sets out ten characteristics of good design, of which designing to incorporate nature is one. It highlights the value that natural spaces can bring to people and encourages networks of green and blue infrastructure within the design of spaces as well as making space for biodiversity.

The Environment Act

2.4 This legislation received Royal Assent on 9th November 2021 and includes provisions to strengthen and improve the duty on public bodies to conserve and enhance biodiversity. In particular, it introduces a mandatory requirement for net gains in biodiversity of 10% from most forms of new development approved through the planning system, this must be calculated using the DEFRA Biodiversity Metric and informed by a biodiversity gain plan which details the strategy for how biodiversity net gain will be delivered. The Act also requires the preparation and publication of Local Nature Recovery Strategies to support Nature Recovery Networks by setting out priorities for nature recovery and proposing actions in the locations where it would make a particular contribution to achieving those priorities. These Recovery Strategies are to be prepared by 'Responsible Authorities' as appointed by the Secretary of State, Oxford falls into the strategy that will cover the Oxfordshire County area.

Natural Environment and Rural Communities Act 2006

2.5 Section 40 of this Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

Conservation of Habitats and Species Regulations 2017 (as amended)

2.6 Legislation that previously transposed the European Habitats Directive (European Commission 92/43/EEC) into English law was amended upon exit from the EU in order to transfer functions from the European Commission to the appropriate authorities in England and Wales but otherwise functions broadly the same. The Regulations designate Special Areas of Conservation (SAC) and Special Protection Areas as priority locations for biodiversity conservation. In Oxford, this is the Oxford Meadows SAC, and near Oxford are the Cothill Fen SAC and Little Wittenham SAC. The effects of any plan or programme on these designated areas must be assessed via a Habitats Regulations Assessment (HRA).

National Parks and Access to the Countryside Act 1949

2.7 Section 21 of this Act enables local authorities to designate Local Nature Reserves where they are of high natural interest in the local context.

Oxford Local Plan 2036

2.8 As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network including policy G2 which addresses biodiversity and the

ecological network specifically, including protections for national and locally designated sites.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 It has long been noted that the biodiversity around the country is under intense pressure and has been in prolonged decline. This biodiversity loss is particularly pronounced in cities and urban areas such as Oxford as wildlife is forced out of natural habitats due to development pressure, recreational disturbance, pollution from various sources, as well as climate change. A particular issue in the city relates to the ecological conditions in Oxford's rivers and streams as water quality is being put under pressure from various sources including sewage discharges, invasive species and pollutants arising from agricultural practices upstream. This issue is explored in greater detail in the separate Natural Resources Background paper and more fully in the Water Cycle Scoping Study.

3.2 Nevertheless, Oxford benefits from a concentration of rare and valuable habitats that are important refuges for a variety of flora and fauna, including lowland hay meadows, calcareous grassland, alkaline spring fen (among other types of wetland) as well as pockets of woodland. A number of sites have been designated as being of particular importance to ecology including:

The Oxford Meadows Special Area of Conservation (SAC)

3.3 An internationally important site of nature conservation importance. The SAC is situated on the broad floodplain of the River Thames to the west and north-west of Oxford. The site is made up of an extensive complex of meadows and pastures which support species-rich grassland vegetation which would once have been widespread on floodplains in lowland England, but which is now very rare. The qualifying features for which the area was designated as a SAC are the presence of Lowland Hay Meadows habitat and the species *Apium repens* (creeping marshwort), which is a very rare plant of seasonally-flooded habitats. The Port Meadow population of this plant remains the largest and most consistently recorded in the UK.

3.4 Natural England's assessments indicate that the colony of *Apium repens* is under pressure from hydrological changes in the areas, possibly due to deeper, more prolonged and frequent flood episodes. There is also concern about invasive species moving into the habitat from other parts of the meadow and outcompeting the plant. Additionally, previous liaison with Natural England relating to Habitat Regulations Assessments work undertaken by the Council for the SAC have identified potential vulnerabilities arising from the impacts of air pollution (from traffic on the nearby roads), recreational disturbance due to increased visitors to the area (particularly those with dogs), as well as impacts from changes to hydrology and water quality as noted above.

3.5 There are also two other SACs within 10km of Oxford, these are:

- **Cothill Fen SAC** is a 43ha site located just over 5km from the city boundary. It is designated for its lowland valley mire, which contains one of the largest surviving examples of alkaline fen vegetation in central England. In 2015, the last year of analysis of Cothill Fen, the alkaline fens were of good overall ('global') value, and the alluvial forests were of significant overall ('global') value. It is highly threatened by pollution to groundwater and human-induced change in hydraulic conditions.
- **Little Wittenham SAC** is a 69ha site located around 8.5km from the city boundary. It is designated because it contains one of the best-studied great crested newt sites in the UK. In 2015, the last year of analysis of Little Wittenham, it was of good overall ('global') value, but it is highly threatened by non-native invasive species.

Sites of Special Scientific Interest (SSSIs)

3.6 These nationally important designated sites include four geological SSSIs and eight ecological SSSIs that are wholly or partly within the city, as well as others nearby. Four of these SSSIs comprise the Oxford Meadows SAC: Cassington Meadows SSSI; Pixey and Yarnton Meads SSSI; Port Meadow with Wolvercote Common and Green SSSI; and Wolvercote Meadows SSSI.

3.7 Natural England intermittently publishes condition assessments for the units comprising the SSSIs, which is available on the Designated Sites View website. These assessments are usually 5-10 years old, as such the condition may have changed in the intervening years since the last assessment was completed. As can be seen in Figure 3.2 and Table 3.2, the SSSIs are in varying condition, and of the twelve within or partially within the city, two SSSIs are in unfavourable condition and three are partly in unfavourable condition, whilst the others are in a favourable condition.

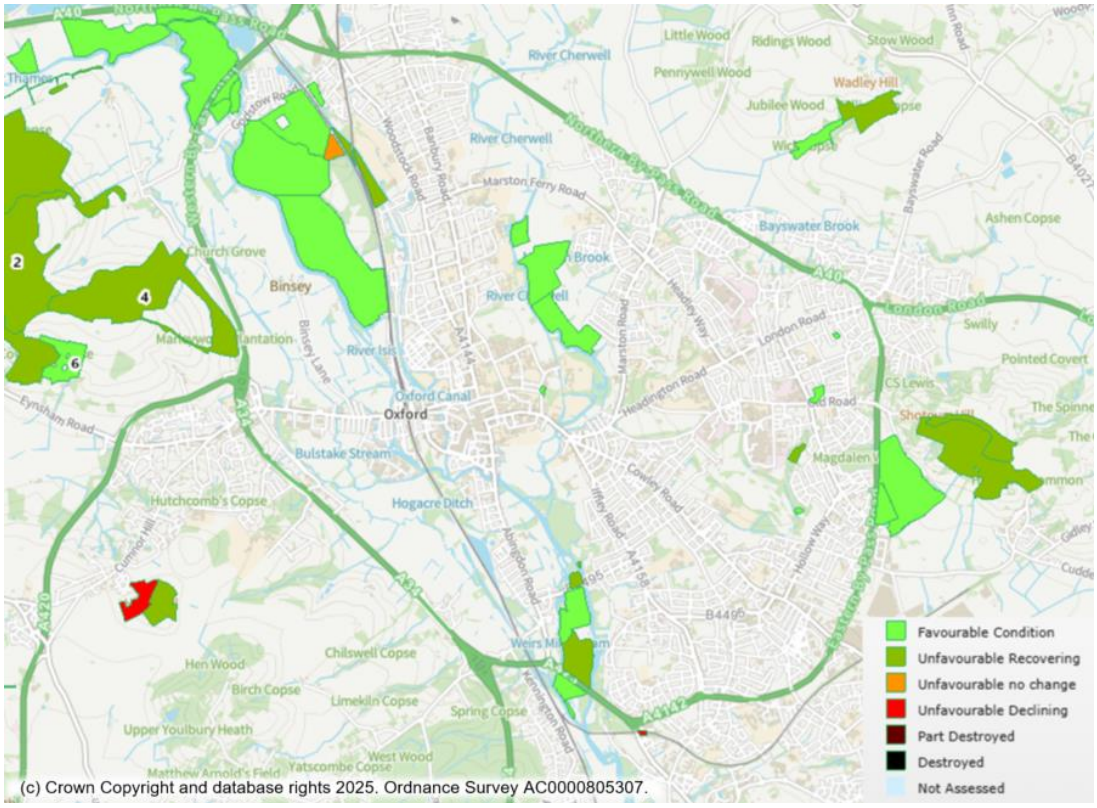


Figure 3.2 - Locations of Special Scientific Interest (SSSIs) within and around Oxford and their condition, source: DEFRA MAGIC website accessed 13.01.25)

Table 3.2 - Condition assessment for the Sites of Special Scientific Interest (SSSIs) within Oxford or nearby (Natural England)

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering
Littlemore Railway Cutting	0.50ha	Yes	100.00% Unfavourable declining
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering
Magdalen Grove	0.43ha	Yes	100.00% Favourable
Magdalen Quarry	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable

Pixey and Yarnton Meads	86.38ha	Partially *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Rock Edge	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

Local ecological designated sites

3.8 The city includes a number of locally important sites made up of Local Wildlife Sites, Oxford City Wildlife Sites and Local Nature Reserves. These are non-statutory sites of local importance for nature conservation, recognised for having high conservation value, containing rare species or habitats whose protection is bestowed upon them via the policies of the Local Plan rather than national legislation. This means that our policies will be particularly important for these local features which do not reach of the benchmark of higher protections and yet can still be valuable refuges of priority habitats and for local species.

3.9 Local Wildlife Sites are designated through criteria that is shared across the county, meanwhile Oxford City Wildlife Sites are sites of importance to the city which were established as part of work on the Local Plan 2036 (replacing what were previously known as Sits of Local Importance to Nature Conservation or 'SLINCS'). Whilst the overall interest of OCWSs has not been considered sufficient to be of county level importance in the same way LWSs are, with appropriate management, many do however have the potential to become LWSs in the future. The Thames Valley Environmental Records Centre (TVERC), undertake yearly reviews of sites across the county and assign LWS status on new sites where these are deemed to meet specific criteria.

3.10 As part of its work on the Local Plan 2040, the Council undertook a high-level review of its existing OCWSs to consider whether it was still appropriate to protect them and whether there were additional sites that might meet the criteria of local designation as either an OCWS (or LWS). This review was supported by a limited number of new surveys undertaken throughout 2023. As set out in Table 3.3, the work resulted in four previously proposed OCWSs being formalised (although in practice, these were already treated as full OCWS sites because of their proposed status at the time), as well as the addition of three new OCWSs. In addition, two sites were taken forward as LWSs via the county-wide selection process.

Table 3.3 - Recent updates to ecological network of local sites in city

Site name	Result of review process
Mileway Gardens	Previously proposed OCWS – Designation confirmed
Churchill Hospital Field	Previously proposed OCWS – Designation confirmed
University Parks	Previously proposed OCWS – Designation confirmed
Stansfeld Study Centre	Previously proposed OCWS – Designation confirmed
Burgess Field	New OCWS designation confirmed
Dunstan Park	New OCWS designation confirmed
CS Lewis Reserve	New OCWS designation confirmed
Showman's Field	New LWS designation confirmed
Marston Brook Meadow	New LWS designation confirmed

Other important areas of habitat

3.11 Beyond these formally designated sites within the city, there are also many of types of habitats which have been formally identified as being of importance in other ways. This includes Priority Habitats under Section 41 of the Natural Environment and Rural Communities Act 2006, many of which are included within Conservation Target Areas that were identified as part of work on Oxfordshire's Biodiversity Action Plan (BAP) for being the most important areas for wildlife conservation in Oxfordshire and where targeted conservation action will have the greatest benefit. It should be noted that the expectation is that the mapping of the Local Nature Recovery Strategy will subsume and replace the previous Conservation Target Areas.

3.12 There are also areas of irreplaceable habitat in the city, which are afforded significant protection through national planning policy. These types of habitat include several areas of ancient woodland, including at Brasenose Wood and at Shotover Country Park which straddles the boundary of the city to the east, as well as areas of lowland fen habitat such as can be found in the Lye Valley SSSI.

Protected species

3.13 The various types of habitat discussed above are important for supporting a range of wildlife species, many of which are under direct threat from pressures like habitat loss, climate change and pollution. The city has records of a variety of notable species, again as identified under Section 41 of the Natural Environment and Rural Communities Act 2006 referenced above. Species that are present in Oxford and that are protected under the Act include, but are not limited to: Hedgehogs, Water voles, Dormice, Swifts and Slow worms.

3.14 It is not only the natural environment which supports some of these different types of wildlife either. There are certain species present in the city which have come to rely upon elements of the built environment to support their life cycle. For example, urban birds like

swifts which return to the UK every spring to breed and raise young and that have experienced significant declines. Swifts have come to rely on buildings for nesting and will often return to the same nest site each year so the re-development and demolition of buildings, and loss of old nest sites can have further negative impacts. The development process can support the species through careful design and inclusion of artificial roosting features.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 The currently adopted Local Plan 2036 will maintain protection of ecological sites within the city (via LP2036 policy G2) alongside protection of the network of green infrastructure across the city. The Local Plan 2036 sets out that development that results in a net loss of sites and species of ecological value will not be permitted and includes specific details of protection/mitigation required for the SAC, SSSIs and Local sites. Alongside this, protection exists within national policy, such as affording protection to nationally designated sites as well as protections more generally to open space.

4.2 The requirement of 5% net gain in biodiversity in Local Plan 2036 policy G2 for all major developments proposed on greenfield sites or brownfield sites that have become vegetated has already been superseded by the 10% requirement of the Environment Act. With the mandatory 10% biodiversity net gain being set as a condition unrelated to the Local Plan and with the expectation being that the associated habitat is secured for at least 30 years, there is potential that biodiversity could receive increasing support going forwards without a new Local Plan, however, opportunities for this net gain to be delivered within the city are likely to be limited. The county's Local Nature Recovery Strategy (LNRS) will identify opportunity areas for enhancement actions to improve biodiversity in due course, however, the LNRS cannot force enhancements nor assign additional protection, thus these opportunities will rely on willing landowners and sufficient sources of funding, thus their benefit for biodiversity is not certain.

4.3 The GI study 2022 noted the unequal distribution of certain types of green space and this is likely to remain the case in the absence of the new Local Plan – and this would include more nature rich spaces. The constrained nature of the city means that opportunities for creation of significant new green spaces within the denser urban areas will remain limited and smaller-scale enhancement are likely to be more forthcoming where resource and changes to management practices are forthcoming. A growing population as the city grows means that green spaces including those for nature will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this could lead to a deterioration of these spaces.

4.4 Climate change is also likely to put pressure on many green spaces, particularly ecological sites (discussed further below). Increases in summer temperatures, milder winters, changes in rainfall distribution and seasonality, and more extremes of weather are anticipated long term impacts of climate change. The effects of these changes are uncertain and may occur as sudden and unexpected step changes. Potentially they could result in the need for additional management measures (e.g. to address risk from wildfires during drought seasons), or make spaces unusable due to additional flooding throughout the year. Indirectly, adaptation actions by other sectors that are key to land and water management may force changes in how certain spaces are utilised (e.g. to secure additional land for flood relief).

4.5 Climate change could influence biodiversity in various ways such as by making ecological sites less suitable for the species that rely on them or driving changes in species distribution as they move to better suited climates. It could also lead to influxes of invasive species that are better suited to the new climate. Generally, it has been suggested that in the longer term, there is a significant risk of direct impacts on priority habitats. Equally, pressures on watercourses impacting ecological conditions will likely continue without various interventions such as upgrades to key wastewater infrastructure as are noted in the green infrastructure section.

5. Key issues addressed through the Local Plan

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to biodiversity and nature conservation. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Implementing Biodiversity Net Gain in Oxford

5.3 Policy G4 sets a requirement of 10% net gain consistent with the target required through the Environment Act. This target should be considered as a minimum, however, and the policy encourages delivery which exceeds this wherever possible. There were responses to the Regulation 18 consultation that expressed a desire for the Council to go with a higher target, and officers are aware of other authorities pushing for higher levels.

5.4 It is important to recognise that the 10% net gain requirements of the Environment Act are very specific in how they can be delivered. The requirement is essentially focused on habitat creation (as a proxy for biodiversity) which must be to a certain quantity and quality that conforms with the Statutory Biodiversity Net Gain metric, which is the calculation tool applicants are expected to use to assess and demonstrate how they have met the target. A higher requirement would mean higher amounts of habitat creation but potentially still missing out on delivering enhancement for the full range of species that need to be supported in the city. It could also limit delivery of other important types of green features that have other benefits, such as for people (recreation, food growing). Additionally, for many sites in the city, a higher than 10% target is also likely to result in additional proportions of offsetting payments being secured for delivery in other locations, rather than extra habitat creation on sites themselves.

5.5 For the above reasons, the Local Plan seeks to maintain the requirement at 10% but to reinforce this requirement through other policy requirements that seek to support biodiversity in other ways (as discussed further below), as well as deliver broader greening on development sites (e.g. policy G3).

Further supporting onsite biodiversity including priority species

5.6 Whilst biodiversity net gain is one mechanism for delivering new habitat for biodiversity, it is important that the Local Plan utilises other mechanisms to deliver for nature. This is also important because, as discussed earlier, the DEFRA metric primarily focuses on habitat as a way to support species, whereas there are other important features that support wildlife which are not recognised/incentivised by it. For example, species-based features like bird and bat boxes are not included within the metric but can be just as valuable to more urban wildlife.

5.7 Oxford hosts a range of important species and these have varying environmental needs in terms of space, shelter, and feeding. Our urban context and the development processes that happen throughout the city can negatively impact these species in different ways, like fragmenting landscapes, introducing pollution, removing food sources and spaces to rest. In some cases though, development can positively support these species too, particularly for the wildlife that have come to rely on areas of the urban environment to flourish, e.g. buildings for roosting.

5.8 The planning process is an important mechanism for mitigating negative impacts on existing species where they could arise but also for supporting developers to maximise on opportunities to positively support species in other ways. Whilst policy G6 includes requirements for ensuring that important species on a site are properly identified and

impacts on them mitigated in accordance with the mitigation hierarchy, policy G5 sets out the additional enhancement actions the Council expects to see to support onsite biodiversity regardless of whether 10% habitat net gain has been provided onsite or not.

5.9 The onsite ecological enhancements list has been devised to offer applicants as much flexibility as possible to respond to the specifics of their site. The list includes a number of potential enhancement features which have been chosen for their suitability in supporting known species in Oxford and that are generally not covered by the considerations of the Statutory BNGy metric. Applicants are required to select from a certain number of features depending on the scale of the development from three different 'pots'. Some features (those in first pot) are mandatory and form a minimum provision, whilst the other two pots address needs for shelter/movement and for other supporting landscape features. The intention is for this list to be kept live and added to in the future, so whilst the initial list is included in the appendix to the Local Plan, future versions will be published via the Technical Advice Note along with additional guidance on how they should be implemented in a scheme.

5.10 Alongside the minimum standards for green surface cover on a site as set out in policy G3 (and discussed in the green infrastructure background paper), policy G5 is intended to ensure that overall new development will bring forward a variety of additional spaces for nature. The combination of these policies is considered to be a more bespoke but pragmatic approach response to the constraints of many sites in Oxford that is in keeping with the spirit of going beyond the minimum 10% biodiversity net gain. It also means that, even if the Environment Act's 10% net gain cannot be delivered onsite, the Local Plan can help ensure direct onsite delivery of features to support nature throughout the city.

Oxfordshire's Local Nature Recovery Strategy

5.11 Oxfordshire County Council published the Oxfordshire Local Nature Recovery Strategy (LNRS), which includes the Oxford area, in November 2025. The LNRS is made up of a number of documents, including a Local Habitat Map, Statement of Biodiversity Priorities, Species Priorities List, and a Description of the Strategy Area.

5.12 Of particular spatial relevance to the city as covered by the Local Plan is the Local Habitat Map, which is intended to help a range of stakeholders, including landowners, conservation groups, and local communities to target their efforts where they'll have the most impact, creating a stronger, more connected natural landscape across Oxfordshire. The Habitat Map identifies both:

- existing areas of particular importance to biodiversity – which, in the city, are primarily limited to national and locally designated ecological sites; and
- areas that could become particularly important to biodiversity – which can also be known as 'recovery' areas,

5.13 In complying with their duties under Section 40 of the Natural Environment and Rural Communities Act (as amended by the Environment Act 2021), local authorities need to "have regard" to the relevant Local Nature Recovery Strategy. The Council has engaged in the development of the LNRS and sought to ensure that the various priorities and opportunities identified in it are reflected where possible in the Local Plan, whilst balancing the range of broader sustainability objectives need to be planned for within a highly constrained city.

5.14 In particular:

- any site allocation in Chapter 8 of the plan which includes opportunity areas identified in the LNRS, flags this as part of the policy. The policy identifies that the site includes areas identified in the LNRS and that the LNRS sets out particular measures which would be particularly beneficial for biodiversity. In this way, applicants are encouraged to refer to the LNRS and incorporate BNG which aligns with the strategy.
- for applications coming forward elsewhere in the city, the overarching policy G4 applies and specifically sets out that *opportunities to deliver measures which align with those identified in the LNRS as part of any net gain provision should be prioritised, particularly where a proposal is located in an area identified in the LNRS, unless site constraints would make this unfeasible*.

5.15 It should also be noted that many areas of the LNRS are protected from development through the Local Plan's protection for the green infrastructure network, as set out in Policy G1.

5.16 As the county's website notes, *the main purpose of the LNRS map is to show which locations hold the greatest potential to benefit nature and the wider environment if habitats were created or enhanced in those places. However, this does not mean that landowners and managers would be required to implement any of these meas*ures. The mapping identifies a range of potential measures that could be targeted to different locations based on a range of the best and latest data available including soil data, but these locations and identified measures would need to be sense-checked in-person, to ensure the right habitat is created in the right place. As such, the Local Plan seeks to ensure applicants and decision makers take account of the LNRS whilst also acknowledging that particular site

context may or may not allow the specific actions within the LNRS to be implemented in practice.

Protecting designated sites and other areas of habitat

5.17 The earlier section 3 detailed the extensive network of designated ecological sites in the city which have either international, national or local importance for biodiversity. Policy G6 sets out how the Local Plan will protect the hierarchy of ecological sites for the future of the city. Because the various sites have been designated for a range of qualities, they are susceptible to different sorts of impacts from new development and so the policy acts as an overarching protection from adverse impacts and requires appropriate mitigation which will need to be informed by relevant data sources such as Natural England's SSSI Impact Risk Zones mapping.

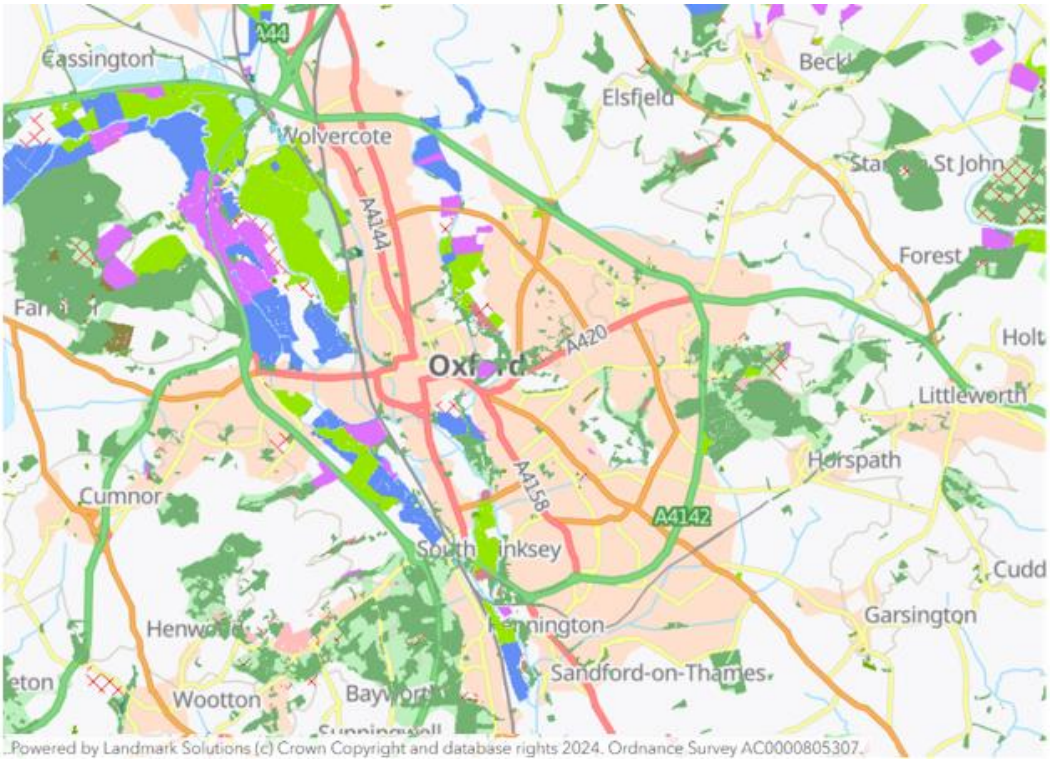
5.18 The considerations for potential adverse effects will differ depending on the site and its particular sensitivities. A number of the sites in the city are particularly susceptible to impacts on hydrological processes including those associated with surface water and groundwater, this includes the Oxford Meadows SAC, as well as some SSSIs including Lye Valley, New Marston Meadows and Iffley Meadows. Policy G6's supporting text therefore explicitly highlights these risks in its supporting text, and the policy itself lists a wider range of potential impacts that could have adverse effects.

5.19 Informed by separate workstreams such as the Habitats Regulations Assessment (HRA), for the Oxford Meadows SAC, and the Source Pathway Receptor Analysis (SPRA), for the SSSIs, relevant allocated sites that have been identified as having the potential to impact upon protected sites also include explicit requirements for mitigation of impacts to ensure these risks are addressed by applicants (with cross reference to policy G6).

5.20 Of course, there is also valuable habitat that exists beyond the boundaries of designated sites. Irreplacable habitat, is highly protected through national policy, and whilst this does not need to be repeated in the Local Plan, Policy G6 also makes clear that the Council will apply the strict tests in the NPPF to applications that could impact this habitat.

5.21 Additionally, there is a significant amount of priority habitat in the city as is highlighted in Figure 5.1. The most significant locations of this habitat are protected through the GI network's policy G1.

Figure 5.1 Mapping of various priority habitats in the city according to DEFRA Magic mapping (accessed January 2026).



5.22 More generally, Policy G6 sets out that proposals with a reasonable likelihood of adversely impacting natural and/or semi-natural habitats, or protected species, on or immediately adjacent to the site, will only be permitted where they have been informed by targeted ecological surveys and impacts addressed in line with the mitigation hierarchy. This would apply wherever a development is located.

Appendix A – Regulation 18 Policy options sets

Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity

There is a national mandatory requirement for providing 10% Biodiversity Net Gain (BNG) as part of planning applications (subject to some exceptions in the legislation). Applicants are incentivised through the DEFRA biodiversity metric (used to calculate net gain) to provide this onsite or in areas identified within an appropriate strategy, but are able to find other offsite options where necessary.

The constrained nature of many sites in the city means that BNG may need to be provided offsite in many instances even if kept to the national minimum target, going higher than this may have impacts in terms of what other features can be provided onsite, or result in more BNG having to go offsite. Where offsite delivery is necessary, the Local Plan can play an important role in steering where this should go. The Local Nature Recovery Strategy identifies opportunity areas where enhancements for biodiversity could be particularly valuable. At the time of writing the options, the LNRS was still emerging, thus options also referenced Conservation Target Areas and previous Nature Recovery Network mapping as a way to help steer net gain to suitable areas. The options considered relate particularly to how offsite delivery should be guided, but also whether higher BNG targets should be incorporated.

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Table 1 - Policy options set 005d: Delivering mandatory net gains in biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a hierarchy for how 10% net gain as required through Environment Act should be delivered, particularly where on-site net gain is not possible.	The approach is in line with national expectations for net gain in biodiversity and would allow more flexibility to secure other types of benefits for sites too e.g. other types of onsite features not addressed by the BNG metric (as is the topic of option set G5).	There is an element of repetition of the national BNG legislation here which may not be necessary. The city has limited capacity for taking on additional biodiversity enhancement to the scale and specific standards required through the Environment Act/DEFRA metric. As such, whilst a policy could try to focus any off-site delivery in the local area, geographical constraints may limit its

Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas) in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.	The national guidance, and the BNG metric, are not as prescriptive about where off-site gains should be delivered, so this approach would provide some local steer about the Council's priorities. This policy would help to ensure that any off-site delivery of net gain would be to the benefit of the local area in first instance before options further afield are considered.	effectiveness and options further afield, even beyond the boundary, may be necessary regardless. Off-site delivery may actualy deliver better outcomes for biodiversity if geared towards landscape-scale nature conservation. From a net gain perspective, it may be less effective forcing constricting delivery to local areas first (particularly onsite).
Option b Require higher than 10% net gain, in excess of the minimum requirements of the Environment Act (but subject to same exemptions as apply to national 10% requirement). Set out hierarchy for where this should be delivered if on-site not possible.	Recognises the importance of supporting biodiversity and acting on biodiversity decline nationally by setting a standard higher than the nationally imposed minimum.	10% net gain on sites as required by Environment Act is likely to be challenging enough in many areas of city. A higher target is not considered realistic/deliverable particularly on many smaller, constrained sites and could result in more off-site mitigation, as opposed to on-site measures. This off-site mitigation is unlikely to all be within the city, but instead via contributions to schemes across the wider county. There are other measures that can support biodiversity which are not recognised by the DEFRA metric and that would not

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Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.		be boosted under this option. Eng. wildlife friendly features like bird boxes, insect hotels, hedgehog highways etc. Additional demands in terms of net gain could impact ability/viability to provide for other needs. The additional cost of this will affect the affordability and therefore selection of other policy approaches that are equally important.
Option c Do not include a policy addressing biodiversity net gain requirements as set out in Environment Act, defer to national guidance/policy.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments. It may be that this is brought into the NPPF at a national policy level instead.	The national requirements in the Environment Act are not informed by local context. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on off-site delivery elsewhere in city (and, as last resort, beyond city). Could result in limited benefit to local area.

Initial sustainability appraisal screening of options sets

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Is there only one option or are there various options we could take? Either option a, b or c (they are alteratives to each other).
High-level screening conclusion? the options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? No

Rationale: The options relate to whether the Local Plan should include policy guidance setting out the Council's preference for how offsite biodiversity net gain should be provided, guiding this to the local area and the opportunities identified in the LNRS, before looking more widely (option a and b) or not to set any local guidance. Option b also weighs up an approach of requiring more than 10% biodiversity net gain.

In terms of sustainability impacts, the options most directly relate to **criterion 10. Biodiversity.** Options a and b are likely to have minor positive impacts for the criteria, though in practice they do not exceed national standards particularly and are principally focussed on articulating how the Council would wish to see BNG implemented in the city. Option a and b would both seek to try to ensure that even if biodiversity net gain cannot be delivered onsite, it would be guided to local areas in the city (particularly those that are also identified as opportunities in the LNRS), potentially reducing the risks that this would otherwise be provided much further afield and to mimimal benefit to local biodiversity. Option b might result in more positive impacts because it would seek to secure higher proportions of BNG than the national 10% target, however, larger targets are less likely to be able to be accommodated on many of Oxford's constrained sites and would also likely reduce the pool of local offsite opportunities that could accommodate this where it is not able to be met onsite (meaning it may go further afield) - thus the benefit is likely to depend on implementation. Option c would still likely result in minor positive impacts, because of the national target of 10% BNG which would still apply to all applicable planning permissions, which is likley to result in positive improvements over time even without the benefit of local policy specifying the Council's preferences for how BNG should be implemented. Overall, the sustainability impacts are unlikely to vary significantly between the options and it is not considered necessary to scope these in for further detailed appraisal.

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Delivering mandatory net gains in biodiversity – draft Policy G4

The preferred approach is to take forward **option A.** This approach would maintain BNG requirements in line with national requirements, recognising that onsite delivery is already challenging on many constrained sites, but also that there are various other onsite

enhancements that the Council is seeking to drive forward to improve the environment and provide for biodiversity alongside the 10% habitat net gain as recognised by the DEFRA metric (e.g. draft policy on urban greening G3, draft policy G5 onsite ecological enhancements). This approach would also ensure that where onsite provision cannot be achieved, offsite provision is guided towards areas that most benefit the city and wider county, particularly focusing on the Local Nature Recovery Strategy areas once adopted.

Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

Whilst the national mandatory Biodiversity Net Gain (BNG) targets for planning applications promote habitat creation to support biodiversity, there are other needs for supporting species that are not recognised as part of the Environment Act's net gain requirements but that can still be highly beneficial. For example, the ways we design the urban environment can either support or hinder movement of species between habitats, meanwhile, certain species such as swifts and bats have adapted to rely on elements of the built environment for shelter where these spaces are designed in the right way. Habitat creation to satisfy BNG may also not always be able to be delivered onsite and so it is important to seek to secure other types of enhancements to support biodiversity too.

The options considered in the below table address the ways that the Local Plan can support biodiversity in other ways beyond BNG. They range from more prescriptive requirements that still retain some flexibility to meet needs of particular sites, to less prescriptive requirements or having no policy at all.

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Table 2 - Policy options set 005e: Protecting and enhancing onsite biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Policy with prescriptive requirements to secure biodiversity features on site. • Could require a specific number of enhancements on each site selecting from a pre-defined 'biodiversity points list'	Highlights on-site biodiversity measures as a priority for the Local Plan/Oxford City Council. Policy could be tailored to challenges of delivering biodiversity net gain in a constrained city like Oxford. Would primarily seek to secure some sort of onsite improvement and support/fill	Every site is likely to be different, risk that a prescriptive list/point system could be too blunt a tool, limiting any benefits. On more constrained sites, the scope for biodiversity enhancements will still be challenging.

(e.g. bat box, bird box, wildflowers). • Points could be broken down into several pots/categories. • Potentially different points targets for householder, minors and majors applications. Could potentially be supported by updated Technical Advice Note (TAN).	in gaps left by Environment Act which may result in off-site compensation for on-site impacts. More specific targets (e.g. through point system) would be more practical to monitor and implement. A pre-defined list would provide guidance to applicants about what is most suitable for their site/location.	
Option 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.	Highlights on site biodiversity measures as a priority for the Local Plan/Oxford City Council. Allows more flexibility than Option b for developers to work within the constraints of a site.	Less prescriptive policy and lack of quantifiable targets for what measures are expected could result in less effective policy and less influence on what comes forward. Without a minimum target, proposals may be more likely to fail at maximising opportunities on a site.
Option c No bespoke policy on supporting biodiversity on	Constrained city means achievable measures could have limited effect anyway,	The Environment Act requirements likely to have issues with achieving onsite net gain in many parts of city, resulting in off-site contributions, exemptions also, meaning net gain in real

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site, instead, via complimentary policies (e.g. sustainable design and construction), include requirements to incorporate general ecological enhancements.	protection of established ecological sites nearby may be more effective overall.	terms could be limited. A specific policy would highlight this as a priority for the City Council, not including one could weaken this position. General encouragement of ecological enhancements means effectiveness of policy is harder to quantify and monitor.
Option d Do not include a policy for protecting and enhancing on site biodiversity, defer to national policy/standards.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments.	Environment Act 10% net gain is focused primarily on habitat creation which equates to habitat units and will have limited benefits for addressing wider needs of many species present in Oxford. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on offsite delivery elsewhere in city (and, as last resort, beyond the city). Could result in limited benefit to local area and lead to ecological impoverishment.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Either option a, b, c or d **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** The options presented set out alternative approaches for the Local Plan to address provision for onsite biodiversity beyond what is expected as part of the Environment Act 10% net gain requirements and could be treated as standalone alternatives to each other. Options a, b and c set out different ways that additional biodiversity enhancements could be secured through policy. Option d would mean no local policy requirements. In terms of sustainability impacts, the options all most directly address SA **criterion 10. Biodiversity**, whilst some of the enhancements that might be secured under the options could support **criterion 7. green infrastructure**, this would depend

on implementation (some biodiversity enhancements could instead take the form of other features like bird boxes, swift bricks, etc), so it is difficult to assess impacts. For criterion 10. Options a, b and c are all expected to have some varying level of minor positive impact, with more prescriptive requirements of options a and b likely to have a slightly more positive impact than option c, which has the potential to be a less effective approach. Option d is likely to have a neutral or minor negative impact for criterion 10. Whilst the net gain requirements of the Environment Act are likely to ensure key habitat features are identified on a site and a net gain of 10% biodiversity secured, this does not have to be onsite and could be provided for off-site and potentially outside of the city. Equally, the BNG process is focussed on habitat and may not fully address impacts on particular species onsite or in the surrounding area, meaning there is potential for new development to have harmful impacts if these are not mitigated through other mechanisms. Under criterion 7. Whilst this is dependent on implementation, options a, b and c could result in minor positive impacts where enhancements are in the form of greening and habitat creation measures, meanwhile option d would likely be neutral. Other than option d, the options for this policy are about securing additional benefit for biodiversity from development, and the impacts for sustainability are similar and not considered significant enough, regardless of option, to warrant detailed appraisal.

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Protecting and enhancing onsite biodiversity – draft Policy G5

The preferred option for the draft policy is **option A** which would set prescriptive requirements for types of onsite ecological enhancements that are expected of development. This approach will help to provide clarity for applicants as to expectations and allow the Council to set out a list of features that would be most appropriate to the city's context and the needs of particular local species. Flexibility can be introduced to accommodate varying context of development sites by allowing applicants to pick a number of features from this list. The policy will complement the 10% BNG requirements and help to ensure that even where BNG cannot be delivered onsite, some provision for biodiversity is incorporated. There may be opportunities to tailor the list of features so that they complement the types of enhancements that the Local Nature Recovery Strategy identifies as opportunities within the city.

Policy options set 005f (draft policy G6): Protecting Oxford's ecological network

There is a range of sensitive species and habitats across the city which need to be considered in the development process. Onsite, there may be features already present that need to be investigated and appropriately addressed through the design process in order to mitigate impacts. Additionally, there are a range of designated sites across the city of varying national/local significance, and whilst the nationally

important sites benefit from high levels of protection through national policy, the locally valuable sites rely on Local Plan policies for their protection. The sites have varying characteristics and can be sensitive to different types of impacts from developments which applicants would need to consider.

The options set below includes options for addressing onsite biodiversity through the development process, as well as options for how to protect the wider ecological network across the city. These national and local designated sites would also be identified within the green infrastructure network (the subject of draft policy G1), and as such these options would set out additional considerations for development that could impact these particular sites in relation to their special biodiversity functions.

Table 3 - Policy options set 005f: Protecting Oxford's ecological network

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site.	There are often habitat/features/species that exist outside of designated sites in the city which are valuable and need to be protected where possible. Ensures developers assess potential impacts on legally protected species.	This would involve additional checks and assessment for applicants before commencing work.
Option b Include a policy which protects the city's network of national and local designated sites from development. Define hierarchy within the network, with level of protection based upon importance/value of	Ensures that the city's most important areas of habitat and species are protected from the direct and indirect impacts of inappropriate development in future. Also ensures that the level of protection is proportionate to the level of ecological interest.	Protecting designated habitats is important for supporting biodiversity in the city, however, there are likely to be other smaller/undesignated habitats which provide an important supporting/connecting role which will need to be safeguarded where possible also. Space in the city is under demand to deliver upon a variety of objectives, including providing for affordable/quality housing and jobs – these needs must be balanced with the need for

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species/habitat they have been designated for such as: • International designations (SAC) • National designations (SSSIs) • Local sites like Local Wildlife Sites and Oxford City Wildlife sites. • Priority habitat. Reiterate national guidance for how to deal with irreplaceable habitats.	Protection of SACs, SSSIs and irreplaceable habitats set out in legislation/NPPF. No specific protection for locally designated sites, although the NPPF requires local plans to identify, map and safeguard such sites. Also acknowledges that there is differentiation in local designations where Oxford has multiple tiers of locally designated sites; notably, more stringent criteria area applied in designating local wildlife sites (LWS) versus Oxford City Wildlife Sites (OCWS). Also ensures protection of sites/habitats that are of notable ecological value but not previously identified through selection of designated sites.	protecting biodiversity, but will necessarily be limited as space is secured for other purposes like this.
Option c Set out that proposals will need to consider a range of	Recognises that there are different characteristics/qualities for	Whilst the approach would flag the range of considerations that applicants may need to consider and address in an application, the level of information needed to assess and

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potential impacts depending on the context of application and proximity to any protected site(s), particularly, but not limited to: • Loss of protected land • Recreational impacts • Changes to the hydrological regime (groundwater, primarily), • Impacts on water quality • Impacts from air pollution.	which sites are designated and these are at risk from different impact mechanisms arising from development. For example, some sites in the city, such as the SAC and Lye Valley SSSI are particularly at risk from changes to hydrological regime (e.g. changes to groundwater flows and pollution impacting water quality). Others are at risk from other pressures. Provides a hook in policy from which to develop additional helpful guidance, potentially tailored to particular locations or types of sites (e.g. Technical Advice Notes) that can provide further detail for area specific requirements/considerations -- e.g. where applications impact a particular designated site.	justify no impact will vary depending on the level of protection on a site and type of application (e.g. likely a higher burden of information needed where proposal impacts a site protected through national legislation). Would be challenging to provide detailed steer on this at Local Plan policy level, and the level of assessment would need to be determined by the applicant through reference to the appropriate information.
Option d Include separate policies focussed on specific sensitive areas in the city, e.g. in	Particular considerations tailored to the specific risks to these areas could be set out	There is a network of ecological sites in the city and varying levels of national/local significance and

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proximity to the Lye Valley, or the SAC, with bespoke requirements focussed on particular risks (e.g. changes to groundwater flows).	clearly for development coming forward nearby.	Focussing policy on particular risks to the areas might reduce the ability to look at wider impacts from development as a whole. There may be other adverse effects that particular developments may need to consider. There are other ways to provide more specific guidance on particular locations, e.g. Technical Advice Notes, which can be kept updated more regularly throughout the Local Plan's lifetime.
Option e Do not include a policy protecting biodiversity including ecological sites. Instead, defer to national policy/standards.	There is already legislation and national policy governing the upper levels of the hierarchy so may not be necessary to repeat that locally.	Particularly for local sites of ecological importance, the Local Plan is the key means through which these designations are protected from inappropriate development.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations e.g. option a, a+b, a+b+c, a+c, d **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** If not taking forward option e (no local policy), it is likely a combination of options that include option a would be taken forward. Option a sets out requirements for identifying what is already on a site and responding accordingly. The additional options presented are either to include a policy protecting a hierarchy of ecological sites, including those of national/internation importance and those of local importance (option b), or to have more specific policies focused on particular areas (option d). Option c isn't an alternative, but rather an additional element that could be incorporated into option

b which would set out additional guidance/expectations for proposals to consider a range of impacts that could cause harm to these sites.

In sustainability impacts arising from the options, these would most directly relate to SA **criterion 10. Biodiversity.** Whilst option a is likely to have a neutral impact, as it is about identifying the biodiversity features present on a site and mitigating any impacts from development, Options b and c would have minor positives for this criterion by helping to ensure that existing biodiversity onsite is identified/protected and that the most valuable sites in the city for ecology would be protected from harmful development, particularly the locally important sites that do not benefit from the same levels of protection in national legislation as the SAC and SSSIs (option c would just provide further detail about implementation in relation to dealing with adverse impacts). Option d would be similar, but more focussed to particular locations and would thus depend on implementation (which locations). Option e is likely to have neutral impacts in relation to the national sites (because they are already strongly protected at national level), however, there would potentially be minor negative impacts in relation to the local sites not protected in the same way through national policy.

Overall, the sustainability impacts of the options are principally focussed on mitigating impacts from development and protecting what is already there, so they are unlikely to differ significantly enough from each other to warrant detailed sustainability appraisal.

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Protecting Oxford's ecological network – draft Policy G6

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of **options A, B** and **C**. Option **A** will help to ensure that development appropriately investigates and addresses any existing biodiversity on site in accordance with the mitigation hierarchy (e.g. seeking to avoid impacts before thinking about mitigating). Meanwhile options **B** and **C** mean that the Local Plan can identify and protect a the network of designated sites in the city, including locally important sites and set out the various considerations that applicants may need to take into account in order to avoid adverse effects. This should mean that applicants fully consider all the relevant information and potential impacts from their development, taking into account the varying characteristics of different sites around the city. The expectation would be that, where appropriate, additional guidance would be provided through technical advice notes which expand on the policy and help applicants to interpret its requirements, e.g. setting out how the Council expects them to avoid adverse effects in relation to particularly sensitive sites.

Background paper 006

Title: Green Belt

This paper addresses the protection of Oxford's Green Belt.
Relevant Local Plan Objective(s): • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.

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1) Introduction

1.1 The Green Belt is an important strategic planning policy tool implemented to protect the rural surroundings of conurbations and prevent unmanaged 'urban sprawl'. Within a localised context, the Oxford Green Belt offers protection to the historic setting of Oxford and to areas surrounding the city.

1.2 Green Belt should remain protected, with sites only released from this designated area after a thorough consideration of all other options. Areas in the Green Belt are protected in line with the National Planning Policy Framework (NPPF), last updated in December 2024.

1.3 Although the Government still attaches great importance to Green Belts and meaningful protections against development within it remain, significant changes were made in respect to Green Belt policy in the 2024 update to the NPPF. This included the introduction of 'grey belt' and how this should be identified. A second key change is set out in paragraph 146 of the NPPF which states that Green Belt boundaries should be reviewed by authorities who *"cannot meet their identified need for homes, commercial or other development through other means."* Further detail about how authorities should be undertaking reviews and identifying grey belt have been provided in an update to the Planning Practice Guidance (PPG), published in February 2025. These issues will be discussed further below, including how Oxford City Council has interpretated these changes and what the next steps will be.

2) National Planning Policy Framework (December 2024) and Planning Practice Guidance (updated February 2025)

2.1 The five purposes which Green Belt serves are unchanged in the latest National Planning Policy framework (NPPF) and are as follows:

a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2 Paragraphs 144 and 145 of the NPPF express that the boundaries of established Green Belts across the country should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. When a Council is considering making changes to Green Belt boundaries, they must consider all other reasonable options for meeting its development needs, including:

a) making as much use as possible of suitable brownfield sites and underutilised land;
b) optimising densities, including whether policies promote a significant uplift in minimum density standards in city and town centres, as well as other locations well served by public transport; and

c) liaising with neighbouring authorities about whether they could accommodate some of the identified development needs.

2.3 As previously referred to in paragraph 1.3 of this background paper, paragraph 146 of the NPPF states that in this context, one of those exceptional circumstances includes not being able to meet the identified need for homes. The Government's Standard Method has been used to calculate the housing need for Oxford. This is currently 1,087 per annum, equating to a housing need for the 20-year plan period 2025-2045 of 21,740 homes. It is highly unlikely that the capacity of the city will be sufficient to meet this housing need, even when maximising brownfield land and underutilised land, optimising densities of sites and liaising with our neighbouring authorities as referred to in the previous paragraph. It should be noted that the unmet housing need arising from the current Oxford Local Plan 2036 was largely met through all neighbouring authorities allocating sites in their respective most recently adopted local plans, with some authorities releasing land in the Green Belt to accommodate this. At the same time, Oxford City also released Green Belt land through its Plan where it was identified to have the least harm, in order to ensure it was maximising its capacity. However, whilst this dealt with unmet need arising from the Oxford Local Plan 2036, the City Council is now undertaking a new Local Plan 2045, which is also highly likely to generate unmet housing need. As a consequence, Oxford City Council has commissioned Land Use Consultants (LUC) to undertake a review of the Green Belt in Oxford.

2.4 Paragraph 001 (Reference ID: 64-001-20250225) of the National Planning Practice Guidance (PPG) related to Green Belt makes clear that there is an expectation for authorities to identify grey belt land in their review and where necessary, identify where land is grey belt for the purpose of determining planning applications. The PPG details that this should be done in accordance with paragraph 147 of the NPPF which is referred to in the previous paragraph in respect of maximising brownfield sites, optimising development density and liaising with neighbouring authorities, but also with paragraph 148. Paragraph 148 identifies that where release of Green Belt land is necessary, priority should be given to previously developed land, then to grey belt which is not previously developed and then other Green Belt locations. However, Paragraph 001 (of the PPG) also states that, *"where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances."* Assessing the contribution that Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. The application of the relevant NPPF policies should also inform any decision.

Grey belt

2.5 The glossary of the NPPF notes that not all the five purposes of the Green Belt should be used to identify grey belt. The three purposes below are identified as relevant to its identification:

a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

d) to preserve the setting and special character of historic towns

2.6 Whilst the comprehensive details of how grey belt should be identified were not provided in the NPPF, the glossary did note that 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of three purposes (a, b or d) listed above. The glossary also noted that *"grey belt excludes land where the application of the policies relating to the areas or assets of particular importance in footnote 7 (other than Green Belt) would potentially provide a strong reason for refusing or restricting development"* of the assessment area. Assets in footnote 7 refer to designations such as Sites of Specific Scientific Interest (SSSI), Local Green Spaces, designated heritage assets and areas at risk of flooding.

2.7 Paragraph 003 (Reference ID: 64-003-20250225) of the PPG notes that after grey belt land has been identified, local authorities need to identify if the release or development of the assessment areas would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.

2.8 After discussions with Land Use Consultants (LUC), it was determined that the Green Belt assessment would be split into two parts. The first of these would focus on identifying grey belt land within Oxford and the second part would identify if release or development of an assessment area would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt.

3) Methodology and summary of findings

3.1 The methodology undertaken reflects the latest changes to the NPPF and PPG which have been discussed in the previous chapter and builds upon previous Green Belt assessments undertaken by LUC in Oxford in both 2017 and 2023. These assessments were based on the older methodology which focused on the level of harm (or otherwise) to the Green Belt that may result from their potential release for development, whereas the latest methodology is based on assessing the strength of the contribution that each parcel makes to each of the purposes of the Green Belt.

3.2 The first stage of the most recent assessment required Oxford City Council to determine the location, scale and most appropriate parcel size as set out in the Paragraph 003 (Reference ID: 64-003-20250225) of the PPG. All green sites including those in the Green Belt are already in the Council's Strategic Housing Land Availability Assessment (SHLAA), therefore it was considered that any SHLAA site which contained any Green Belt would be looked at in the first instance. This resulted in an initial 121 parcels of or including Green Belt (one was subsequently split into two for allocation purposes), which can be found in Appendix 1 of this background paper.

3.3 A filter was then applied to exclude those sites that were either entirely or nearly all within greenfield Flood Zone 3b, or where the pattern of Flood Zone 3b would otherwise preclude development, a Site of Special Scientific Interest (SSSI) or a Special Area of Conservation (SAC). These are constraints that are considered to be included under footnote 7 of the NPPF and insurmountable to overcome, and therefore there is no development potential on these sites, because of these intrinsic constraints. The assessment of their performance against Green Belt purposes would therefore be entirely academic and not required. Other constraints such as Registered Parks and Gardens, Flood Zones 2 and 3a and brownfield 3b, Local Wildlife Sites or anything else that could not definitely be assumed to be included under Footnote 7 of the NPPF were NOT used to exclude areas from the Green Belt assessment.

3.4 This exercise resulted in 25 new parcels to be further reviewed by LUC, with 18 from the previous assessments undertaken in 2017 and 2023 to be reviewed using the new methodology that assesses the strength of the contribution to each of the five purposes of the Green Belt, rather than assessing the level of harm of releasing the parcel from the Green Belt.

Identification of grey belt

3.5 The first part of the assessment undertaken by LUC was to identify if any of the assessment parcels could be identified as grey belt. As referred to in paragraph 2.5 of this background paper, only the strength of contribution to three of the five purposes (a, b and d) can be considered when identifying grey belt. LUC have made clear in their assessment that none of the assessed parcels were identified as making any contribution to purpose B (prevent merging of towns), therefore only the strength of contribution to purposes A (check unrestricted sprawl) and D (preserve the setting and special character of historic towns) have been further analysed.

3.6 Further detail of how strength of contribution has been assessed can be found in chapter 3 of the Oxford Local Plan Green Belt Assessment of Additional Sites (LUC, June 2025). Using that methodology, **12 of the 25 new parcels, and part of one other** (split into two for assessment purposes) have been identified as grey belt. After reviewing the 18 previously assessed parcels, **3** were identified as grey belt. The sites that have been identified can be found in Tables 4.1 and 4.2 of the 2025 Oxford Local Plan Green Belt Assessment referred to above.

3.7 Paragraph 001 (Reference ID: 64-001-20250225) of the PPG supports the position that grey belt parcels are not all developable. As the Oxford Local Plan 2045 has developed, they have been considered alongside other parts of the Green Belt, which are not grey belt, to see if any of them warrant further consideration.

Assessing fundamental impact

3.8 The second part of the assessment LUC undertook was to address paragraph 146 of the NPPF and to ascertain whether any alterations to Green Belt boundaries would *"fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan".* Paragraph 008 (Reference ID: 64-008-20250225) of the PPG states that this judgement should focus on evaluating the effect of release or development on *"the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way"*. LUC acknowledge that this can be most clearly judged at a later stage in the planning process, when there is a detailed set of development options, and the cumulative impact of their release can be considered. Nevertheless, any *potential* for development in a particular location to 'fundamentally undermine the purposes' can be assessed at this earlier stage of the process.

3.9 More detail on the interpretation of what is a fundamental and meaningful impact on each of the five purposes is discussed in paragraphs 3.82-3.87 of the Green Belt Assessment of Additional Sites (LUC, December 2025). In the absence of specific proposals, LUC has highlighted the areas where Green Belt contribution is at its greatest. These areas of highest contribution have been reviewed in the round to judge where there is *potential* for development (this would be dependent on the exact nature of development which is unknown) to fundamentally and meaningfully undermine the purposes. This has been undertaken for each of the 25 new parcels and for those 18 previously reviewed.

3.10 Using that methodology, 21 of the 25 new parcels have been identified as not having the *potential* to fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. Of the previously reviewed sites, 13 of the 18 parcels, and part of two others (split into smaller parcels for assessment purposes) have also been assessed as **not** having the *potential* to fundamentally undermine the five purposes of the remaining Green Belt within the plan area. The sites that have been identified can be found in Tables 4.1 and 4.2 of the Oxford Local Plan Green Belt Assessment of Additional Sites (LUC, 2025).

4) Consideration of Green Belt parcels against the strategy of the OLP2045

4.1 Not all parcels which do not fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan are developable, just as not all grey belt is developable. These parcels, and those which were assessed as having potentially fundamental impacts on the Green Belt purposes, have all been considered alongside the identified grey belt parcels, to see if any of them warrant further consideration and to assess against other aspects of the spatial strategy.

4.2 Many parcels have strong reasons for protection, such as Registered Parks and Gardens, and the Core Green Infrastructure (GI) network, which includes important parks such as Cutteslowe and Sunnymead. Development on these areas would undermine the spatial strategy of the plan, so these are not taken forward for further consideration. Other sites, both grey belt and Green Belt, do merit further investigation for development potential.

4.3 Further investigation has included checking issues such as potential access and traffic impacts, biodiversity issues and landowner interest. Appendix 2 sets out which parcels were assessed as grey belt and the parcels where development may have a fundamental impact on the Green Belt purposes. It then sets out whether development on the site would be otherwise contrary to the strategy of the plan, or not feasible, in which case it was not considered further.

4.4 Appendix 2 shows that many of the Green Belt sites assessed are Core Green Infrastructure, so to allocate them for development would be contrary to the Plan's strategy. Some sites have a green infrastructure function (playing pitches/sport) but are not designated Core Green Infrastructure. These were explored further; however, nearly all were found to be in use and all with no landowner or leaseholder intention to develop, or in a few cases are not practically developable because of their cut-off locations and surrounded by watercourses. One except is part of site 298, Hertford College Sports Ground. On this site, the landowner is interested in bringing the site forward for an alternative use, but the landowner does not have a current strategy for bringing the site forward for an alternative use and re-providing the sports pitches. The exception is site 114e, which was assessed as part of a larger parcel, mainly in the ownership of the Oxford Preservation Trust (OPT). This site is a farmhouse and its curtilage, including garden and hard standing as well as trees and grass. The landowner has put forward the site for housing development. The site is allocated as SPE9, with a minimum housing capacity of 20 units. The site is considered to be grey belt, because it meets the definition of previously developed land. However, in order to be allocated for housing in the Local Plan 2045, the Green Belt boundary must be amended and this site removed from the Green Belt. Therefore, an exceptional circumstances case must be made

5) Exceptional circumstances

5.1 The NPPF sets out that strategic plan making authorities should have examined all other reasonable options for meeting its identified development needs before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. The criteria to be considered are whether the Plan's strategy makes as much use as possible of suitable brownfield sites and underutilised land, including by optimizing the density of development, and whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the need identified for development.

5.2 The plan's strategy has been to consider every potential site for development, fully utilizing all potential opportunities on brownfield land. Background Paper 015 - Developing Local

Plan 2045 Site Allocations sets out how sites have all been considered, and the SHLAA 2026 sets out the process in more detail. The capacity assessments are based on an assumption of high but appropriate densities, as set out in Background Paper 016: Efficient Use of Land. All opportunities to focus development on brownfield sites and maximise their capacity have been taken. In addition to this, discussions have continued with neighbouring districts about production of the Plan. Extant plans in neighbouring districts include releases of Green Belt, with exceptional circumstances that justified their release being the need to accommodate Oxford's unmet need. Therefore, to not look at Green Belt whilst asking for unmet housing need to be accommodated in neighbouring districts, which may then require Green Belt release, is not a good foundation for unmet need discussion. Looking to Green Belt for housing development potential is a justified approach.

5.3 In order to establish the need for any changes or alterations to Green Belt boundaries, a set of exceptional circumstances needs to first be demonstrated. Demonstrating exceptional circumstances requires the presentation of a set of factors that come together to override the normal presumption that Green Belt boundaries should endure. There is no formal definition or standard set of assessment criteria for assessing 'exceptional circumstances'. Rather, it is for the local planning authority to determine whether exceptional circumstances exist to justify removing land from the Green Belt.

5.4 Although national planning policy does not explicitly define the phrase "exceptional circumstances", there is a considerable amount of case law on its meaning in the context of reviewing Green Belt boundaries through the Local Plan process. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration. Oxford City Council considers that the following make up the set of factors that come together to override the normal presumption that Green Belt boundaries should endure (exceptional circumstances).

5.5 Oxford's historic housing need is well-documented and Oxford has been unable to meet its housing need for decades. The housing need in Oxford calculated using the Government's Standard Method is 21,740 dwellings over the Plan period. The Capacity of the city is calculated in the SHLAA 2026 as 9,267 dwellings over the Plan period. That means that, over the Plan period, there is an unmet housing need of 12,478 generated from Oxford. As Oxford's housing need is already being accommodated through the Local Plans of neighbouring authorities, Oxford must demonstrate that it is doing all that it can to locate as much of its own housing need as can be sustainably accommodated within the city, without resulting in detrimental impacts to the special character and historic setting, which give Oxford some of its unique qualities – qualities important to maintain in order that Oxford remains an attractive place to both live and work.

5.6 Oxford's potential for growth has been well-documented and addressing the barriers to this growth is imperative for the national, sub-regional and local economy. Oxford is an

international city, it is successful, vibrant and a national economic asset. It is the focus of a world-class knowledge economy with one of the most important concentrations of high-value businesses in Europe. It is a global brand, known all over the world for its academic excellence and historic significance. Oxford's historic undersupply of housing has resulted in a housing shortage. This housing shortage is widely recognised as one of the key barriers to economic growth facing not only the city, but also the sub-region and more widely the UK.

5.7 All options to accommodate need outside of the Green Belt have been fully explored, but a high need for housing remains. This high need for housing has detrimental impacts for people and also for the economy. Exceptional circumstances exist for amending the Green Belt boundary to allow for housing development. The proposed amendment to the Green Belt would have very limited impact, as the site is previously developed land and therefore grey belt. The landownership extends beyond the site allocation area into greenfield which means there are opportunities for the required enhancements to open space required alongside Green Belt release.

Appendix 1 – Green Belt parcels showing results of filtering process (i.e. which were filtered through to the Green Belt assessment)

Key

Not taken forward for Green Belt assessment due to intrinsic constraints	Previously been assessed	Put forward for Green Belt assessment	Not put forward for Green Belt assessment for specific reasons as outlined

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HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
25	Oxford Sports Park	15.9	Sports facilities. Most of site within Green Belt	GI supporting network	n/a	n/a		Put forward to be assessed in 2025
62	Univ of Oxford Science Area & Keble Road Triangle	12.43	A very tiny proportion of site is within Green Belt (already built on)	Approx 270m from New Marston SSSI Adjacent to Oxford City Wildlife Site (OCWS) University Parks Adjacent to Local Wildlife Site (University Parks)	n/a	Adjacent to and part within Central (University & City) CA Within High Buildings Area Contains Listed Buildings Adjacent to Grade II listed Registered Park and Garden (University Parks)		Parcel is not included in LUC assessment as only a very tiny part is within Green Belt, and that part is already developed.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
67	**Wolvercote Paper Mill**	**Site 4.94 but GB area only 5% of site (0.27ha)**	**Green Belt is only a small part of the site, most of which has been developed recently. The Green Belt part is greenfield.**	**Supporting GI**	**FZ3b (Green Belt part)**	**southern 'finger' of Green Belt in Wolvercote CA**	**n/a**	Parcel not included in LUC assessment. The wider site has already been developed and the Green Belt part of the parcel is very small .
112a1	**Hill View Farm**	**4.25 (formerly 3.52)**	**Part of site within Green Belt**		**n/a**	**n/a**		Adopted site allocation, and site under construction (2025). Site expected to be developed within the Local Plan time period- only small part not removed from Green Belt, which did not need further assessment.
112a2	**Green Belt Land at Cherwell Valley/Old Marston, (southern part of previous site 112).**	**12.8**	**greenfield- agricultural land**	**GI supporting network**	**Flood Zone 3a (5%)** **Flood Zone 3b (4%) (greenfield)**	**n/a**	**2017 assessment- high impact**	Reviewed in the 2023 GB assessment, as part of the site assessed in 2017 has since been allocated in the 2036 LP (SP25 and SP26). However, the latest review concluded that this would not alter the change to the 2017 assessment findings of this part of the site.

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HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
112b2	Green Belt Land at Old Marston	20.3	Entire site within Green Belt	Entire site within Green Belt Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill) Adjacent to Oxford City Wildlife Site (Victoria Arms Spinney) GI Network (Core and Supporting)	very small amount	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
112b3	Green Belt Land at Old Marston	2.7	Entire site within Green Belt	Entire site within Green Belt GI Network (Core) Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill)	FZ3b (nearly all)	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
112b4	Green Belt Land at Old Marston	7.4	Entire site within Green Belt	Entire site within Green Belt GI Network (Supporting)	n/a	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
112b5	**Green Belt Land at Old Marston**	**5.7**	**Entire site within Green Belt**	**Entire site within Green Belt** **GI Network (Supporting)**	**n/a**	**n/a**		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
112b6	**Land at Old Marston (formerly #112b(5-6))**	**2.7**	**greenfield- agricultural land**	**GI supporting network**	**all fz3b**	**n/a**	**2017 assessment- high impact**	Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
114	**Field at Junction of Marsh Lane and Elsfield Road**	**1.84**	**Greenfield- tree/hedge lined grass**	**GI supporting network.**	**About 1/4 FZ3b**	**n/a**	**2017 addendum. Moderate-high impact**	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings.
114a	**Land at Marston Brook (Northern part)**	**3.56**	**Greenfield- pastoral and heavily treed in east.**	**GI supporting network**	**Small amount of FZ3b**	**n/a**	**2023 review of additional sites. Moderate-high impact**	Reviewed in 2023 GB assessment.
114b	**Showman's Field**	**2.18**	**Greenfield site with biodiversity value**	**GI Core Network. LWS**	**n/a**	**n/a**	**2017 addendum. Moderate-high impact**	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings.

1252

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
114c	Marston Saints Sports Ground	0.98	greenfield- pitches drawn on.	GI supporting network.	n/a	n/a	No review as sports pitches.	Put forward to be assessed in 2025
114e	Marston Paddock Extension	0.51	Part of site within Green Belt	Part of site within Green Belt Site in Old Marston CA GI Network (Supporting)	n/a	n/a		Site was assessed as part of parcel site 114a. This part put forward by landowner and a separate site has been created and is proposed for allocation for housing
117	Land surrounding St Clement's Church	2.31	A very tiny proportion of site is within Green Belt	A very tiny proportion of site is within Green Belt GI network (Supporting) but adjacent to GI Network (Core) (St Clement's Church & Magdalen College Fellows Garden)	N/A	Entire site within St Clement's and Iffley Rd CA and adjacent to Central Area (University & City) CA and Headington Hill CA The site is close to two view cones and the high buildings area and adjacent to a listed building (St Clement's Church)		Site not included in GB assessment as only a negligable part is Green Belt.
118	Land rear of Meadow Court Flats (formerly Land to rear of Wolvercote Social Club)	0.52 (GB only tiny part- 0.07ha)	Greenfield- full tree cover.	GI supporting network.	N/A	n/a	2023 assessment - low impact	Included in the LUC 2023 assessment

1253

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
126	Wildlife Corridor at River Cherwell 8	5.29 (GB same)	Greenfield - tree/hedge lined around perimeter and centrally, in a vertical direction	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
127	Wildlife Corridor North of South Hinksey	2.51 (GB same)	Greenfield - tree covered at southern end, maintained grass at northern end. Most of the site appears to be unmowed grassland with a few trees dotted within the site and along parts of the perimeter.	Core GI network	Whole site lies within FZ3b	n/a	n/a	Functional floodplain
129	Wildlife Corridor at River Cherwell 9	3.93 (GB same)	Greenfield - pastoral and tree/hedge lined around perimeter	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
131	Wildlife Corridor at River Cherwell 4	0.67	Greenfield - meadow and parkland, heavily treed along perimeter	Core GI network	Nearly all FZ3b	Site within Grade I listed Magdalen College Registered Park and Garden	n/a	Functional floodplain
133	Wildlife Corridor Adjacent North Hinksey Village	23.48	Greenfield.	GI Core Network. contains LWS	Nearly all FZ3b.	Very small part of site within Osney CA	n/a	Functional floodplain

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
134	Wildlife Corridor at Christ Church Meadow	23.2 (GB same)	Greenfield - meadow and park with trees dotted around perimeter	Core GI network	Nearly all FZ3b.	Within Grade I Christ Church Registered Park and Garden and majority withing Central CA	n/a	Functional floodplain
135	Wildlife Corridor at River Cherwell 1	3.95 (GB same)	Greenfield - school playing field with some pitches marked on	Core GI network	Nearly all FZ3b	Within Central CA	n/a	Functional floodplain
136	Wildlife Corridor at River Cherwell 2	0.44 (GB same)	Greenfield - amenity open space/ sports pitches to the east and a play area within scattered mature trees to the west	n/a	Nearly 12% within FZ3b - forms a 'v' shape along the western and south eastern boundaries.	Within Central CA	2023 assessment - high impact	Included in LUC 2023 asssessment
137	Wildlife Corridor at Seacourt	2.53 (GB area is 2.51)	Greenfield - heavily covered in trees except south eastern corner which appears to be maintained grass.	Core GI network	Nearly all FZ3b.	n/a	n/a	Functional floodplain
139	Wildlife Corridor at River Cherwell 3 (Angel and Greyhound Meadow #161)	5.28 (GB same)	Greenfield - meadows with a heavily treed perimeter and a row of trees separating the two meadows	Core GI network	Nearly all FZ3b	Within Central CA	n/a	Functional floodplain
142	Wildlife Corridor at River Cherwell 5	2.53	Wildlife corridor on banks of watercourse and including watercourse.	Adjacent to New Marston Meadows SSSI.	Small part FZ3b but including most the land	Within Central CA	n/a	Parcel is mainly river and the small part that is land is mainly FZ3b.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
144a	Wildlife Corridor at Marston Brook (northern part)	1.39	Greenfield, meadow adjacent to watercourse with perimeter made up of mature trees; accessible green space	Local Wildlife Site (Marston Brook Meadow), Core GI network	More than half FZ3b	n/a	2023 assessment - moderate-high impact	Included in 2023 assessment
144b	Wildlife Corridor at Marston Brook (southern part)	0.84	Greenfield, dense mature tree cover all over site, appears to be accessible to public	Adjacent to LWS, part of supporting GI network	N/A	n/a	2023 assessment - high impact	Included in 2023 assessment
145	Wildlife Corridor at River Cherwell 6	3.22	Greenfield, bordered by mature trees and hedgerows, private open space	Core GI Network. Adjacent to New Marston Meadows SSSI	Almost entire site (95%) in FZ3b	n/a	n/a	Functional floodplain
147	Wildlife Corridor North of Binsey	11.77	Greenfield, meadow adjacent to watercourse with perimeter made up of hedgerows, accessible green space	Core GI Network. Adjacent to watercourse, in proximity to Port Meadow SAC and Wolvercote SSSI	Two-thirds of site in FZ3b.	Small part within Binsey CA	n/a	This site, although nearly 12ha in size is awkwardly shaped and is fairly narrow in parts, following the shape of the adjacent watercourse. The patches of the site which lie outside FZ3 are surrounded by FZ3, and are therefore not suitable for development. Not to be included in review.

1256

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
148	Wildlife Corridor at River Cherwell 7	8.34	Greenfield, meadow (pasture?) adjacent to watercourse with perimeter made up of hedgerows, accessible green space	Core GI Network. Adjacent to watercourse, in proximity of New Marston Meadows SSSI	Almost all FZ3b	n/a	n/a	Functional floodplain
149	Wildlife Corridor at Godstow Holt	2.53	Greenfield, adjacent to watercourse and bordered by a number of designated sites; perimeter made up of hedgerows and mature trees	Core GI Network. Adjacent to watercourse, in proximity of New Marston Meadows SSSI, part of Core GI network	Around a third of the site in FZ3b	n/a	n/a	FZ3b (and FZ3a) lie within the eastern part of the site, with a significant part of the western side not within a flood zone. However, access is poor and most of the area surrounding the site lies within FZ3b apart from the northern perimeter, although this largely lies within FZ2. Not to be included in review.
150	Wildlife Corridor at West Godstow Road	0.42 (GB same)	Greenfield - unmaintained grassland with trees and shrubs along the perimeter	Core GI network	largely FZ3b.	n/a	n/a	Functional floodplain
151	Wildlife Corridor at St Edward's Boat Yard	0.76 (GB same)	Greenfield - dense mature tree cover across the entire site	Supporting GI network.	A quarter of the site lies within FZ3b.	n/a	2023 assessment - high impact	Included in 2023 assessment
152	Wildlife Corridor at Lower Wolvercote South of Godstow Road	2.57	Greenfield, meadow or pasture with paddock; adjacent to watercourse	Core GI network	Most of site in FZ3b	n/a	n/a	Functional floodplain

1257

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
153	Wildlife Corridor at River Cherwell 10	1.96	Woodland and pasture adjacent to watercourse	Supporting GI network In proximity of SSSI	Nearly half FZ3b	n/a	2023 assessment - where pasture and woodland parcels of site were considered separately (using refs 153a, 153b respectively). Moderate high impact.	Included in 2023 assessment
154	Wildlife Corridor at River Cherwell 11	6.8	Greenfield, comprises 2 parcels of meadow land that adjoin a watercourse. Perimeter is made of hedgerows and trees. A hedgerow also runs through the site separating the 2 parcels.	Directly adjoins watercourse, Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
155	Wildlife Corridor at Lower Wolvercote North of Godstow Road	3.66	Greenfield, comprises of a number of parcels (pasture, and a small area of woodland)	Core GI network, adjacent to allotments, Wolvercote Meadows SSSI, Oxford Meadows SAC and in proximity to other designated sites	Three quarters FZ3b	Within Wolvercote with Godstow CA	n/a	Much of the site is within FZ3b. The patches that don't lie within FZ3 are spread across the site and are largely immediately surrounded by FZ3b, making access unsuitable for any potential development. Not to be included in review.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
156	Wildlife Corridor at River Cherwell 12	1.22	Greenfield, local public park - Sunnymead Meadow, adjacent to watercourse and LWS	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
157	Wildlife Corridor at Hill Farm (site boundary updated)	2.78	Greenfield, pasture bordered on NE by A40 and with hedgerows on remaining perimeter	Supporting GI network	Very small part FZ3	n/a	2023 assessment - high impact	Included in 2023 assessment
158	Wildlife Corridor South of Pixey Mead	0.93 (GB same)	Greenfield - entire site is covered in trees	Core GI network Immediately adjacent to two SSSI	Over half FZ3b	Within Wolvercote with Godstow CA	n/a	Pattern of FZ3b precludes development.
159	Wildlife Corridor Adjacent to Duke's Meadow	0.85	Greenfield, scrub and woodland - adjoining railway line and canal	Directly adjoins Duke's Meadow OCWS	N/A	n/a	2023 assessment - moderate impact	Included in 2023 assessment

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
163	Astons Eyot (#163a) and The Kidneys (#163b)	17.52	Green field, public park and nature reserve with diverse ecology including woodland, scrubland and meadows. Adjacent to watercourse	Designated wildlife site (OCWS), high level of biodiversity part of Core GI network	Some areas within FZ3, mainly confined to banks along the watercourse	Designated heritage asset	n/a	Put forward to be assessed in 2025
166	Banbury Road North Sports Club	3.48 (2.22 ha in GB - car park not included)	MUGA with pitches for football, hocky, tennis	Supporting GI network	n/a	n/a	n/a	Put forward to be assessed in 2025
178	Boults Lane Recreation Ground	1.8	Greenfield, comprises of football pitches (senior and junior)	Supporting GI network	n/a	Within Old Marston CA, Elsfield VC	n/a	Put forward to be assessed in 2025
179	Brasenose College and Queens College Sports Ground	9.13	Greenfield, comprises of playing pitches - including formal and informal spaces	Most of site in Core GI network, although Queens College SG (33% of site) is designated as Supporting GI network	about 80% FZ3b	n/a	n/a	Pattern of FZ3b precludes development.
180	Brasenose Farm Allotments	1.91	Mainly greenfield- allotments in active use, some historic barns in corner converted to kitchen architect business.	GI Core Network (except barns). Adjacent to Brasenose Wood and Shotover Hill SSSI	n/a	n/a	n/a	Put forward to be assessed in 2025

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
182	Bullstake Close Allotments	1.61	Greenfield, allotments in active use	GI Core Network, allotments	98% FZ3b	n/a	n/a	Functional floodplain
183	Burgess Field (edge of Port Meadow)	35.52	Greenfield- scrub, grass, paths	GI Core Network, OCWS	1% FZ3b	n/a	n/a	Put forward to be assessed in 2025
186	Christ Church Meadow – South	0.87	Greenfield- treed riverside adjacent to meadow	GI Core network.	Nearly all FZ3b	Within Central CA	n/a	Functional floodplain
188	Court Place Farm – East	1.52	Greenfield- nature park	GI supporting network	N/A	n/a	n/a	Put forward to be assessed in 2025
189	Court Place Farm – West	9.98	Mix of brownfield and greenfield of the OXRAS integrated sport and leisure facility.	GI supporting network (outside of buildings)	Tiny part FZ3b	n/a	n/a	Put forward to be assessed in 2025
190	Court Place Farm Allotments	5.91	Greenfield- large allotments site, around half the site in active use.	GI Core Network	n/a	Within Old Marston CA	2017 Assessment divided into parcels 190-1 and 190-2 and both assessed to have a moderate-high impact	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings.
192	Cowmead Allotments	3.49	Greenfield- allotments in active use.	GI Core Network, allotments	Nearly all FZ3b	n/a	n/a	Functional floodplain
193	Cripley Meadow Allotments	6.02	Greenfield- allotments	GI Core Network	about 70% FZ3b	n/a	n/a	The patches of site not within FZ3 are scattered across the site and therefore not appropriate to consider for development as flood risk across the site is high.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
194	Cutteslowe Park 1	2.79	Greenfield- cricket field	GI Core Network	n/a	n/a	n/a	Put forward to be assessed in 2025
195	Cutteslowe Park 2	13.51	Greenfield and brownfield. Traditional large park with formal planting, duck pond, play areas, aviary, miniature railway, community centre and collection of buildings including nursery greenhouses, depots and a cabin used as an office.	GI Core network.	n/a	n/a	n/a	Put forward to be assessed in 2025
196	Cutteslowe Park 3	11.5	Greenfield- grass playing pitches within Cutteslowe Park	GI Core Network, playing pitches	N/A	n/a	n/a	Put forward to be assessed in 2025
197	Cutteslowe Park 4	7.95	Greenfield- grassland area of large Cutteslowe Park	GI Core Network	Part FZ3b	n/a	n/a	Put forward to be assessed in 2025
198	Cutteslowe Park Allotments	2.38	Greenfield- western half allotments, eastern half woodland.	GI Core Network, half allotments	n/a	n/a	n/a	Put forward to be assessed in 2025
209	Fairacres Road Allotments	0.79	Greenfield- allotments	GI Core Network	Less than 1% FZ3b	n/a	n/a	Put forward to be assessed in 2025
215	Former Abingdon Road Allotments	0.86	Greenfield- former allotments completely overgrown with thick scrub and trees	GI Core Network	Nearly 80% FZ3b	n/a	n/a	Pattern of FZ3b precludes development.

1262

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
217	Former Binsey Lane Allotments	3.78	greenfield- grassed-over former allotments	GI Core Network	Nearly all FZ3b	n/a	n/a	Functional floodplain
223	Goose Green (South-West of Goose Green Close)	1.95	greenfield- grass and tree common land	GI Supporting Network, designated Common Land,	part FZ3b (west and north edges)	Within Wolvercote with Godstow CA	n/a	Designated Common Land
225	Grandpont Sports Ground	4.27	Greenfield (Hogacre Common Eco Park)	GI Core Network,	Nearly all FZ3b	n/a	n/a	Functional floodplain
251	Merton College Sports Ground	5.29	Greenfield- mown college sports/recreation ground with cricket and football pitches and tennis courts	GI Supporting Network	very small amount of FZ3b	Within Central CA	n/a	Put forward to be assessed in 2025
252	Merton Field	3.5	Greenfield- grass university playing fields- cricket pitches	GI Core network	n/a	Within Central CA	n/a	Put forward to be assessed in 2025
267	Oxford Golf Centre	3.15	Entire site within Green Belt	Entire site within Green Belt GI Network (Core)	Nearly all FZ3b	Adjacent to Adopted OHAR		Functional floodplain

1263

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
274	Park Adjacent Rowing Clubs	1.21	Greenfield- heavily treed area	GI Supporting Network	Part within FZ3b	n/a	n/a	The site was not taken forward for assessment by LUC because it was nearly fully in FZ3b. The change to the flood mapping in the SFRA L1 shows only part of the site in FZ3b. It is still a greenfield site in FZ3b, but for the purposes of this assessment it would have been assessed for Green Belt function.
275	Part Trinity and Magdalen Sports Grounds – North	7.76	Greenfield- grass college playing fields including cricket pitches and tennis courts	GI Supporting Network	N/A	Small part within St Clement's and Iffley Road CA, contains listed building	n/a	Put forward to be assessed in 2025
278	Pembroke College Sports Ground	3.43	Greenfield- tree-lined grass college playing fields withing green floodplain corridor.	GI Core network	100% FZ3b	n/a	n/a	Functional floodplain
279	Port Meadow	165.93	Greenfield- ancient meadow floodplain with cattle grazing.	GI Core Network, SAC/SSSI	86% FZ3b	Two Scheduled Monuments located within site	n/a	SAC/SSSI
290	Shotover Country Park	8.01	Greenfield- well-established woodland and grass- country park	GI Core Network, SSSI	n/a	n/a	n/a	SSSI

1264

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
298	St Catherine's, Exeter, and Hertford Colleges Sports Grounds	10.86	Greenfield- grass college playing fields (including two cricket pitches)	GI Supporting Network	A third FZ3b	n/a	n/a	Put forward to be assessed in 2025
311	Sunnymead Park	7.87	Heavily treed park with mown grass areas and paths.	GI Core Network.	8% FZ3b	n/a	n/a	Put forward to be assessed in 2025
315	The Harlow Centre Playing Fields	5.96	Site includes most of the Swan School and Swan School playing fields.	Playing fields are GI Supporting Network	n/a	n/a	n/a	Not to be included in review - new secondary school and associated playing fields
323	Trap Grounds Allotments	3.71	Greenfield- allotments	GI Core Network. Allotments	84% FZ3b	n/a	n/a	Pattern of flood risk precludes development.
325	University College Sports Ground	4.26	Greenfield- mown, tree-lined pitch	GI Core Network	Nearly all FZ3b	n/a	n/a	Functional flood plain
326	University Parks	33.02	Greenfield well-used open space with areas of pitches, mature trees, areas of semi-natural grassland and riverside vegetation.	GI Core Network, LWS/OCWS	Small part FZ3b	Within Central CA	n/a	Put forward for assessment in 2025

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
347	Iffley Meadow	7.15	Greenfield- meadow	GI Supporting Network	Small part FZ3b	n/a	n/a	The site was not taken forward for assessment by LUC because it was nearly fully in FZ3b. The change to the flood mapping in the SFRA L1 shows only part of the site in FZ3b. It is still a greenfield site in FZ3b, but for the purposes of this assessment it would have been assessed for Green Belt function.
364	Donnington Bridge Road Riversports Centre and City of Oxford Rowing Club	3.221	Site is split into two parcels; to the north and south of Donnington Bridge Road. Both are predominantly brownfield containing various buildings related to more than one rowing club as well as the Sea Cadets and Sea Scout Group.	n/a	Over 1/4 FZ3b.	n/a	n/a	Southern parcel is mainly within FZ3. The southern half of the northern parcel lies outside of FZ3, but is mainly within FZ2 and is currently in active use by the Falcon Rowing and Canoeing Club.
380	Iffley Road Sports Centre (west)	1.984	Northern part of site is not Green Belt and has sports buildings. Southern part in GB is artificial pitch.	GI Supporting Network	Most of Green Belt part of site FZ3b	n/a	n/a	Green Belt FZ3b
390	Land at Wolvercote Viaduct (west of canal)	0.487	Greenfield grass floodplain	GI Core Network	Mainly FZ3b	n/a	n/a	Functional floodplain
391	Land at Wolvercote Viaduct	1.887	Greenfield- marsh habitat	GI Core Network, LWS (Oxford Canal Marsh)	Mainly FZ3b	n/a	n/a	Functional floodplain

1266

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
	(east of canal)							
393	Land east of Abingdon Road (south)	0.923	Greenfield- mown college sports/recreation ground	GI Core network	Part FZ3b	n/a	n/a	The site was not taken forward for assessment by LUC because it was nearly fully in FZ3b. The change to the flood mapping in the SFRA L1 shows only part of the site in FZ3b. It is still a greenfield site in FZ3b, but for the purposes of this assessment it would have been assessed for Green Belt function. However, there is no landowner interest and it is a sports ground.
403	Manor Farm, Binsey	1.496	Greenfield, farm buildings and treed area, listed building within site.	n/a	Part FZ3b	Listed building within site. Within Binsey CA.	n/a	Site all at flood risk, though little FZ3b, but site surrounded by a large area of FZ3b with no potential for access except through this area of high flood risk.
431	Walton Well Road Car Park	0.318	Parking area surrounded by trees and drainage ditches	n/a	Part FZ3b (southern and eastern edges)	n/a		Put forward for assessment in 2025

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
464	Land adjacent Seacourt P&R	37.2	Greenfield- agricultural	GI Core Network, Scheduled Monument northern part of site.	82% FZ3b	Scheduled Monument in northern part of the site.	2017 Assessment- high impact	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings, which concluded that its development would result in high harm to GB purposes. The 2023 assessment also concluded that there are no allocations in the Vale of White Horse DC Local Plan 2031 which would affect the 2017 assessment and that much of this area to the west of the A34 remains designated as SSSI and Ancient Woodland.
468a1	Sunnymead	4.19	greenfield- grass floodplain	GI Core Network	About 85% FZ3b	n/a	n/a	Pattern of flood risk precludes development.
468a2	Land South of A40, Old Marston	11.38	Greenfield- grass floodplain	GI Core Network	About 85%FZ3b	n/a	n/a	Pattern of flood risk precludes development.
469	North of Botley Road/ around Binsey/ Cripley Meadow	212	greenfield- meadows	GI Core Network, small part OCWS, small part LWS.	About 85%FZ3b	n/a	n/a	Pattern of flood risk precludes development.
470	North of Godstow Bridge	2.18	Greenfield, tree-lined hay meadow (West Cowleys Meadow).	GI Core Network, LWS.	Just under half FZ3b (southern portion of site)	n/a	n/a	Given location of flood risk and proximity of SSSI and SAC, do not include in review.

1268

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
471	North of Marston Ferry	3.84 (GB same)	Greenfield - pastoral and tree/hedge lined around perimeter	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
473	SLINC west of Willow walk & site to east –an extension of Bulstake stream SLINC site.	17.56	Greenfield- meadows	GI Core Network, mainly LWS, remaining part OCWS	Nearly all FZ3b	n/a	n/a	Functional floodplain
474	Extension to site #127	6.62	Greenfield, heavily treed, watercourses, alongside railway.	GI Core Network.	Over half FZ3b (present throughout site but predominantly in the central region)	n/a	n/a	The lower area of flood risk is spread in patches across the site and most of the site is immediately surrounded by FZ3b, therefore do not include in review.
476	Land between HWRS and Kennington Road	2.76	greenfield, significant tree cover, large pylons.	Supporting GI network.	About 1/4 FZ3b (largely towards the north western and north eastern perimeter)	n/a	n/a	Given location of flood risk and only possible access road located in area of higher flood risk, do not include in review.
477	Principal Oxford Spires Hotel (formerly Four Pillars) including surrounding land (former #477a & #477b).	18.2	mainly greenfield with a hotel- trees, horse-grazed and grass pitches	Core GI network (except hotel). University pitch.	Nearly all FZ3b	n/a	n/a	Functional floodplain

1269

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
478	OCWS to North of Weirs Lane (Long Bridge Nature Park)	2.53	greenfield- heavily treed area between watercourses	GI Core Network, half LWS, other half OCWS	Over 60% FZ3b	n/a	n/a	Pattern of flood risk precludes development.
479	Isis Farmhouse Pub and surrounding OCWS area	1.75	Isis farmhouse pub complex (very limited parking/hardstanding) and greenfield	middle of site is LWS, all Core GI network	100% FZ3b	n/a	n/a	Functional floodplain
480	Meadow Lane / opposite Isis boat house	1.84	Greenfield, footpath crosses site.	GI Core Network on northern half of site.	Nearly all FZ3b	n/a	n/a	Functional floodplain
489	Marston – gap between SSSI	5.13	Greenfield.	GI Supporting Network	Over 1/4 FZ3b	n/a	n/a	Put forward for assessment in 2025
490	Park Farm and adjoining OCWS	9.13	Brook runs through the site (Greenfield).	OCWS (Park Farm Meadows). Adjacent to SSSI.	About 85% FZ3b	n/a	2017 assessment - Moderate	GIven location and level of flood risk, do not include in review.
491	East of Wolvercote Paper Mill site (Nixey's Field)	3.43	Greenfield	GI Core Network	N/A	n/a	n/a	Put forward for assessment in 2025

1270

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
524	**Wolvercote Green**	**2.14**	**Entire site within Green Belt**	**GI Network (Core)** **Part designated Common Land** **Oxford City Wildlife Site (OCWS) adjacent to site (Oxford Canal)** **This site is located within the Port Meadow with Wolvercote Common and Green SSSI**	**Around 85% in Flood Zone 3b (greenfield)**	**The entire site is located within the Wolvercote with Godstow CA** **Listed bridge/building adjacent to site**		Pattern of flood risk precludes development.
534	**Land north and west of Hogacre Common Eco Park.**	**19.5**	**Greenfield grass and trees (informal) publicly accessible natural green space.**	**GI Core Network**	**Nearly all FZ3b**	**n/a**	**n/a**	Functional floodplain
536	**Island Site North of Weirs Lane**	**0.82**	**Entire site within Green Belt**	**Part GI Network (Core)**	**N/A**	**A very small element of the site is located in a View Cone**		Site is not suitable or available for development as it is a wooded site with a watercourse on both sides and no potential suitable access.
546	**Sidling Island**	**0.31**	**Greenfield, wooded**	**Supporting GI network**	**100% FZ3a**	**n/a**	**n/a**	Since sites were put forward to LUC for assessment, updates to the flood risk mapping have changed this site from 100% FZ3b to 100%FZ3a. Therefore, this site has not been assessed for its Green Belt purposes. However, the site is not a developable site, being a narrow site stranded between the river and the railway, as well as being a greenfield site at high risk of flooding.

1271

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
547	Fiddler's Island	1.66	Entire site within Green Belt	GI Network (Core) Oxford City Wildlife Site (OCWS) (Cripley Island and Fiddler's Island) Site is Designated Common Land	84% in Flood Zone 3b (greenfield)	n/a		Pattern of flood risk precludes development.
548	Iffley Meadows - Off Donnington Bridge	33.6	Nearly entire site within Green Belt	Iffley Meadows SSSI GI Network (Core) Local Wildlife Site (LWS) (Longbridges Nature Park Fen) Oxford City Wildlife Site (OCWS) (Longbridges Nature Park)	90% in Flood Zone 3b (greenfield)	This site is part located within a View Cone		SSSI

1272

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
550	Green Belt Land west of Iffley Road (rear of Iffley Road Sports Ground)	5.86	Greenfield- unmown grass, treelined, adjacent to Cherwell	Core GI network. Over half site LWS	Nearly all FZ3b	n/a	n/a	Functional floodplain
551	Land East of Wolfson College Boathouse	4.57	Entire site within Green Belt	GI Network (Core)	This site is located within the New Marston Meadows SSSI 90% in Flood Zone 3b	This site is located adjacent to the North Oxford Victorian Suburb CA		Functional floodplain
552	Land East of Wolfson College	0.95	Entire site within Green Belt	GI Network (Core)	Nearly all Flood Zone 3b	This site is located adjacent to the North Oxford Victorian Suburb CA Adjacent to listed building		Functional floodplain
553	Green belt land east of University Parks	42	Entire site within Green Belt	Located adjacent to Oxford City Wildlife Site (OCWS) (Park Farm Meadows) Entire site within Green Belt GI Network (Core)	This site is located within the New Marston Meadows SSSI 65% in Flood Zone 3b	This site is largely located adjacent to the Central (University & City) CA Part located within a View Cone		SSSI and significant amount of FZ3b.

1273

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
554	**Long Meadow**	**11.3**	**Nearly entire site within Green Belt**	**Supporting GI**	**Nearly 80% in Flood Zone 3b**	**This site is located entirely within the Central (University & City) CA** **Adjacent to listed building** **Part located within the Historic Core Area and a View Cone**		Pattern of food risk precludes development.
556	**The Water Meadow**	**8.1**	**Entire site within Green Belt**	**GI Network (Core)** **Local Wildlife Site (LWS) (Magdalen Meadow)**	**90% in Flood zone 3b**	**This site is located entirely within the Central (University & City) CA** **This site lies within the Grade I listed Magdalen College Registered Park and Garden** **Adjacent to listed buildings** **Historic Core Area**		FUnctional floodplain.

1274

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
557	**Pixey Mead SSSI**	**10.7**	**Nearly entire site within Green Belt**	**Located adjacent to Local Wildlife Site** **Nearly entire site within Green Belt** **GI Network (Core)** **Site is Designated Common Land** **This site comprises two SSSIs (Pixey & Yarnton Meads and Wolvercote Meadows)** **Site wholly lies within Oxford Meadow SAC**	**Nearly 85% in Flood Zone 3b**	**The majority of this site is located within the Wolvercote with Godstow CA**		Pattern of flood risk precludes development.

1275

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
558a	Hook Meadow and the Trap Grounds (West)	3.7	Entire site within Green Belt	GI Network (Core) Adjacent to Oxford City Wildlife Site (OCWS) (Burgess Field Nature Reserve) This site is located within the Hook Meadow & The Trap Grounds SSSI and adjacent to a SAC	Over 70% in Flood Zone 3b	n/a		SSSI and significant flood risk.
628	Seacourt Park & Ride	5.93	Part of site within Green Belt	Oxford City Wildlife Sites (OCWS) (Seacourt and Wytham Streams)	nearly 90% within FZ3b	n/a		Functional floodplain
636	Land off Mill Lane	0.33	Greenfield- grass with goal post and trees at edge.	GI Supporting Network	n/a	n/a	n/a	Put forward for assessment in 2025.

1276

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
670	**St Hilda's College, Cowley Place**	**0.55**	**Part of site within Green Belt**	**Part of site within GI Network (Core)** **Site adjacent to Local Wildlife Site (LWS) (St Hilda's College Meadow)**	**About a quarter FZ3b**	**Site within Conservation Area** **Site within Historic Core Area**		Only a very small part is within Green Belt so not assessed. in addition, landowner confirms no intention to develop.

Appendix 2 – Results of Green Belt assessment and further consideration of development potential

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
25	Oxford Sports Park	Most of site within Green Belt	GI supporting network	N	N	In intense sporting use, including as Oxford United training ground.
112a2	Green Belt Land at Cherwell Valley/Old Marston, (southern part of previous site 112).	greenfield- agricultural land	GI supporting network	N	N	Landowner interest but not put forward for allocation due to comments from Highways Authority that not feasible vehicular access could be obtained and would be car dependent development.

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
112b2	Green Belt Land at Old Marston	Entire site within Green Belt	Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill) Adjacent to Oxford City Wildlife Site (Victoria Arms Spinney) GI Network (Core and Supporting)	N	Y	Fundamental impacts, but still investigated further. County Council as Highway Authority clear that there is no feasible vehicular access and the site would be overly car-dependent.
112b3	Green Belt Land at Old Marston	Entire site within Green Belt	GI Network (Core) Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill)	N	N	GI core network and part LWS.
112b4	Green Belt Land at Old Marston	Entire site within Green Belt	GI Network (Supporting)	N	N	No landowner interest confirmed (OPT)
112b5	Green Belt Land at Old Marston	Entire site within Green Belt	GI Network (Supporting)	N	N	No landowner interest confirmed (OPT)

1278

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
112b6	Land at Old Marston (formerly #112b(5-6))	greenfield- agricultural land	GI supporting network	N	Part Y	No landowner interest confirmed (OPT)
114	Field at Junction of Marsh Lane and Elsfield Road	Greenfield- tree/hedge lined grass	GI supporting network.	N	N	Landowner confirmed no interest (OPT)
114a	Land at Marston Brook (Northern part)	Greenfield- pastoral and heavily treed in east.	GI supporting network	N	N	No landowner interest confirmed (OPT)
114b	Showman's Field	Greenfield site with biodiversity value	GI Core Network. LWS	N	N	Core GI network, LWS
114c	Marston Saints Sports Ground	greenfield- pitches drawn on.	GI supporting network.	Y	N	Leased and in sports use
114e	Marston Paddock Extension	Part of site within Green Belt	Site in Old Marston CA GI Network (Supporting)	N	N	Site was assessed as part of larger site 114a. This part put forward by landowner and so this separate site has been created and is proposed for allocation for housing
118	Land rear of Meadow Court Flats (formerly Land to rear of Wolvercote Social Club)	Greenfield- full tree cover.	GI supporting network.	Y	N	
136	Wildlife Corridor at River Cherwell 2	Greenfield - amenity open space/ sports pitches to the east and a play area within scattered mature trees to the west	n/a	N	Y	Magdalen College Playing Field. Watercourse on each side, only accessible by bridge from school grounds, no development potential, no landowner interest.

1279

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
144a	Wildlife Corridor at Marston Brook (northern part)	Greenfield, meadow adjacent to watercourse with perimeter made up of mature trees; accessible green space	Local Wildlife Site (Marston Brook Meadow), Core GI network	N	N	GI core network, LWS
144b	Wildlife Corridor at Marston Brook (southern part)	Greenfield, dense mature tree cover all over site, appears to be accessible to public	Adjacent to LWS, part of supporting GI network	Y	N	GI core network, LWS
151	Wildlife Corridor at St Edward's Boat Yard	Greenfield - dense mature tree cover across the entire site	Supporting GI network.	N	N	Parcel does not have development potential- it is surrounded by water on three sides, with Port Meadow opposite on one side and Godstow Abbey on the other and no connected significant development. It has an access track to the boathouse and no potential for access to serve a development.
153	Wildlife Corridor at River Cherwell 10	Woodland and pasture adjacent to watercourse	Supporting GI network In proximity of SSSI	Y	N	GI core network
157	Wildlife Corridor at Hill Farm (site boundary updated)	Greenfield, pasture bordered on NE by A40 and with hedgerows on remaining perimeter	Supporting GI network	N	Y	Landowner confirmed no interest (OPT)

1280

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
159	Wildlife Corridor Adjacent to Duke's Meadow	Greenfield, scrub and woodland - adjoining railway line and canal	Directly adjoins Duke's Meadow OCWS	Y	N	Site squeezed between the canal and railway with no opportunity for access that would support development.
163	Astons Eyot (#163a) and The Kidneys (#163b)	Green field, public park and nature reserve with diverse ecology including woodland, scrubland and meadows. Adjacent to watercourse	Designated wildlife site (OCWS), high level of biodiversity part of Core GI network	N	N	GI core network and OCWS
166	Banbury Road North Sports Club	MUGA with pitches for football, hocky, tennis	Supporting GI network	Y	N	Leased and high level of sports use
178	Boults Lane Recreation Ground	Greenfield, comprises of football pitches (senior and junior)	Supporting GI network	Y	N	Leased and high level of sports use
180	Brasenose Farm Allotments	Mainly greenfield- allotments in active use, some historic barns in corner converted to kitchen architect business.	GI Core Network (except barns). Adjacent to Brasenose Wood and Shotover Hill SSSI	Y	N	GI core network and allotments in active use, with historic barns at edge
183	Burgess Field (edge of Port Meadow)	Greenfield- scrub, grass, paths	GI Core Network, OCWS	N	Y	GI core network and OCWS
188	Court Place Farm – East	Greenfield- nature park	GI supporting network	Y	N	Leased and high level of sports use

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
189	Court Place Farm – West	Mix of brownfield and greenfield of the OXRAS integrated sport and leisure facility.	GI supporting network (outside of buildings)	Y	N	No landowner interest confirmed (OPT)
190	Court Place Farm Allotments	Greenfield- large allotments site, around half the site in active use.	GI Core Network	N	N	GI core network
194	Cutteslowe Park 1	Greenfield- cricket field	GI Core Network	Y	N	GI core network
195	Cutteslowe Park 2	Greenfield and brownfield. Traditional large park with formal planting, duck pond, play areas, aviary, miniature railway, community centre and collection of buildings including nursery greenhouses, depots and a cabin used as an office.	GI Core network.	Y	N	GI core network
196	Cutteslowe Park 3	Greenfield- grass playing pitches within Cutteslowe Park	GI Core Network, playing pitches	N	N	GI core network
197	Cutteslowe Park 4	Greenfield- grassland area of large Cutteslowe Park	GI Core Network	N	N	Gi core network
198	Cutteslowe Park Allotments	Greenfield- western half allotments, eastern half woodland.	GI Core Network, half allotments	Y	N	GI core network, half allotments
209	Fairacres Road Allotments	Greenfield- allotments	GI Core Network	Y	N	GI core network
251	Merton College Sports Ground	Greenfield- mown college sports/recreation ground with cricket and football pitches and tennis courts	GI Supporting Network	N	N	Sports ground with no landowner interest
252	Merton Field	Greenfield- grass university playing fields- cricket pitches	GI Core network	N	Y	GI core network

1282

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
275	Part Trinity and Magdalen Sports Grounds – North	Greenfield- grass college playing fields including cricket pitches and tennis courts	GI Supporting Network	N	N	Landowner confirmed no interest
298	St Catherine's, Exeter, and Hertford Colleges Sports Grounds	Greenfield- grass college playing fields (including two cricket pitches)	GI Supporting Network	N	N	Landowners confirmed no interest except Hertford College Sports Ground. That area made into separate site 676 within this larger site.Site in active use for sports provision. Whilst landowner has indicated interest in developing for residential use at the same time they have said their primary intent for the site is to keep it in sports use, and it has not been demonstrated that the sports facilities are surplus or can be re-provided.
311	Sunnymead Park	Heavily treed park with mown grass areas and paths.	GI Core Network.	N	N	GI core network
326	University Parks	Greenfield well-used open space with areas of pitches, mature trees, areas of semi-natural grassland and riverside vegetation.	GI Core Network, LWS/OCWS	N	N	GI core network, OCWS and LWS
431	Walton Well Road Car Park	Parking area surrounded by trees and drainage ditches	n/a	N	N	The site includes FZ3b and drainage ditches that make the developable area very small. In addition, it is currently in use as the main public car park for visitors to the south of Port Meadow. The site is also in a highly sensitive area adjacent to the SAC and SSSI. Not considered suitable for development.

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments	Grey belt?	Potential for development to have fundamental impact	Further considerations
464	Land adjacent Seacourt P&R	Greenfield- agricultural	GI Core Network, Scheduled Monument northern part of site.	N	Y	GI Core Network, part Scheduled Monument
489	Marston – gap between SSSI	Greenfield.	GI Supporting Network	N	Y	Landowner confirmed no interest (OPT)
491	East of Wolvercote Paper Mill site (Nixey's Field)	Greenfield	GI Core Network	Y	N	GI core network
636	Land off Mill Lane	Greenfield- grass with goal post and trees at edge.	GI Supporting Network	Y	N	Landowner confirmed no interest (OPT)

1284

Background paper 007

Title: Flood risk, SuDS and drainage

This paper addresses flood risk and new development including SuDS and drainage
Relevant Local Plan Objective(s): • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment
SA Objective(s): 2. To build resilience to climate change including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
SEA theme(s): Water, climatic factors, human health

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1. Introduction

1.1 Oxford is located at the confluence of two rivers, the Thames and the Cherwell, as well as numerous watercourses. The risk from river flooding is one source of flooding that has the potential to impact development in Oxford, with other sources including groundwater, surface water and sewer flooding. The ongoing impact of climate change, including projected wetter winters and increased incidences of intense rainfall events, is likely to exacerbate these risks in the future, with a variety of negative consequences for property, economy and ecosystems as well as human health.

1.2 Oxford has a history of flood events with several occurring during 2024, where a number of flood warnings were issued, temporary defences deployed, several roads closed and footpaths along the city's waterways completely obscured. Other recent flood events were at the start of 2021, with more historic flooding events occurring in January 2014, November 2012 and July 2007, each of which resulted in significant disruption to the city. This series of flood events resulted in a programme of short-, medium- and long-term measures including the development of the Oxford Flood Alleviation Scheme (OFAS) - the primary purpose of which is to reduce the risk of flooding for properties and infrastructure.

1.3 This background paper provides a brief overview of some of the flooding issues in the city, including SuDS and drainage. It begins by taking a look at flooding from a policy perspective, reviewing relevant policies, plans and programmes at the national, regional and local level. It then goes on to set out the current situation for flooding in Oxford, looking at each source of flooding in turn and how they present a different set of issues. Then the paper moves on to look at what would happen if we didn't produce a plan before setting out what potential

topics could be included in the new plan. Finally, it draws out some of the key issues relating to flooding.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The Flood and Water Management Act, 2010

2.1 This piece of legislation requires better management of flood risk, creates safeguards against rises in surface water drainage discharges and protects water supplies for consumers. It gave a new responsibility to the Environment Agency for developing a National Flood and Coastal Risk Management Strategy, and established upper tier local authorities (in our case Oxfordshire County Council) as Lead Local Flood Authorities and provided them with a range of duties.

National Planning Policy Framework (NPPF)

2.2 Paragraphs 170-182 of the NPPF set out the policy for planning for development in flood risk areas. It requires a sequential approach to development: sites should not be allocated, or permitted, if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It also requires an exception test for proposed development in areas of flood risk: this requires proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Paragraphs 180-181 focus primarily on planning applications and paragraph 182 states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. It is expected that these sustainable drainage systems will provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Local Planning Authorities need to have appropriate policies in place on sustainable drainage systems.

2.3 Paragraph 125 (b) of the NPPF recognises that some undeveloped land can perform many functions, including flood risk mitigation. The NPPF also requires that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies. The NPPF states that the SFRA will be the basis for determining the sequential approach to development. This is important as applicants need not apply the sequential test again on sites allocated in the development plan through the sequential test.

2.4 The NPPF was recently updated and published in December 2024, however there were not any significant amendments to the flooding policy. A few minor amendments were made to

the September 2023 version of the Framework, which included specifically referencing that improvements to green infrastructure and other forms of infrastructure can provide opportunities to reduce the causes and impacts of flooding as well as explicitly stating that as well as development being resistant and resilient to flooding, in the event of a flood, buildings should be able to be quickly brought back into use without significant refurbishment. Additionally, a separate Annex 3 was provided which classifies flood risk vulnerability.

National Planning Practice Guidance (PPG)

2.5 The Flood risk and coastal change section of the PPG was last updated in September 2025. Significant amendments were made in 2022 to bring the guidance up to date and in line with the latest policy position on flood risk introduced in the updates to the NPPF in 2018 and 2021. Paragraph 078 refers to a table which sets out the definition of the different flood zones:

- Flood Zone 1 has the **lowest** probability of flooding
- Flood Zone 2 has a **medium** probability of flooding
- Flood Zone 3 has a **high** probability of flooding
- Flood Zone 3b is the **functional flood plain** and this zone comprises land where water has to flow or be stored in times of flood.

2.6 The key difference made in 2022, is that the definition of the functional flood plain (Flood Zone 3b) changed from an annual probability of 1 in 20 (5%) or greater in any year to 1 in 30 (3.3%) or greater in any year.

2.7 The PPG on Flood Risk and Coastal Change provides more detailed guidance as to the application of the sequential and exception tests in the context of plan-making and planning applications. It also provides additional information on the "sequential approach to the location of the development" and provides some over-arching guidance relating to "taking flood risk into account in preparing plans".

New national flood and coastal erosion risk information

2.8 In December 2024, the Environment Agency published a new report summarising the changes to the National assessment of flood and coastal erosion risk in England in 2024. In March 2025, new national flood risk assessment (NaFRA) was also made available. Its intention is to provides a single picture of current and future flood risk from rivers and the sea, and from surface water, using both the existing detailed local information and improved national data. This includes future scenarios accounting for climate change. This new flood zone data is expected to inform any new flood risk assessments, including those undertaken at a strategic level.

Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026

2.9 The Flood and Coastal Erosion Risk Management (FCERM) Strategy for England was published in 2020, with an initial 1-year action plan showing the actions needed, published

in May 2021. The Environment Agency has recognised that a longer-term view is now needed to implement the strategy and to address this, they have worked with partners to develop a roadmap. The roadmap contains practical actions out to 2026, which once completed will help to implement the strategy's 2100 vision. These include actions such as taking forward projects and programmes that will pioneer innovative ways of boosting flood and coastal resilience and make a difference to their local communities, as well as identifying practical ways in which flood and coastal investments can contribute to wider priorities, including local nature recovery, carbon reductions and more integrated water solutions that help with both flood and drought resilience.

Catchment Strategic Plan, Part of our Drainage and Wastewater Management Plan (DWMP) for Oxfordshire, Swindon, Wiltshire, Gloucestershire and Warwickshire, Thames Water, 2023

2.10 Thames Water produced a strategic plan which develops a strategy for the next 25 years to meet future challenges such as climate change and population growth which could impact the sewerage and drainage systems in the region. The document also illustrates the range of investment that is required for each of the catchments across the region (including Oxford) and identifies sewage treatment works that will need to be upgraded within the next 25 years to ensure treatment capacity keeps pace with growth.

Our Catchment Plan, Thames Water, 2018

2.11 Thames Water produced a plan which includes an analysis of the causes of sewer flooding and pollution in the Oxford catchment. These include heavier and more intense rainfall events happening more often; deterioration within the sewerage network and blockages caused by fat, oil and grease deposits, resulting in flooding and operational issues; loss of local river flood plains; and increasing river flooding. The report notes that the foul sewers were not designed to cope with surface water. For example, in the Grandpont area, the deterioration of some of the sewers within their network has allowed groundwater into the foul sewers. At Abingdon Road, flooding from surface water sewers has also occurred as a result of high river levels and / or restriction of the outfalls due to vegetation growth.

2.12 The Our Oxford catchment plan is currently at the Options Appraisal stage. Thames Water are recommending an intervention comprising short-, medium- and long-term measures. Short-term activities will include their ongoing work to improve the operation of their network and their response to problems as they occur. Medium term activities will include the refurbishment of their local sewerage network to reduce pollution and foul sewer flooding. Long term activities include the review and refinement of their catchment approach based on the experience gained, and outcomes achieved from the short- and medium-term interventions.

Oxford City Council "Our Strategy" 2024-28

2.13 The City Council's "Our Strategy" document sets out the importance of working with partners to deliver improved flood defences and managing the increased risks of flooding in order to help the city become more resilient to climate change.

Oxford Local Plan 2036 Policies on Flood Risk

2.14 The Oxford Local Plan 2036 is the current development plan for the city and it contains a number of policies that relate to flood risk. In particular, Policies RE3 and RE4 set out the City Council's approach to flood risk, sustainable drainage, and also provide the policy approach in relation to water management at some of Oxford's important nature conservation sites. Policy RE3 includes strict provisions as to what development will be granted planning permission in Flood Zone 3b. Any proposal must meet all of the criteria in this policy and must be for water-compatible uses or essential infrastructure; or, where it is on previously developed land, it must represent an improvement of the existing situation in terms of flood risk.

2.15 Policy RE3 was informed by the Flood Risk and Sequential Test of Sites Background Paper. In line with the associated guidance in the PPG, when developing site allocation policies, the sequential test was applied if any of the potential sites were outside of Flood Zone 1. Before allocating sites in higher risk flood zones, it was demonstrated that there were no reasonable alternative sites available in areas with a lower probability of flooding that would have been appropriate to the type of development or land use proposed. Any proposals for the development of sites in Flood Zone 3a that incorporated 'more vulnerable' uses such as housing also required the exception test. In the case of Oxford, where previously developed sites in Flood Zone 3b were proposed, an exception test was also required. Paragraphs 1.21 to 1.59 of our Statement of Common Ground with the Environment Agency provide more detail as to how the sequential and exception tests are applied in Oxford.

2.16 The Flood Risk and Sequential Test of Sites Background Paper set out the individual capacities of sites within each Flood Zone and demonstrated that Oxford had insufficient capacity to accommodate its housing need within lower risk flood zones. Consequently, development sites were allocated within higher risk flood zones applying the sequential test. These sites must be accompanied by a site-specific flood risk assessment when planning permission is sought.

Oxford City Sustainable Drainage Design and Evaluation Guide

2.17 In 2010 the Flood and Water Management Act proposed that sustainable drainage systems (SuDS) should be used on most development and this was confirmed in a ministerial statement in 2015 introducing the 'non statutory technical standards' for SuDS. The evaluation guide to sustainable drainage was published in 2018 and provides a link between the design of SuDS with the evaluation requirements. The design and evaluation guide promotes the idea of integrating SuDS into the fabric of development using the available landscape spaces as well as the construction profile of buildings. This approach provides

more interesting surroundings, cost benefits, and simplified future maintenance. This guide provides a background context for SuDS designs, taking into account the landscape character and local geology and provides advice on what type of SuDS is most suitable in Lye Valley; a Site of Special Scientific Interest (SSSI) with a unique nature, where special consideration to the type of SuDS must be given.

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 In Oxford there are major technical obstacles which mean any solutions to flooding will be expensive, provide different levels of protection and not benefit everyone in the affected communities. Proposals can be brought forward that will reduce the risk to many people, but major flood defences are not a realistic option in the foreseeable future. The most sustainable way of managing flood risk in Oxford will be through a Flood Risk Management Strategy. As set out in the introduction, flooding occurs from a number of sources including groundwater, surface water, river, and sewage flooding. Each will be looked at in turn to present a current picture of what is happening in the city.

Fluvial Flooding

3.2 Fluvial (or river) flooding occurs when a river bursts its banks and water spills out onto the surrounding land. This type of flooding is caused by heavy rain. Fluvial flooding is the primary source of flood risk in Oxford in terms of flooding extent, the number of properties at risk and historical flood damages. Oxford is located at the confluence of the River Thames and River Cherwell, and is at risk from both watercourses independently, as well as concurrently in large flood events. As can be seen from Figure 3.1 below, large parts of Oxford are at risk from this type of flooding. Some areas of flood risk in Oxford allow the river to naturally burst its banks onto river floodplain, however other areas have properties in them.

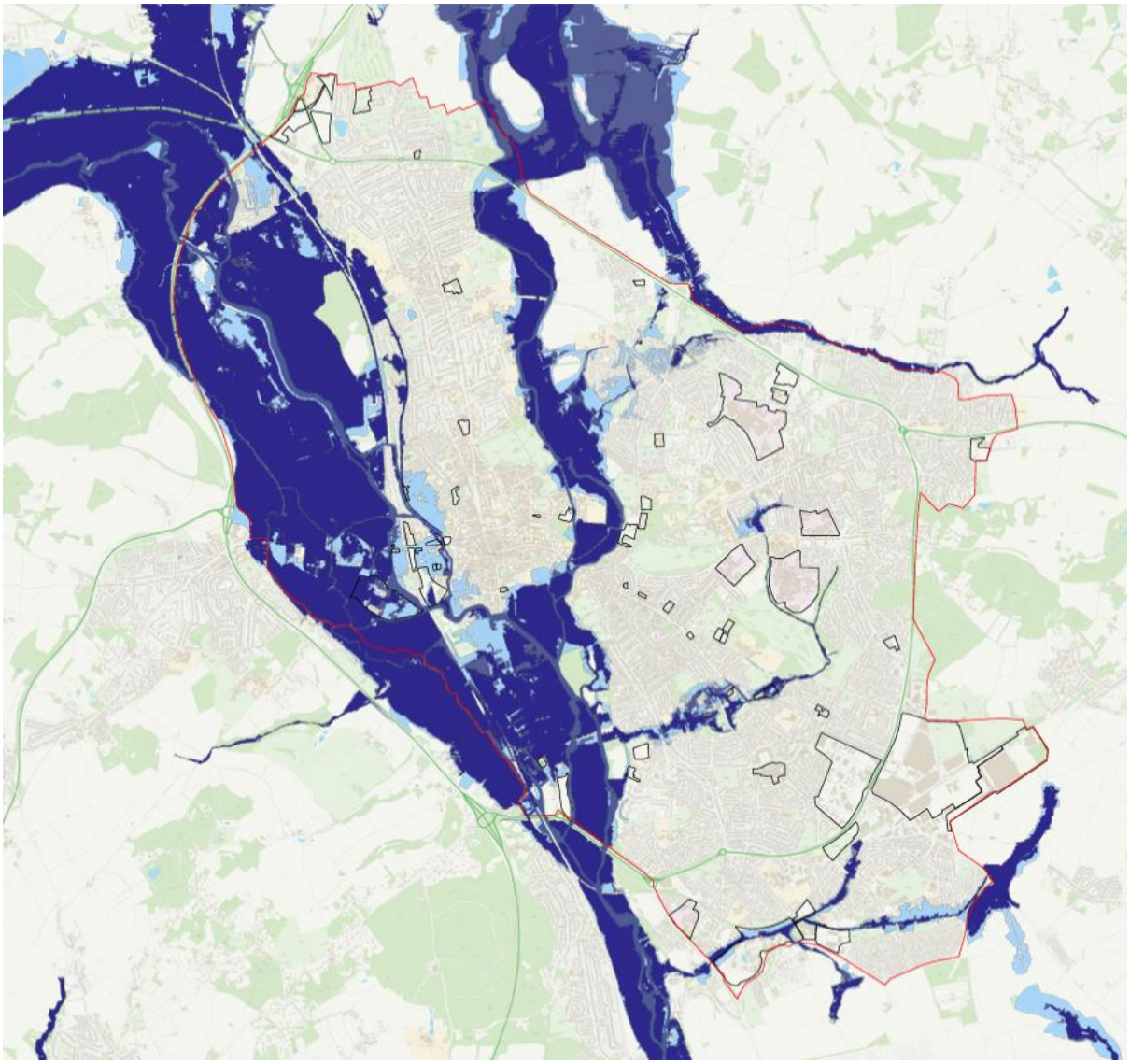

Figure 3.1 - Flood map showing risk of river flooding in Oxford (WHS, 2025)

Groundwater Flooding

3.3 According to the Environment Agency, groundwater flooding:

> *"can happen when the level of water within rock or soil underground – known as the water table – rises. When the water table rises and reaches ground level, water*

starts to seep through the surface and flooding can happen. This means that water may rise up through floors or underground rooms such as cellars or basements."

3.4 The Environment Agency and British Geological Survey have investigated the nature and mechanisms behind groundwater flooding in Oxford. In the majority of cases, it has been found that local ground water is linked to river flows and has an independent response to rainfall. There is a lack of reliable data however, therefore a system of water level measurement points for future monitoring purposes has been established.

3.5 The Environment Agency holds and updates a groundwater flooding register identifying the locations and nature of specific groundwater flooding events. For Oxford, the groundwater register has identified 21 records of suspected ground water flooding. These occurred between 2000 and 2003 and 2007 and 2009. 15 of the incidents occurred within the city, whereas 6 were located just outside the city's boundary. Groundwater flooding tends to occur in low lying areas, with clusters of incidents in New Hinksey, Grandpont and New Botley. These three areas all lie within Flood Zone 3, so the groundwater incidents are likely to be associated with fluvial flooding.

3.6 Four of the incidents reported immediately to the west of the Cherwell-Thames confluence are within Flood Zone 1. The sites are located on gravels like those within the floodplain. Although the incidents took place within Flood Zone 1, the proximity of the Rivers Cherwell and Thames means that groundwater emergence is likely, especially during periods of high-water level in the two rivers.

Surface Water Flooding

3.7 Surface water (or pluvial) flooding happens when heavy rainfall overwhelms local drainage capacity. It is a significant risk affecting 3.2 million properties in England. Surface water flooding is **more** difficult to forecast than flooding from rivers as it is often caused by periods of intense rainfall. This is because "current meteorological methods are not able to pinpoint where or when potential intense rain will arrive, nor can they know or predict the capacity of local systems to manage the level of rainfall." There are several high-risk areas near the city centre where surface water pools, including large parts of St Aldates and Speedwell Street to the south of the city, and George Street to the west. The Oxford City Level 1 Strategic Flood Risk Assessment (WHS, 2023) indicated that ground levels to the west and south of the city are lower than those in the city centre, which may explain why water is shown to pool in these locations. The greatest risk of surface water flooding is around certain roads pertaining to the areas of Jericho, Headington, Summertown, Woodstock Road and the city centre. Recent surface water flood incidents have been reported at the following locations:

Table 3.1 - Recently recorded surface water flood incidents

Area	Road	Year
Headington	Old Road	2020

Summertown	Summerhill Road	2020
Summertown	Water Eaton Road	2023
Woodstock Road	Blandon Close	2020

3.8 Most of the areas identified above tend to be located outside of the floodplains of the River Thames and River Cherwell, meaning that the main source of flooding shown in these areas is likely to originate from surface water flooding rather than from fluvial flooding.

Sewer Flooding

3.9 Sewer flooding is when sewage or foul water leaks from the sewerage system (through pipes, drains or manholes) or floods up through toilets, sinks or showers inside a building. The responsible authority for sewer flooding across in Oxford is Thames Water, the sewerage undertaker, who have confirmed that a total of 155 historic records of sewer flooding have been recorded within the Oxford City administrative area since records began. The most incidents have occurred in the built-up areas of New Hinksey, Grandpont, Botley, Osney and Marston.

Strategic Flood Risk Assessment (SFRA)

3.10 The NPPF requires local plans to be supported by an SFRA and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as Lead Local Flood Authorities (in this case, Oxfordshire County Council). The EA provides guidance on how to undertake an SFRA. The most recent SFRA was undertaken in 2023 to support the emerging Oxford Local Plan 2040 (now withdrawn). A Level 1 SFRA was initially undertaken which identified all flood risk areas, based on all sources of flooding and taking account of the latest climate change allowances. A Level 2 SFRA was then carried out as it was determined that the City Council could not allocate all land for development outside flood risk areas. The Level 2 SFRA gives more detail on the nature of the flood risks identified and where the sequential and exception tests will need to be applied. Although the Oxford Local Plan 2040 has now been withdrawn, the 2023 SFRA is based on the most up-to-date modelling available at the time, including running the associated central, higher central and upper end climate change allowances, which provided a comprehensive update to the flooding mapping for the city. The Level 1 assessment in particular therefore provides a very useful baseline (regardless of which site allocations are taken forward in the Oxford Local Plan 2045). However, any future SFRA will need to use the new flood zone data that was published by the Environment Agency in March 2025.

Taking account of Climate Change impacts when looking at Flood Risk

3.11 The paragraphs below summarise the approach that was taken in respect of taking account of the climate change allowances in the Local Plan 2040. The new Local Plan will have to determine if this approach is still the preferred one.

3.12 An important part of predicting the likely impact of flooding in the future is looking at the likely impacts of climate change. In flood risk terms, climate change is likely to bring increased wetter weather and more incidences of various types of flooding. The headline findings from the current UK Climate Projections released in 2018 (known as UKCP18) highlighted that in the most recent decade (2009-2018), the UK climate has been on average 1% wetter than 1981- 2010, and 5% wetter than 1961-1990. Looking into the future, UKCP18 reported that rainfall patterns across the UK will vary, but that by 2070, under a scenario of high greenhouse gas emissions, winters will on average grow increasingly wetter and summers drier. However, despite overall summer drying trends in the future, there are likely to be future increases in the intensity of heavy summer rainfall events, particularly for urban areas in the UK, which will have an impact on the frequency and severity of surface water flooding.

3.13 To take climate change into account in planning for flood risk, the 2023 SFRA has been informed by the latest guidance released by the Environment Agency on how local planning authorities, developers and their agents should use climate change allowances. There are allowances for different climate scenarios over different epochs, or periods of time, over the coming century.

3.14 For Oxford City, the peak river flow and peak rainfall intensity allowances are relevant and have been used in any relevant modelling updates. For peak river flow, Oxford falls within two management catchment areas: Gloucestershire and the Vale Management Catchment and Cherwell and Ray Management Catchment. The climate change allowances for the Cherwell and Ray are significantly lower than those for the Gloucestershire and the Vale. The majority of the Oxford administrative area lies within the Gloucestershire and Vale Management Catchment, therefore this in combination with the more precautionary climate change allowances, is why this management catchment has been deemed to be the most appropriate one to use for Oxford. More detail on how the climate change allowances have been applied to the updated hydraulic modelling can be found in the Level 1 SFRA (2023). In the emerging Oxford Local Plan 2040 (now withdrawn), we also looked at the implications of climate change on a site-specific basis as part of gaining a clear understanding about whether development proposed in higher-risk flood zones would be safe, as well as meeting the other tests set out in national policy. Climate change allowances were applied to all site allocations assessed as part of the Level 2 SFRA.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 Flood risk from a range of sources will be an ongoing challenge in the city. Climate change is projected to bring about wetter winters and more incidences of high intensity rainfall events, which is likely to increase the risks of flooding, particularly in highly urbanised parts of the city and within the flood risk zones.

4.2 In the absence of a new local plan, local flooding policy would still be in place until 2036, as long as the plan remained "up-to-date". In the absence of an up-to-date local plan, development management decisions would need to be made against the national framework. As the NPPF presently contains a strong policy framework at the national level for flooding, it is unlikely that new or existing development would be adversely impacted by this change.

4.3 More locally, the Environment Agency is working in partnership on a major new scheme to reduce flood risk in Oxford. The Oxford Flood Alleviation Scheme (OFAS) will cost around £176 million and is one of the biggest flood schemes in the country, with the aim of reducing flood risk to homes, businesses, services and major transport routes into the city. The OFAS will create a new stream with wetland wildlife corridor to the west of Oxford. The intention of the scheme is to reduce flood risk to all properties in Oxford currently at risk of flooding from the River Thames, as well as to the railway, Botley and Abingdon Roads, other local roads, utilities and services such as broadband. The scheme will also bring additional environmental improvements to the area, including creating new wetland which will link up existing wildlife sites. The proposed scheme is approximately 5 km long, starting just north of Botley Road and passing under the A423 Kennington Railway Bridge (Southern by-pass) to the south before re-joining the River Thames.

4.4 In spring 2022, the Environment Agency submitted a new planning application for the scheme to Oxfordshire County Council, who in summer 2024, resolved to grant planning permission for the OFAS. Approval is subject to the application first being referred to the Secretary of State for the Ministry of Housing, Communities and Local Government, due to the scheme's location in the Green Belt. The Secretary of State will decide if they wish to make a determination. The Environment Agency also made a new compulsory purchase order (CPO) for the scheme. There was a public inquiry into the CPO, led by an independent inspector, which ran from 14 November 2023 to 26 January 2024. In May 2025, the Secretary of State confirmed the CPO which means the Environment Agency can progress with purchasing the land and securing the access needed to build the scheme.

4.5 Although a scheme like the scale of OFAS has the potential to significantly reduce flood risk to all properties in Oxford currently at risk of flooding from the River Thames, even with flood defences in place, an element of residual risk will remain in areas that are prone to flooding. Residual risk can arise from the failure of flood management infrastructure such as a breach of a raised flood defence or blockage of a surface water conveyance system.

4.6 In respect of sustainable drainage systems (SuDS), the absence of a local plan would not be so impactful. National policy now requires SuDS on not just major developments (over 10 dwellings), but for minor developments (fewer than 10 dwellings) within an area liable to flood from surface water or groundwater, or that are likely to increase flood risk locally, as well as for developments that need sustainable drainage solutions to be provided. The relevant policy in the current Oxford Local Plan 2036 (Policy RE4) contains a hierarchy of

SuDS approaches to apply and refers applicants to the guidance provided by either the City Council (minor development) or County Council (major development).

5. Key issues addressed through the Local Plan 2045

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to climate change, resources and flood risk objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Impacts of Climate Change on Flood Risk

5.3 Addressing current and future flood risk remains a key priority for the new Local Plan. The ongoing impact of climate change includes projected wetter winters and increased incidences of intense rainfall events and this is likely to exacerbate risk of flooding in the future, with a variety of negative consequences for property, economy and ecosystems as well as human health. Although there is a need to strike a balance to ensure that other objectives such as the correct amount of housing, infrastructure etc. are also achieved, it is imperative that any new development is directed to areas with the lowest risk of flooding first, and that flood risks are well managed in new development so as to not increase flood risk elsewhere and to ensure the safety of occupants.

5.4 Our existing policy is performing fairly well according to feedback from specialists and the EA. Our approach to flooding also benefits from national policy providing a strong framework for addressing flooding, much of which can be applied directly to Oxford. There are however some areas where relying on national policy alone is not appropriate, as it does not take account of the local circumstances of Oxford's flood risk context, particularly in relation to extensions and also brownfield land at high risk of flooding. As the Local Plan 2036 policy has been put into use, some weaknesses and lack of clarity in how to apply the policy have also surfaced, which the Local Plan 2045 could address.

Strategic Flood Risk Assessment

5.5 Our current Strategic Flood Risk Assessment (SFRA) was published in 2017. In order to ensure that the SFRA is still relevant to best practice and the latest available knowledge, there is a need to undertake a new assessment to ensure that it takes account of the latest climate change predictions and modelling published at the time of the study. Climate change predictions are constantly being updated and refined and new predictions can have a notable effect on the picture of risk which we have considered as we have refined our policies (particularly our site allocations).

5.6 To support the Oxford Local Plan 2045 we commissioned an SFRA in order to understand the impacts of the latest modelling, including climate change predictions. The SFRA uses the EA's latest available modelling data, but also considers the detailed and area-specific 2018 model alongside this to maximise the accuracy of defining Flood Zone 3b. The SFRA assesses the risk from all sources of flooding as well as cumulative impact that development or changing land use would have on flooding. It also identifies opportunities to reduce the causes and impacts of flooding and identifies any land likely to be needed for flood risk management features and structures. The SFRA provides an evidence base to allow us to carry out a sequential test for site allocations to locate these in the lowest areas of flood risk wherever possible. It is also necessary for informing a more detailed assessment (SFRA level 2) of any allocations that need to be located in areas of higher flood risk to ensure development can happen in a safe way, historically this has been necessary in the city due to the lack of available sites that can meet our housing needs within areas of lowest flood risk.

Approach to flood zone 3b (functional flood plain)

5.7 The city is highly constrained by areas of flood risk, with a significant area comprising flood zone 3 – this is the area at highest risk of flooding. Flood zone 3 includes an area that is functional flood plain, referred to as flood zone 3b. National guidance is that we should not usually accept development within this area due to the high risk of flooding along with the loss of flood storage that this would incur, and our proposed approach is to continue to follow national policy and set out that development of greenfield sites within 3b would not be permitted. However, historic development has happened within the flood plain and has led to a number of areas of brownfield land existing within 3b.

5.8 Current policy in the Local Plan 2036 was formulated recognising that these brownfield sites can provide more sustainable locations for development than greenfield sites and that refusing further development could allow these areas to deteriorate whilst ignoring the opportunities for thoughtful redevelopment that can actually reduce flood risk in future. Many developments in these flood zones in the past have not compensated for lost flood storage or ensured suitable drainage systems, whereas new development on these same sites can make sure this does happen. The Policy in the Local Plan 2036 takes a pragmatic approach that recognises that Oxford already has significant development in areas at high risk of flooding, but that preventing redevelopment of these sites would also be preventing

opportunities to be taken for improvements to the flood risk situation, as well as sterilising sites in highly accessible locations.

5.9 Policy G7 in the Local Plan 2045 would broadly continue the approach of the existing plan, but would also deliver a clearer and more comprehensive approach to a range of development types including explicit reference to minor and householder development, and basement development. The policy allows some limited development within Flood Zone 3b, for water-compatible uses or essential infrastructure, as allowed for in national policy, but also on previously developed land in circumstances where the flood risk is demonstrably decreased through careful design and where all of the set of six criteria can be met, which are designed to ensure safety and improvements to flood risk management. These criteria include that the built footprint of the site is not increased and that the development does not result in an increase in flood risk vulnerability classification (so for example and office in flood zone 3b could not change to residential).

5.10 The approach for greenfield sites in Flood Zone 3b follows national policy, setting out that new development would not be permitted there except for water compatible uses and essential infrastructure. It is not seeking to be any more restrictive that this.

Sustainable Drainage Systems (SuDS)

5.11 National Policy includes some references to SuDS; however, we feel that more detail can be added in the new Local Plan, especially in regard to the design of SuDS which are specific to Oxford and have developed Policy G8 to capture this. In Oxford, a significant amount of development comes from minor planning applications, and we recognise that there is an opportunity to further help mitigate for flood risk by requiring SuDS on all new developments, including minor schemes. This would have a significant positive impact, especially considering the potential cumulative effect that numerous small developments could have on increasing overall flood risk in Oxford.

5.12 In addition to having SuDS on all new developments, Policy G8 is also explicit about encouraging green SuDS, that incorporate natural features, rather than grey (e.g. tanks underground). SuDS that incorporate natural green features have the benefit of bringing a wider range of additional benefits to place-making, such as making spaces for biodiversity and making spaces that are more pleasant for people. The policy therefore includes a hierarchical style approach to SuDS design, prioritising green SuDS and maximising multi-functionality. More details on this can be found in the background paper for Green Infrastructure which illustrates the benefits of multi-functionality, which although a priority, are far wider than just reducing flood risk.

6. Appendix A - Policy options and preferred approaches

The analysis set out in the previous sections of this background paper indicates that flood risk is a key issue that new development will need to consider and respond to depending on where it comes forward in the city. The process by which drainage is managed on sites is also a related consideration.

The Local Plan 2042 therefore includes proposed policies in response to the following topics:

- Addressing flood risk and requirements for flood risk assessments
- Sustainable Drainage Systems (SuDs)

For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments

Table 1 - Policy options set 007a: Flood Risk and Flood Risk Assessments

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Reiterate national policy and set out requirements for when an FRA will be required, particularly where there is less certainty within national policy (e.g. extensions). Include expectations for how flood risk ought to be assessed, avoided, managed and mitigated. This will include where flood risk could be impacted off-site.	Applications for extensions are a regular occurrence across the city, including within Flood Zone 3b. Owing to the constraints within the city we are seeking to allow some householder extensions if it can be demonstrated that it will not result in a significant increase in flood risk. This option would set out greater certainty as to what is expected.	Whilst the Local Plan can set out some basic principles that should be applicable to most situations, there is likely to always be an element of site-specific context which will need to be considered and may require deviation from these principles. With more extensions permitted within Flood Zone 3b, there is a risk of cumulative impacts from increased developed footprint over time.
Option b For extensions proposed within Flood Zone 3b – set out some key principles/ requirements that will need to be met to address flood risk before these will be permitted.	This option would make explicit the City Council's expectations for when FRAs are to be submitted, and how flood risk is to be addressed in Oxford. It would ensure that where flood risk is present on a site, this is effectively assessed and then addressed in the most appropriate way through the design of the development. Despite strength of national policy regarding flood risk, it does have some weaknesses/ ambivalence towards certain	National policy is generally strong regarding when FRAs are to be expected and how they ought to be completed. Policy is also strong regarding how flood risk ought to be addressed by new development. This could result in some repetition.

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	situations, for example how FRA is to be applied to extensions, and local policy can provide greater certainty regarding our expectations.	
Option c Prevent self-contained basement flats in areas at risk from fluvial flooding.	There is a higher level of risk to life in self-contained basement flats than in basement accommodation more widely when in areas of flood risk. This policy approach would make self-contained basement flats unacceptable in such an area.	Could reduce opportunities for development of sites which are otherwise in accordance with national policy and where risks could be largely addressed through specific mitigation measures. Such development is already prevented by national guidance in Flood Zone 3 and subject to an exemption test in Flood Zone 2, so a specific option would not be considered necessary.
Option d Prevent culverting of open watercourses.	Culverting of open watercourses can introduce additional flood risk in the local area due to potentially throttling water flows during heavy rainfall events as well as risks of blockages during storm events that can exacerbate flooding. It can also have detrimental effects for the quality of the watercourse, removing habitat and harming local species.	Could reduce opportunities for development of sites if the open watercourse cannot be incorporated into the scheme.
Option e 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 Flood Zone 3b, with high standard of	Allowing only water-compatible and essential infrastructure in undeveloped flood zone should not increase flood risk elsewhere or result in unnecessary net loss of functional floodplain.	Where development is proposed on brownfield sites in Flood Zone 3b, it will be essential for proposals to have appropriately assessed risks and be able to demonstrate that new development would not: reduce the water storage capacity of the floodplain; impede flows of

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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 proposals would conflict with safe access and egress requirements, they would be refused.	In Oxford there is much existing (and historic) development in areas of flood risk; it is important that those existing properties can be improved/ reused/ redeveloped to make efficient use of land. This approach would provide for careful regeneration of existing development sites but limiting further changes in built footprint should help to ensure no increase in flood risk elsewhere (with potential for improvement). Also, encourages use of brownfield land over developing on greenfield sites and can allow development close to where people already live.	water; create or increase any risks for occupants, or of flooding elsewhere. The policy would need to provide clarity on what constitutes the built footprint of a site and what conditions are acceptable under the policy – e.g. if the footprint remains the same, is it acceptable to be relocated within a site?
Option f 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 Flood Zone 3b, no restriction on built footprint change if risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposals would conflict with safe access and egress requirements, they would be refused.	Greenfield sites are likely to have a role as flood storage, and this option would preserve this function and help to ensure no increased flood risk elsewhere. Exemptions could be possible for specific allocated sites where the required evidence has been gathered at the Local Plan stage to support this.	This policy could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way that is safe from flooding, does not shift flood risk elsewhere, and is in accordance with the NPPF.

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Option g Prevent development of greenfield sites within Flood Zone 3a, but with specific exemptions (e.g. for allocated sites).	Same positives as above for option b, except this option allows for a greater use (e.g. densification) of site compared with option a - as long as design of development ensures flood risk is ultimately reduced compared to pre-development.	Where development is proposed on brownfield sites in Flood Zone 3b, it will be essential for proposals to have appropriately assessed risks and be able to demonstrate that new development would not: reduce the water storage capacity of the floodplain; impede flows of water; create or increase any risks for occupants, or of flooding elsewhere. A demonstrable reduction in flood risk alongside an increase in built footprint could be very difficult to achieve in practice.
Option h Do not include a policy about flood risk but rely on national policy instead.	Simply relying on national policy could be easier for developers to understand and work with. National policy on flood risk is fairly developed and well tested and may ultimately be transferred into National DM policies.	Oxford has a unique flooding environment and particular constraints on development in the city. There is a risk that a more generalised approach misses opportunities to address this.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, or Option a+ combination of all or some of Option b, Option c and Option d, with either Option e or Option f or Option g. Option h is an alternative option to Option a.

High-level screening conclusion? The options are similar to each other from a sustainability perspective. National policy already provides a strong framework for managing flood risk, however the additional options proposed on top of national policy are seen as necessary due to local context.

Screened in for detailed appraisal? No

Rationale:
Options a and h are alternative options. Option a reiterates national policy and provides more detail where there is less certainty within national policy such as for extensions, whereas Option h does not have a policy and just defaults to national policy. Options b, c and d are all additional options which seek to set out key principles to consider for extensions in Flood Zone 3b; to prevent self-contained basement flats in areas at risk from fluvial flooding; and to prevent culverting of open watercourses respectively. Option e would allow limited development on brownfield land within Flood Zone 3b, where the built footprint of the site is not increased and where flood risk is demonstrably decreased and where safe access and egress requirements are mandatory. Option f is similar to Option e, except it would not restrict the size of the built footprint of the development. Option g goes further than either Options e or f as it prevents development of greenfield sites in Flood Zone 3a, but with specific exemptions (e.g. for allocated sites).

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In terms of sustainability impacts, **criterion 2. Climate resilience** is the most relevant. Most of the options would score positively against this criterion as they seek to manage flood risk, albeit in different ways, for example, whether it's addressing extensions in Flood Zone 3b (Option b) or preventing culverting of watercourses (Option d), or providing more detail than what is contained in national policy (Option a). The extent of the positive impact of these options will be dependent on the implementation. The only option that would score neutral is Option h as it would proposes no policy and defers to national policy. Some of the policy options would impact **Criterion 3. Efficient use of land**. Options e or f would have a minor positive impact as they both seek to allow limited development on brownfield land within Flood Zone 3b, which minimises the use of greenfield land. Depending on implementation, Option g would score neutral against this criterion, as although it wouldn't allow development on greenfield Flood Zone 3a, this more restrictive option might limit sites that could be allocated for development, where land is already constrained. Option d might even score positively against **Criterion 10. Biodiversity** as not allowing watercourses to be culverted, not only reduces flood risk (water storage) but keeps the water naturalised, potentially allowing preferable conditions for biodiversity to flourish. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Flood Risk and Flood Risk Assessments - Policy G7

For the Local Plan 2045, the preferred approach is a combination of **Options A, B, C, D and E.** This will allow for a targeted policy that responds to various considerations and potential risks arising from the local context of flood risk in the city.

Option A helps to ensure national flood risk requirements are met but also provides more certainty around expectations for FRAs where national guidance is less clear, or where there are particular local issues that applicants need to consider. **Option B** would help to ensure that extensions in particular flood risk zones are informed by FRAs that meet particular requirements. **Option C** would prevent self-contained basement accommodation in areas of flood risk because of the particular vulnerabilities associated with this type of development and the risks for occupants. Meanwhile, **Option D** would prevent culverting which can incur additional flood risk due to constraining water flows during heavy rainfall events, but also have negative impacts for ecology and wildlife that rely on the watercourses.

Option E is considered to be an important response to Oxford's particular circumstances in relation to pre-existing development in flood risk areas. The option allows only water-compatible and essential infrastructure in the undeveloped flood zone, which should mean flood risk is not increased elsewhere or that loss of functional floodplain does not occur unnecessarily. However, the option also recognises that there is sometimes historic development located in areas of flood risk that could benefit from sensitive redevelopment in order to secure more sustainable futures for these sites, whilst also taking opportunities to address existing flood risk there. However, it will be important to ensure that strict requirements are set out in the policy for when this may be acceptable.

1306

Policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDs)

Table 2 - Policy options set 007b: Sustainable Drainage Systems (SuDs)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require SuDS on all new developments (including minors), unless this is shown not to be feasible, and include guidance on how they should be implemented.	Greener solutions have multiple benefits – so these can be maximised where green SUDs are prioritised for in the first instance.	Some sites may not be able to accommodate green solutions. Whilst well-designed SuDS can deliver multiple benefits, this should not come at

Incorporate hierarchy style approach to SuDS design, prioritising green SuDS and maximising multi- functionality.	Same benefits as Option b but with more detailed specifications on the type of SuDS to be implemented, with a priority given to green, natural features. Green, multi-functional SuDS can contribute to wider placemaking and have a variety of benefits that extend beyond water management, including improving water quality, reducing urban heat, promoting biodiversity and better placemaking.	the cost of their role as flood risk mitigation where this is required – potentially this could be complicated by seeking to deliver wider multi-functionality particularly where inappropriately designed. Additional management/ maintenance requirements for green SuDS would need to be factored into design and cost of schemes.
Option b Require SuDS on all new developments (including minor household applications), unless this is shown not to be feasible, and include guidance on how they should be implemented.	Some sites might only be able to accommodate limited 'grey' drainage measures (e.g. tanks). This approach would ensure that new development include SuDS wherever possible and set out guidance for how this ought to be designed. SuDS can help to reduce risks of flooding, particularly during times of intense, heavy rainfall by capturing surface water run-off and reducing pressures on sewers. Sets out that SuDS would be required on minor schemes also (which are not addressed in national policy).	Could lead to proliferation of 'grey' SUDs and miss out on benefits that greener solutions for SuDS design – e.g. making use of green infrastructure – can provide. SuDS may be more challenging to deliver on smaller sites where space is limited. Would need to ensure that proposals are accompanied by appropriate infiltration studies.

1307

Option c Do not include a policy about SuDS but rely on national policy instead.	There is a variety of industry guidance about good design for SuDS which could be utilised by developers. Equally the City Council could set out its expectations in the form of supporting guidance/ technical advice note.	Guidance in national policy about SuDS is limited in terms of 'good design' and regarding wider objectives (e.g. water quality), it also only addresses SuDS on major schemes. A local policy could be more explicit in terms of what is expected/ suitable for Oxford, including on minor applications. This option would arguably not address the local context of flood risk in the city and the need for all new development to address it.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b or c are alternative to each other **High-level screening conclusion?** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** Options a, b and c are all alternatives. Option a requires SuDS on all new developments (including minors), prioritising green SuDS and maximising multifunctionality. Option b is similar to Option a except it doesn't prioritise green SuDS or multifunctionality, whilst Option c is not to have a policy and rely on national policy/ guidance instead. In terms of SA impacts the options are most directly relevant to **criterion 2. Climate resilience** and both Options a and b would be a positive impact. Option a will also have minor positive impacts for **criterion 7. Green Infrastructure.** Potentially option b might also positively impact criterion 7 as well but it depends upon implementation, otherwise it would be neutral. Option c is expected to be neutral in impact for these criteria, as there is strengthened national policy guidance however this is lacking the detail that would help to steer the design of these measures to take account of local context. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

1308

Sustainable Drainage Systems (SuDs) - Policy G8

For the Local Plan 2045, the preferred approach is **Option A**, which would mean requiring SuDS on new development and also incorporating a hierarchy style SuDS policy that steers applicants towards prioritising green SuDS measures first, before other 'grey' solutions are selected. This approach would help to ensure that surface drainage is managed appropriately, reducing strain on sewer systems and helping to build in flood resilience into sites.

This approach would also help to ensure multi-functional benefits can be derived from SuDS design by seeking to maximise green infrastructure features that can manage drainage whilst also providing other benefits for people and the environment. It would also complement the greening aspirations of other elements of the Local Plan. An approach of having no local policy, or not prioritising green features could risk missing opportunities for multi-functional features and applicants selecting less optimal drainage solutions for their sites.

1309

Background paper 008

Carbon reduction and climate resilient design

This paper addresses carbon reduction in new development and how the Local Plan will support the city's transition to net zero carbon. The paper also addresses climate resilient design and adapting the built environment to the changing climate of the future.
Relevant Local Plan Objective(s): • Ensure Oxford is ready for a net zero carbon future. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero carbon emissions by 2040. 2. To build resilience to climate change, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
SEA theme(s): Climatic Factors, Air

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1. Introduction

1.1 The Council has a legal duty, as set out in Section 19(1A) of the Planning and Compulsory Purchase Act 2004, to ensure that the new Local Plan includes policies that, taken as a whole, have been designed to secure action on climate change. This is reflected in national policy, which sets out that the planning system should help to: 'shape places in ways that contribute to radical reductions in greenhouse gas emissions', and that Local Plans should take a proactive approach to mitigating climate change. In recognition of the need to take action on climate change, the Council declared a climate emergency in 2019 and has committed to achieving net zero carbon emissions as a city by 2040.

1.2 Alongside the transport network, the built environment is a primary contributor to Oxford's carbon dioxide emissions, a potent greenhouse gas which is causing global climate change. The power used to heat and operate buildings, as well as the resources used within the construction process, all have a role in these emissions. In order to meet national and local commitments on mitigating climate change, it is essential that new development being built in the city is designed for a net zero carbon future, and that existing development is retrofitted to reduce its carbon footprint. It is also important that new development is designed to be resilient to the impacts of the changing climate – e.g. flood risk and overheating – which could be more common in future.

1.3 This background paper firstly sets out key context in the form of existing policy analysis, current situation in the city and the likely situation without a new Local Plan. It then goes on to discuss the key topics and options for policies that will need to be considered in the preparation of the Local Plan 2042.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National and international context

Climate Change Act 2008

2.1 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as in response to the Paris Agreement, most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels).

2.2 Under the Act, the government is required to set five-year caps on emissions (known as carbon budgets) twelve years in advance and publish its proposals and policies for meeting these budgets. Most recently, the sixth carbon budget enshrined a target of 78% reduction in carbon emissions for the period from 2033 to 2037, whilst the seventh carbon budget is expected to be set in 2025.

Planning and Compulsory Purchase Act 2004

2.3 Sets out the current structure for the English Local Planning framework and includes, within section 19 (as amended by the Planning Act 2008), the legal duty to ensure that, taken as a whole, planning policies contribute to climate change mitigation and adaptation.

Planning and Energy Act 2008

2.4 The Planning and Energy Act (2008) makes provision within Section 1 for a local planning authority to include policies within its development plan that require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations, provided these policies are reasonable, not inconsistent with national policies, and compliant with usual provisions around plan making as set out in section 19 of the Planning and Compulsory Purchase Act 2004.

National Planning Policy Framework (NPPF)

2.5 Chapter 14 of the NPPF sets out the government's requirements for how the planning system should address the challenge of climate change, particularly paragraphs 161 to 169. For the first time, the updated wording in para 161 that opens the chapter now explicitly references the transition to net zero by 2050, stating that: The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It goes on to flag the need for shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, and conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

2.6 Para 162 sets out that plans should take a proactive approach to mitigating and adapting to climate change, footnote 53 clarifies that this should be in line with the objectives and provisions of the Climate Change Act 2008, which legislates for net zero carbon emissions by 2050. Para 164 (b) discusses the need for planning development in ways that help reduce greenhouse gas emissions, such as through its location, orientation and design.

2.7 Paras 165 flags the importance of securing energy from renewable sources and the role of plans in helping to enable this. In particular, it sets out the need for providing a positive strategy for energy from these sources; considering identifying suitable areas for renewable and low carbon energy and supporting infrastructure; and identifying opportunities for development to draw energy from such sources. Para 167 also highlights that significant weight should be given to the need to support energy efficiency and low carbon heating improvements to existing buildings.

National Planning Practice Guidance (PPG) including National Design Guide/Model Design Code

2.8 National guidance supporting planning policy is set out on the Planning Practice Guidance climate change webpage, although much of this now dates back to 2019 or earlier (with some sections dating to 2015). Whilst some of the guidance, including key legislation planners should take into account and general advice on climate change mitigation measures that could be applied through planning process are still of relevance, other sections appear to have been overtaken by recent policy developments (such as guidance around the 2015 Ministerial Statement as discussed below).

2.9 The National Design Guide (2019) which now forms part of the PPG includes guidance on what government considers to be 'good design' and breaks design down into 10 key topics. There is a section on "Resources" which sets out that "well-designed places and buildings follow the energy hierarchy" as well as containing some other general design guidance which can help local authorities with preparing more locally specific design guidelines.

Written Ministerial Statements on Plan Making (2015 and 2023)

2.10 There are two WMSs that have been published since the above legislation which have some relevance to the topic of energy and carbon, but also serve to confuse policy and local authorities' powers.

- The first, published in 2015, set out the expectation that local authorities should not set energy efficiency standards with requirements above the equivalent to level 4 within the withdrawn Code for Sustainable Homes. It should be noted that an update to Building Regulations during that same year meant that they had already superseded the old Code for Sustainable Homes standard.
- The more recent WMS, published in December 2023, indicates that Local Authorities cannot set their own targets based on actual energy use in buildings and dissuades them from going beyond national standards. It sets out that "*Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rational...*" Where policies are proposed that do go beyond national standards, the WMS sets out that these should be supported by viability evidence that shows development would remain viable, with a focus on housing affordability and supply. It also states that such policies should be expressed as a percentage uplift of a dwelling's Target Emission Rate (TER) calculated using the Standard Assessment Procedure (SAP) of Building Regulations.

Regional and local context

Oxford's climate emergency declaration and the Zero Carbon Oxfordshire Partnership (ZCOP)

2.11 In January 2019, Oxford City Council members unanimously declared a climate emergency and agreed to create a citizens assembly in Oxford to help consider new carbon targets and additional measures to reduce emissions. This was followed in February 2021, by signing the Zero Carbon Oxford Charter, and the creation of a new Zero Carbon Oxford Partnership (ZCOP) for the city along with the setting of a local target of achieving net zero carbon emissions as a city by 2040 (ten years ahead of the UK net zero carbon target). The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.

2.12 The ZCOP has previously developed a Roadmap and Action Plan (published 2021) for the city which identifies the primary sources of carbon emissions in city at present and the key milestones that are needed in relation to decarbonising different aspects of life in Oxford in order to meet the net zero target of 2040. The roadmap highlights the large-scale changes and the challenging nature of the transition to full decarbonisation which is needed across various sectors, such as expansive retro-fit of existing buildings to decarbonise heating and increase fabric efficiencies, large amount of micro-renewable installation on rooftops to increase clean energy generation as well as ongoing increases in EV charging infrastructure to support decarbonisation of transport.

Oxford Local Plan 2036

2.13 Policy RE1: Sustainable design and construction sets out the Council's expectations regarding carbon emissions in new development. The policy requires new development to achieve reductions in carbon emitted beyond those set out in national Building Regulations. The targets are increased at intervals throughout the plan period, beginning at 40% reduction, before moving to 50% by 31 March 2026, and then zero carbon after 2030 (for residential development).

2.14 Other policies in the adopted Local Plan that have a role in contributing to reductions in carbon emissions in the city, include:

- Policies that encourage and enable sustainable/active travel and the transition to electric vehicles (policies M1 to M5),
- Policies relating to protecting and enhancing Oxford's green and blue infrastructure network (policies G1 to G8).

Other relevant plans/programmes/strategies

Future Homes/Buildings Standard – Building Regulations reforms

2.15 Outside of the planning system, a review of national Building Regulations has also been ongoing with staged plans to implement the Future Homes Standard (dealing with residential development) and Future Buildings Standards (non-residential development). These reforms to the technical requirements within Building Regulations are intended to deliver higher standards of energy efficiency and carbon reduction across all new buildings through Building Control process. The first stage of these reforms came into

effect in 2022 and was presented as an interim uplift to Building Regulations that would result in homes producing 31% less CO2 emissions compared to current standards. It also included updates to other technical standards such as on ventilation, the performance gap, overheating and EV charging.

2.16 Further changes, expected in 2025, will result in new homes producing at least 75% lower CO2 emissions than those built to previous Building Regulations standards, as well as being 'zero carbon ready'. This means that, even if the new buildings are still emitting some emissions, these should reduce to zero over time (e.g. with the continued decarbonising of the energy supply sourced from the national grid as fossil fuels are phased out of the system). The reforms only affect the performance standards of buildings that are addressed by Building Control (e.g. regulated energy systems), meaning the current proposals would not deliver full net zero development, nor address embodied carbon/energy.

Oxfordshire Climate Vulnerability Assessment (2024)

2.17 The County Council have produced a climate risk vulnerability assessment for the county which identifies how climate change could impact various sectors within Oxfordshire. The assessment identifies the city as being an area with increased climate risk to hazards such as overheating and flooding, both now and in the future.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Primary sources of greenhouse gas emissions in the city

3.1 Analysis of the greenhouse gas emissions that are generated across the city is challenging with varying estimates depending upon the methodology and data sources used. The Department for Energy Security and Net Zero (formerly BEIS) publish statistics on per capita emissions yearly and these show an overall trend of reducing per capita emissions for Oxford since 2005, as can be seen in Figure 3.1.

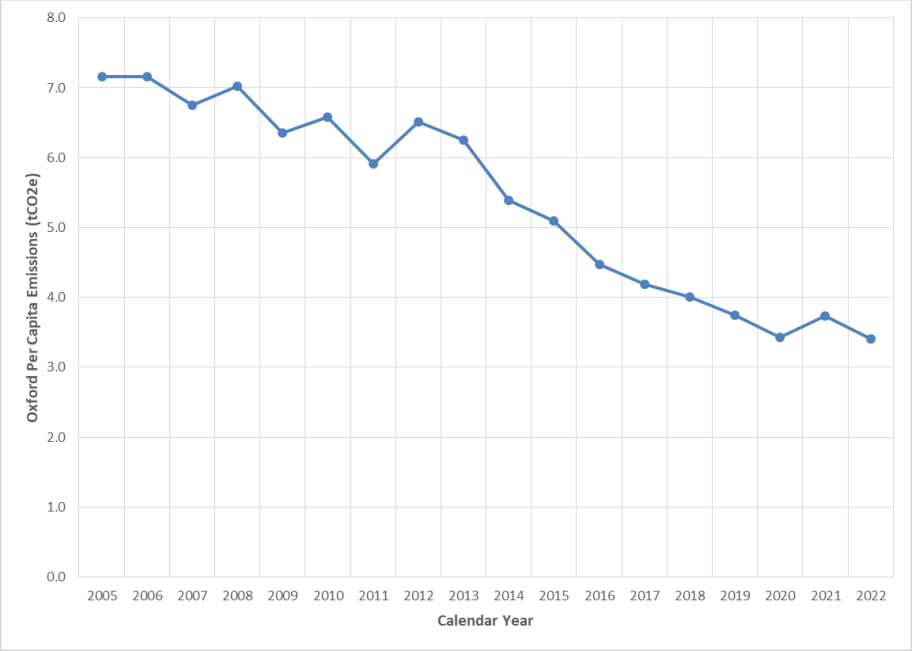

Figure 3.1 - Per capita emissions of carbon dioxide (tCO2 equivalent) for Oxford according to Local Authority Greenhouse Gas Emissions statistics (2005-2022) Sourced from the Department for Energy Security and Net Zero statistical release (June, 2024)

3.2 The underlying summary accompanying the statistics above highlights that the national pattern in declining emissions, which the city's own performance tracks with, has largely been due to reductions in emissions from power stations and industrial combustion. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a large reduction in the amount of coal, which is a carbon intensive fuel, and increasing use of renewables. A small increase in emissions was noted in 2021 for the majority of Local Authorities, including Oxford, due to COVID-19 restrictions easing and colder temperatures in that year increasing the use of heating in buildings. For the most recent statistical release (2022), per capita emissions for the city had decreased in line with much of the rest of the country. The national decrease in emissions associated with 2022 was attributed largely to milder weather reducing heating demands and potentially the impact of higher energy prices.

3.3 The Zero Carbon Oxford Partnership's Roadmap and Action Plan (2021) identified the key sources of emissions in Oxford as part of its work in defining a roadmap to net zero by 2040. This was an assessment of all greenhouse gas emissions across the city (not just carbon, as is highlighted in the government data above) and drew upon data from both BEIS and from the SCATTER cities tool as well as local sources, to produce a sector-by-sector breakdown of emissions in the city. Whilst the baseline data informing the analysis is now a few years old (2018 was the baseline year), the sector-by-sector profile as shown in Figure 3.2 clearly highlights the major impact of the built environment on emissions, with buildings being the primary source of emissions resulting from the city, and this is not

considered likely to have changed in the intervening period. Transport was the second largest contributor though this is a much smaller proportion of emissions as a whole.

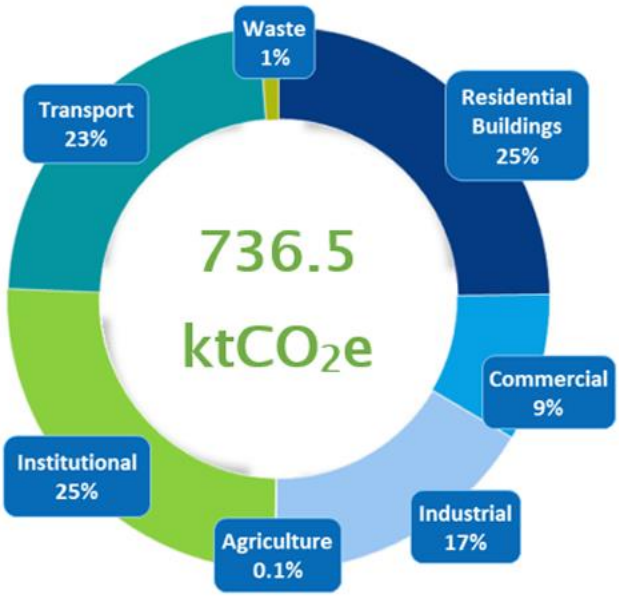

Figure 3.2 - Sector-by-sector greenhouse gas emissions in Oxford (2018 baseline year as used in the Zero Carbon Oxford Partnership Action Plan)

Carbon emissions associated with buildings in operation

3.4 As the ZCOP work notes, the primary reason for the major contribution buildings are making to Oxford's carbon footprint is the use of fossil fuels for heating. However, other sources within buildings include gas used for cooking, as well as emissions associated with electricity use (where this is not sourced from renewables). The majority of the emissions associated with buildings are from buildings that are already in existence. This flags a significant need for retro-fitting to happen alongside ensuring that new development does not exacerbate the problem.

3.5 The Building Regulations reforms embodied through the Future Homes and Future Buildings Standards (as discussed in section 2) should help to ensure new buildings make a much smaller contribution to this existing carbon footprint. Until grid energy is decarbonised, however, where these buildings rely on power from the national grid for their operation then there will still be some associated emissions from them without applying further standards via local policy.

Embodied carbon emissions during construction

3.6 The carbon associated with buildings in operation is not the only source of emissions that need to be addressed as the city moves towards net zero carbon by 2040. There is an embodied carbon cost of the materials used in the built environment in the construction,

maintenance, redevelopment and demolition processes. Carbon dioxide can be emitted in various ways as part of the processes but equally, carbon can be sequestered through careful design choices (e.g. use of natural materials like wood). As operational energy becomes zero carbon, the embodied carbon cost of new development will become the primary source of emissions that needs to be addressed and this will be a growing area of focus in future years.

3.7 Addressing the issue of embodied carbon is closely tied with the concept of a circular economy (Figure 3.3). The Low Energy Transformation Initiative (LETI), in its Embodied Carbon Primer, define the circular economy as a system that is 'restorative or regenerative by intention and design'. In this regard, products, buildings and systems are designed in a way that considers not only how these can be repaired and reused easily, but also how the energy and materials used to construct them can be remanufactured and recycled at the end of their life. This approach enables reductions in the raw materials we extract from the environment over time, our energy demands and the impacts we have upon the wider environment, and by extension, carbon emissions associated with the construction process.

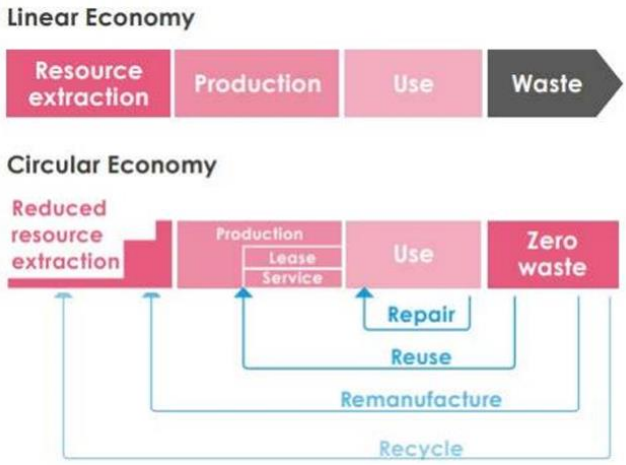

Figure 3.3 - The stages of a linear economy versus a circular economy (source: LETI Embodied Carbon Primer)

3.8 But embodied carbon is an even more challenging and complex aspect of net zero carbon design to address than operational carbon. There is much ongoing research and emerging guidance with varying levels of understanding at present in relation to the different stages of a building's life cycle. As UKGBC note, most of these embodied emissions occur early during the construction stage and this is typically the focus at present. Perhaps reflecting the emerging nature of this topic, it is not currently addressed through a consistent set of national standards, though this is something that has been repeatedly called for through an amendment to Building Regulations as highlighted in this recent House of Commons Committee report.

3.9 The emerging nature of our understanding of the topic and how to effectively address it makes formulating policy challenging, particularly because there are many difficult

questions that the development management process must grapple with when considering embodied carbon and how it is balanced with other place-making objectives, and there are not always definitive answers. For example:

- Is it more sustainable to retain an energy inefficient building or demolish to provide a highly energy efficient replacement?
- How should we balance out the benefits of long-life materials that may have a high carbon cost to produce, as opposed to shorter lived materials which will need replacement more quickly but have a low carbon cost to produce?
- How do we balance out issues of carbon reduction alongside other important choices in delivering high-quality design that contributes to making the places we wish to see in Oxford?

Energy supply and grid capacity

3.10 Across the UK, there are national trends in new sustainable technologies which are of increasing popularity and that also form important context to the new Local Plan policies. The uptake in electric vehicles has been growing, leading to increased demand for EV charging infrastructure. Equally, we are seeing increasing uptake in electric solutions for heating our properties instead of fossil fuel burning boilers, such as Air Source Heat Pumps. The uptake in these technologies is likely to continue and most likely speed up and will result in increasing demands for electricity and increased pressure on the national and local energy grid infrastructure.

3.11 The Oxfordshire Energy Strategy (2018) and associated delivery plan (2019), supported by the Stage 1 work of the Oxfordshire Infrastructure Strategy (OXIS) commissioned by the Oxfordshire local authorities, previously identified that the electricity grid across the county is already constrained. The OXIS work concluded that annual electricity consumption across the county to 2040 is expected to increase due to three reasons: continued increase in the number of domestic and non-domestic buildings; the transition to electric vehicles; and the decarbonisation of heat. These factors will not only increase annual consumption but will also increase peak demand and will necessitate ongoing work by the Distribution Network Operators to meet future demands through upgrades and reinforcing of the grid so that constraints can be reduced and additional generation capacity (e.g. solar PV) incorporated. Whilst this work is some years old now, the high-level messages about future needs are unlikely to have changed, though there is emerging work such as Local Area Energy Planning across the County and an updated OXIS emerging which may update this picture in due course.

3.12 Looking beyond Oxford, the current Government has recently published an action plan for meeting a target of securing a clean power grid by 2030 (in advance of the previous 2035 commitment) as it seeks to ensure that the majority of the country's energy demand is generated by clean, renewable sources, backed up with gas only during generation shortfalls. National decarbonisation actions to date have already supported reducing per capita emissions in the city, which is likely to continue, however, it seems reasonable to hold a 2030 or 2035 net zero target with some caution. Recent assessments have

highlighted that the pace and lack of investment to date has put targets for decarbonisation of grid in doubt, for example, the Climate Change Committee flagged multiple uncertainties based on lack of strategy and direction for rollout of renewable energy generation. In their most recent 2024 report to parliament, they continue to note that pace of delivery in rollout of renewable energy capacity needs to increase radically if net zero targets are to be achieved. A new 2030 clean power target suggests this required increase in pace is even more pressing.

Fuel poverty

3.13 The Oxfordshire Joint Strategic Needs Assessment (JSNA) defines a household as being in fuel poverty if:

- they have a fuel poverty energy efficiency rating (FPEER) of band D or below; and
- if they are to spend their modelled energy costs, they would be left with a residual income below the official poverty line.

3.14 Three factors therefore affect fuel poverty: household income, fuel prices and household energy consumption. Buildings that demand a lot of energy to heat and run, combined with high energy prices (e.g. as has been seen subsequent to global instability in face of crisis like war in Ukraine and covid recovery), and pressures on household incomes can serve individually and cumulatively to exacerbate fuel poverty.

3.15 The Oxfordshire JSNA identifies that Oxford City is significantly worse than the Oxfordshire or regional averages on fuel poverty, whilst the other Oxfordshire districts are each significantly better than average (Figure 4). The 2024 update, which reports on 2021 and 2022, indicates that fuel poverty worsened across the county including in Oxford with its score increasing from 10% to 11.2% (+1.2%). The picture of fuel poverty within the city is unequal; there are twelve areas in the city with more than 10% of their households in fuel poverty, with the highest proportion (East Central Oxford) and lowest in (North Central Oxford) (Figure 3.4).

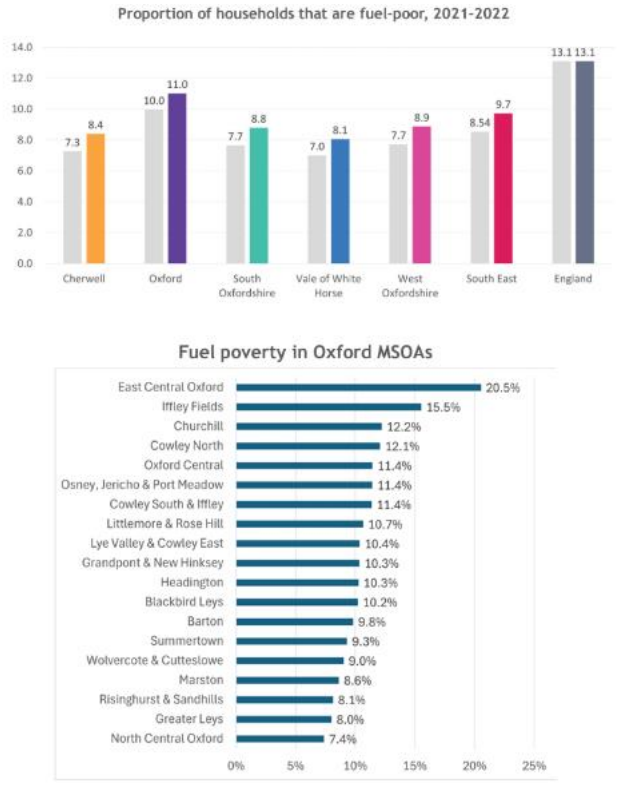

Figure 3.4 - Percentage of households in fuel poverty across Oxfordshire in 2021 and 2022 (top) alongside a breakdown of fuel poverty across different parts of Oxford in 2022 (bottom) (source: Joint Strategic Needs Assessment 2024)

Climate change risk and the need for adaptation

3.16 The impacts of greenhouse gas emissions such as carbon dioxide are in exacerbating the global problem of climate change, however, even if emissions were to be cut to zero today, the climate would continue to change because emissions in the atmosphere will persist for some time. The risks from climate change such as milder, wetter winters; coupled with increasing periods of intense and prolonged rainfall; as well as hotter, drier summers, will impact everyone in Oxford, but could be especially pronounced for more deprived communities and those living in poor health (as is discussed further in the health and wellbeing background paper).

3.17 Oxford has various characteristics that lead to climate change risks. A significant amount of land is exposed to flood risk from the two rivers, and other water courses running through the city. Despite areas of abundant green space, other areas are intensely urbanised and lacking in any green features, reflecting the constrained nature of parts of the city which brings additional challenges. For example, water runs off these artificial surfaces easier and there is less storage available in the form of green features and soils which can exacerbate flood risk (e.g. surface water flooding or overwhelming drainage systems). Also, the lack of green features exposes the city to additional overheating risk and the urban heat island effect as artificial surfaces absorb and reradiate heat, shading is reduced and the natural cooling effects of vegetation are reduced.

3.18 Recent research by the Oxfordshire County Council as part of their County-wide Climate Vulnerability Assessment 2024 identifies Oxford as having some of the most at risk areas in the county for future climate change in respect of flooding and heat waves. The assessment highlights that confirmed that current heat wave risk is concentrated in the most urban parts of the county and is only exacerbated in future according to different projections for 2050. Eight of the ten wards in Oxfordshire with the highest current heatwave risk are located in the Oxford City (Barton and Sandhills, Blackbird Leys, Cutteslowe and Sunnymeade, Carfax and Jericho, Holywell, Littlemore, Northfield Brook and Walton Manor), including some in higher deprivation areas.

3.19 The picture is similar for flooding, with the county work identifying a number of wards in the city as being in the top ten with highest flooding risk at present (Blackbird Leys, Holywell, Hinksey Park, Littlemore, Marston and Northfield Brook). The subject of current and future flood risk is explored further in the Flood risk background paper and will be an important factor in the updated Strategic Flood Risk Assessment.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 In the absence of a new local plan, the existing Oxford Local Plan 2036 policies would continue to apply. Policy RE1: Sustainable design and construction, sets out the carbon reduction requirements that proposals for new-build residential developments and new-build non-residential developments of 1000m2 or more need to demonstrate through submission of an energy statement. At time of writing, this requirement is a 40% reduction over the current Building Regulations baseline.

4.2 However, Policy RE1's requirements are not fixed over time, instead, they step up and require an increase in carbon reductions against the current Building Regulations baseline in 2026 and 2030 for residential developments, and 2026 for non-residential developments. The policy ultimately requires Zero Carbon homes from 2030, although this requirement does not apply to new build non-residential developments and as such the requirement for those types of development the expectation would remain at a 50% reduction from 2026 onwards.

4.3 Policy RE1 applies only to regulated carbon emissions, excluding those unregulated emissions from any policy requirements. Meanwhile, the policy is also very limited in setting requirements in relation to actions that can reduce embodied carbon emissions within the construction process. Additionally, the Local Plan has minimal control over existing buildings and cannot force through owners to undertake retro-fit works, which will leave the existing retro-fit challenge to be addressed in other ways.

4.4 Beyond the plan period (past 2036), in the absence of a new local plan, the policies for planning in national planning policy as set out in the NPPF would take on increasing prominence. Whilst recent updates to the NPPF highlight the role of planning in supporting transition to net zero carbon, there is no specific requirement for net zero carbon development despite the national legislated target of being a net zero carbon country by 2050.

4.5 Of course, if the proposals are progressed as previously consulted on, then national standards set through Buildings Regulations are expected to become tighter in future with the introduction of the full Future Homes and Future Buildings Standards. This will support further reductions in some emissions associated with new development. As touched upon earlier in this paper, these proposed updates however do not currently address the full operational energy demands of buildings, ignoring unregulated energy loads not controlled through Building Regulations and associated with up to 50% of energy demand in a new building. They also do not address embodied carbon/energy. As these elements are also not touched by Local Plan 2036, the emissions associated with them would remain unaddressed without a new Local Plan.

4.6 Nationally, we are likely to see continued drop in emissions related to grid electricity used in development in line with the government's clean power target of 2030, which is ahead of previous 2035 net zero grid commitments. However, the national scale rollout of renewable energy generating technology needed to support a net zero grid has, to date, suffered from lack of strategy and investment at the required pace to achieve such targets.

4.7 In the short term at least, without additional mitigation measures in place to address emissions from new development via a new Local Plan, then any additional growth can be expected to result in an increase in emissions.

4.8 In relation to climate change risk. The impacts of climate change are likely to continue to be felt, even with radical reductions in greenhouse gas emissions, but could become more severe if trends in emissions do not reduce. The Oxfordshire Climate Vulnerability Assessment 2024 indicates that six of the city's wards which were discussed in the last section remain in the top ten at risk from overheating for 2050 projections (Littlemore and Walton Manor are replaced by other wards in the county) and five remain in the top ten for flooding (Holywell and Hinksey Park are replaced by other wards in the county).

5. Key issues addressed through the Local Plan

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to carbon reduction and achieving net zero carbon objectives. Under each of these topics, there were various options for policy

approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Ensuring new development is net zero carbon in operation

5.3 The Local Plan's influence over carbon reduction is primarily about making sure new development does not add to the challenge of decarbonisation in the city, either by emitting additional emissions or by introducing costly retrofitting burdens for future occupiers. In the absence of net zero carbon standards in national policy, including current or future Building Regulations, this means that the new Local Plan needs to ensure that new development is net zero carbon.

5.4 At its simplest, net zero carbon design essentially means ensuring that new buildings do not contribute net additional emissions into the atmosphere whilst in use. Most directly, emissions from buildings comes from the burning of fossil fuels for heating (e.g. within boilers), as well as for cooking. Indirectly, emissions are also associated with fossil fuels used to power the energy grid. A growing consensus has developed around several metrics which relate to energy use in net zero carbon buildings in operation which have guided the formulation of policy R1:

- **A maximum energy allowance for total Energy Use Intensity (EUI)** – Encouraging energy efficient design by limiting the overall annual energy use needed to operate the building. Also important for addressing challenge of rising energy costs and fuel poverty by reducing energy costs for occupants. Targets for total EUI vary depending on type of development.
- **A maximum energy allowance for space heating** – having a specific limit on energy used for heating - driving a focus on thermal efficiency (in line with a fabric first approach). Choice of heating technology will influence overall energy demands (some systems are more efficient than others) - and can also address cooling needs.
- **Requiring enough on-site energy generating capacity to match total EUI** – to be net zero carbon in operation energy demands need to be met renewably and ideally through on-site energy generation which matches the development's total EUI. Encouraging greater decentralised energy production through more onsite renewables (especially if coupled with energy storage) also reduces strain on the wider energy grid and increases energy security.

5.5 Additionally, whilst recent (and further planned) tightening of Building Regulations will make direct burning of fossil fuels for energy in new buildings more challenging in future, Policy R1 specifically sets out that these systems will not be permitted. This will have benefits not only for avoiding direct carbon dioxide emissions, but also avoiding costly future retrofits for occupants, as well as for local air quality.

Addressing energy efficiency and setting energy use targets

5.6 With direct fossil fuel burning omitted from new buildings, the focus of design then needs to be on energy efficiency. Policy R1 requires that design of development is led by the principles of the energy hierarchy which helps to ensure buildings are as efficient as possible. These principles can be applied to various scales of development, from a simple extension up to a multi-building development and seek to guide energy efficient design through several different levels of action, which the National Design Guide summarises in the following way:

1. Reduce energy need (be lean) – through passive design measures
2. Be efficient in energy use (be clean) – use energy efficient systems such as heat networks for lighting, heating/cooling, operation etc.
3. Source energy from renewables (be green) – source remaining energy needs from renewable technologies, including decentralised sources.

5.7 The policy sets targets for total operational energy used in the building via an Energy Use Intensity (EUI) target, which is the total energy used by the development in a year as measured at the meter divided by the gross internal area (m2). The use of EUI as the key performance metric accommodates for both regulated and unregulated energy sources to that comprise all operational energy uses in the building. The EUI calculation also allows for easier verification of real world performance of the building as built and can better represent how the building will perform in terms of energy use.

5.8 Additionally, alongside the total energy use/EUI target, the policy also sets a target for the energy associated with space heating. This is because the primary source of energy use in our buildings is the energy used for heating (and cooling) and it is important to ensure that the overall energy balance of the building is not overly dedicated to space heating alone. A space heating target helps to promote a 'fabric-first' approach to design and encourage more efficiently designed buildings that take less energy to heat (and cool).

5.9 These targets help to reinforce the first couple of steps in the energy hierarchy by promoting reductions in energy use through careful design choices. Additionally, the requirements will have other important benefits. For example, buildings with an inefficient layout or poor fabric efficiency, take more energy to keep comfortably warm (or cool), which is a particular issue when coupled with high energy prices which can increase risk of fuel poverty.

5.10 When coupled with other design features, they can also help to reduce the risks of overheating by maintaining a comfortable temperature indoors all year round (reducing heat infiltration during summer). Equally, in the context of the known constraints on existing electricity infrastructure, more efficient design helps to reduce additional energy demand being imposed by new development and the carbon emissions associated with grid electricity whilst power plants still rely on some level of fossil fuels.

5.11 The policy includes specific energy targets for EUI and space heating. In setting the specific targets for the total energy demand/EUI and space heating requirements, the Council has considered a range of sources. This includes recommendations from national industry best

practice such as produced for the UK Net Zero Carbon Standard, the Low Energy Transformation Initiative (LETI), the Committee on Climate Change, and others. It also includes a review of technical feasibility studies produced to inform similar adopted or emerging Local Plan from other local authorities (as summarised in the separate Net Zero Carbon Technical Feasibility literature review), as well as previous engagement responses on the development of the Local Plan (and the withdrawn Local Plan 2040).

5.12 In particular, the various sources above identify that whilst residential developments tend to be more standardised in energy performance, non-residential development typically have more variety and generally higher energy demands which can only be reduced so far. There are also particular challenges for high energy demand uses, such as those associated with some types of healthcare, as well as research (e.g. labs). This has led to Policy R1 including varying EUI targets for residential and non-residential uses, as well as an additional allowance for high energy demand uses to justify exceeding targets where necessary through their application (having made every effort to ensure other elements of the policy are met).

Requirements for renewable energy generation on new development

5.13 The other factor intrinsic to net zero carbon design is ensuring that the energy needs which cannot be designed out through efficient design are being met through clean, renewable sources wherever possible (step 3 in the energy hierarchy). Policy R1 therefore sets out that the overall EUI figure for the development needs to be met with sufficient renewable energy generation which should ideally be installed onsite. Keeping operational energy demands as lean as possible by meeting the minimum targets referenced earlier helps to reduce the amount of onsite renewables needed.

5.14 It is acknowledged that some types of development will struggle to match total energy demand through installation of sufficient onsite renewables. This is particularly the case for high energy demand uses, as well as constrained sites with limited roof space (e.g. for rooftop solar PV). The policy allows for different ways to overcome this challenge, including installing renewables offsite on land elsewhere that is within control of the applicant. Equally, there is an allowance for making a contribution into the Council's energy offsetting fund (discussed further below), which would utilise financial contributions from the applicant to pay for installation of an appropriate amount of renewables, or potentially other energy saving retrofit measures, elsewhere in the city.

Additional considerations which have informed the approach to net zero carbon

5.15 Whilst policy R1 has a number of prescriptive targets which relate to the performance of the building as outlined above, it is also important to highlight that the approach continues the existing LP2036 one of being technology agnostic. In practice, this means that flexibility is retained for applicants to justify the most appropriate technologies for their site in order to attain the targets and the policy is future-proofed where new technologies arise in future.

5.16 In relation to heating/cooling, often air source heat pumps are likely to be most effective, particularly as these systems are much more efficient than other systems like direct electric heating. However, the policy also encourages applicants to consider connection into heat

networks where this could offer a more sustainable option. The policy also supports the development of new energy centres and heat networks in recognition of the role these can play in supporting decarbonising of the city's energy systems.

5.17 The policy includes minimum energy performance targets which should be feasible for most development and that are comparable to best practice for net zero carbon development today. However, the Council acknowledges that there are likely to be challenges for some types of development, and where difficulties arise, the policy seeks to set out a clear and consistent approach to how these challenges should be dealt with through the planning process. In summary, this includes:

1. An allowance for non-residential uses with exceptionally high energy demands to align with a higher Energy Use Intensity target where it can be robustly justified, including the measures taken to limit this.
2. An allowance for offsetting as a last resort where the particular challenge of providing enough onsite renewables to meet total EUI cannot be fully met.
3. Where any other individual performance target cannot be met due to specific constraints of an application, the policy requires the proposal to demonstrate net zero carbon overall (in no circumstances will direct fossil fuel burning be a permitted solution to meeting needs). It also sets out a clear set of steps that an applicant should follow to meet the overall spirit of the policy.

Energy offsetting mechanism

5.18 Whilst the full process for the energy offsetting mechanism, including full offsetting costs, will be outlined in the Energy and Carbon Technical Advice Note, an indicative process and approach to pricing offset contributions is outlined below:

1. Applicants work through the policy criteria and clearly set out in their Energy and Carbon Statement how they have met this criteria.
2. Where any criteria cannot be met, applicants should set out robust justification for why the proposal is unable to meet the requirements. Justification should only relate to technical feasibility (e.g. site/design constraints).
3. The Energy and Carbon Statement should set out the total energy demand that needs to be offset because it is unable to be met through onsite renewable energy generating installations provided by the applicant. This would be devised by working out the total operational energy demand of the development per year, compared with the average annual renewable energy generation that can be achieved through installed renewables. The deficit in demand that cannot be met by renewables will be what is to be met through offsetting.
4. An S106/developer contribution will be agreed with the applicant as part of the planning application. The cost will cover the provision of an equivalent amount of renewable energy generation (or energy saving) elsewhere to match deficit onsite.

5.19 Policy R1 is focused on ensuring energy efficient development, meaning buildings designed to specified total energy use and space heating targets, as well as ensuring that all

energy needs are then met through sufficient renewable energy generation. Offsetting is only to be relied upon where a development is unable to meet its full energy needs through onsite generation, as such, the offsetting funds are envisaged to be utilised to support alternative energy generation schemes (or potentially to reduce energy demands in existing buildings) elsewhere in the city. The most practical way of delivering the offsetting requirement is likely to be the installation of rooftop solar elsewhere in the city, as such it is envisaged that the standard offset pricing is linked to the cost of providing comparable solar pv.

5.20 The energy offset fee is envisaged to be based upon the average cost for installing equivalent solar pv (per kwh) according to the regularly published national costs figures from the government. This would provide for a standard and transparent costing, which could be kept updated as the average cost changes over the lifetime of the plan. Administrative costs (e.g. 10% the offsetting fee) would be incorporated on top of the average solar pv installation cost as part of the overall offsetting payment. This would account for the Council's time and resource in establishing the offset fund as well as identifying, developing and managing appropriate offset projects.

5.21 It is envisaged that the pricing of these contributions would be published clearly on the Council website as part of the TAN, or separately, and updated regularly in line with the changing national cost of installing comparable renewables.

Addressing embodied carbon in the construction process

5.22 Despite the challenges identified earlier in this paper with addressing embodied carbon in the construction process, the Local Plan's Policy R2 is aimed at reducing embodied carbon through careful design choices. The policy sets out that all new development should demonstrate how the design process has considered embodied carbon emitted during the construction stage via their Energy and Carbon statement and includes a set of principles which are intended to be used as a framework guiding applicants in how to do this. The principles have been formulated to tackle the key drivers of carbon emissions (mainly at the construction phase) though not all will be relevant for every application and will depend on the context of the site and the type of proposal.

5.23 On larger scale development, the policy also requires completion and submission of Whole Life Cycle Carbon Assessment (WLCCA) demonstrating how embodied carbon has been quantified and reduced through the design process. Whole life/lifecycle carbon assessment is a process which details the predicted carbon emissions associated with each stage of a building's lifecycle, although the policy is focussed on upfront emissions related to construction specifically as these are most within the control of the applicant and design process.

5.24 Whilst the requirement for WLCCA is focussed on the largest developments, as these are likely to have the most significant carbon impacts, smaller scale development may still find WLCCA to be a useful way of evidencing how they have followed the other elements of the policy – but it is not a requirement.

5.25 Unlike Policy R1, Policy R2 does not set specific targets for reduction in emissions. The framing of the individual requirements set out above are, however, considered to be a pragmatic

step forward driving development in Oxford to start seriously thinking about issues of embodied carbon alongside designing to net zero carbon in operation from adoption of the Local Plan. In this way, the policy is intended as a stepping stone which lays a foundation for more rigorous requirements in future iterations of the Local Plan that can be further developed as industry knowledge on the subject and best practice matures (and if national policy continues to fail to take action). The approach also allows for a degree of flexibility on an application-by application basis where the balance between embodied carbon savings and other important placemaking issues which could ultimately result in a more sustainable development cannot be resolved easily.

5.26 The intention is to expand on the guidance for addressing principles as part of a supporting Technical Advice Note to accompany the policy, this will also allow the Council to signpost various independent guidance and best practice and keep this list updated as new references become available.

Supporting the retrofit of existing buildings

5.27 Beyond new development, there is a significant need for retrofitting existing buildings to meet net zero carbon goals, as well as to deliver climate adaptation. Many retrofitting measures, including installation of renewable energy generation technologies like solar panels, are classed as permitted development under the General Permitted Development Order (GDPO). This means that planning permission would not usually be required for such works – unless the buildings are listed or within a conservation area or if the works are more extensive than what is covered by the GPDO.

5.28 As these buildings have already gone through the planning process, the Local Plan has limited influence over them, except for where they come forward for planning permission associated with redevelopment in future. The Local Plan seeks to set out a clear signpost of support through Policy R3 for applications which involve retrofitting that would require permission.

5.29 Oxford has a high preponderance of older and historic buildings and many of these buildings will also require retrofitting in future, however, their particular qualities require additional consideration which policy R3 also makes clear. For example:

- Some types of retrofit that would be commonplace for most buildings, such as fabric efficiencies and improved air tightness, can be inappropriate for older buildings which rely on passive ventilation to control issues like moisture build up. Applying such measures to historic buildings can lead to problems of damp build up that can impact health of occupants and the building.
- Additionally, the Council also has a statutory duty towards protecting the historic environment which the Local Plan must also balance. In the case of designated assets, some solutions may not always be suitable, or will need to be carefully designed, especially where they might cause conflict or cause harm to the special features for which a building is protected.

5.30 The difficulty is that every historic building is different, and solutions that may be acceptable in some cases will be much more harmful in others. This variation in harm occurs even at the building scale, with certain facades being more sensitive than others. Policy R3 reinforces the position that the Council will recognise the public benefit of retrofit measures, however, in every case this will need to be balanced out against potential for harm. This is an important caveat which reflects our responsibility towards preserving Oxford's unique heritage and ensuring change is managed in the right way for these features. To aid applicants, the policy includes some general principles which proposals should demonstrate have been addressed in the design rationale for any intervention to aid in securing the most successful application.

5.31 A key aspect of the policy is the explicit reference to the need for taking a **Whole Building Approach** to retrofitting traditional buildings (including designated buildings). This is a way of ensuring that alterations to buildings are informed by a careful and methodical understanding of the context of the asset, its surroundings, and how it performs so that the correct interventions are selected for the sustainability of the structure and the health of occupants. This is particularly important for avoiding harm to valuable heritage features, but also for ensuring that improper retrofit measures that might cause harm to the functioning of the building and/or occupants' health are avoided. By showing that a proposal has been informed in this way, the applicant will be better positioned for a successful application.

5.32 The Local Plan policy is but one tool to help encourage retrofit of existing buildings. An update to the Council's existing Technical Advice Note on retrofitting historic buildings, available on the website here, will also help elaborate on the policy requirements with additional guidance and useful resources.

Ensuring new development is resilient to climate change

5.33 The Local Plan includes a range of policies which seek to drive more climate resilient design in new development. Most directly, policy G9, seeks to ensure applicants consider current and future climate projections and use this to inform their design. It also sets out a range of resilience measures that should be included where applicable, including measures to address overheating, water use, flooding.

5.34 Naturally, policy G9 crosses over with various other policies, particularly in chapter 4, including requirements for greening (which can bring multiple adaptation benefits in terms of managing water run off, flood risk and cooling); as well as for dealing with flood risk. Equally, there is some overlap with requirements for Health Impact Assessment, which would increasingly need to consider health risks posed by climate change.

5.35 More broadly, the Local Plan's policy G1 seeks to protect a network of green space in the city, and climate resilience was one consideration in defining the GI network, with spaces providing for significant amounts of flood storage (areas with more than 50% flood zone 3b) being assigned to the core GI network. Protecting open spaces will not only help

to ensure resilience against climate change in terms of people's health, but also help wildlife to adapt to climate change by being able to move through the city as easily as possible.

Appendix A – Policy options and preferred approaches

Policy options set 008a (draft policy R1): Net zero carbon buildings in operation

It is clear that the built environment contributes overwhelmingly to Oxford's existing carbon footprint as existing buildings contribute to emissions arising from the energy used to heat and power them. New buildings coming forward in the city will only add to these emissions unless they are designed to operate as net zero carbon buildings (which do not emit net additional carbon dioxide emissions in order to function).

Whilst the current Local Plan already requires improvements in carbon dioxide emissions over national building regulations standards, the current requirements do not ask for net zero carbon design. National buildings regulations are expected to be updated in future, and require net zero carbon ready development, but these will not deliver true net zero carbon buildings in operation (because Building Regulations does not address all energy sources in a building – only 'regulated' energy sources).

The options for policy that have been considered for the Local Plan therefore relate to how much further local standards should go beyond what is asked for in national building regulations now or in future. They also include whether or not to allow for offsetting on trickier sites.

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Table 1 - Policy options set 008a Net zero carbon buildings in operation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Specify design in accordance with energy hierarchy principles (including fabric-first) for all new development **and** permit no fossil fuel use in new buildings.	Designing in accordance with the energy hierarchy will help to ensure buildings are as efficient as possible from the ground up. Energy use is the primary source of carbon emissions from buildings in operation, tackling this will support carbon reduction but also potentially help address issues of fuel poverty and reduce demand on the wider energy grid.	Different types of application will have varying opportunity to apply the energy hierarchy – for example, it may be easier to take a fabric first across a new self-contained dwelling, compared with an extension to an existing dwelling. This could add complexity or confusion in the design process. There may be circumstances where there is a need for relying on fossil fuel systems – potentially where grid

	Preventing any additional fossil fuel combustion heating systems will help to reduce the need for retrofit later. This could also ensure that new development does not contribute further to air pollution, including NO2 levels, but also Particulate matter levels (PM) in the city. Direction of travel, including previous updates to Building Regs already (and will further) disincentivizes fossil fuel systems like gas boilers. Policy would lock in local commitment and ensure all new development accords with it from adoption of the plan.	constraints are unable to support fully electric systems for example. Equally, there may be opportunities for future technology advances to enable the transition of fossil fuel systems to cleaner sources (e.g. infrastructure and gas boilers being upgraded to function using hydrogen), although this is highly uncertain.
Option b **Mandate net zero carbon in operation (applying to <u>regulated</u> energy only)** from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as the primary calculation. Set targets for: • regulated energy use in the building, and • energy use associated with space heating, and • this energy use to be met through equal amount of new renewable energy generation (ideally onsite). Encourage net zero unregulated energy to be addressed as part of overall	Regulated energy use is a well understood area of operational energy consumption and there is good understanding about how to decarbonise it. It is currently addressed as part of Local Plan 2036 so would keep in line with current practices. Assessing net zero carbon performance using an Energy Use Intensity (EUI) calculation would measure energy use as recorded at the meter and is more reflective of performance. Measuring via EUI instead of traditional carbon % reduction targets allows for better comparisons of performance between buildings also.	The option is not in line with the government's current policy guidance for Local Authorities. A more prescriptive policy, with specific targets could limit innovation and become outdated more quickly, whilst also making for an overly technical policy. It may be difficult to set targets that are realistic for the range of building types that could come forward under non-residential development (e.g. schools, offices, warehouses etc). Encouraging net zero unregulated energy through the policy would not be as strong

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approach where possible (e.g. seek opportunities to reduce, and to meet through additional renewable generation capacity).	Policy would still encourage developers to address unregulated energy where possible, which may secure some additional benefit for energy use/emissions associated with thus type of energy use, but would not make it compulsory.	of a requirement as requiring it.This could have implications for power grid capacity considering expected increasing demands on electricity nationally with the shift to net zero. Ultimately, this option could risk the city not meeting its targets in addressing climate change, or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.
Option c **Mandate net zero carbon in operation (applying to <u>regulated and unregulated</u> energy)** from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as primary calculation. Set targets for • total energy use (regulated and unregulated) in the building, and • energy use associated with space heating, and • this energy use to be met through equal amount of new renewable energy generation (ideally onsite).	Similar positives to option b, however, option c would resemble a more reaching policy encapsulating decarbonising of unregulated energy sources also. Unregulated energy can be a significant component of the total operational energy use of a building and it will need to be decarbonised in the same way as regulated energy in order to meet future net zero targets. This option would seek to ensure unregulated energy needs are met through sufficient on-site generation wherever possible, potentially reducing demands for power from the main power grid. This policy option is considered to be the most well-aligned with the measures	Similar negatives to option b, however, option c is likely to be much more challenging. Again, the option is not in line with the government's current policy guidance for Local Authorities and strays further in scope (than option a). Unregulated energy use is predominantly determined by occupant behaviour within the building once in operation, something that planning policy and the design/ construction process has limited influence on. There could be particular challenges for high energy demand, non-residential uses, such as healthcare and research (such as labs) with bespoke equipment needs central to their operation. Some flexibility may need to be built into targets used in such a policy.

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	needed to accord with the city's 2040 Net Zero Carbon target (and roadmap/action plan) as well as the national net zero 2050 target. It should help boost micro-generation of renewable energy across the city and mitigate need for future retro-fitting. It also accords with the majority of industry guidance for designing to net zero carbon in operation e.g. (LETI, BRE GROUP etc).	More constrained sites and/or certain buildings (e.g. with limited roof space) may struggle to meet unregulated energy demands through on site renewables and may be pushed towards other forms of offsetting.
Option d **Mandate 'net zero ready' buildings, in line with the principles in the proposed Future Homes/Buildings Standard (which apply to regulated energy only)**. Measure compliance via national Building Regs calculations (e.g. SAP/ SBEM) demonstrating carbon reduction over notional building. Encourage net zero unregulated energy to be addressed as part of overall approach where possible. (e.g. seek opportunities to reduce, and to meet through additional renewable generation capacity)	This approach represents a less advanced one to options b and c but would be closer to the direction of travel outlined by central government in its consultations on the Future Homes/Buildings Standard. It would mandate the requirement for net zero ready homes from the Local Plan's adoption, even if the national standards are delayed or watered down and would seek to ensure that no further retrofit is needed to new developments in the future to bring them to net zero as the national grid decarbonises. Recognising that the proposals set out in FH/BS do not currently address unregulated emissions, this policy would still encourage developers to address unregulated energy through ensuring sufficient on-site renewable energy	Net zero ready development as currently set out in the Future Homes/Buildings Standard does not address total operational energy of buildings and would omit emissions associated with unregulated energy. Development built to this standard would not be net zero in terms of regulated energy until the national grid has fully decarbonised either, thus would be responsible for continued emissions. Encouraging net zero unregulated energy through the policy would not be as strong of a requirement as requiring it.This could have implications for power grid capacity considering expected increasing demands on electricity nationally with the shift to net zero. Ultimately, this option could risk the city not meeting its targets in addressing

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	generation and to demonstrate this via submission of EUI calculations.	climate change, or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.
Option e For challenging typologies of development that have exhausted all onsite options to meet operational energy demand in line with other policy requirements, accept offsetting as a way to mitigate impacts through paying to provide offsite retrofitting to existing buildings elsewhere. Set out strict principles for how/when this would be accepted including that this option is **a last resort**. This would be framed as 'energy offsetting' (rather than carbon offsetting) and tied to the energy calculations of demand versus generation for the development.	Due to the constrained nature of many sites in the city, it may be difficult to incorporate technologies such as renewables onsite (or find spaces offsite) to balance out energy use, thus offsetting may be necessary. It could be an option where all other approaches are exhausted. Collection of an offset fund could potentially create a pot of money which could be utilised to deliver carbon reduction measures elsewhere in the city (e.g. existing buildings in need of retrofit).	There is the risk, as evidenced elsewhere with similar schemes, that offsetting could be more attractive than delivering onsite measures leading to poorer performing buildings. Offsetting shifts the problem of carbon emissions elsewhere and does not address the real need to deliver truly net zero buildings from the beginning. Offsetting projects would need to be identified, resources would need to be found to monitor their delivery, manage the fund, and ultimately ensure a 1-to-1 offset in carbon emissions between the project and the contributing development.
Option f Set no local standards on net zero carbon design of new buildings. Conform with the approach advocated by the Written Ministerial Statement 2023 and rely on national standards set out in Building Regulations, including the upcoming uplifts associated with Future Homes/Building Standard which is envisaged to deliver 'net zero ready' development from 2025 onwards.	Similar to option d but not setting any expectation/local direction on net zero carbon design standards. This option would mean greater consistency for developers building in Oxford compared to elsewhere and less complexity in the planning application process. At the design stage, regulated emissions are the primary area that can be influenced thus Building Regs process could achieve this.	This approach ignores the local context of Oxford, such as its 2040 local net zero carbon target. Previous updates to Building Regs have been slow historically, and Future Homes/Buildings Standard is not yet guaranteed (at time of writing the results of the last consultation on the options it proposed have not even been released).

		Even when in place, the updated building regs will not deliver net zero carbon until the grid is decarbonised, it will also not address unregulated/embodied carbon (in its current proposed form). Ultimately, this option would be even more likely (than other options) to risk the city not meeting its targets in addressing climate change or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.

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Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - various options/combinations e.g. A+B, A+C, A+D, E, F
High-level screening conclusion? - the options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? - No

Rationale: In terms of options, it would be appropriate to consider having a policy or not as there is no specific NPPF demand either way, though local context supports the inclusion of some sort of policy, the considerations then are how far such a policy goes in requirements. The options that the Council has considered represent various approaches to setting policy for new development to deliver upon net zero carbon in operation through use of various combinations of requirements relating to: types of energy addressed (e.g. regulated or unregulated); use of specific targets for energy use (space heating and total); requirements for renewable energy generation; as well as the methodologies for calculating performance (e.g. SAP or EUI). Whilst options b, c, d and f, represent four alternative approaches, some of the options (options a and e) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside one of the other options, as with option e (offsetting) which is less likely to stand alone.

In terms of sustainability impacts, the different options all relate primarily to levels of mitigation that the Local Plan could ask for in relation to new developments' energy use and carbon emissions and would be assessed against similar criteria within the SA assessment framework – particularly criteria **1. Carbon emissions**, **2. Resilience to climate change**, but also potentially **5.**

Inequalities (because of potential influence on fuel poverty) and **11. Urban design** (because higher standards may push towards more standardised design styles/shapes in buildings and limit design innovation). As the differences between the options are essentially in how they propose to technically implement net zero carbon design, as well as in how far they push in terms of standards applicants must meet, there would be some variety in the extent of any impact each option would incur against the SA criteria – particularly the extent of positive impact under criteria 1. 2. and 5. and variation between neutral or minor negative impact under criteria 11. (because as standards get stronger and potentially limit design). Option f would mean no local policy requirements, however, this is likely to still be accompanied by some positive impact for criteria 1. 2. and 5. because of the expected tightening of national building regs to move new development towards being net zero ready, although the positive impact is going to be reduced and would take longer to begin to take effect (it is likely to be negative/neutral in the immediate term). Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Net Zero Carbon buildings in operation – Policy R1

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The preferred approach is to take forward a combination of **options A, C and E**. Whilst the approach would risk not aligning with central government expectations (because it sets energy standards for development that exceed national standards), this approach is considered necessary to ensure new development does not compromise the city's ability to meet net zero carbon targets in future.

The combination of **options A and C** will help reduce need to retro-fit buildings in future and also help to address risks of fuel poverty for occupants of new buildings by reducing energy demands to operate buildings and drive renewable energy onsite, which can help with bills. Equally, driving more energy efficient buildings are important for reducing burdens on the wider energy grid.

The addition of **option E**, which makes an allowance for offsetting is considered to be a necessary and pragmatic approach, recognising that delivering net zero buildings in operation will be challenging for some typologies. It should only be allowed for as a last resort, once all onsite options for meeting the rest of the policy have been explored. Where utilised, the offsetting mechanism could help to deliver retro-fitting of existing buildings, which is also a potential positive (though the preference is for the mechanism to be used sparingly, if at all).

Policy options set 008b (draft policy R2): Embodied Carbon

In addition to the carbon dioxide emissions related to a building whilst it is in operation, there is also an upfront embodied carbon cost associated with constructing them as was touched upon earlier. Embodied carbon in construction can be influenced by a wide range

of factors, from the types of materials used in construction, to where these are sourced from and how they are processed, making this topic a highly complex one, subject to various considerations. As set out in Section 3 of this paper, the balance between addressing embodied carbon and achieving other place-making concerns in the planning process is not always clear either.

The stronger and more explicit a policy is, the more challenging it could be to implement, particularly as national guidance and industry understanding is still emerging. Nevertheless, whilst the current Local Plan is not explicit in requirements to reduce embodied carbon, it is important that development at least begins to consider and take action to address this topic in order to mitigate impacts on the wider environment and climate change. The options for policy relate to how far the Local Plan should go in requiring applicants to address embodied carbon.

Table 2 - Policy options set 008b: Embodied Carbon

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**
Option a Include high level principles for limiting embodied carbon, including the importance of retaining existing buildings where possible. Guidance would be expanded upon in accompanying technical advice note (TAN).	A strong set of principles for addressing embodied carbon (an area where industry guidance/learning is more limited at present) would ensure the issue is not ignored, whilst leaving flexibility for applicants to respond in the most suitable way per application. Providing more detailed guidance in an accompanying TAN would allow for expectations to be expanded upon and guidance to be regularly updated considering evolving knowledge/guidance which is less developed than for addressing operational energy.	This is an area of evolving guidance and understanding and broad principles could be difficult to formalise in policy. Equally, principles need to retain a level of flexibility to enable innovation and adaptation to specific context of individual sites and schemes.
Option b *Unless superseded by future updates to Building Regulations (or other national policy).*	Requiring larger development to measure embodied carbon at the construction stage will allow for improved understanding of the embodied carbon	Assessment methods for measuring embodied carbon in construction can be resource intensive and could be challenging for some smaller scale major

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Set more specific requirements for major development requiring a measurement of embodied carbon during construction through a recognised methodology and require applicants to demonstrate specific actions taken to reduce this as much as possible. Applicants would complete and submit a Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and reduced.	problem. It will enable a more informed approach to addressing the issue and requiring applicants to demonstrate how they have taken action to reduce it will be an important step forward in delivering net zero construction. This could be expanded upon in future iterations of the local plan as national guidance and understanding on this issue grows.	development – setting an alternative/appropriate threshold for where these would be required may require further consideration. Demonstrating actions to reduce embodied carbon in major schemes is less prescriptive than setting a fixed maximum target for embodied carbon. It also risks a lack of clarity for applicants about how far the Council expects them to go in justifying their approach in an application and in the level of detail they will be asked to provide.
Option c *Unless superseded by future updates to Building Regulations (or other national policy).* Set more specific requirements for major development requiring a measurement of embodied carbon during construction through a recognised methodology. Require applicants to demonstrate that they have kept embodied carbon levels to within a specific maximum target for embodied carbon on new developments. Applicants would complete and submit a Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and how they have aligned with policy target.	Same benefits as option C but going further requiring that embodied carbon levels are kept to within a certain limit. This is likely to have more effect at reducing overall embodied carbon footprint of new development. Clear targets could also provide greater clarity to applicants about the level of action the Council expects them to take/demonstrate in order to address embodied carbon in the design process.	Setting specific targets to comply with will reduce the level of flexibility for applicants to respond to various drivers influencing design of proposals on particular sites. Rigid targets may not be achievable on some sites in the city and this more prescriptive approach to policy would make their redevelopment more challenging. Setting specific targets could be challenging at policy level considering the complexities of accounting for it in construction processes and the evolving nature of guidance/industry knowledge on this issue. Equally, it may be challenging for applicants to deliver upon

		or satisfactorily respond to in a planning application. Alongside net zero carbon in operation, targets for embodied carbon are likely to have additional viability impacts.
Option d Do not include any policy requirement setting principles or targets/requirements for measuring embodied carbon.	There is potential for future updates to national policy/ Building Regs that would address embodied carbon, which may render reference in the plan unnecessary.	Previous updates to Building Regs have been slow historically, and Future Homes/Buildings Standard is not yet guaranteed. Even when in place, the updated building regs will not deliver net zero carbon until the grid is decarbonised, it will also not address unregulated/ embodied carbon.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Yes, various options (e.g. options A alone, A+B, A+C, D) **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** Option a proposes setting general principles for applicants to follow in order to take action on reducing embodied carbon, whilst options b and c represent alternative ways of setting further standards for larger scale developments. Both options b and c require these types of applications to submit evidence showing they've quantified their embodied carbon and quantifying how much they have reduced this, however, option c goes further and sets a specific target that should not be exceeded. Option d is to set no local policy requirements for addressing embodied carbon. In terms of sustainability impacts, the impacts arising from the options most directly relate to SA **criterion 1. Carbon Emissions.** For this criterion, option a is likely to have a slight positive impact, though will depend upon implementation, and may not result in any significant reductions in embodied carbon emissions. Option b and c have increasingly positive impacts as they begin to set

standards for quantifying the emissions and actual reductions secured, so are likely to have more meaningful impact, though they will not negate all emissions so the positive impact would be minor overall. Option C is

Embodied carbon in the construction process – Policy R2

The preferred approach for this topic is a policy that comprises of **options A and B.** The policy approach would essentially act as a stepping stone, introducing requirements for the city where very little currently exist, but also recognising that embodied carbon is an area of complex topic and one where understanding is still emerging.

Option A would apply to all proposals, but the principles it would propose will vary in relevance depending on each specific site context and type of development proposed. The principles would act as important considerations to guide applicants when designing their proposals, whilst remaining flexible enough to respond to the varying context that each application for development is brought forward in. **Option B** would seek to push larger developments towards taking more explicit action in addressing this topic. Whilst the option does not impose specific targets to limit embodied carbon to, which some may feel limits the effectiveness of the policy, it would help to ensure the largest schemes with the most significant potential impacts are transparently calculating embodied carbon and specifically demonstrating the types of measures they propose to reduce this and by how much.

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The options together will help to improve awareness and understanding around this topic which will be of increasing pertinence in future. They will form an important step forwards towards potentially more stringent requirements in future, either locally or nationally.

Policy options set 008c (draft policy R3): Retrofitting existing buildings including heritage assets

The Local Plan will have limited influence over existing buildings that have already gone through the planning process, yet the earlier analysis in this background paper highlights that these buildings collectively form a significant source of carbon emissions which will need to be retro-fitted to help achieve local and national net zero targets. Many retro-fitting measures, such as fabric efficiency and installation of renewables, can be undertaken without planning permission, but where permission is required the Local Plan can help applicants to approach these projects in the right way.

This is particularly important for traditional buildings and heritage assets which can have special qualities which need to be conserved (particularly where these benefit from national designation). It will also help avoid problems of maladaptation which could lead to negative impacts for occupants' health (e.g. impairing passive ventilation processes many of these buildings rely on and that

is essential for avoiding damp build up). The options set out for this topic therefore mostly focus on how the Local Plan policy should treat applications impacting traditional and historic buildings.

Table 3 - Policy options set 008c: Retrofitting existing buildings including heritage assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.	This policy recognises the high priority afforded to the retrofit need in the city and seeks to ensure that retrofit measures that require planning permission will be supported wherever possible – particularly where demonstrable benefits for climate (mitigation or adaptation) can be evidenced. It highlights that as a starting point, such measures are presumed to be acceptable on planning grounds. This additional certainty is intended to support and encourage more occupants to pursue retrofit projects.	The local plan has limited direct influence on retrofitting of existing properties unless they need planning permission (many small-scale improvements are considered permitted development and would not). Any such policy can only be supportive, as and when such measures do require planning permission. Whilst this policy would highlight the importance which we assign to supporting retrofitting measures in existing buildings, there will be other material considerations which have to be weighed up against this policy and could still ultimately be determined to outweigh this presumption in favour.
Option b In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm.	This option addresses the retrofit need in the context of historic buildings and heritage assets and responds to the particular challenges present in the need to balance heritage considerations. It guides applicants to follow Whole Building Approach in order to ensure retro-fit maximises opportunities for	Same negatives as for option a as well as the following: Listed buildings and other heritage assets are afforded statutory protection which is over and above that given through planning controls. Great weight is given to preserving or not harming the

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Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note (updated from the current version of TAN 15 supporting Local Plan 2036). This additional supporting guidance could expand on this complex topic such as by flagging measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit.	carbon reduction/climate adaptation and minimises potential for harm to the asset or its occupants (e.g. through maladaption). Same benefits as option a, however, this option would seek to provide further certainty for how retrofit of heritage assets will be considered through the planning application process. It would provide clarity on how to approach design of retrofit projects for these assets, setting out the key issues the Council would want to see addressed in an application for it to be succesful. Yet this option would also benefit from leaving flexibility for approaching each project in a way that is tailored to the specific context of the site and the particular features for which it is protected. Would also help to address the complexity in navigating how harm to heritage assets needs to be balanced with benefits of retrofit (e.g. carbon reduction/climate adaptation) in the decision-making process.	significance of these heritage assets, and this must be borne in mind when considering measures of change to buildings or retrofitting measures to combat or mitigate the impacts of climate change. In supporting retrofitting of older buildings, a policy will have to take account of the protection afforded to heritage assets and the need to preserve their values. Setting out principles that applicants would be expected to follow, as opposed to specific measures that would be acceptable or not, would still leave a fair amount of site-specific analysis for occupants to undertake. They would still need to set out project-specific justification for why a particular design (and set of retro-fit measures) has been selected. There is a risk that this quite complex topic of retro-fitting heritage assets remains a challenging one to navigate for applicants.
Option c In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate	Similar benefits as options above but without the additional flexibility for approaching site specific considerations relevant to retro-fit of heritage assets as is offered in option b.	Same negatives as above aside from the point about flexibility as is offered in option b which seeks only to set out key principles to follow.

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adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on this through guidance in an updated version of Technical Advice Note 15.	Listing specific retrofit measures that would be more or less suitable in a policy potentially provides greater certainty to applicants as to which measures would be more appropriate versus those that would be viewed as more harmful in a heritage context. It might reduce some of the uncertainty around what would be acceptable for such applications.	In addition, option c's approach of setting out specific measures in the policy that may cause more or less harm would have its own potential negatives. This is because it is likely that identifying a strict list of measures that cause less harm in a policy will be challenging when the character and value of heritage assets and their setting varies so much across the city. Such a policy is likely to be highly complex to present in the Local Plan and subject to many caveats because it is unable to grapple with the level of detail needed to be truly helpful to applicants (and likely better suited to an optional Technical Advice Note instead). Ultimately, decisions will still have to be made on a case-by-case basis, thus the benefits of this approach may be undermined.
Option d Do not include policy addressing retrofitting of existing buildings and/or heritage assets.	The local plan has limited direct influence on retrofitting of existing properties unless they need planning permission (many small-scale improvements are considered permitted development and would not). Any such policy can only be supportive, as and when such measures do require planning permission. It would also be limited by the need for balancing other	This would ignore the significant need for pursuing retrofit projects on existing buildings in the city to reduce our carbon footprint. Any policy in the plan is likely to have limited effect in directly driving retrofit measures, however, by highlighting that such measures would be supported and providing clarity on what is most appropriate where, this could help to

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	relevant planning issues in the decision-making process (such as any potential harm to protected heritage features).	avoid the planning system being seen as a barrier to uptake where such measures are planned and require planning permission.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Yes (e.g. options A, A+B, A+C, D) **High-level screening conclusion? -** the options should be screened in for detailed appraisal **Screened in for detailed appraisal? -** Yes **Rationale:** Option a sets out a presumption in favour of retro-fitting for non-heritage buildings, meanwhile, options b and c are alternative approaches for how local policy could support retro-fit on heritage assets and represent alternative approaches which could be combined with option a. Option d would mean no local policy requirements in relation to retro-fitting. Options a, b and c would all likely have some positive impact for **SA criterion 1. Carbon Emissions** and **SA criterion 2. Resilience to Climate Change** through establishing a local policy environment that is as supportive and enabling of retro-fit of existing buildings in order to achieve carbon reductions/energy efficiency or climate adaptation. Option b and c would have slightly more positive impact as they would also relate to the city's various historic buildings. Local Plan policy cannot enforce retro-fit of existing buildings and, in relation to historic assets, there are also other competing considerations that may limit the positive impact, meaning the options are likely to result in minor positives at best. Whilst Options b and c might increase the scope for positive impact against criteria 1. and 2., because these options would explicitly support sensitive retro-fit on heritage assets, they do also introduce the potential for harm to the special characteristics for which many are designated – thus resulting in a potential negative impact against **SA criterion 11 Urban Design and Historic Environment,** though the extent of this impact would depend upon implementation and types of assets that are retro-fitted, but should be reduced through following the key principles such a policy would set out. Option D would result in neutral impacts against the criterion because it would neither cause additional harm (indeed emissions are likely to continue to reduce in some respects e.g. as national grid decarbonises), nor will it result in specific positive impacts (there is no national requirement to undertake retro-fitting). The balance between competing priorities of reaching net zero through retro-fit and also continuing to preserve and enhance the historic environment which is intrinsic to Oxford is a complex one. Whilst the potential sustainability impacts arising from the

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options are not expected to be significant, the extent of negative impacts under options b and c could vary. Based on this initial screening, it is suggested that the option set should be scoped in for further detailed appraisal.

Retro-fitting existing buildings including heritage assets – Policy R3

The preferred approach for policy addressing retro-fitting in the new Local Plan is a combination of **options A and B.** This would make it clear that the Council supports retro-fitting existing buildings, but that for traditional buildings and heritage assets this support is contingent on applicants demonstrating they have approached the design of retro-fit projects in the right way.

Option B includes that the policy would set out the need for taking a Whole Building Approach to retro-fitting traditional buildings and heritage assets along with some other key principles to follow. It would then refer applicants to a more detailed Technical Advice Note, which can be kept updated as regularly as needed, to provide additional guidance. This would ensure that the key considerations that an applicant needs to address as part of their application are set out in the policy. However, it would allow flexibility to take into consideration varying contextual factors that might need to guide design on a case-by-case basis, as there is unlikely to be a one-size-fits-all solution that will work for every building and site in the city.

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The option set was scoped in for testing through the Sustainability Appraisal (SA) to better understand the effects of each option and any potential for significant effects. The SA testing indicates that this preferred approach would have the most sustainability benefits according to the SA testing, although potential for negative impacts in terms of the historic environment would need to be mitigated through careful wording of the policy in terms of guidance for applications impacting traditional buildings/heritage assets.

Policy options set 008d (draft policy G9): Resilient design and construction

Oxford is at risk from climate change, particularly in relation to increased flood risk, water stress, overheating and more intense weather events generally. Climate resilience will be supported by various policy areas in the Local Plan, and various climate adaptations such as greening can have multiple benefits not just for making places that are healthier and more comfortable for people. A specific policy could be beneficial in ensuring that the key issues of relevance are flagged to applicants and in guiding them towards considering future climate as part of their design process. The options presented below relate to what this policy approach could look like.

Table 4 - Policy options set 008d: Resilient design and construction

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a discrete adaptation/ resilience policy, whilst continuing to address risks in other policies where relevant. Ask applicants to demonstrate how they have designed in accordance with policy via the design checklist or a separate checklist. Cross referencing to other relevant policy requirements (e.g. flooding) as well as incorporating other specific requirements such as: • Need for climate resilience impact assessment; • Details of a cooling strategy (for the building and surrounding spaces in large schemes, addressing alignment and shading) intrinsic to the design (not having implications for carbon use), including measures for addressing overheating risk for lifetime of development; • Measures to conserve/recycle water; • Flood resistance/resilience measures; • Supporting infrastructure such as electricity supply and broadband	Would set out a strong position/stance on the issue of climate adaptation and building resilience to climate impacts which could negatively impact on health and wellbeing. Bringing the range of policy areas into one checklist, ensuring applicants are looking at them through the lens of climate resilience, could be helpful. Would specifically pick up on issue of overheating, a key risk in the city moving into the future, and require applicants to detail what measures they have included in design/construction to address this and maintain thermal comfort for occupants during hot summer periods. Likely to go further than what is asked for in Building Regs alone.	Many aspects of climate adaptation will be dealt with through other policies, there is a danger of repetition e.g. with health, flood risk, design, and GI. Will need to find a consistent and concise way for applicants to demonstrate they have met these policy requirements without forcing them to repeat work in multiple places in their application. The design checklist would be one means of doing this. Could allow for cross-referencing to evidence prepared to meet other policy requirements where relevant.

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designed to function in extreme weather conditions (such as prolonged periods of very high temperatures or heavy rainfall).		
Option b Require major development to achieve certification against a recognised sustainability assessment e.g. BREEAM/HQM.	There are several sustainability certification schemes in existence which are well recognised by industry such as BREEAM. These schemes often take a holistic view of design and ensure that considerations like climate change are weighed up alongside other design measures. Certification would ensure a high standard of sustainable design in major developments and help to ensure consistency across for applicants.	Schemes such as BREEAM are not specifically focused on climate resilience/adaptation alone, it is usually one element that is assessed amongst a range of sustainability considerations. Points that underpin certification can usually be scored across a variety of categories – though we could require points in certain places as we do at present with requiring 4 points under the water topic of BREEAM under RE1. This option would force applicants to pursue independent certification with a particular provider, though we could specify that any equivalent is acceptable to provide more flexibility. Relying on this kind of certification alone may not fully maximise climate resilience objectives. Likely to incur additional costs and resource demands for applicants.
Option c Address climate risks as theme purely through other policies e.g. design flood	Ensures resilience/adaptation is central to thinking across local plan policy framework.	Climate resilience aspects can be lost amongst other objectives when they are not given sufficient consideration.

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risk, green infrastructure. No requirement for specific policy addressing issue.	Avoids repetition of requirements/considerations set out in other complementary policy areas (e.g. flooding and green infrastructure).	There are some specific adaptive measures, and wider sustainable construction issues which may not easily fit into other policy areas without making them overly long/ unwieldy.
Option d No policy on climate adaptation/resilience – rely on national guidance.	Some elements of building resilience to climate change will necessarily be covered elsewhere e.g. flood risk requirements are strong in NPPF, overheating within building regs.	Ignores local context – e.g. heritage, dense urban environment, as well as identified climate risks facing the city in future. National policy hasn't traditionally been particularly strong on adaptation. Could miss opportunities to tie together benefits for many complementing agendas – e.g. health, air quality.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Either option A, B, A+B, C, C+B, or D **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** The options represent different approaches to incorporating requirements for applicants to deliver climate resilient design into local policy or not. Option a would be to have a bespoke policy with a checklist of requirements for them to address where relevant and option c would instead scatter these requirements across other policies. Option B would instead require applicants to achieve certification against an independent sustainability certification scheme, which could be standalone or in combination with option A or C. Option D would be to have no local policy requirements about climate resilient design. Most directly these policy options relate to **criterion 2. Resilience to climate change**, although the wide-ranging nature of climate resilient design means that these policy options can indirectly impact a variety of other criteria such as **criterion 7. Green Infrastructure** (where resilience measures include greening), **criterion 5 inequalities** (where resilient design reduces health risks

from climate change), though this is more dependent upon implementation and challenging to appraise. In relation to criterion 2, however, the options are all likely to represent minor positive impacts, other than option d, with the differences between them being more about how a local policy approach is implemented through the local plan. Option D is assumed to be neutral (because national policy has enough requirements to at least ensure some level of risk mitigation such as through national guidance on addressing flooding and Building Regs addressing overheating to some degree). Overall, the differences between the options are not significant enough in sustainability terms to warrant being scoped in for a detailed appraisal.

Resilient design and construction – Policy G9

The preferred approach is **Option A.** This acknowledges climate risk as a key issue for health and wellbeing of people and the sustainability of the wider city and will allow the Local Plan to guide applications in considering future climate change as part of the design process. The key issues of concern relevant to Oxford and its particular climate change risks can be set out in the policy and applicants can be encouraged to incorporate resilience measures to address them through the design process.

There is likely to be overlap with other policy areas, e.g. requirements for addressing flood risk, or providing green infrastructure, and information provided to meet other policy requirements can be used to support meeting this policy's requirements. The policy will help to ensure that these aspects of design are approached through the lens of adapting to climate change in particular, which may not always be the focus, and will help reduce the chances of opportunities for resilience building being missed.

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Background paper 009

Title: Natural Resources including air, water, soil quality

This paper addresses the protection of Oxford's natural resources including the quality of air, water and land/soil.
Relevant Local Plan Objective(s): • Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.
Relevant SA Objective(s): 8. To reduce traffic and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. 9. To achieve water quality targets and manage water resources.
SEA theme(s): Water, air, climatic factors, soil, material assets, landscape

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1. Introduction

1.1 This background paper addresses the topic of environmental quality and natural resources in the city. In particular, it focuses on three aspects of Oxford's environment: the quality of air, land (including soils), and water and the issues that relate to these different aspects of the environment.

1.2 Oxford is a small city with a tightly drawn administrative boundary and contains a number of physical and policy constraints which means that land must be used prudently. Where land is available, it needs to be used in the most efficient way possible while ensuring that there is no harm to the city's natural environment, human health and well-being.

1.3 The issue of poor air quality is multi-faceted and has various causes which are discussed in greater detail later. It is an important topic for the Local Plan to address because air pollution has a direct link with health and well-being and has been evidenced to cause and exacerbate health problems. Poor air quality also has negative impacts for the wider natural environment, especially our most sensitive ecological habitats.

1.4 Oxford has a long history of settlement with different parts of the city having been used for a variety of types of development in the past, some of which can leave behind a legacy of contaminated materials and other pollution which is another issue the planning process needs to address. The development process can play an important role in helping to identify historic contamination and contributing to its remediation to make it safe for future generations, however, where this is not carried out appropriately, people can be brought into contact with harmful pollutants that can damage health. Equally, it is important to ensure that the quality of our soils is protected as these act as important natural capital which supports the environment in a number of ways, from mitigating flood risk and supporting healthy habitats, to acting as important sinks of carbon which could otherwise be released into the atmosphere exacerbating our impacts on climate change.

1.5 Water quality issues have been brought to the forefront of planning since the introduction of the Water Environment Regulations, which seek to ensure that the biological and chemical quality of watercourses in England and Wales reach a "good standard". Key concerns for the Local Plan to address include whether the availability of sufficient water resources for the existing and future population of Oxford. Also, that the quality of the water environment is preserved from further harm arising from new development, particularly because certain nature sites rely on certain amounts and quality of water to maintain the particular habitats and species for which they are protected.

1.6 The paper also considers wider issues of pollution such as impacts of noise and light which are also important for new development to address where necessary.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

2.1 There are a range of national and local plans, policies and strategies which form important context for the policies of the new Local Plan. Those of most relevance to the natural resources policies are summarised below.

National Planning Policy Framework (NPPF)

2.2 The NPPF addresses topics of natural resources and environmental quality in several sections. In particular, paragraph 187 of the NPPF states that policies should contribute to and enhance the natural and local environment in a number of ways including:

- Protecting and enhancing soils (in a manner commensurate with statutory status or identified quality in the development plan)
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

2.3 Paragraphs 196 to 201 of the NPPF set out various requirements relating to ground conditions and pollution including:

- Ensuring that sites are suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- Ensuring that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment
- Policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, (including presence of Air Quality Management Areas and Clean Air Zones). Identify opportunities to

improve air quality or mitigate impacts such as through traffic and travel management, and green infrastructure.

2.4 Paragraph 124 of the NPPF sets out principles for effective use of land and strongly emphasises making as much use as possible of previously developed or "brownfield" land (paragraph 125(c) unless it would conflict with other policies in the NPPF. Paragraph 125 also sets out that plans should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production. It also sets out that plans should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

2.5 Water supply and wastewater treatment is briefly referenced in the NPPF, including that strategic policies should set out a strategy for and make provision for infrastructure to address this (paragraph 20(b)). Also, take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications of water supply (paragraph 162).

National Planning Practice Guidance, including National Design Guide

2.6 The Planning Practice Guidance (PPG) provides additional support for interpreting the policies of the NPPF related to these topics, for example:

- Air quality guidance, covering topics such as: the air quality considerations planning and local plans address; information sources available to assess air quality; detail required within air quality assessments; and how can air quality impacts be mitigated.
- Water supply, wastewater and water quality guidance, which sets out how this should be addressed within planning processes as well as where information can be obtained with respect to the water environment.
- The natural environment provides guidance on issues such as agricultural land quality, soil protection and brownfield land of environmental value.
- Land quality, is in several places including in guidance about contaminated land and land stability, about how the planning processes should interpret and address these issues as well as potential mitigation measures.
- The National Design Guide sets out ten components of what the government considers to be good design. One of these components is the efficient use of resources including issues of prudent use of resources and factoring risks of pollution into the design process.

The Environment Act 2021

2.7 The Environment Act 2021 does not revoke or replace the Environment Act 1995, but it does make amendments to strengthen and enforce adoption of the environmental provisions. The Act includes requirements for the Secretary of State for DEFRA, to set long-term legally binding targets on air quality, biodiversity, water, resource efficiency and waste reduction within the UK. Part 5 of the Act also aims to tackling discharge of sewage and places several duties on water companies regarding monitoring of water quality near storm overflows and sewage disposal works to secure a reduction in the adverse impacts of discharges from storm overflows.

Air Quality: other specific context

Air Quality Standards Regulations 2010 (as amended) and Air Quality Strategy

2.8 The European Directive 2008/50/EC was transposed to UK law through the UK Air Quality Standards Regulations 2010. This legislation sets legally binding limits for concentrations in outdoor air of air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). Key limits are:

- the annual mean standard for NO2, which is 40 µg/m3 for humans and 30 µg/m3 for vegetation.
- Targets for fine particulate matter (PM2.5) set through the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, which require a maximum annual mean concentration target of 10µg/m3 to be achieved by 2040 (the AMCT), and a population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT). Defra is developing guidance on how to consider PM2.5 targets in planning decisions.

2.9 The UK Air Quality Strategy sets out the UK government's plans for dealing with all sources of air pollution. The Environment Act 1995 Part IV of the Environment Act 1995 requires the Secretary of State to publish a national Air Quality Strategy and established the system of local air quality management. The Act also requires local authorities to regularly monitor air pollution in their areas against national targets and to take action where it is found that these targets are unlikely to be met. If areas are found to be in exceedance of the legal limit values and improvements are necessary, those areas need to be designated Air Quality Management Areas, and an Action Plan need to be developed and put in place by the local authority which set up the actions that are going to be put in place to address air quality.

Oxford City Air Quality Action Plan 2021-2025

2.10 Oxford City Council is committing to becoming the first UK Local Authority to set a local annual mean NO2 target in a citywide AQAP. The Oxford Air Quality Action Plan 2021-2025 sets an ambitious target of meeting a local annual mean (Nitrogen Dioxide) NO2 target of 30µg/m3 by 2025. The overall objective of this AQAP for the whole of the Oxford City area is to achieve a local annual mean NO2 target of 30 µg/m3 by 2025 "30 by 25".

2.11 The Plan sets out 30 actions and measures that will be delivered by Oxford City Council and partners, via four priority areas of intervention:

a) Developing partnerships and public education;
b) Support for the uptake of Low and Zero emission vehicles;
c) Reducing emissions from domestic heating, industry and services;
d) Reduce the need to travel, explore opportunities for modal shift and increase the uptake of sustainable transport.

2.12 Progress against the targets is reported annually in the Air Quality Annual Status Report, the most recent was published in June 2024.

2.13 The Council has produced a 2025 source apportionment study, which has updated the known picture of the contribution of various sectors (e.g. transport, domestic, industry, etc) to the levels of the multiple air pollutants in the city. This work will then inform a new Air Quality Action Plan in 2026, following the public consultation which took place at the end of 2025.

Land Quality: other specific context

Oxfordshire County Council Minerals and Waste Plan

2.14 Oxfordshire County Council has an adopted Minerals and Waste Core Strategy which sets out the over-arching county policy for minerals and waste in Oxfordshire to 2031.

Land Quality Strategy for Oxford (2020)

2.15 This City Council strategy seeks to ensure that Oxford's residents and the natural environment are not exposed to unacceptable risks from land contamination and to improve our environment for a sustainable future. The strategy seeks to achieve this through working with developers, landowners and other key stakeholders to manage risks from land contamination effectively and efficiently. The first objective of the strategy is "To deal with contamination through development control and building control wherever

possible". In order to achieve this, the strategy sets out that it seeks to "ensure that land contamination is taken into account when developing planning policy documents".

Water Quality: other specific context

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

2.16 These regulations aim to improve and integrate the way water bodies are managed in England and Wales. They require England and Wales to reach good chemical and ecological status in inland and coastal waters by 2027.

Thames River Basin District Management Plan, Environment Agency 2022

2.17 River Basin Management Plans provide a framework for the protection and enhancement of water environments at a river basin scale, as part of implementing the Water Framework Directive.

2.18 The Thames River Basin District Management Plan (updated 2022) covers a wide area including Oxford, and it identifies a number of significant water management issues impacting upon the river basin as a whole, (though not necessarily reflective of Oxford specifically) including issues relating to physical modifications to water bodies; pollution from waste water; pollution from towns, cities and transport; changes to the natural flow and level of water; negative effects of invasive non-native species; and pollution from rural areas.

Thames Water's Water Resources Management Plan 2024

2.19 Thames Water recently published its updated Water Resources Management Plan (WRMP) which sets out how the company will provide a secure and sustainable supply of water to their customers, whilst protecting the environment, over the next 75 years. WRMPs are important strategic plans that set out the preferred programme for managing water resources in the Thames Water supply area. The plan sets out forecasts of supply and demand, including the expected shortfalls in the future due to pressures such as climate change and population growth. It also sets out a programme of planned interventions to ensure that water resources within the Thames Water area are appropriately managed, including demand reduction measures like addressing leaks, and larger more strategic measures including water transfers and a new reservoir in the Abingdon area.

Thames Water's Drainage and Wastewater Management Plan

2.20 Thames Water's Drainage and Wastewater Management Plan (DWMP) addresses future pressures on our wastewater service and sets out their approach and the investment needed to deliver a sustainable service that manages wastewater for the area and protects the environment. The DWMP covers a 25 year period and was published in May 2023.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Air quality

3.1 The City Council declared an Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO2) in central Oxford in 2003, which was expanded in 2005. Despite good progress being made as part of the responses enacted to address these designations, significant breaches of the national objectives for NO2 still existed and additional hotspots were identified. Following further detailed assessments of air quality, a city-wide AQMA was declared in September 2010. In 2021 the Council published its Air Quality Action Plan (AQAP) prepared to address poor air quality in the city covers the period from 2021-2025 and includes an ambitious headline target to "achieve a local mean NO2 target of 30µg/m3 by 2025".

3.2 Air pollution can have a variety of causes including tail pipe emissions from transport, the wearing of tyre and brake pads, as well as emissions from heating sources within buildings (e.g. gas boilers). The pollutants are comprised of various substances including nitrogen dioxide, ozone, and particulate matter (small particles of solids like soot and dust). The latest Air Quality Annual Status Report (published June 2025 and reporting on 2024 observations) indicates that the transport sector continues to be the largest contributor (44%) to total emissions of Nitrogen Oxides (NO + NO_2) in the city, followed by combustion from industry and services (30%), domestic combustion (26%), and others: waste, agriculture, solvents, nature (<1%).

3.3 The Council's annual air quality status report (published June 2025 and reporting on 2024 observations) indicates the following in terms of current situation:

- Air pollution levels have significantly improved in the city of Oxford over the last few years since the launch of the Air Quality Action Plan (AQAP) 2021-2025. Nitrogen Dioxide (NO_2) is the pollutant of greatest concern in Oxford, it is

emitted from high-temperature combustion processes and is generally concentrated around busy roads due to its short lifetime. Across the city, it is estimated to have decreased on average by 10% in 2024 compared to 2023. Despite this, there are still air quality challenges to address.

- Only one of the 118 sites that the city monitors for NO_2 levels were in breach of the UK's legal annual mean limit value for this pollutant: Headington Hill (TF19), though this is not an area of primary concern (i.e. where members of the public are likely to be regularly present for a period of time).
- Only four of the 118 sites were in breach of Oxford's local annual mean target for NO_2 (30 µg/m3) – this target is the city's local commitment laid out in the city's AQAP, and which is expected to be achieved across the city by 2025. Those locations are St Clements (DT55), Headington Hill (TF19), and Oxford's ring road (TF31 and TF36).
- The reduction in NO_2 levels are likely linked with reductions in transport levels in the city seen recently, which are also expected to have been influenced by the closure of the Botley Road in April 2023 for improvements to the railway station, as well as the influence of the Zero Emission Zone Annual mean for particulate matter (PM2.5 and PM10) levels is measured in fewer locations than NO_2 (at AURN St Ebbes, representing urban background and Oxford High Street, representing roadside). For PM2.5, annual mean levels recorded at the city's two monitoring locations were of 6 and 7 µg/m3 respectively. These are below the current UK legal annual mean limit of this pollutant (10 µg/m3) but slightly above the WHO recommended annual mean (5 µg/m3). Annual mean PM10 levels were recorded as 9 and 13 µg/m3 respectively and have seen reductions of 0% and 7% at the city's monitoring sites compared with the levels measured at these sites in 2023. Values are well within compliance with the UK's annual mean limit value of 40 µg/m3, and just below the 15 µg/m3 guideline value recommended by WHO for this pollutant.
- Ozone is measured at one site in Oxford and levels exceeded the legal air quality objectives for this pollutant 114 times, during a total of 15 days in 2024, compared with 113 times over a total of 15 days during 2023. Therefore, AURN St. Ebbes has not met the AQ objectives for this pollutant in 2024. These breaches were likely caused by periods of warmer weather, linked with south-eastern winds coming from Europe, which brought pollutants that contributed to ozone formation.
- The report also details various positive steps that have happened over the last year with regard to addressing transport emissions. For example, the County

secured £3.6 million funding from the Department of Transport to triple its public EV chargers; the City and County held Air Quality Action Plan workshops; and the City and Canal & River Trust launched 'eco-moorings' for the first time along the Aristotle Canal for charging e-boats.

3.4 Long-term exposure to air pollution has been linked to chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term increases in levels of air pollution are associated with a range of health impacts, including lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. It can be particularly detrimental for society's most vulnerable individuals including the children, the elderly, and those with long-term health conditions. Air quality was legally recognised as a contributing factor in the death of an individual in the UK for the first time in 2020. The issues of poor air quality affect everyone, but there are often inequalities in exposure towards those living in more deprived communities for reasons such as: living in poorer quality buildings; reduced access to open space and green infrastructure; proximity to busier main roads where pollution is worst.

3.5 Poor air quality can also have negative impacts on sensitive habitats, particularly near to sources of emissions like roads with deposits of substances like nitrogen altering the suitability of the environment for certain species and changing the makeup of the ecosystem over time. Previous iterations of Habitats Regulations Assessment (HRA) have flagged that air quality impacts are a particular sensitivity that risks the habitats and species of the Oxford Meadows Special Areas of Conservation (SAC). The HRA which has been published alongside the Regulation 19 Local Plan should be referred to for additional detail.

Land quality/soils

3.6 Oxford contains several wedges of agricultural land. The best and most versatile agricultural land (Grades 1, 2, and 3a) is considered to be a national resource and should not be lost. Most of the agricultural land in Oxford is not of this quality, however, there are some parcels of Grade 2 agricultural land north of Binsey and in the Cherwell Valley.

3.7 Oxford has seen significant industrial change to the present day in fact Oxford's industrial history has resulted in a substantial amount of land affected by contamination. Almost all of the former major industrial sites have now been remediated and redeveloped, such as Lucy's in Jericho and the former car factory site in Cowley. However, there remain a number of smaller sites that have the potential to be affected by contamination.

3.8 In 1989, Oxford City Council commissioned a review of former landfill sites in the city. It was a comprehensive review that allowed the city council to manage the risks associated with those sites. A review of council-owned allotment sites was also carried out in the 1990s following some concerns about the quality of the land for growing produce. Since then, some council-owned land, such as former depots, has been redeveloped for housing and the necessary site investigations and remediation has been secured through the planning process.

3.9 Oxford City Council maintains a public Contaminated Land Register in accordance with the relevant legislation. There are currently no entries on the Contaminated Land Register. It is worth noting that the register does not include the details of sites that have been remediated through the planning process. There is the possibility that contaminated sites which have not been identified remain and thus could be added to the register in the future.

3.10 Oxford also has a number of peat-rich soil deposits which are located in several locations across the city. Peat rich soils are particularly valuable natural features which not only act as important storage for carbon (carbon sinks) but are also important for managing/storing water and also for retaining archaeological deposits. Historic British Geological Survey/Natural England mapping has these identified at Dunstan Park, around the Churchill Hospital and Lye Valley, as well as along Littlemore Brook in the south of the city. Engagement with Natural England officers previously suggests that this mapping was only approximate and that a future project is likely to result in refinements to this mapping (discussed further in Section 5). Indeed, the Council is aware of the potential for deposits more widely in the city despite historic development having likely removed much of what was once present.

Water resources/water quality

3.11 The Council has produced a separate Water Cycle Scoping Study which should be referred to for a detailed assessment of water conditions in the city. This follows best practice for preparing such studies as set out by the Environment Agency. The following is a summary of the situation in relation to water resources (supply and quality).

3.12 In terms of water supply, the city remains in an area of serious water stress as identified by the EA and this is the basis for the more stringent water use limits imposed by Building Regs which the Local Plan 2036 requires of new development. Thames Water are responsible for water supply for the city and their Water Resources Management Plan (see earlier in this background paper) notes several key challenges facing the management of the water supply for the region in the future: a growing population, climate change and the

need to protect the environment. By 2050, without taking action, the plan projects a water supply shortfall for the region of 1060 million litres per day, which increases to 1100 million litres per day by 2075. In order to tackle the shortfall, the plan proposes a variety of measures including leakage reduction, smart meter installation, free water efficiency measures and advice for customers, as well as new water supply schemes.

3.13 Water quality issues are ongoing in the city, with the majority of watercourses either classified as moderate or poor in ecological status for a variety of reasons. Oxford is located within the Thames River Basin District which is covered by the Thames River Basin Management Plan (TRBMP) which was last updated by the Environment Agency in 2022. As part of this update, revised condition assessments are available showing the variety of reasons for the condition of water quality in waterbodies, in particular:

- Agricultural practices (poor nutrient management)
- Sewage discharge
- Invasive species
- Urbanisation
- Global pollutants (uPBTs) - causing all waterbodies across country to currently be classed as fail for chemical status

3.14 Some of these stressors are not within the Local Plan's influence, for example, pollution arising from agricultural practices within the catchment, as well as the influx of invasive species into watercourse or the chemical contamination arising from global pollutants. Others are more within the influence of planning policies that guide the quality of new development, for example the treatment of urban run-off arising from urbanisation, as well as the pressures on wastewater infrastructure leading to sewage discharges (though this is partial in relation to new development, as there is already a significant proportion of existing development that new planning policies are not able to influence).

3.15 There are known capacity concerns in relation to wastewater infrastructure in the city and upgrades are required to the Wastewater Treatment works which services the city to address current capacity problems and future needs. On 20 March 2025, following a rigorous process to find a solution to the existing concerns, an announcement was made that the EA, Thames Water and Oxford City Council agreed a scheme to provide the capacity needed at the Oxford Sewage Treatment Works, this will help provide the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, allowing projected growth to come forward. Separately, Thames Water's Drainage and Wastewater Management Plan (covering the period 2025 to 2050), proposes various measures to address targets for addressing known issues with the wastewater and drainage systems across their region which will include

Oxford. The Council has been engaging with representatives of Thames Water and the EA during preparation of the Local Plan 2040 and continues to do so on throughout the preparation of the new Local Plan 2045.

3.16 Groundwater is another important element of the city's water environment and the Environment Agency includes various pieces of guidance in relation to its protection. The quality of groundwater and the way it flows below the ground can be particularly important for maintaining the healthy functioning of various sensitive ecological sites around the city, including the Oxford Meadows SAC and SSSIs such as the Lye Valley. New development coming forward in particular areas needs to ensure that risks of introducing pollutants into groundwater are mitigated sufficiently but also that subterranean development, such as introduction of basements, does not interrupt water flows.

3.17 Climate change is likely to put additional pressures on the water environment in future. Drier, warmer summers could put pressure on water supply and the quality of waterbodies in the city, as well as impacting the more sensitive habitats that rely on a certain hydrological profile to support species that exist there. Equally, more intense rainfall events could put additional pressures on wastewater systems and result in additional releases of pollutants into waterbodies without appropriate mitigation measures in place.

Other impacts on the environment

3.18 The development process can have other impacts on the environment and people's health unless sufficient mitigations are put in place. In denser urban areas, sources of different types of amenity impact and pollution can be more common and their impacts increased. For example,

- Impacts of noise pollution arising from construction processes as well as when a development is in operation and from other sources such as traffic can have a variety of health impacts such as sleep disturbance, impairing concentration and causing stress in people whilst also disturbing wildlife.
- Impacts of dust released arising from during construction processes like demolition and processing materials can exacerbate air pollution
- Impacts from odour, including where development arises in proximity to particular odour sources such as sewage treatment works or industrial uses.
- Excessive artificial lighting can impair natural functions of wildlife such as birds and insects.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 The policies of the adopted Local Plan 2036 would continue to apply. There would also be national policy which affords various protections and requirements for addressing issues of pollution/contamination of air, land and water. This would be supported by the range of other associated environmental legislation, including what was touched upon in the policy context section.

4.2 Whilst air pollution arises from various sources, it is predominantly transport-related emissions (particularly fossil fuel burning engines) which is responsible for the bulk of pollutants in Oxford. The Local Plan has limited influence on transport emissions as the Council is not the highways authority. However, there are a number of schemes proposed for Oxford through the Local Transport and Connectivity Plan (LTCP) and the Central Oxfordshire Travel Plan (COTP) which, in combination, should improve air quality by reducing emissions associated with transport. These include: traffic filters, low traffic neighbourhoods (LTNs), and the zero-emission zone (ZEZ). These are likely to bring benefits even without a new local plan as they are being driven via different work-programmes and funding. The Transport background paper 012 explains these programmes in more detail.

4.3 Nationally, transport-related emissions are expected to continue to reduce as transport shifts towards electric vehicles with the phasing out of new petrol/diesel engines (previously this was delayed to 2035, although the current government have pledged to bring this date forward to 2030). Indeed, Oxford is already shifting public transport to electric modes, with the recent delivery of 159 electric buses which will help to shift 69% of the total bus mileage operating in the city to electric. There are likely to remain air quality impacts from brakes/tyres, however, small improvements could also occur in this regard as technologies improve.

4.4 Government proposals to phase out gas boilers in domestic heating, alongside tighter Building Regulations and general improvements in the efficiency of these systems, are also likely to bring improvements in relation to domestic sources of air pollutants in the absence of a new Local Plan, at least for new buildings. The effect of these improvements in reducing the sources of emissions from existing buildings will likely take more time as the retro-fitting of existing stock is a significant challenge. These issues are explored more in the Background paper 008 Carbon Reduction and Climate Resilient Design.

4.5 In terms of efficient use of land, development pressures will continue in the city regardless of a new Local Plan, with high demand for land for housing and commercial

uses in particular; pressure for higher density development; and a continued reliance on previously developed land (which also now has greater emphasis in the 2024 NPPF updates). The absence of an up-to-date Local Plan could potentially increase the pressure for development on greenfield sites within the city boundary, including open spaces which could be used for agricultural land. This could have subsequent implications for degrading soils if unmitigated, including areas of more carbon-rich peat reserves which have not already been lost, as well as the potential to have an adverse impact on the amenity of residents and visitors to the city. With use of previously-developed land, there is also likely to be a continued need to address issues of contaminated land including appropriate remediation where necessary to ensure that people do not come into contact with harmful pollutants.

4.6 In terms of water resources, Oxford is already in an area of water stress, and climate change may exacerbate this. Increased development and associated population growth will also put more pressure on water resources without appropriate mitigations. Thames Water has various plans in place to address water supply and wastewater treatment which will likely have benefits for Oxford. To be most effective, these will also need to be combined with appropriate water efficiency measures in homes and businesses, which a new Local Plan could help to implement for new developments only (not for retrofitting) as is the case with the extant Local Plan 2036. A new Local Plan would also provide infrastructure providers like Thames Water with the best certainty over the location, scale, and type of future development expected to come forward in the city allowing them to better plan for future needs.

4.7 In relation to water quality, Local Plans have varying levels of influence over the different factors negatively impacting the quality of the water environment in the city. Without a new Local Plan, problems associated with urbanisation and sewage discharge could be exacerbated as the current Local Plan policies grow out of date, meanwhile impacts of pollution relating to agriculture, or invasive species in the environment are likely to persist without other types of interventions outside of planning. There are various infrastructure upgrades and improvements that will need to be carried out by Thames Water in order to address existing capacity concerns and meet demands for the future, which will support improvements to the water environment by addressing problems of sewage discharges. Again, having an up-to-date Local Plan can help ensure that there is a clear picture of how future development will come forward in order to help inform those upgrades. Whilst the current Local Plan sets policies that help to mitigate water quality impacts from new development (e.g. SUDs policies), a new Local Plan will help to ensure the right policies are in place up to 2045 in order to mitigate impacts of future growth and complement the upgrades to infrastructure that also need to be put in place.

5. Key issues addressed through the Local Plan

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to impacts on natural resources. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

5.3 The new Local Plan continues the approach of the Local Plan 2036 in addressing different elements of natural resources and environmental quality across a number of policies. Overarching across all the topics discussed in this paper is policy R8 Amenity and Environmental Health impacts of development which covers a wide range of issues that can arise during the construction and operational phases of development. The policy sets out various impacts a development may need to mitigate including various types of pollution such as noise and vibration, light, as well as impacts of odour. This is supported by requirements for construction management plans as set out in policy C6. The Local Plan then also includes several bespoke policies which address particular issues that need more nuanced responses.

Air

5.4 Policy R4 sets out requirements in relation to air quality including requirements for Air Quality Assessments on major developments as well as general requirements with regard to designing to mitigate impacts of poor air quality, particularly on sensitive receptors. Air quality limits of new development are expected to fall in line with the local target for Nitrogen Dioxide (NO2) as set within the Council's Air Quality Action Plan, this is intended to ensure that the standards of development are aligned with the wider strategy for addressing poor air quality in the city. With the shift towards electric vehicles and electric forms of heating in buildings (as opposed to burning fossil fuels), it is expected that accordance with this target should become increasingly manageable over time.

5.5 Additional policy requirements set out elsewhere in the Local Plan, including those related to net zero carbon buildings (Policy R1) which restrict burning of fossil fuels in new development, as well as policies promoting walking/cycling/wheeling in Chapter 7 will also support air quality.

Water

5.6 The Local Plan 2045 includes a new water focussed policy—Policy R5—which addresses both the use of water (water resources) and protection of the water environment in the city (water quality). This is an important policy which responds to various pressures on water in and around the city and requires applicable proposals to submit a water awareness statement as part of their application setting out how the policy's requirements have been met.

5.7 The policy sets requirements that seek to promote prudent use of water including the tighter water use restriction of Building Regulations, as well as more general water saving/efficiency measures. This is important for seeking to mitigate impacts on water resources, which we know from the Council's Water Cycle Study are under pressure now and increasingly so in future due to factors like increased demand from population growth and hotter, drier summers due to climate change.

5.8 Additionally, the policy seeks to protect the water environment from the impacts of new development, seeking to ensure that proposals demonstrate that development will not have an adverse impact on the quality of controlled water bodies and groundwater. The policy works in tandem with a range of policy requirements across the Local Plan, such as:

- Policy G2 encouraging buffers along watercourses which seek to protect and enhance these areas where development happens adjacent to them.
- Policy G6 setting out the protection and mitigations required where development could potentially have an impact on ecological sites including those that are particularly sensitive to impacts on water quality (and/or flows of surface/groundwater and groundwater recharge.
- Policy G8 setting out requirements for multi-functional green Sustainable Drainage Systems (SuDS) which are important for helping to filter contaminants of surface water run off.

Land and soils

5.9 There are two policies in chapter 5 which deal with land and soils, policies R6 and R7. Policy R7 addresses the potential for presence of land contamination. This policy is largely unchanged from the currently adopted policy within the Local Plan 2036, with minor revisions including reference to sustainable remediation practices. It seeks to ensure applications are accompanied by appropriate investigation of land contamination where it could be present and that remediation efforts are put in place where necessary to ensure it is made safe.

5.10 Another new policy for the Local Plan, first proposed as part of the withdrawn Local Plan 2040, is Policy R6 which addresses soils and peat reserves. The purpose of these requirements are to help mitigate impacts on soils, which are a resource which takes a very long time to replenish, but one that can be impacted in various ways through development (e.g. compaction from heavy equipment during construction, sealing off by overuse of artificial surfaces etc). General requirements are included which encourage more sustainable use of soils, and whilst these will be more relevant on greenfield sites, it is important that they are considered in any development which affects soil where this could be a risk as these are important resources.

5.11 Additionally, the policy also includes requirements for preserving remaining peat reserves in the city, of which there are several recorded reserves in Oxford. Previous engagement with Natural England on mapping of peat across the UK has identified that existing mapping can be patchy and subject to some uncertainty. Indeed, the new national peat map published by Natural England in 2025 does not appear to currently identify any of the previously recorded deposits in the city on Natural England's old mapping or that appear on British Geological Survey records, although the guidance associated with this new mapping indicates it is subject to some uncertainties based on how deposits have been modelled. As such, the historic mapping has been utilised as the basis of the policies map layer as the Council is fairly confidend that this acts as a good indicator for significant existing deposits in the city based on existing knowledge of ground conditions in the city.

5.12 To accommodate for uncertainties in existing mapping, the policy also includes a requirement for investigations within 200m of the previously recorded reserves identified on the policies map if proposing development on undeveloped land. This requirement is considered to be a pragmatic solution so that the development process is informed by a sound understanding of below ground conditions in areas with a higher likelihood of deposits being found. It will also help to ensure that the Council is provided with sufficient information to make a determination about impact of proposals on other peat deposits in the city when applications come forward.

Appendix A – Regulation 18 Policy options sets

Policy options set 009a (draft policy R4): Air quality assessments and standards

Whilst air quality is improving in the city, it is important that new development is designed with appropriate consideration for existing pollutant exposure in area, potential impacts on users of the development (including sensitive users), and also the potential for the new development to exacerbate existing issues. Whilst the key pollutant of concern in the city to date has been Nitrogen Dioxide, there are a range of other pollutants which have impacts on people's health that need to be considered, including particulate matter. These various pollutants can have a range of sources including transport, boilers, manufacturing and construction processes. The city's Air Quality Action Plan (currently being updated), includes local targets for air quality that are more stringent than national targets and it is important that new development is aligned with this.

The policy options set out include requirements for undertaking air quality assessments and demonstrating that proposals have considered the range of pollutant sources during operation but also construction and that any significant impacts on air quality are mitigated. There is also an option for requiring new development to align with the city's locally set air quality targets as outlined in the latest Air Quality Action Plan. There is also an alternative option of having no locally set policy on air quality.

Table 1: Policy options set 009a: Air quality assessments and standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require Air Quality Assessments (AQAs) for all major developments, and any other development considered to have a potentially significant impact on air quality. The AQA must consider all the different sources of air pollution during operational and construction phases (including but not	Improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality across Oxford is key to safeguarding public health and the environment. The whole of the city was declared an AQMA in September 2010. A policy in the Oxford Local Plan can influence and seek improvements in air quality at both a local and strategic level. For example, the	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

limited to: transport, heating, dust generated from construction activities, etc). Any resultant significant impacts on air quality inside an AQMA must be mitigated.	encouragement of active travel options reduces dependence upon use of private cars, the majority of which are currently non-electric vehicles (EVs). The Air Quality Action Plan (AQAP) has been produced as part of the City Council's statutory duties and it outlines actions to be taken to improve air quality in Oxford 2021-2025. Key objective is to bring NO2 emissions into legal compliance as soon as possible and to go beyond legal compliance.	
Option b Require all new major developments within the city's AQMA to comply with the locally-set, more stringent, air quality standard for Nitrogen Dioxide (NO2) set out in the city's latest air quality action plan (AQAP) (currently a target of 30µg/m3) as well as compliance with current national air quality objectives (unless superseded by local standards).	This target would set an ambitious standard for accepted Nitrogen Dioxide emissions from all new development in recognition of the rigorous target the City Council has set locally within its Air Quality Action Plan (AQAP). The standard would potentially become more challenging if the AQAP is updated with tighter standards in future. The target is currently 10ug/m3 lower than the UK's current annual mean limit value for this pollutant.	A more stringent target will set a higher standard for new development in the city which could be considered more onerous for applicants. This is an additional standard to the requirements that developments currently follow in the current local plan.
Option c Do not include a policy about air quality assessments but rely on other regulatory regimes.	None identified	This option is not considered to be reasonable due to the poor air quality across the city, and the whole city already covered by an AQMA. Relying upon national legislation ignores the Oxford context and the city's ambition to go beyond national targets.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or a+b, or c **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale: These options are about whether to set local policies about air quality (options a and b) or to rely on national policy and regulatory regimes (option c). The whole of Oxford is covered by an Air Quality Management Area (AQMA) so air quality is a sustainability issue of particular relevance to Oxford. Historically there have additionally been air quality 'hotspot' areas identified, where pollutant levels were of even greater concern than the rest of the city, although in recent years the levels at the majority of these hotspots have now reduced significantly as a result of various measures to improve air quality (as set out in the Oxford Air Quality Action Plan), such that they no longer warrant bespoke policy measures for those areas. The AQAP sets more stringent targets for air quality than national targets, and as the monitoring in the AQAP report sets out, those more ambitious targets are being met in recent years, so it would a reasonable approach for LP2042 to continue to set ambitious targets to tackle the issue of air quality.

In terms of sustainability impacts, options a and b could potentially help to meet **criterion 8 reduce traffic and associated air pollution**, because although the options aren't about traffic, they encourage consideration of air pollution and as emissions from transport are one of the biggest contributors in Oxford then any AQA would need to consider the operational impacts which would include transport (as well as other sources of air pollutants). This is partly however subject to implementation. Option b is likely to have the greatest positive impact because that sets stringent targets whereas option a only requires consideration of air quality but does not set targets. Option c would be neutral because it does not go beyond the national policy baseline and sets no targets, however emissions from transport are likely to continue to reduce under this scenario as the national transition away from fossil fuel transport and heating sources continues. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

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Air quality assessments and standards – Draft policy R4

The preferred approach for the Local Plan policy is to have a local policy that addresses air quality so as to ensure that impacts on health, particularly for the most sensitive groups, are fully considered and that progress on improving the city's air quality continues. This recognises that this issue is an important one locally, as well as a particular objective to be addressed by the new Local Plan, and responds to the ongoing AQMA designation which covers the entire city.

This means a combination of **options A and B**, with option A helping to ensure that new development fully considers the issues of relevance in relation to existing air quality issues in the area, but also how a proposal could be impacted by this or could impact upon it via submission of an Air Quality Assessment. Option B will also help to ensure that new development is designed in a way that is aligned with the city's local objectives for addressing air quality, including aligning with the local air

quality targets which are tighter than national targets in relation to Nitrogen Dioxide (for which past exceedances are the reason for which the city's AQMA designation is in place).

Policy options set 009b (draft policy R5): Water quality and resources

The city is subject to various issues impacting the water environment. Oxford is in an area of water stress and this stress is likely to increase due to climate change, meaning that it is imperative that new development uses water prudently and minimises waste. Equally, watercourses around the city are subject to pollution from various sources which impact on their ecological status, some of which is associated with the development process (e.g. urbanisation increasing pollutant run off; pressures on wastewater systems leading to sewage discharges). Whilst the Local Plan cannot fully protect or mitigate all of the ongoing challenges facing the water environment (which is subject to actions carried out by stakeholders across the wider catchment), it can help to ensure that the impacts from new development are fully considered and appropriately mitigated.

Various design choices can help to address pressures on the water environment, from the way services and water fittings are implemented within buildings, to the way that green infrastructure and sustainable drainage systems are incorporated in areas around buildings. As such, one option would be to ensure that considerations affecting water are spread throughout relevant policies of the Local Plan to ensure a wholistic approach to assessing new development. Alternatively, because issues impacting the water environment are so pronounced, and subject to increasing concern, it may be more appropriate to include a bespoke policy addressing these requirements, though there may be some repetition/crossover with other policy areas. The options also include requirements for separating foul and surface water in when designing drainage for new sites, to reduce pressure on the sewage system.

Table 2: Policy options set 009b: Water quality and resources

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a bespoke policy on water resources and water quality. This would include various requirements such as	Ensures that water quality is addressed separately in any development. Having a bespoke policy is a clearer way of presenting the various requirements for water use and water quality for applicants and also decision	This could result in unnecessary repetition in the Local Plan and additional information being prepared for a proposal that would have already been undertaken as part of the SuDs design, and would have already been considered in assessing any potential impacts of the proposal on water quality.

requiring measures to limit water use and conserve water, including meeting the tighter Building Regs water use limits. Also, measures to mitigate impacts on water quality, such as use of Sustainable Drainage Systems (SuDs).	makers, and transparently demonstrating compliance with Water Framework Directive requirements.	
Option b Do not have a bespoke policy but instead incorporate water resources/ quality considerations into other policies about managing the impacts of development.	This approach ensures that water quality is addressed through approaches such as: ensuring water use is limited to certain standards in new development through resilient design and construction; the use of SUDs in development; and the provision of evidence in any planning application submitted which demonstrates that there would not be a negative impact on water quality.	Previous feedback on the Local Plan 2040 from the Environment Agency flagged concerns about this approach including that there was potential for it to result in elements of water quality being overlooked. It is also potentially a more complicated way of presenting the policy position rather than having a bespoke policy.
Option c Expect that foul water is separated from surface water drainage on development sites. Require a Foul and Surface Water Drainage Strategy for all new build residential development and non-residential development above a certain threshold.	Would ensure that appropriate consideration is given to foul water drainage and how this is handled on site regarding sewer system. Would ensure that design of foul water drainage is appropriately informed by strategy on larger developments.	Additional requirements placed upon developers in order to achieve planning permission.

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Option d Do not include any policy direction about water quality but rely on other regulatory regimes and national policy.	The NPPF includes high level guidance about water quality and drainage (paragraph 182).	Would not address Environment Agency concerns raised at LP2040.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a or b or d (they are alternatives) or combination with option c **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** These options are about whether to set local policy requirements about water quality (options a or b) or to rely on national policy and regulatory regimes (option d). Option c would require additional information to be submitted in relation to foul and surface water drainage which is important for reducing impacts on sewer network. Options a, b and c would score positively for **criterion 9 water quality targets**, but option a would set out the requirements in a single policy whereas in option b the issue of water quality would be woven into other relevant policies through the plan (the requirements themselves are not expected to differ, the choice is principally in how they are presented). Option d will be neutral in some respects because there are regulatory regimes that should prevent deterioration of water quality in various ways, alongside Thames Water's own responsibilities for addressing this challenge, however, there could potentially be some negative impacts where national standards are not considered enough, particularly in light of known challenges with water quality in the city and this makes this option unlikely to be reasonable to take forward. Overall, it is considered that the sustainability impacts from the options do not differ significantly enough to warrant them being scoped in for further detailed appraisal.

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Water quality and resources – Draft policy R5

6.7 Again, the preferred approach for the Local Plan policy is to have a local policy that addresses the issues of water resources and water quality. Whilst the local plan will not be able to fully address the various stressors on the water environment which arise from various sources such as climate change, pollution from land use management like some agricultural practices, as well as the actions of stakeholders beyond the city, it can still help to ensure the impacts from new

development are appropriately considered and mitigated. Previous feedback on the Local Plan 2040, which proposed addressing water issues across various policies instead of one policy, suggested that stakeholders such as the Environment Agency wanted to see a bespoke policy which would provide more clarity and better signpost this as a key issue facing the city.

6.8 As such, the preferred approach is a combination of **Options A and C. Option A** will mean setting out a policy with various requirements for how development should address conserving water, including that they follow the optional tighter standard for water use limits, as well as incorporating other water saving measures. It also means including requirements for how water quality should be preserved, which would have overlap with other policies in the plan such as use of sustainable drainage measures. The preferred approach would also include **option C** which is to ask applicants to ensure foul water is separated from surface water in drainage systems, which can help reduce the strain on wastewater systems, and, on larger developments, go further and ensure their application is supported by a foul and surface water drainage strategy which can fully set out how these issues have been considered.

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Policy options set 009c (draft policy R6): Soil quality

Earlier sections of the background paper identify that construction practices and inappropriate design of new development can have harmful impacts for soils, of which Oxford has varying quality. Soils are important for providing a range of benefits, from supporting green infrastructure and habitats, to flood storage and locking up carbon. In particular, Oxford has several areas of particularly valuable peat deposits, which are especially important carbon sinks as well as sources of archaeological deposits. Whilst existing mapping identifies several recorded deposits, there is potential for additional areas of deposits in undeveloped land nearby which have not been officially recorded.

The options set includes an option for setting out requirements to ensure new development considers its impact on soils, regardless of their quality, and seeks to adapt design and construction practices to help ensure sustainable management of soils and mitigate harmful impacts. In addition, there is an option for having additional requirements in relation to protecting peat reserves because of their particular range of benefits they provide, which would focus on the known peat deposits, but could also incorporate requirements for investigating and addressing potential undiscovered deposits nearby.

Table 3: Policy options set 009c: Soil quality

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out requirements/principles for conserving and enhancing soils.	Construction practices, including use of heavy machinery, below ground construction and reworking of soil layers can have detrimental impacts on long-term health of soils. Incorporating standards within policy to guide design and construction would help to ensure the least impactful practices are followed wherever possible to avoid and mitigate impacts. Preserving soil health could help to secure multiple benefits in the long term, including for biodiversity, flood risk (improved flood storage) and climate change (healthier soils can better lock up carbon).	Different sites and types of proposed development will result in a variety of considerations and different solutions that will be needed. Unlikely to be a one-size-fits-all solution that a policy could guide applicants towards. Asking applicants to tailor construction processes to avoiding impacting soil quality e.g. through avoiding loss, erosion, compacting soils with heavy machinery is likely to impose additional challenges for design and construction and potentially incur additional cost and resource.
Option b Set out additional standards for the protection of peat reserves including no loss/dewatering of these reserves.	This approach would help to ensure that some of the most valuable types of substrate, not only for locking up carbon, but also archaeological remains, are preserved where they still remain. This is particularly important as peat deposits take a significant period of time to develop. The most pragmatic approach would be to focus this policy requirement on the known areas of recorded peat deposits in the city according to public mapping from Natural England with a precautionary buffer area, whilst treating the surrounding areas with an element of caution, focusing requirements for additional investigation only to proposals on undeveloped sites in the vicinity.	Known, publicly accessible mapping of peat reserves that applicants could rely upon is potentially patchy. Whilst it seems most appropriate to focus requirements for additional investigation to areas within or around recorded deposits, the approach could potentially miss out on unknown deposits located more widely across the city. Requirements for additional investigations within the buffer zones to known reserves will incur additional cost and resource from applicants, though this could be reduced by focusing on undeveloped land where potential for underlying peat is potentially higher.
Option c	None identified	National policy is fairly limited in guidance for conserving soils and peat so a lack of local policy may

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No additional policy for addressing soil quality or protection of peat.		lead to further deterioration and loss of peat (which is effectively irreplaceable).

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option A, B, A+B, or C **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The options represent varying levels of protection that local plan policy could provide for soils, with option a setting out general requirement and guidance, and option b setting out additional protections for peat reserves (which could theoretically be standalone or in combination with option a). Option c would mean setting no local policy. The sustainability impacts relate most directly to **SA criterion 3. Efficient Use of Land** with option a and b representing minor significant impacts for protecting soils. Admittedly, the additional protections for peat could have negative impacts for the same criterion at the site scale in a select number of locations in the city where development capacities of sites in proximity to peat reserves could be limited by their additional protection (although these circumstances are expected to be quite limited). Option b would also represent an additional indirect positive impact for **criterion 1. Carbon Emissions** because it would help to ensure that the most carbon-rich reserves recorded in the city (peat reserves are typically significant carbon sinks) would be protected from further loss arising from the development process – although these resources are not factored into the city's specific net zero target roadmap. Option c is likely to be a minor negative impact for criterion 3. in relation to soil quality because there is little specific guidance in national policy alone that development would need to follow, thus without local guidance development has a far greater likelihood of coming forward in ways that degrade soils. The same is likely true for criterion 1. although the impact of option c may be closer to neutral in this regard as peat reserves in the city do tend to occur near to waterbodies or within areas of green space that mean they may benefit from additional protections that could mitigate some of the harm, although these are not specific to conserving below ground deposits like peat. Overall, the sustainability impacts are unlikely to be significant or to differ much between the options and screening in for detailed appraisal is not considered necessary.

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Soil quality – Draft policy R6

6.11 To ensure impacts on soils are fully considered and opportunities for sustainable soil measures incorporated, the preferred approach is to follow **Option A and B** and include a local policy on soil quality. **Option A** will allow the Council to set

out various principles which applicants will need to follow, depending on the context of the site. This should help to ensure that future development mitigates impacts on soils as much as possible and ensure the issue of soil quality has greater prominence than in the current Local Plan.

6.12 In addition, **Option B** would help to respond to concerns flagged about the Local Plan needing to protect remaining peat reserves in the city as part of the previous Local Plan 2040 preparation and would recognise the particularly important role these deposits serve as carbon sinks and sources of archaeology which will be hard to replace if lost. It is acknowledged that mapping of peat reserves in the city is subject to some uncertainty, however, the focus on the recorded reserves according to publically accessible Natural England mapping would be bolstered by a buffer zone that seeks to ensure proposals nearby sufficiently investigate potential for peat on their sites and respond accordingly.

Policy options set 009d (draft policy R7): Contaminated land

Many of Oxfords past major industrial sites have been subject to remediation to address potential land contamination in the past, however, there is potential for additional contamination on smaller sites across the city due to Oxford's long history of settlement. Whilst national policy already sets various requirements for developers to address contamination, there is the option to set out specific local policy expectations for ensuring that potential contamination investigated and appropriately mitigated, with the alternative option being not to include a local policy at all.

Table 4: Policy options set 009d: Contaminated land

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy 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.	This would be a continuation of the existing policy (currently set out in policy RE9). This approach ensures that there will be no threat to the health of future users or occupiers and no adverse environmental impacts.	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

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Option b Do not include a policy about land quality but rely on national planning policy and other regulatory regimes.	NPPF includes general policies about ground conditions and pollution and remediation.	This option is not considered to be optimal as the relatively large proportion of brownfield sites in Oxford means that there are more sites with potentially contaminated land than in other areas.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option a or b (they are alternatives) **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The options presented are either to have a local policy that requires applicants to demonstrate they have sufficiently investigated potential for land contamination where relevant (and carried out sufficient remediation) or not to have a local policy. In terms of sustainability impacts, the options relate most directly to SA **criterion 3. efficient use of land** and would also indirectly impact upon **5. Inequalities** (in relation to impacts on health). Option a would likely have a minor positive impact for criterion 3. in that it would allow for the efficient reuse of brownfield land through ensuring the previous contamination is investigated and remediated, ensuring this land can be brought back into use. It would have neutral or slight positive impacts for criterion 5. in that it would help ensure any harm to future occupiers' health is avoided, though the sites may not have been suitable for redevelopment at all without appropriate action to address any existing contamination too. Option B is likely to have a neutral impact across the criteria, as there is at least national policy guidance about addressing contamination, as well as other environmental quality legislation. The options are not considered to have significant sustainability impacts to warrant further detailed sustainability appraisal.

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Contaminated land – Draft policy R7

6.14 Whilst national policy is already fairly strong on requirements for considering contaminated land, the preferred approach is to follow **Option A** and set out a local policy for addressing contaminated land. This would allow the Local Plan to clearly set out the specific local context of contamination in Oxford and provide applicants with a steer on the Council's expectations for how potentially contaminated sites are investigated and remediated.

Policy options set 009e (draft policy R8): Amenity and environmental health impacts of development

The constrained nature of the city means that development is often coming forward in close proximity to existing uses with various amenity implications where design has not considered this existing context. New development can have various impacts either as part of the construction process, or once in operation, particularly in relation to noise, dust and vibration, but also in other respects, such as glare, emission of pollutants and other forms of nuisance. These impacts can affect not only people but also the wider environment. Equally, the operation of existing uses nearby can impact upon users of a new development if a proposal is brought forward without due consideration. These existing uses may mean appropriate mitigation needs to be incorporated as part of the new development to ensure a reasonable and healthy environment for new occupants.

Some of these considerations, particularly those arising from the construction process and transport movements, will be factored into the production of construction management plans which would be required elsewhere in the Local Plan (discussed more in background paper 012/ draft policy C6). However, an option has also been considered for a broader amenity policy that could address these issues as a whole, alongside an option not to include a local policy.

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Table 5: Policy options set 009e: Amenity and environmental health impacts of development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc. Continue to require that impacts of developments must be mitigated to ensure that the amenity of communities, occupiers	This approach ensures that any potential threat to the residents, future occupants and existing communities from the development are assessed and mitigated appropriately. This is not a prescriptive policy but one that ensures that the impacts of development are comprehensively considered and mitigated where applicable. This option should provide greater protection to the health and wellbeing of the population.	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

and residents are protected.		
Option b Do not include a policy but rely on national planning policy and other regulatory regimes.	Relying on regulatory regime would be familiar to developers and not unreasonable burden.	Regulatory regimes may provide the minimum standards of protection, however, having a local policy helps to ensure the impacts of development are properly considered and assessed in the local context of Oxford.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option a or b (they are alternatives) **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** One option is to include local policy that sets standards for protecting amenity and environmental health from the impacts of new development, and the other is to not include a local policy. The nature of this policy option set is that it is likely to impact upon a range of SA criteria such as **8. traffic and associated air pollution, 9. Water Quality, and 5. Inequalities** (the health element of this), due to the broad range of considerations it addresses. However, as it is focussed on ensuring mitigation to avoid negative impacts from new development this is likely to result in neutral impacts overall for these criteria. Option b would potentially therefore result in minor negatives for the same criteria, where development could come forward and cause amenity/environmental health consequences, however, this impact is mitigated by the presence of various other types of environmental health legislation and national requirements that could reduce these negatives, although it is less likely these would align with local objectives. Overall, the sustainability impacts of the options are not significant or different enough from each other to warrant further detailed appraisal.

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Amenity and environmental health impacts of development – Draft policy R8

6.17 Again, the preferred approach for the Local Plan is following **Option A** to include a local policy on amenity and environmental health impacts of development. This recognises that the nature of the many constrained sites in the city means

that applicants need to consider a variety of impacts from their development on the surrounding area and vice versa and allows the Council to set out the key issues it wants to see applicants address.

6.18 The local policy can help ensure issues like noise, dust and vibration are considered as well as other impacts, to ensure that amenity for occupiers and neighbours as well as impacts on wider environment are sufficiently mitigated, although not all issues will be relevant to all applications. There is likely to be some crossover with other policies, such as the requirements for Construction Management Plans, however this policy would address broader issues like the impacts arising from the development once in operation too (not just the construction stages). Without a local policy, some of these considerations risk being missed, or not being sufficiently addressed upon submission of an application, potentially delaying the decision process.

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Background paper 010

Title: Health and Wellbeing

This paper addresses: Regeneration, geographical spread of new development, accessibility of areas of deprivation, availability of green space in areas of deprivation and availability of essential services/facilities in areas of deprivation.
Relevant Local Plan Objectives: • Provide access to affordable, high-quality and suitable accommodation for all. • Curate a built environment that supports and enables people to be physically and mentally healthy.
SA Objective(s): 5. To reduce poverty, social exclusion, and health **inequalities**.
SEA theme(s): Human health, population, material assets.

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1. Introduction

1.1 The causes of poor health and wellbeing do not arise by chance and cannot be explained by genetics alone. It is now recognised that the built environment can have a significant impact on health and health inequality. The way that areas are designed and constructed can have a tangible impact on many of the wider determinants on health and wellbeing, such as peoples' activities, communities, economies and lifestyles.

1.2 Furthermore, health is not consistent across the population and stark inequalities often exist across population groups, even over small areas. Health and wellbeing are strongly correlated with levels of socio-economic deprivation, for example, with those living in the most deprived areas typically facing worse health inequalities compared to those living in less deprived areas.

1.3 As such, there are many indicators of health and wellbeing which can be influenced by planning. This paper highlights a range of physical and mental wellbeing indicators, which together begin to build a general overview of the health of Oxford's population.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

2.1 The **National Planning Policy Framework (NPPF)** updated in December 2024 is explicit in its support for healthy place shaping. It states in paragraph 96 that:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and
c) *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

2.2 The NPPF further seeks to promote healthy lifestyles and wellbeing with requirements that have implications for placemaking, including restrictions on the location of hot food takeaways (paragraph 97), positive planning for the provision of shared spaces and community facilities, avoiding the unnecessary loss of such facilities, and ensuring an integrated approach to considering the location of housing, economic uses and community facilities (paragraph 98).

2.3 **Planning Practice Guidance (PPG)** sets out that plan-making bodies will need to discuss emerging strategies early with bodies such as NHS England and local clinical commissioning groups, while maintaining an awareness of the potential impacts of development on health infrastructure.

National guidance documents

2.4 NHS England Long Term Plan (Jan 2019) aims to ensure that the nation's future health is given high regard when planning and designing places. "*Wider action on prevention will help people stay healthy and also moderate demand on the NHS. Action by the NHS is a complement to – not a substitute for – the important role of individuals, communities, government, and businesses in shaping the health of the nation*". Lessons have already been learned from healthy new town demonstrator sites around the UK and principles for

healthy place making have been incorporated into the NHS 'Putting Health into Place' guidance.

The Marmot Report and 2020 update

2.5 The Marmot report of 2010 "Fair Society, Healthy Lives" stated that there must be prioritisation of policies that both reduce health inequalities and mitigate climate change by improving active travel, the availability of good quality open and free spaces, the food environment in local areas and energy efficiency of housing across the social gradient. It also suggested that planning, transport, housing, environmental and health systems should be fully integrated to address the social determinants of health in each locality.

2.6 Ten years on from that review, an update published in 2020 by the Institute of Health Equity, highlighted various negative observations on health equity across England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health. It highlighted that the original recommendations made in 2010 are still relevant, and increasingly so, in many cases.

Marmot Places

2.7 The Institute has promoted the concept of 'Marmot Places', which are areas where local authorities and policy makers recognise that health inequalities are largely shaped by the social determinants of health and pursue policies and interventions that aim to improve health equity. Such interventions are based on the 8 Marmot Principles, and there is a commitment by such places to improve health equity over the short, medium and long term by:

1. Developing and delivering approaches, interventions and policies to improve health equity.
2. Strengthening their health equity systems.
3. Involving communities in the identification of the drivers of poor health and in the design and implementation of actions to reduce them.
4. Broadening advocacy on health equity and engaging with other Marmot Places to share knowledge, roll out best practice alongside partners in local regions and nationally.

Regional supporting strategies

2.8 The **Oxfordshire Joint Health and Wellbeing Strategy (2024-2030)** sets out how the NHS, Local Government and Healthwatch will work together as the Oxfordshire Health and Wellbeing Board, to improve health and wellbeing in Oxfordshire. The vision of this strategy is:

"To work together in supporting and maintaining excellent health and well-being for all the residents of Oxfordshire"

2.9 To achieve this vision, the Health and Wellbeing Board propose to focus on:

- *Agreeing a coordinated approach to prevention and healthy place-shaping.*
- *Improving the resident's journey through the health and social care system (as set out in the Care Quality Commission action plan).*
- *Agreeing an approach to working with the public so as to re-shape and transform services locality by locality.*
- *Agreeing plans to tackle critical workforce shortages.*

2.10 Cutting across all of these priorities is a commitment to shift the focus to the prevention of ill health, reducing the need for treatment and care whilst also tackling health inequalities.

2.11 **Oxfordshire Local Industrial Strategy (July 2019):** Oxfordshire's LIS Vision Statement aims to position Oxfordshire as one of the top three global innovation ecosystems by 2040, building on the region's world leading science and technology clusters to be a pioneer for the UK in emerging transformative technologies and sectors. The LIS recognises the importance of planning for the health and well-being of communities and integrating the concept of healthy place shaping in developing communities. It also recognises the importance of 'inclusive growth' to ensure that the benefits of economic growth are felt by those in more deprived communities, thereby addressing the problem of income inequality that is a key cause of health inequalities.

Local Transport Connectivity Plan 2022-2050 (LTCP5)

2.12 The LTCP5 was published in July 2022 and follows on from the previous **Local Transport Plan 2015-2031 (LTP4).** The vision is of a net zero travel system for the county that protects the environment and makes for a better quality of life for communities that live there. The objectives of the strategies are to reduce the need to travel, reducing reliance on individual private car use and promoting alternative modes such as walking, cycling and public or shared transport as natural first choices.

2.13 There is a greater emphasis on promoting a 'decarbonised' transport network, air quality and productivity on a sustainable basis, which includes highlighting role of digital infrastructure in enhancing connectivity and reducing the need to travel.

2.14 There are direct implications on public health and wellbeing, and the policies specifically focus on healthy place-shaping. The creation of liveable neighbourhoods, that are made up of communities where social connections are easy and local amenities and services are readily accessible, and where active travel (walking, cycling) is a viable option and car journeys are minimized. There is a greater ready availability of public or shared transport, and an environment that incentivizes active travel. The promotion of a net zero or 'decarbonised' transport network can also have impacts in terms of air quality.

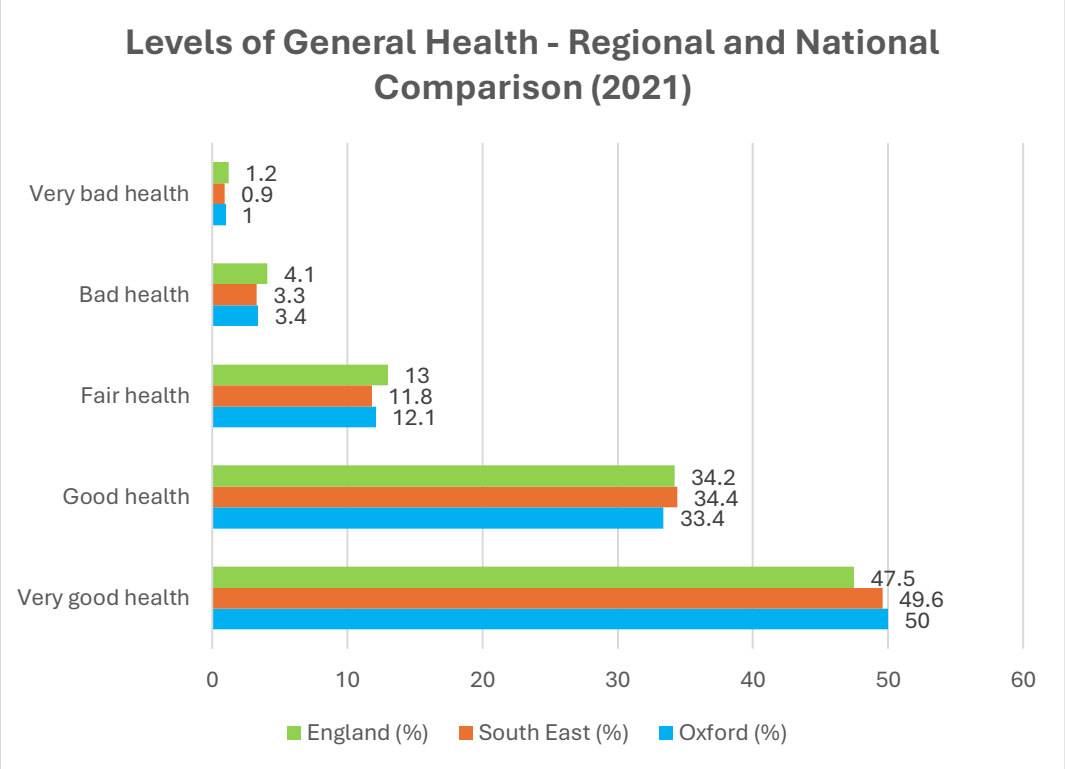
2.15 **The Joint Strategic Needs Assessment Annual Summary Report 2023:** The Joint Strategic Needs Assessment (JSNA) monitors trends in the health and wellbeing of Oxfordshire's population and assesses changing patterns of need and demand for services across the county. Much of the data set out in this paper is taken from this report.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Levels of General health

3.1 In 2021, 50% of Oxford residents described their health as “very good”, increasing from 48.3% in 2011. Those describing their health as “good” fell from 33.8% to 33.4%. the proportion of Oxford residents describing their health as “very bad” was 1.0% (similar to 2011), while those describing their health as “bad fell from 3.9% to 3.4%.

3.2 Figure 3.1 shows a higher percentage of people in Oxfordshire report good or very good health than in the South East or in England. Oxford has a higher level of people reporting good or very good health than the national and regional average, but at a lower level than the last reporting in 2021. Compared across the county, Oxford has a lower level than West and South Oxfordshire districts.



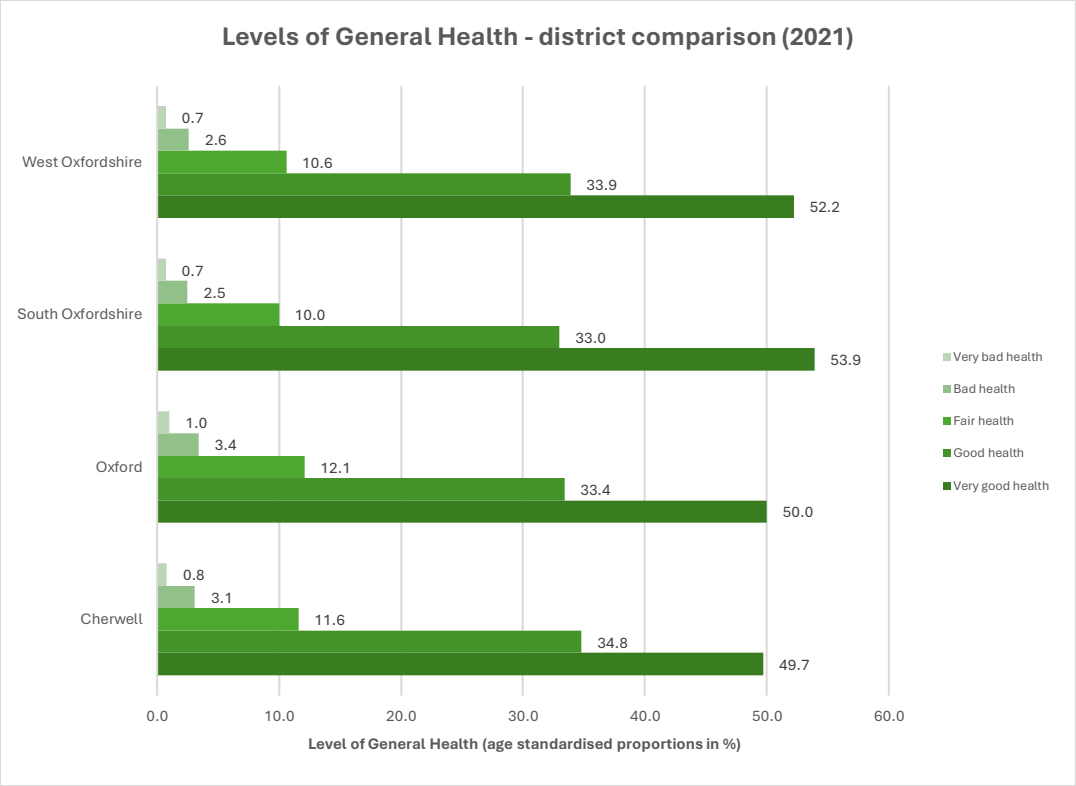


Figure 3.1 - Level of reported health – regional, national, and district comparison (Census 2021)

3.3 Figure 3.2 shows a range of health indicators and how Oxford compared to the benchmark of South East England and England. For several indicators, Oxford performs better than the benchmark, for example for life expectancy at birth (female), percentage of physically active adults, and Year 6: prevalence of obesity (including severe obesity).

Indicator	Period	Oxford			Oxon	England	England		England	
		Recent Trend	Count	Value	Value	Value	Worst		Range	Best
Life expectancy and causes of death										
Life expectancy at birth (Male, 3 year range)	2021 - 23	–	-	80.4	81.3	79.1	73.1			83.4
Life expectancy at birth (Male, 1 year range)	2023	–	-	80.6	81.6	79.3	73.4			83.2
Life expectancy at birth (Female, 3 year range)	2021 - 23	–	-	83.9	84.9	83.1	78.9			86.5
Life expectancy at birth (Female, 1 year range)	2023	–	-	83.4	84.5	83.2	78.2			86.8
Under 75 mortality rate from all causes New data	2024	→	322	312.3	250.8	329.4	563.5			191.9
Under 75 mortality rate from cardiovascular disease	2024	→	67	68.4	51.4	74.3	138.9			33.8
Under 75 mortality rate from cancer	2024	→	111	108.0	102.1	117.9	169.0			74.6
Suicide rate	2022 - 24	–	38	9.4	9.4	10.9	20.6			4.6
Injuries and ill health										
Killed and seriously injured casualties on England's roads	2024	–	-	-	67.0*	89.8*	-		*Insufficient number of values for a spine chart*	-
Emergency Hospital Admissions for Intentional Self-Harm	2023/24	↓	210	100.6	97.3	117.0	342.5			36.1
Hip fractures in people aged 65 and over	2023/24	→	120	560	519	547	849			120
Percentage of cancers diagnosed at stages 1 and 2	2022	→	245	59.3%	60.2%	56.8%	48.0%			66.8%
Estimated diabetes diagnosis rate	2018	–	-	66.8%	67.2%	78.0%	54.3%			98.7%
Estimated dementia diagnosis rate (aged 65 and older) > 66.7% (significantly) similar to 66.7% < 66.7% (significantly)	2025	→	1,152	64.7	63.0*	65.6	45.3			94.2
Behavioural risk factors										
Admission episodes for alcohol-specific conditions (under 18 years)	2021/22 - 23/24	–	15	17.3	18.3	22.6	75.2			3.8
Admission episodes for alcohol-related conditions (Narrow)	2023/24	→	574	445	414	504	890			240
Smoking Prevalence in adults (aged 18 and over) - current smokers (APS) New data	2024	–	-	9.9%	7.5%	10.4%	20.8%			2.4%
Percentage of physically active adults	2023/24	–	-	73.4%	73.9%	67.4%	48.9%			81.1%
Overweight (including obesity) prevalence in adults, (using adjusted self-reported height and weight) (18+ yrs)	2023/24	–	-	49.6%	58.6%	64.5%	77.2%			42.6%
Child health										
Under 18s conception rate	2022	→	17	6.0*	9.2	13.9	34.4			4.2
Smoking status at time of delivery	2024/25	→	59	5.5%*	5.5%*	6.1%	13.2%			2.2%
Infant mortality rate	2022 - 24	–	16	3.7*	2.4	4.2	8.7			1.2
Year 6 prevalence of obesity (including severe obesity) (10-11 yrs)	2024/25	–	250	19.0%	17.8%	22.2%	30.7%			9.7%
Deprivation score (IMD 2019)	2019	–	-	16.7	11.7	21.7	45.0			5.5
Inequalities										
Smoking prevalence in adults in routine and manual occupations (aged 18 to 64) - current smokers (APS) New data	2023	–	-	*	15.3%	19.5%	54.8%			2.4%
Inequality in life expectancy at birth (Male)	2021 - 23	–	-	9.6*	5.4*	10.5*	17.2			0.5
Inequality in life expectancy at birth (Female)	2021 - 23	–	-	8.5*	4.8*	8.3*	14.9			0.3
Children in relative low income families (under 16s)	2023/24	↑	4,189	16.7%	11.7%	22.1%	44.6%			5.6%
Wider determinants of health										
Children in absolute low income families (under 16s)	2023/24	↑	3,562	14.2%	9.8%	19.1%	40.7%			4.7%
Average Attainment 8 score	2023/24	–	-	46.4	46.4	45.9	36.1			58.3
Percentage of people in employment	2024/25	→	79,200	73.5%	82.4%	75.7%	61.0%			88.1%
Homelessness: households owed a duty under the Homelessness Reduction Act	2023/24	→	792	15.1	9.6*	13.4	30.6			2.9
Violent crime - hospital admissions for violence (including sexual violence)	2021/22 - 23/24	–	130	23.2	15.6	34.2	170.5			6.3
Winter mortality index	Aug 2021 - Jul 2022	→	20	7.5%	12.6%	8.1%	30.1%			-11.5%
Health protection										
New STI diagnoses (excluding chlamydia aged 24 years and under) per 100,000	2024	↑	1,001	606	358	482	2,903			126
TB incidence (three year average)	2022 - 24	–	76	15.4	7.2	8.5	42.1			0.7

Figure 3.2 Health indicators, Oxford compared to benchmark of Oxfordshire and England (Department of Health and Social Care, 2023)

Active Travel

3.4 The latest Sport England data (November 2023-24) shows that the South East of England Region had a lower proportion of adults (33%) participating in active travel (at least twice in the last 28 days) compared to Oxford City (56%)

3.5 There has been a rise in active travel in all districts since November 2020-21. However, active travel remains lower than before the coronavirus pandemic which may be due to changes in active travel because of home working.

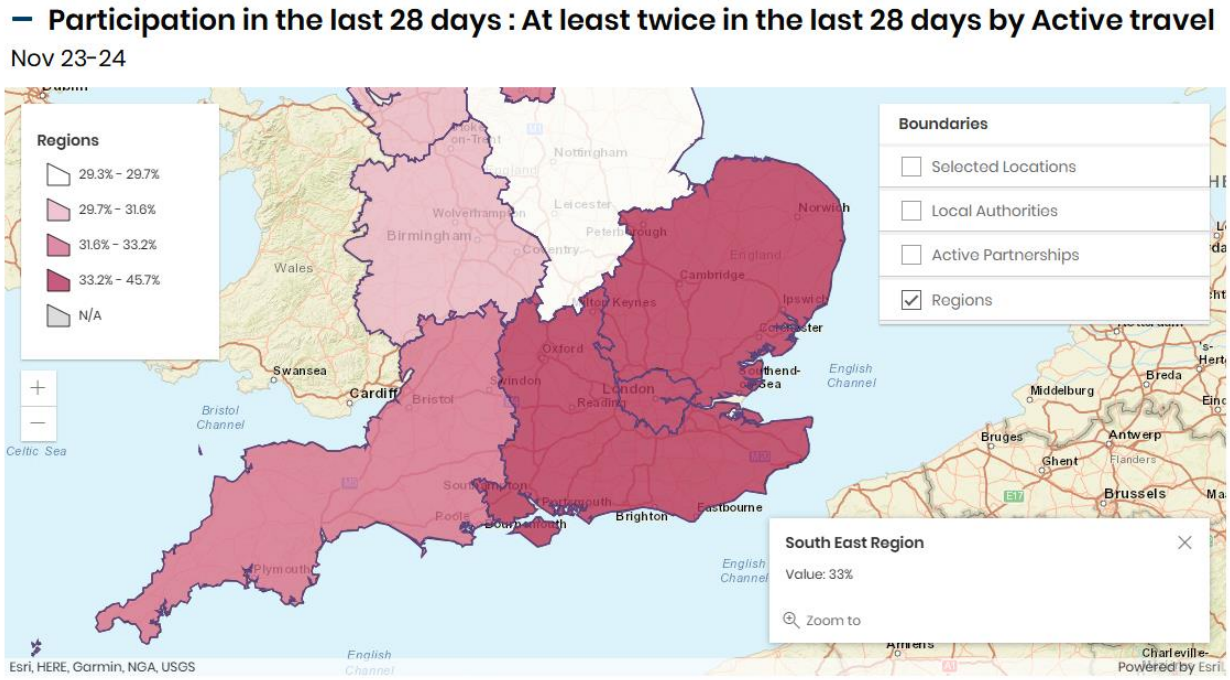


Figure 3.3 Regional participation in active travel (Sport England, 2026)

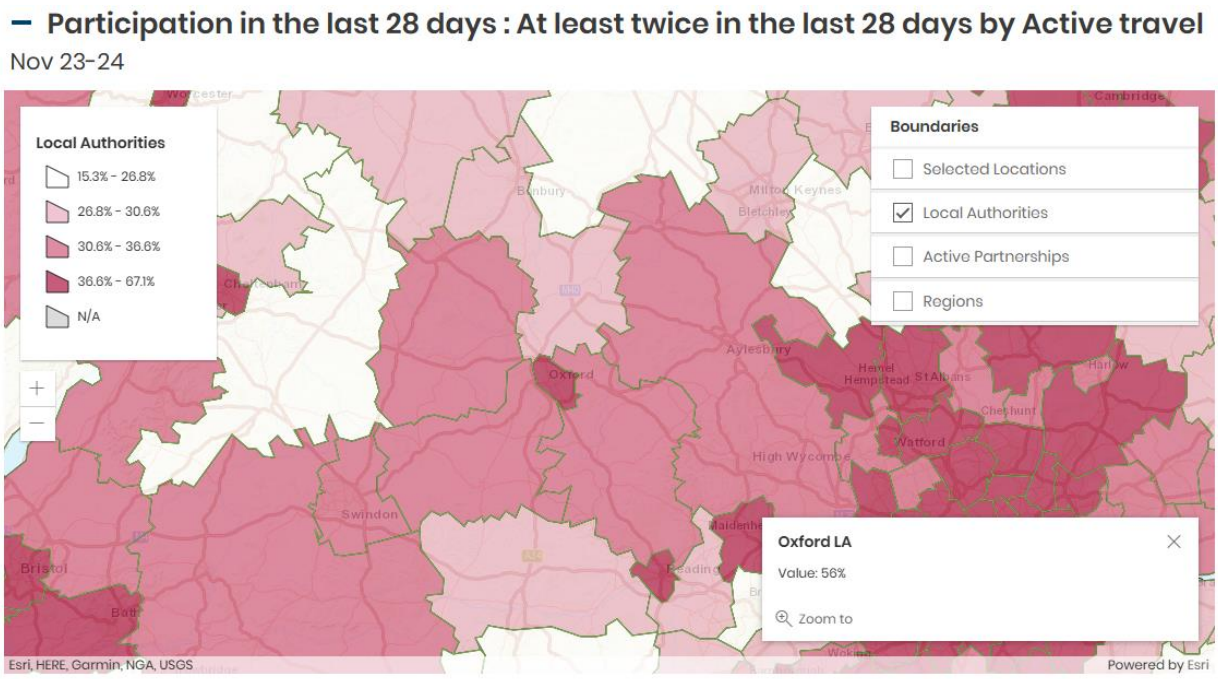


Figure 3.4 Oxford participation in active travel (Sport England, 2026)

Isolation and loneliness

3.6 Various national and international research studies have linked social isolation and loneliness with adverse health outcomes, including higher mortality rates. Social engagement has also been found to be a driver of quality of life. The coronavirus pandemic has had a notable impact on the way people live their lives and as such, reported levels of loneliness in Great Britain have increased since spring 2020.

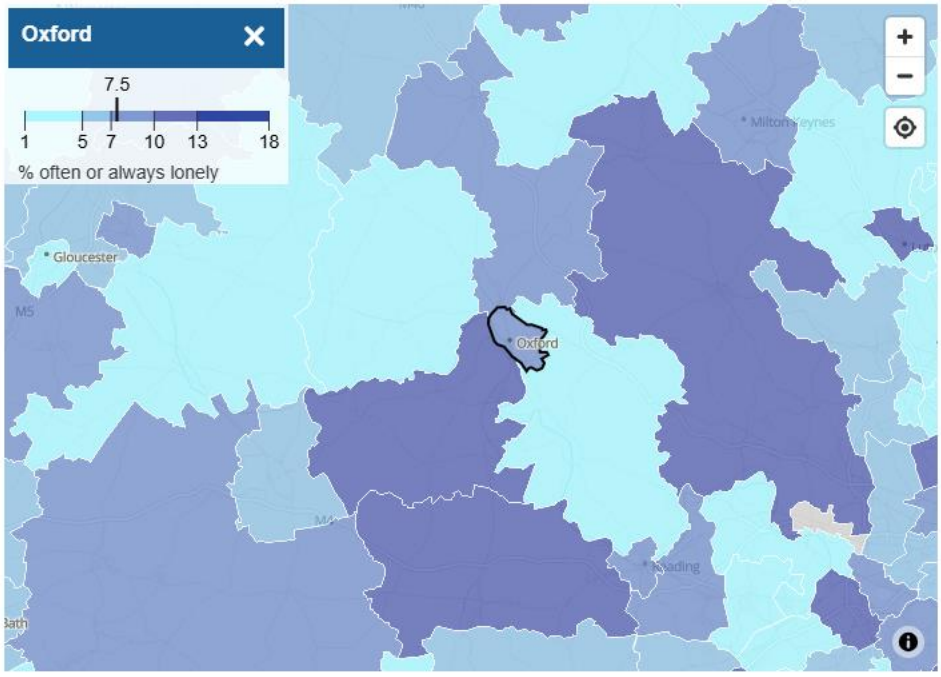


Figure 3.5 Loneliness rates by local authority (Office for National Statistics, 2021)

Air Quality

3.7 In September 2010 Oxford City Council made an Air Quality Management Order declaring the whole of the city as an AQMA, to include the 7 localised hotspots where pollution levels of nitrogen dioxide have exceeded national objectives. It is one of 13 designated Air Quality Management Areas in Oxfordshire, where air quality objectives are not being met. The latest (2020) modelled air pollution data from DEFRA indicate that sites with the highest readings for Nitrogen Dioxide (NO2) in Cherwell, Oxford and West Oxfordshire have each seen a slight increase since 2020.

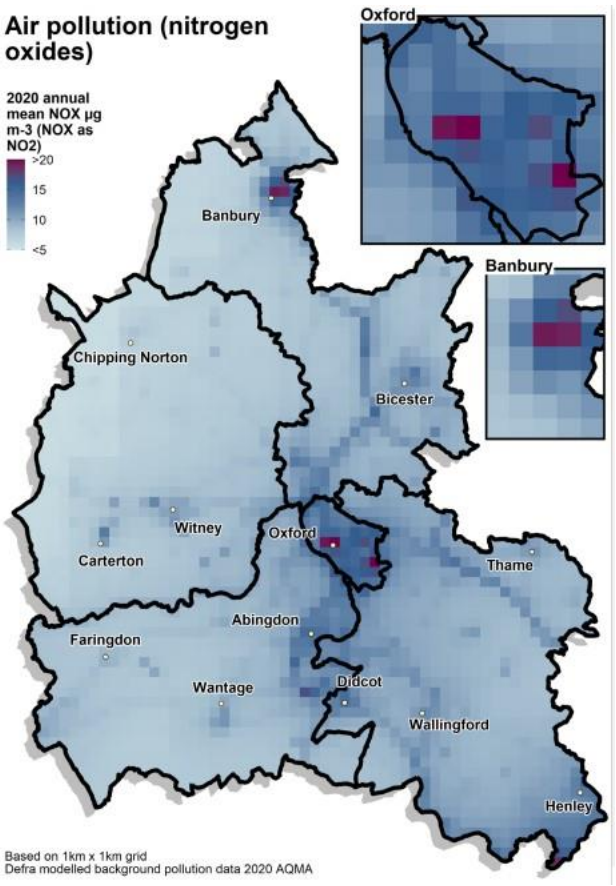


Figure 3.6 - Air pollution in Oxfordshire (Source: Defra modelled background pollution data via Oxfordshire JSNA 2023)

Inequality and health outcomes

3.8 Despite the relative levels of economic prosperity in Oxford, there are still great inequalities within the city. This is reflected in health outcomes and life expectancy. At ward level it can be observed that the life expectancy tends to negatively correlate with the level of deprivation.

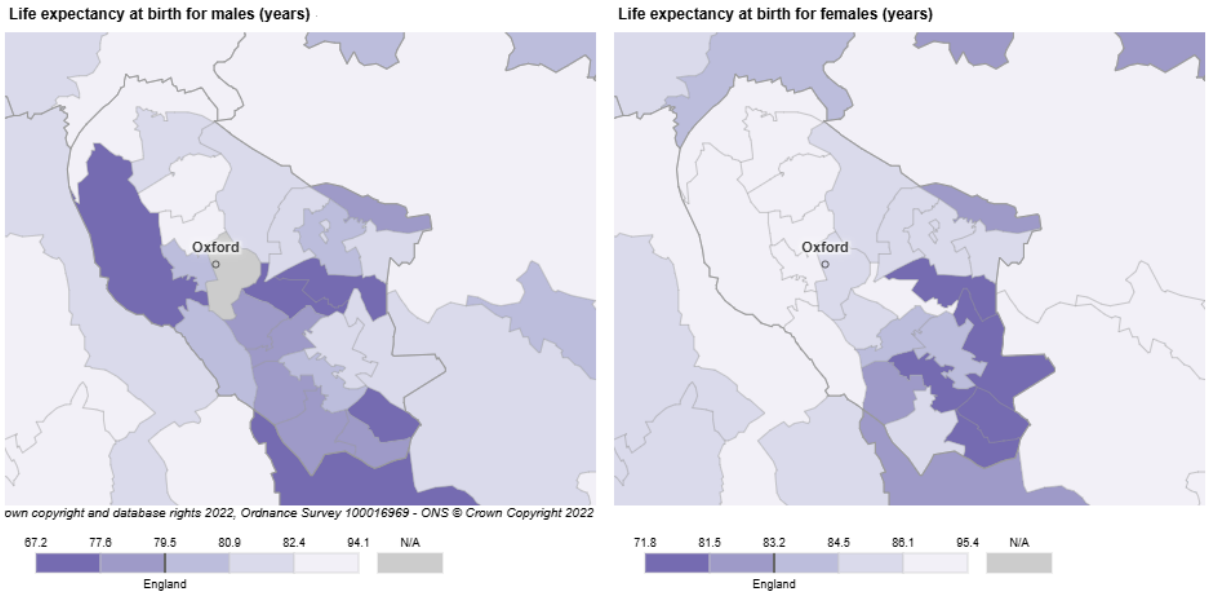


Figure 3.7 - Comparative life expectancy across Oxford wards: Office of Health Improvement and Disparities analysis (accessed 6 January 2025)

Table 3.1 - Life expectancy compared across wards in Oxford. Source: Office of Health Improvement and Disparities analysis (accessed 6 January 2025)

Ward	Life expectancy at birth for males	Life expectancy at birth for females
Barton & Sandhills	79.4	81.8
Blackbird Leys	74	80.9
Carfax & Jericho	80.6	90.8
Churchill	76.7	81.1
Cowley	80.2	79.5
Cutteslowe & Sunnymead	81.6	88.5
Donnington	79	83.3
Headington	79.5	85.5
Headington Hill & Northway	81.4	85.5
Hinksey Park	80.6	86.1
Holywell	N/A - not available	85
Littlemore	78.5	85.4
Lye Valley	80.9	81.3
Marston	81.2	85.1
Northfield Brook	77.7	79.7
Osney & St Thomas	77.3	86.3
Quarry & Risinghurst	81	84.9
Rose Hill & Iffley	78.6	82.5
St Clement's	76.1	87.7
St Mary's	79	85.3
Summertown	87	87.1
Temple Cowley	82	83.5
Walton Manor	85.4	89.1
Wolvercote	83.3	90.9

Health Deprivation

3.9 The Health domain of the Index of Multiple Deprivation is the official measure of relative deprivation in England. Within Oxford, there is wide variation in the level of health deprivation, as shown in Figure 3.8. Areas of the city with high levels of health deprivation include Blackbird Leys. The majority of least health deprived areas, as shown by Figure 3.8 are located within the north of the city.

3.10 In 2025, only 1 of Oxford's Lower Super Output Areas (LSOAs) fell into the 20 per cent most deprived, compared with 2015, where 12 of Oxford's LSOAs fell within the 20 per cent and 2 LSOAs in the 10 per cent most deprived nationally.

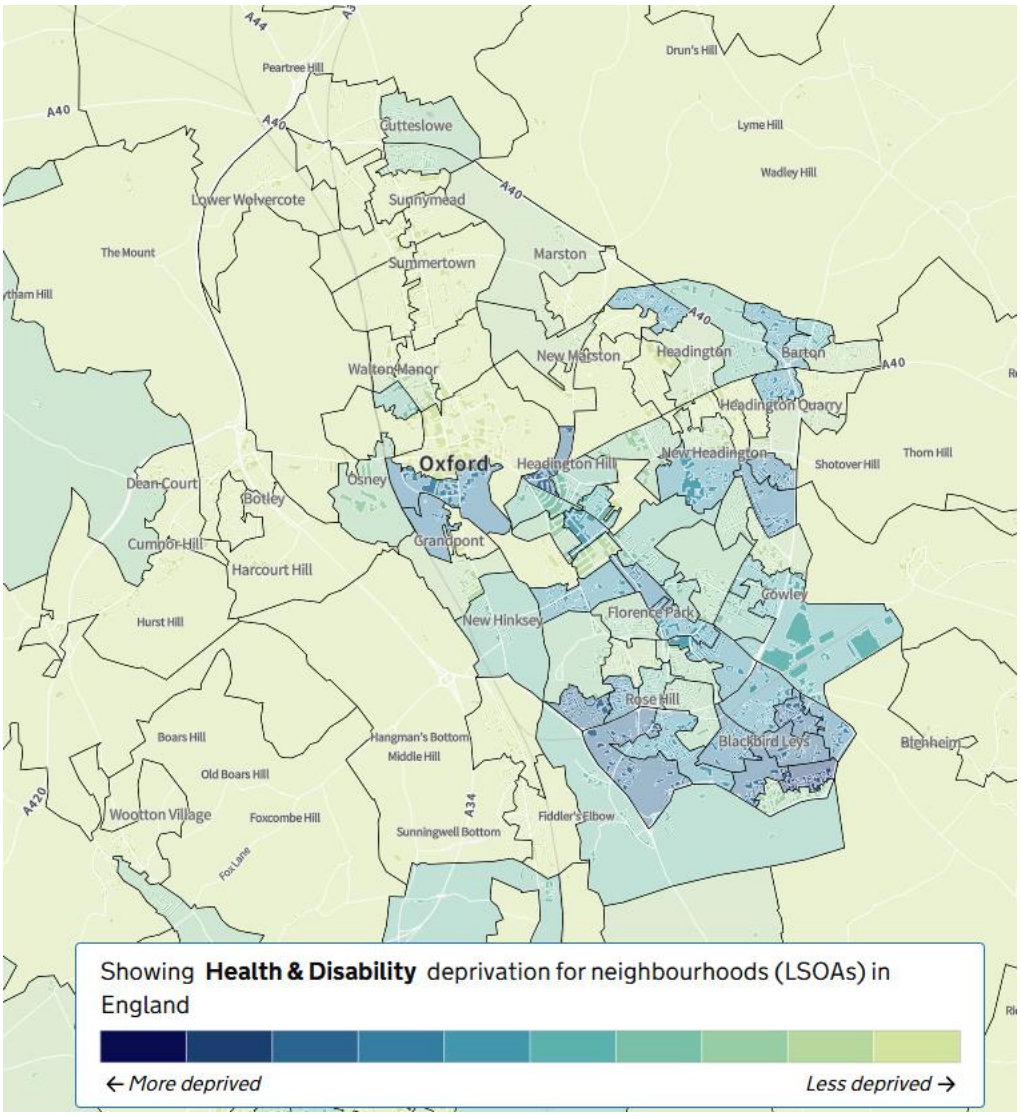


Figure 3.8 - Health deprivation and disability in Oxford (English indices of deprivation 2025))

Employment Deprivation

3.11 Being in employment has been linked to improved health and particularly mental health. Figure 3.9 shows the proportion of the working-age population involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities. There are no areas in Oxford within the 10% most deprived areas in England for this indicator, but a number of areas, predominantly in the south of the city, fall within the 20% most deprived areas in England for employment deprivation.

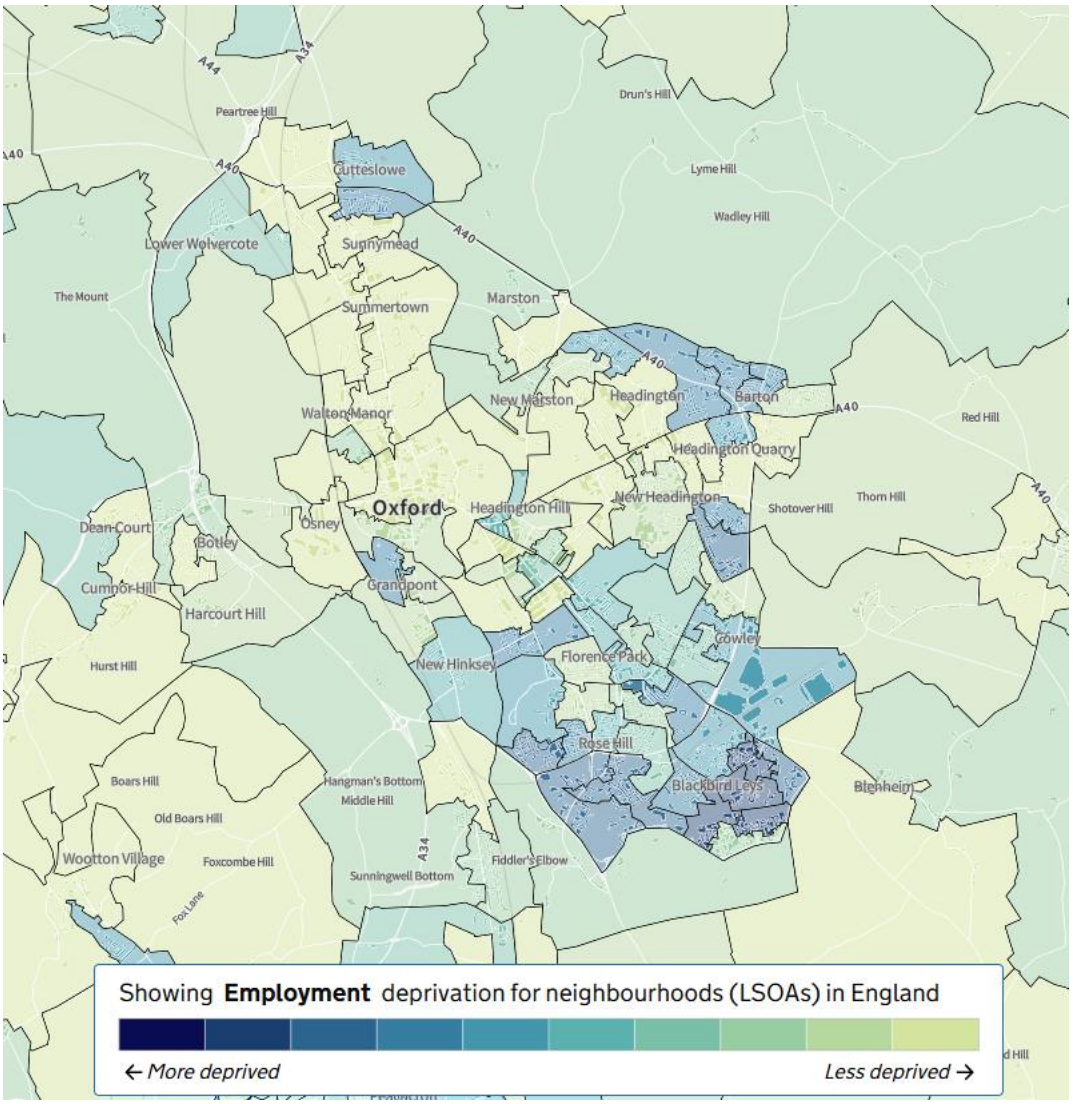


Figure 3.9 - Employment deprivation in Oxford (Oxfordshire County Council 2019)

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

What trends do data show?

4.1 For Oxford as a whole the trends indicate an overall improvement in overall measures of good health, which is likely to be the result of improvements to services and treatments, specific interventions and an increase in awareness and education of lifestyle factors in particular. This is positive when taking into consideration the broader national picture of health and wellbeing in England, which highlights various negative observations of health equity across England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health.

4.2 The data does show, however, that there are several areas where Oxford performs below the local or national average, where more focus is needed to secure similar improvements. It also demonstrates that there are significant health inequalities within the city, typically linked with levels of socio-economic deprivation, which need to be a priority for future health interventions and strategies.

Health and wellbeing in the context of the climate emergency

4.3 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford, but for those living in poor health, the risks are exacerbated. Indeed, regardless of our achievements in relation to climate mitigation (cutting carbon emissions), climate is expected to change in the future due to historic greenhouse gas emissions that have already 'baked in' changes in the climate system.

4.4 The impacts of hotter summers and prolonged heat wave events for example have been shown to be particularly threatening for those with pre-existing health conditions such as heart and lung disease, as well as the young and the elderly. The ongoing stress that is caused by flooding events, and just the threat of flooding, can be taxing on residents' mental health and this is likely to be a particular issue for those already in poor mental health.

4.5 Climate-related risks are further compounded by the particular challenges faced by those living in high socio-economic deprivation. As was evidenced earlier in the paper, those living in more deprived areas in the city are more likely to be living with worse health and wellbeing thus potentially being at higher risk from stresses related to climate change. Furthermore, those living in areas of deprivation may have fewer resources (financial and material) to adapt to changing climate, for example finding it harder to afford cooling measures to cope with high heat in the summer, or to pay for insurance that can cover damages during a flood event. There is also the issue that some may be living in poorer quality accommodation, which is ill-equipped to function in future climate.

4.6 Recent research by the Oxfordshire County Council as part of their County-wide Climate Vulnerability Assessment 2024 confirmed that current heat wave risk is concentrated in the most urban parts of the county and is only exacerbated in future according to different projections for 2050. Eight of the ten wards in Oxfordshire with the highest current heatwave risk are located in the Oxford City (Barton and Sandhills, Blackbird Leys, Cutteslowe and Sunnymeade, Carfax and Jericho, Holywell, Littlemore, Northfield Brook and Walton Manor), including some in higher deprivation areas. Six of these wards remain in the top ten for 2050 projections (Littlemore and Walton Manor are replaced by other wards in the county).

Considerations for the new Local Plan

4.7 Good health includes physical, social and mental wellbeing going beyond simply the absence of illness and care of persons who have become ill. The Local Plan has a role to

play in considering all of the aspects that impact on an individual's health and to help influence positive health and wellbeing outcomes across all parts of the city.

4.8 Indeed, health and wellbeing is a wide-ranging topic that will be influenced by many, if not all, of the policies within the Local Plan. The emerging Local Plan aims to integrate health and wellbeing considerations in a variety of areas, including:

4.9 **High quality housing –** The type of housing someone lives in can negatively impact on their health and wellbeing in a number of ways if it has not been appropriately designed. Poorly designed housing that provides inadequate levels of daylight or ventilation; overcrowding; injuries in the home; or inadequate heating or cooling of the building can all have direct and indirect impacts on physical and mental health. This is an issue that has become more prevalent throughout the Covid-19 pandemic, which saw the population forced to spend greater amounts of time at home in general, as well as for work and exercise. However, housing standards and quality are largely governed by the Government's nationally set building standards and cannot be influenced by local planning policies.

4.10 **Transport and accessibility** – Improving access and movement around the city is important for an individual's health and wellbeing for several reasons. Improving the connections between places can help people to integrate with their communities and reduce the chances of social isolation. Availability, quality and choice of modes of transport are also important not only for facilitating travel to employment, healthcare and social facilities, but also for ensuring people can utilise active travel methods such as walking and cycling, over the car. Transport emissions can also cause adverse health impacts on human health: the local plan can play a role in reducing these and the effect they have on people.

4.11 **Social infrastructure -** Provision of social infrastructure is vital for vibrant neighbourhoods, and this can include uses such as schools; health centres; local food shops; public buildings, local workplaces and open spaces. Neighbourhoods which enable residents to have good access to goods and services and which provides opportunities for social interaction such as in parks can improve social interaction and promote a feeling of community.

4.12 **Natural environment** – The quality of the environment and in particular, access to green space can have a positive impact on health and wellbeing, through increased physical activity and mental health benefits stemming from taking a break from heavily urbanised environments. Healthy environments can also provide opportunities for local food growing which can help promote healthy diets and active lifestyles. Poor air quality can be one aspect of an unhealthy environment and is an important issue in Oxford with impacts on a range of health problems including asthma and cardiovascular diseases.

4.13 **Climate resilience** – Much of what is being built today will be around for the next 50-100 years and thus will need to be able to function and respond to the projected changes in climate that Oxford will face in the future. Development that is able to keep residents cool during warm summer weather will be essential in order to reduce risks from heat stress,

whilst flood resistance (keeping water out) and resilience (allowing quick clean up and drying out) measures will help to reduce danger to life and the ongoing stresses that flooding can cultivate. This issue will be particularly important for the most vulnerable communities in the city.

4.14 **Health inequalities** - Whilst working to ensure that negative impacts on health and wellbeing are avoided and positive impacts maximised for everyone, it will also be important for the new Local Plan to work towards reducing the health inequalities that exist in the city. This could take the form of targeted interventions in particular areas in need, as well as ensuring that the issues of health inequality are considered throughout the planning process.

4.15 **Health Impact Assessment** - The current Local Plan requirement for HIAs on new development is likely to remain an important approach to ensuring that developers consider issues of health and wellbeing throughout the development process. Furthermore, to ensure that health and wellbeing considerations have been embedded sufficiently through the Local Plan, the Council's intention is that the development of its constituent policies should be informed by a high level Health Impact Assessment (HIA). There is no single, nationally applied standard for how local plan HIAs ought to be conducted, though there is a range of guidance and examples of best practice that the Council can draw upon. Work being undertaken at the county level will also help guide the approach, and it will also be important to engage with colleagues in Public Health on this process throughout.

5. Key Issues addressed through the Local Plan

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to health and wellbeing objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. It is important to note that some policy reference numbers have been updated as a result of amendments made post the Regulation 18 consultation.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Health Impact Assessments

5.3 As was set out earlier in the paper, there are clearly health and wellbeing challenges affecting the communities within Oxford. Inappropriate or poorly designed development has the potential to exacerbate some of these issues if these are not sufficiently incorporated into the design process. For this reason, the Local Plan 2045 continues with a requirement of major

development needing to undertake a Health Impact Assessment (now: Policy HD7) as with the previous Local Plan.

5.4 The purpose of Health Impact Assessment (HIA) as part of the planning application process is to ensure that the design of new development is tailored to the particular local health context of the area where it is proposed. Producing an HIA should be far more than just a tick box exercise; the process seeks to ensure that the impacts of new development do not further exacerbate negative health trends, whilst also helping to identify and take up opportunities to ameliorate these conditions and secure positive impacts that support wellbeing. The policy sets out the high level requirements that applicants are expected to follow, including undertaking analysis of the local context and presenting appropriate data on these conditions and then using this to demonstrate how they have addressed the design of their development informed by this understanding. Where impacts are identified, these need to be appropriately addressed (and mitigated where necessary) and details of any monitoring required to ensure mitigations are successful should also be provided.

5.5 Whilst the policy sets out the high-level requirements that the Council will look for to ensure that a proposal has demonstrated that health impacts have been appropriately addressed as part of the design process, there are a number of different methodologies available for how Health Impact Assessments can be specifically undertaken in practice. The policy is supported by an Appendix which sets out more specifics as to the kind of format that the HIA should follow and refers applicants to the toolkit that has been specifically developed by Oxfordshire County Council and that was approved for use by all six Oxfordshire Local Authorities by the Future Oxfordshire Partnership (formerly known as the Oxfordshire Growth Board) on 26 January 2021. The toolkit includes briefing notes as well as a checklist that will help applicants to focus their analysis on the key issues of relevance. A Technical Advice Note (TAN) also contains information to support the preparation of HIAs.

5.6 Ultimately, ensuring that new development undertakes HIA will help to support higher quality design in the city. The policy is designed to be flexible enough to allow applicants to tailor the level of information they provide as part of the HIA to be proportionate to the scale of the development, whilst also ensuring that the key elements are addressed (such as being informed by relevant contextual data). In this way, HIAs provided should include enough information to allow the Council to make an informed judgement as to any potential negative or positive impacts for health and wellbeing in the city, without being overly burdensome to applicants.

Privacy, Daylight and Sunlight

5.7 Ensuring all homes are built with adequate privacy, daylight and sunlight (both internal and external) helps to ensure the wellbeing of residents. It is also important to consider the impacts on neighbouring residential properties to ensure they do not lose their sense of privacy. This is particularly important in the context of Oxford, where high density development is expected in some areas of the city to make efficient use of land.

5.8 The policy approach will ensure that new development provides adequate daylight and privacy and will not reduce privacy and daylight in existing development to an unacceptable level.

Internal Space Standards for Residential Buildings

5.9 It is important to ensure that new homes are of an adequate size and layout to provide high quality, functional homes that meet the needs of a wide range of people and take into account how those needs might change over time. This should apply to development at all scales, from large strategic sites to infill development, which represents an important contribution to meeting Oxford's housing need.

5.10 The pressure to deliver more homes leads to increased pressure to deliver smaller homes. This could result in housing that is unacceptable in terms of internal space because it doesn't offer occupiers appropriate living standards or meet the national aim that everyone should have access to a decent home. The pressure to make efficient use of land, and the fact that dense development is to be required, makes it particularly necessary to ensure that the internal living environment of new homes is adequate.

5.11 The policy has been carefully informed by a consideration the local need for space standards and the viability impact of taking such an approach and the approach is to adopt the optional nationally described standards. In addition, minimum bedroom sizes for HMO are governed by the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018.

5.12 The policy will ensure that new developments are designed and built to provide adequate space for occupants. It will be important to ensure that designs maximise the useable space within housing, through functional layout, and provide scope to adapt and modify housing to meet future requirements. The demand for housing in Oxford means that a small proportion of larger and family homes will be provided in the form of flats or apartments; ensuring adequate space and quality environments will play a crucial role in changing the perception of apartments and their suitability as family homes.

Outdoor Amenity Space

5.13 The adequate provision of outdoor amenity space is a key factor in supporting the physical and mental health and wellbeing of residents. It provides a space to dry clothes, grow plants and vegetables, and can provides shade and limit urban heat-island effects. In addition, if the space is designed with permeable surfaces it can contribute towards flood risk management.

5.14 Where high density development and subdivision of properties are expected and where many sites are infill development, high standards for the delivery of good quality outdoor amenity space becomes increasingly important to ensure the health and wellbeing of residents.

5.15 New homes should provide some open space that allows the occupants to enjoy fresh air and light in privacy. The policy will ensure that appropriately sized balconies/private terraces and private/ shared garden space is provided for residents.

5.16 The policy approach will ensure that both public and private amenity and garden spaces are well designed and ensure that it is clear how these spaces are used without the need for extensive signage, avoiding narrow pathways to link spaces, optimising sunlight, and ensuring principles of good landscape design are incorporated.

Accessible and Adaptable Homes

5.17 Housing provision across the city should meet the needs of everyone and new homes need to be accessible to all, including those with disabilities. As such, it is important to consider the demands and requirements people will have from their homes and how this may change over time. Homes need to be built with the flexibility to be adapted to the changing needs of residents. Adaptability is important to respond to changes to the size and compositions of households, and an ageing population.

5.18 Providing opportunities for residents to maintain their independence is important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs. In addition, housing needs to be adapted to support those with chronic health conditions and specialist housing needs. Ensuring we build homes that can be adapted to meet people's longer-term needs is an important part of good design.

5.19 The policy approach is to provide enhanced accessibility or adaptability through Requirement M4(2) Accessible and adaptable dwellings and/or M4(3) Wheelchair user dwellings in 'Approved Document M: access to and use of buildings. To ensure provision of housing to meet the range of needs that will exist in Oxford and because of the advantages of dwellings that can adapt to changing needs, requirements for accessible and adaptable dwellings are set out in the policy.

5.20 Oxford has a markedly young population compared to neighbouring districts and the UK, mainly because of the substantial number of students. The trend of Oxford having a younger population than average is set to continue; however, people are living longer and there will be an increase in the number of older people resident in the city. As it is likely that Oxford will have a greater proportion of older residents making up its population, there will be changing housing requirements over the Plan period. The Census 2021 showed 5.3% of the population of Oxford are 75 or over. This is lower than the national average, but that represents a section of the population more likely to need adaptable homes in order to remain living in them for longer. The Census 2021 shows that 29% of households in Oxford have one or more people with a disability. Some of those households will need specialist adaptations to their homes, so providing housing that is adaptable will play an important role in ensuring that these people have an adequate choice of homes available to them. The Government has found that 34% of disabled people have had to make adaptations to their homes UK Disability Survey

research report, June 2021 - GOV.UK. Therefore, at least 10% of homes should be adaptable, but given the increasingly aging population and the proportion that are already over 75, the policy requires that 15% of market homes meet Category 2 Standards of Part M of the Building Regulations.

5.21 Some typologies of development will not be suitable for providing homes that meet M4 requirements because these require level access to the front door and so must have lifts. As well as installation costs they have ongoing maintenance costs (which are likely to affect residents' ground rents). This will affect viability and will not be feasible unless a certain number of units are served by one lift shaft. This will be less likely on lower blocks of flats. There may be other options, such as provision of one and two bed units in terraced houses instead of flats, maisonettes with accessible homes below and so on. But these options will often not be feasible, in which case the policy allows schemes with fewer or no dwellings that meet Part M of the Building Regulations.

Appendix A - Policy options and preferred approaches

Policy options set 010a (Draft Policy HD10): Health Impact Assessments

The process of undertaking Health Impact Assessment (HIA) ensures that development promotes and contributes to a healthy living environment, by requiring that local context and particular issues are assessed and then addressed through the design process. The benefit of HIA is greatest when it is conducted at the earliest opportunity to inform the design process. The current local plan requires the undertaking of HIA for major development and the options below set out alternative approaches with respect to continued HIA requirements.

Table 7.1 - Policy options set 010a: Health Impact Assessments

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require an HIA for all developments over a certain size- for example for major developments (as currently). This requirement could be integrated with others such as demonstrating resilient design and construction.	A checklist based template is straightforward and would keep the process fairly streamlined. The intention of this approach is that healthy design is considered from the outset and therefore factored in.	This may be seen as an extra administrative burden on developers, and on those assessing applications.
Option b Include a requirement for HIAs, not just based on a size threshold but other factors such as socioeconomic, health or environmental factors that could trigger the need for a more extensive HIA. Wider categories for	More development is subject to an HIA, which ensures issues are properly considered and addressed at an early stage of the development.	There is limited evidence that expanding the range of development will bring additional benefits. This may create an onerous process where the drawbacks outweigh any benefits.

1408

development that will be subject to an HIA.		
Option c No specific policy requirement, rely on NPPF.	Less burden on developer who will cover off the points in an HIA as part of application process.	Not having a policy makes it harder to have a consistent metric to assess schemes.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? A, b or c (they are all alternatives). **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** The options most directly influence **criterion 5. Inequalities** but depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. greening, accessible services/facilities, resilience to climate change etc). Option a and b are likely to have a minor positive impact on inequalites (and option b is likely to be a slightly more positive impact because it incorporates a greater area of the city/more development). Option c is likely to be a minor negative, as whilst there is some discussion over what health and wellbeing considerations should factor into planning proposals, there are not explicit requirements, so there is much more potential for development to come forward in unhealthy way. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

1409

Health Impact Assessments – Policy HD10

The preferred approach is to take forward **option A**. This option is a continuation of the approach followed by the currently adopted 2036 Local Plan, whereby it is a policy requirement for applicants for qualifying development schemes (currently major development) to submit an HIA. This approach is considered to be the most appropriate for assessing schemes that are the most likely to have an impact on the health and wellbeing of the contexts in which they are set in.

Policy Options Set 010b (Draft Policy HD11: Privacy, Daylight and Sunlight)

There are many factors in the built environment that can affect our health and wellbeing, but it is particularly important to ensure that the places where we spend so much of our daily lives, such as our homes and workplaces, enable us to be healthy and happy. The recent Covid pandemic, with the need for social distancing and the shift to home working for some people, has highlighted the importance of having a healthy home setting for us all, and of particular importance to this internal environment is having ample daylight and privacy.

Table 7.2 - Policy options set 010b: Privacy, Daylight and Sunlight

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Extend the policy to also include expectations for daylight, privacy and sunlight for new non-residential buildings (types to be specified but likely to include offices and similar workspaces, potentially healthcare facilities but may exclude manufacturing and warehouses, retail units), to ensure good working conditions and to ensure consideration of impacts on neighbouring buildings. This will also need to be	These requirements for non-residential buildings may prevent buildings with a large mass, which would have the benefit of more appealing design. It is also likely to reduce energy use due to minimising the need for electric lighting (and potentially also improving natural ventilation). The working environment would also be healthy. Helps meet BRE sunlight/daylight guidance.	This may be restrictive to certain building needs or may affect viability due to reducing the potential for subdivision of a building, or for large machinery. Its application is unlikely to be possible universally so the policy must specify when it applies and when it does not.

1410

considered alongside shading and overheating impacts.		
Option b Include a policy with requirements to ensure adequate daylight, privacy and sunlight to new residential developments.	This would ensure new development provides adequate daylight and privacy and does not reduce privacy and daylight in existing development to an unacceptable level.	This may be too restrictive for certain buildings and/or may impact upon viability due to reducing the potential for subdivision. This needs to be considered alongside considerations of sustainable design and construction, such as avoiding overheating.
Option c Do not include a policy on privacy, daylight or sunlight for any type of development.	This would provide more flexibility for design to reflect the location and other factors.	This could result in poor quality design in new development that does not have sufficient daylight or privacy for its occupants and could reduce daylight or privacy to neighbouring development to an unacceptable level.

1411

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A+B, C) **High-level screening conclusion?** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities,** as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion. Option a and b are likely to have a minor positive impact on inequalities (and option b is likely to be a slightly more positive impact because it incorporates a greater area of the city/more development). Option c is likely to be a minor negative, as it may result in a greater potential for poor quality development – building regulations include standards for window sizes/orientation, daylighting design and good practice for daylight levels, however they do not explicitly state minimum requirements for daylight/sunlight or privacy.

Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Privacy, Daylight and Sunlight – Policy HD11

The preferred approach is to take forward a combination of **options A and B**. This approach will ensure that policy requirements include minimum standards that can be expected for the amenity of occupiers of development (with respect to privacy, access to daylight and sunlight), in terms that can be measured and monitored, and it also allows policy to specify the types of development for which these standards will apply – including the option of having requirements that apply to non-residential development. This will broadly follow the policy approach as followed by the currently adopted 2036 plan.

Policy options set 010c (Draft Policy HD12:) Internal Space Standards for Residential Buildings

1412

New homes, whether they are infill plots or on larger sites, need to be of an adequate size and layout to provide high quality functional homes that meet the needs of a wide range of people. The pressure to build more homes can lead to the building of smaller homes if standards aren't set, which could result in housing being built that does not provide future occupants with appropriate living standards.

Table 7.3 - Policy options set 010c: Internal Space Standards for Residential Buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Apply Nationally Described Space Standards. In flatted schemes, require communal areas to be designed to enable neighbours to meet and interact, for example some fixed seating, wider	Following the Nationally Described Space Standards should ensure that developments maximise the useable space within housing through functional layout and provide scope to modify	Oxford is highly constrained spatially and by adopting these standards it could result in reducing the number of houses being delivered. It may become unnecessary to have this policy if the intended national development management policies cover this (which should not be repeated or contradicted in local plans).

areas of corridor or lobby space.	layouts for future needs. Design of developments can be important in helping people avoid social isolation and loneliness. In flats, communal areas that allow neighbours to interact is likely to facilitate successful inter-generational living. Including these standards is important in Oxford because development pressure is so great and heights are constrained, so without requirements housing could be inadequately small.	
Option b Do not include a policy on internal space standards (if the national standards are not adopted locally then they do not apply).	Does not restrict homes being delivered where space is so limited. If space requirements are written into national policy this will become the preferred option as having a local policy will be unnecessary.	Having no space standards for self-contained dwellings could result in the delivery of housing that is of poor quality with an unacceptable amount of internal space for its occupants.
Option c Include a policy but do not follow the Nationally Described Space Standards.	Provides more flexibility for the delivery of new homes which is so urgent in Oxford.	Government policy is very clear that either the nationally described standards are followed or there is no requirement included in plans, so it is very unlikely that this approach could be justified.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Yes
High-level screening conclusion? The options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? No

Rationale:
The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities,** as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion. Option c is unlikely to be justified, as it will contradict current national policy and if implemented will most likely encourage the development of schemes with poor quality of space for occupants. Overall, the likely sustainability impacts are not expected to be significant and not complex enough to warrant a detailed appraisal.

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Internal Space Standards for Residential Buildings – Policy HD12

The preferred approach is to take forward is **option A.** Government policy does not allow much flexibility for authorities to set bespoke standards, and as such the approaches available to plans are for national space standards to be followed, or no standards to be specified. A key objective for the plan is that housing tenures and types are of the highest quality possible and most conducive to promoting the health and wellbeing of occupants. To secure these objectives in a way that is suited for monitoring and enforcement, following the nationally described space standards which have universal familiarity and application.

Policy Options Set 010d (draft Policy HD13): Outdoor Amenity Space

The adequate provision of outdoor amenity space is important as it supports the physical and mental health and wellbeing of residents. Well-designed outdoor amenity spaces enhance the immediate and surrounding areas and provide much needed open spaces for residents, particularly those who do not have access to their own private garden.

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Table 7.4 - Policy options set 010d: Outdoor Amenity Space

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include an outdoor amenity space requirement for all residential units, with size standards. This could allow flexibility between communal and private space and balconies would be included to ensure flats are deliverable. Include a requirement for outdoor areas	This would ensure that outdoor amenity space provided as part of new development would be well designed and provides more certainty about the level of provision. Requiring space for meetings and interactions may help to reduce loneliness and social isolation.	This could be too prescriptive, and the amount required may not be deliverable or viable. There is no requirement currently for communal outdoor amenity space for flats- it may be hard to know how to set this in a way that can be justified.

where neighbours can meet or interact.		
Option b Include a policy that sets out broad principles required for amenity space for housing but no size requirement.	This approach would be less prescriptive but encourage good design by setting out broad principles.	Potential for poor design and quality and not a large enough quantity of outdoor amenity space to serve needs.
Option c Set a requirement for outdoor amenity space for larger non-residential developments.	This approach ensures biggest non – residential schemes have well designed outdoor amenity for users of the development and, if well landscaped, this enhances the attractiveness of the design and potential for benefits of green spaces such as biodiversity and enhancing wellbeing.	Private amenity space at workplaces should not be needed if there is adequate public open space in an area and in living places. This would not represent the most efficient use of land. Management plans would be needed to ensure it does not become neglected.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various (A, B, A+C, B+C) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities,** as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion**.** Depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. greening, accessible services/facilities, resilience to climate change etc). **Criterion 3. efficient use of land**, may be relevant as there may be implications for design of buildings and site layout. Overall, the likely sustainability impacts are not expected to be significant and not complex enough to warrant a detailed appraisal.

Outdoor Amenity Space – Policy HD13

The preferred approach is to take forward is **option A.** A key objective for the plan is that housing tenures and types are of the highest quality possible and most conducive to promoting the health and wellbeing of occupants. To secure these objectives in a way that is suited for monitoring and enforcement, following the nationally described space standards which have universal familiarity and application.

Policy Options Set 010e (Draft Policy HD14): Accessible and Adaptable Homes

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Housing provision across the city needs to ensure that it meets the needs of everyone whatever age and stage of life. Homes need to be built with the flexibility to be adapted to the changing needs of residents. These changes include adaptations in the size and compositions of households, helping successful intergenerational living, with adult children and older parents moving back into the family home and an ageing population. 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.

Table 7.5 - Policy options set 010e: Accessible and Adaptable Homes

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek 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	This approach future proofs the housing stock.	The standards can be too onerous and impact upon site viability.

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 Introduce specific exceptions to the requirement for accessible and adaptable homes for practical reasons, for example provision of lifts is disproportionately expensive for flats of less than three or four storeys or for a small number of flats (fewer than 10) sharing one lift core, so upper floors would not need to conform.	Rather than lowering the percentage generally to ensure accessible/adaptable homes are achievable in all situations, this allows a generally high percentage, whilst avoiding situations where there are practical reasons that limit the amount of accessible and adaptable homes that can be provided.	This may encourage low-rise flats, or one bed houses, to circumvent the policy, which may often not be the most efficient use of land or the most suitable design for the area.
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	Rely on the NPPF to deliver the policy framework for delivering accessible and adaptable homes.	This could result in homes being built that are not sufficiently adaptable to the changing requirement of residents which is not an effective approach to meeting residents both current and future needs. Retrofitting houses to meet needs in the future is more costly and an inefficient use of resources.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various options (A, B, A+B, C)
High-level screening conclusion? the options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? No

Rationale:
The options most directly influence **criterion 5. Inequalities** but depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. accessible services/facilities). Option a and b are likely to have a minor positive impact on inequalities as there is an explicitly requirement for development to integrate accessibility and adaptability in their designs. Option c is likely to be neutral, as compulsory national policy requirements are likely to apply in most circumstances - particularly building regulations. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

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Accessible and Adaptable Homes – Policy HD14

The preferred approach is to take forward is a combination of **options A and B.** This approach would ensure that a sufficient amount new additions to the city's housing stock is future proofed in line with the projected demographic trends for the aged population and the current needs of residents with mobility issues. Option B in particular will allow the policy to be sufficiently flexible for situations where accessible/adaptable homes are difficult to achieve for practical reasons while ensuring a sufficient amount is still delivered.

Background paper 011

Title: Urban Design, Placemaking, Heritage and Archaeology

This paper addresses: Principles of high-quality design, the historic environment of Oxford including designated heritage assets.
Relevant Local Plan Objectives: • Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage.
SA Objective(s): 11. To promote good urban design through the protection and enhancement of the historic environment and heritage assets while respecting local character and context and promoting innovation.
SEA theme(s): Cultural heritage, landscape.

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1. Introduction

1.1 The importance of high quality design in creating places where people feel safe and rooted and want to be is well recognised. Good design can create or enhance unique character, but is also about functionality, helping to make a place that is attractive for walking and cycling, that feels safer from crime and vehicle traffic and can help stimulate social interaction. Good design means resources are used more efficiently and maintenance costs are reduced. Good design is also linked to health and wellbeing, making space for nature, as well as building resilience to climate change.

1.2 Understanding of existing character, whether that is from natural or built features, is the starting point of creating good design. Strongly linked to that is identifying and understanding heritage assets. Heritage assets are strongly protected in national policy. In recent years there has been a subtle change in national policies that require the significance of heritage assets to be weighed up against the potential benefits of new development. There is also an increased understanding of the wide range of things that contribute to the importance of heritage assets, which includes the significance placed on them by local people.

1.3 The Council has a duty to protect and enhance historic environment through the Local Plan, this is important for delivering sustainable future for city. The historic environment is important for supporting wellbeing and economic growth too, particularly in Oxford, where it acts as a significant draw for tourists globally every year and helps to contribute to the special character of the city. Protections for the historic environment are not about ensuring no development happens to them full stop, instead the focus is on managing change so it happens in right way so we preserve historic environment for benefit of future generations.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The National Planning Policy Framework (NPPF) 2024 and Planning Practice Guidance (PPG)

2.1 The NPPF (2024) places significant weight on good design as a means of bring about sustainable development, creating “better places”, and bringing about development that is suitable and appropriate for the communities where it takes place. Paragraph 135 sets out how planning policy and decisions should ensure that development:

a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
b) *are visually attractive as a result of good architecture, layout and appropriate and*

effective landscaping;

c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

2.2 There is the expectation that design policies are developed alongside local communities in order to reflect the aspirations and defining characteristics of the local area (paragraph 132). The NPPF further requires that the greatest possible amount of clarity on what is expected with respect to design outcomes and requirements is facilitated as early as possible in the development process (para 126). It promotes the use of tools such as design guides and codes within instruments like local plans and supplementary planning documents to create a framework setting design standards and requirements, with the level of detail or prescription tailored to the specific setting.

2.3 Continued engagement during the development of emerging individual schemes is also encouraged, with the onus placed on local authorities and to some extent applicants/developers to ensure early local involvement in the evolution of schemes (paragraph 132). Local authorities are expected to be proactive in using methods such as design reviews, workshops and assessment frameworks such as Building for a Healthy Life to ensure design quality (paragraph 138).

2.4 Paragraphs 202 to 221 of the NPPF contain policies specific to the historic built environment and heritage assets. The objective of the policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance.

2.5 Heritage significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence, but also from its setting.

2.6 'Great weight' is to be given to conservation and clear and convincing justification is required for all grades of harm, including through change to the setting, Justification must be on the grounds of public benefits that outweigh that harm (paragraphs 208 and

209). Public benefits will most likely be the fulfilment of one or more of the objectives of sustainable development as set out in the NPPF, provided the benefits will endure for the wider community and not just for private individuals or corporations. In order to make a sound decision, a planning authority needs to understand from the applicant the significance of any heritage asset affected (paragraph 211). This may require some investigative work, but the information to be supplied with the application should be proportionate to the asset's importance and the potential impact.

National Design Guide

2.7 The National Design Guide (updated January 2021) is a material consideration and forms part of national planning guidance setting out the characteristics of well-designed places and demonstrating what the government considers good design to mean in practice. The guide outlines and illustrates ten characteristics of good design falling under the topics of Climate, Character and Community. The characteristics range from context, identity and built form, through to nature, public space, movement, and the uses on the site including homes and buildings, the resources used to construct them and their life span. Each is discussed in detail in the guide but are illustrated in the circular diagram in Figure 2.1.

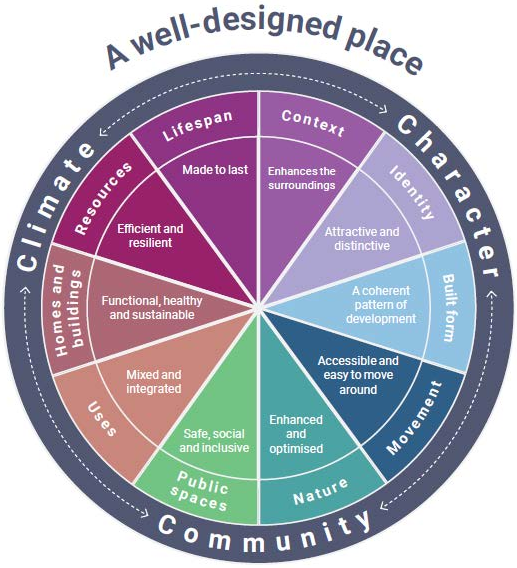

Figure 2.1 - Ten characteristics of good design (DCLG National Design Guide 2021

Listed Building Act

2.8 The Planning (Listed Buildings and Conservation Areas) Act 1990 provided listed buildings and conservation areas with additional protections relating to the granting of planning permission. It created special controls for the demolition, alteration or extension of buildings, objects or structures of potential architectural or historic interest.

Oxford Local Plan 2036

2.9 Existing policies from the Oxford Local Plan 2036 are working to protect the historic environment in Oxford. The design and conservation policies can be found in Chapter 6 'Enhancing Oxford's heritage and creating high quality new development'. The plan promotes high quality design and placemaking through Policy DH1:

Policy DH1: High quality design and placemaking
Planning permission will only be granted for development of high quality design that creates or enhances local distinctiveness.
All developments other than changes of use without external alterations and householder applications will be expected to be supported by a constraints and opportunities plan and supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement or a Planning Statement), which should cover the relevant checklist points set out in Appendix 6.1.
Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 6.1.

2.10 In order to protect Oxford's unique historic environment described above, further policies in Chapter 6 include:

- Policy DH2: Views and building heights
- Policy DH3: Designated heritage assets
- Policy DH4: Archaeological remains
- Policy DH5: Local Heritage Assets
- Policy DH6: Shopfronts and signage
- Policy DH7: External servicing features and stores

Other relevant plans/programmes/strategies

Conservation Area Appraisals

2.11 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. They are available to view on the conservation webpages under conservation areas.

Assessment of the Oxford View Cones (Oxford City Council)

2.12 View cones are drawn as triangles from important viewing points to encompass the width of the area containing buildings that constitute Oxford's historic skyline. A View Cones Assessment has been prepared to examine the significance of views, identifying their special qualities. The View Cones Assessment sets out a methodology for heritage

assessment of the Oxford views and applies this to each of the view cones. It describes and analyses the important features of the view cones. The study enables a greater understanding of the significance of all parts of the view cones, i.e. not just the skyline. It is designed to aid understanding of the impact of proposals on views.

2.13 The 10 identified view cones do not represent an exhaustive list of viewing points that provide an important view of Oxford's skyline. There may be glimpses of the famous skyline in other locations, and tall buildings in particular that are proposed outside of the view cones might still have an impact on the historic skyline.

High Buildings Study (LDA, 2018)

2.14 The High Buildings Study is in two parts-the Evidence Base Report and the Technical Advice Note. The Evidence Base Report (EBR) summarises the current 'baseline' of Oxford and has utilised mapping and 3D city wide modelling. The 'baseline' analysis looks at townscape character areas, how the city is structured such as through identifying the location of the city centre, district centres, and the main transport routes, as well as the current nature of building heights across the city. The EBR looks at the geographical distribution of heritage assets within the city and the ways in which setting contributes to the heritage significance of these assets and their potential to be affected by high buildings. The EBR also considered where future growth in the city is planned or may be anticipated. The EBR concludes by identifying 'Areas of Greater Potential' for high buildings. These are areas that are relatively unconstrained by heritage considerations and also represent opportunities for high buildings such as at district centres and transport nodes. The Technical Advice Note (TAN) is a guidance document that supports policy within the Local Plan 2036 and aims to shape the growth of Oxford positively.

Cowley Branchline Densification Study (LDA, 2025)

2.15 The intention of this study is to give guidance to guide the opportunities for growth and regeneration within this Area of Focus. This includes opportunities that may arise from the planned investment in the Cowley Branch Line and associated walking, cycling and public transport connection to the stations from existing and future residential and commercial neighbourhoods. The study aims to guide development so that it extends the compact and mixed-use development of Oxford's core and district hubs to within the area of change, limiting sprawl and inefficient use of land, and maximising connectivity and availability of facilities and services.

A Character Assessment of Oxford in its Landscape Setting (LUC, 2002) and update Addendum Report (LUC, 2022)

2.16 The report was commissioned in recognition of the importance of the city's landscape and townscape and the changes it faces. The assessment looks at the component parts of the city, including its villages and neighbourhoods, and their individual characteristics

which make up the city as a whole. It considers the historic, cultural and architectural associations, open places, wildlife and natural habitats and perceptual characteristics that combine to create Oxford's sense of place. The study helps in understanding which open spaces in the city are important in landscape terms, which areas of the city are sensitive to change and merit protection and opportunities for enhancement.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Context of the city

3.1 Key to Oxford's character is the fact that it is located in a floodplain overlooked by surrounding ridges, which create a backdrop to the 'dreaming spires'. These ridges provide an important backdrop to Oxford's cityscape. Oxford's setting is defined by agricultural vales to the north and south, wooded hills to the east and the west and river valleys extending through the urban core of the city. The river corridors running either side of Oxford's historic core are also an essential part of its special character and landscape setting.

3.2 Oxford's character is also defined by its unique built environment. The iconic skyline and architecture produced by the limestone colleges and towering spires create a world famous urban environment. As set out in the Oxford Local Plan 2036: *"It is important that design choices about building heights are informed by an understanding of the site context and the impacts on the significance of the setting of Oxford's historic skyline, including views in to it, and views within it and out of it. Taller buildings will be possible in many locations, but they must be designed to ensure they contribute to the existing character, and do not detract from the amenity of their surroundings."*

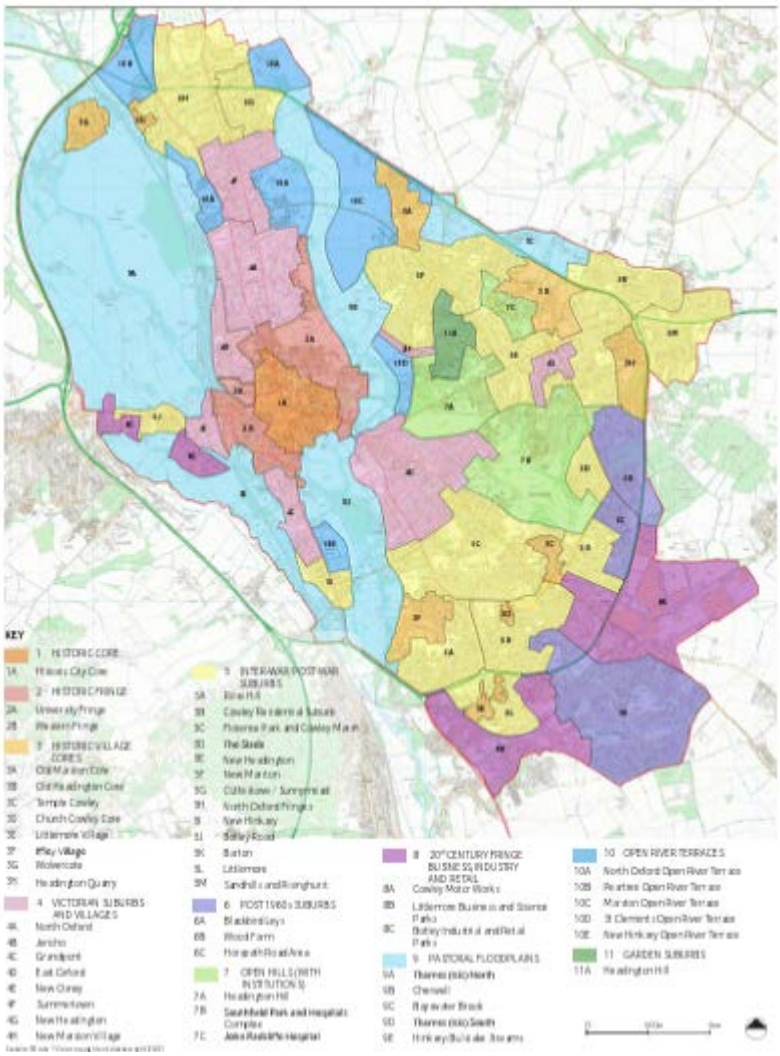

Figure 3.1 - Landscape character areas of Oxford as identified in the Character Assessment of Oxford in its landscape setting and updated using research for the Heritage Assets Register Project

Historical context and heritage assets in the city

3.3 Oxford contains buildings spanning every major period of British architectural history from the 11th century onwards Oxford's extensive history of settlement and cultural significance has contributed to a wide array of statutory designations across the city which are of national importance for ongoing protection for the benefit of future generations. The city hosts around 1,500 listed buildings, with the proportion of grade I and II* as a total of all listed buildings being more than twice the national average. Statutory listing protects both the inside and outside of a building, as well as fixtures and fittings (like windows, doors or staircases) and subsidiary buildings that form the 'curtilage' of the building. Alterations can only be made to a listed building if the Local Planning Authority (LPA) grants Listed Building Consent for any changes that might affect the special architectural or historic interest of the building.

3.4 There are 18 Conservation Areas designated across the city at present3. Conservation area designation is afforded to areas to identify that they have special architectural or historic interest that makes them worth protecting and improving. They include a diverse range of qualities from the compact college environment found in the city centre, the open green space found in the Headington Hill Conservation Area, to the vast meadows in Wolvercote and Godstow. Architectural styles and landscape qualities are diverse, but they all have the common element of containing features that contribute to our historic past. Oxford's Conservation Areas are as follows:

- Bartlemas
- Beauchamp Lane
- Binsey
- Central (University and City)
- Headington Hill
- Headington Quarry
- Iffley
- Jericho
- Littlemore
- North Oxford Victorian Suburb
- Old Headington
- Old Marston
- Osney Town
- Oxford Stadium, Sandy Lane
- St Clement's and Iffley Road
- Temple Cowley
- Walton Manor
- Wolvercote with Godstow

3.5 In addition to Listed Buildings and Conservation Areas, there are other important national heritage designations in the city including 10 scheduled monuments and 15 Historic Parks and Gardens which form an important component of the wider green infrastructure network.

3.6 Aside from national designations summarised above, there are a number of locally designated assets which have been identified on the Oxford Heritage Asset Register. This is a register of buildings, structures, features or places that make a special contribution to the character of Oxford and its neighbourhoods through their locally significant historic, architectural, archaeological or artistic interest. Locally listing does not establish the same level of protection as national listing in of itself.

3.7 Beyond these formally registered local assets, the city then also hosts a large number of traditional buildings (e.g. those built prior to modern methods of construction that arose in the 20th century) which also contribute to the wider character of Oxford. These other

buildings may still benefit from special qualities or features that are characteristic of older construction/architectural styles which warrant protection where possible, and may also require more careful approaches to redevelopment that reflect the unique ways these buildings function (e.g. passive ventilation) compared with modern buildings built today.

3.8 Three of Oxford's heritage assets are currently on Historic England's Heritage at Risk Register, which identifies sites most at risk as a result of neglect, decay or inappropriate development. These are the Church of St Thomas the Martyr, St Thomas Street (condition poor, priority category D - slow decay; no solution agreed), Minchery Farmhouse (condition poor from slow decay, no solution, priority C), and Church of The Holy Family, Blackbird Leys (condition very bad, priority A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed).

3.9 The features below ground also make an important contribution to Oxford's rich heritage and the city has a rich archaeological abundance comprised of features that were deposited at various points in the past from prehistoric times to the modern day. The unique archaeological heritage of the city encompasses a wide variety of asset types. Notable assets include prehistoric domestic, ritual and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city. The town is also distinctive for its middle-late Saxon urban remains, its emergence as a major cloth trading town in the Norman period and for the numerous assets associated with Oxford's development as an international centre for academic study including the remains of multiple religious institutions, academic halls and endowed colleges. Other assets of particular note include the town defences, the distinctive remains associated with the medieval Jewish Community and the Royalist Civil War defences.

Encouraging high-quality urban design

3.10 Oxford continues to develop exciting new buildings at the forefront of modern architectural design. 4 of the 13 2021 RIBA south award winners were new buildings in Oxford, 6 of 13 in 2022, 3 of 11 in 2023, 2 of 6 in 2024 and 2 of 6 in 2025. Many of these award winners are within the historic core of Oxford and respond sensitively to that context, whilst successfully achieving modern and functional design that meets its brief.

3.11 Oxford City Council have been running the Oxford Design Review Panel (ODRP) for over 10 years. It is run in house by the Urban Design team with a highly experienced panel of 40 members. Design Review is an independent and impartial evaluation process conducted by a panel of built environment experts and was set up to ensure that there is a consistently high standard of design for significant built environment projects. It aims to embed best practice in urban design into the planning process. The panel promotes high quality design to help create better buildings, streets and public spaces in the city and all major development proposals are encouraged to engage with ODRP before a planning application is submitted.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 There is an on-going development pressure on historic assets and this is likely to remain the same over the coming years. However, a strong suite of historic environment policies remains in place within the Oxford Local Plan 2016-2036. There are areas where fairly significant amounts of development area expected, and these have 'Area of Change' policies within the Oxford Local Plan 2036, intended to help manage change within these areas.

4.2 The factors that enable the development of successful new buildings that are modern yet integrated are varied, and many will remain. The existing Local Plan policies such as DH1 ensure the design of proposals responds to its context from the start of the process and that sufficient information is submitted to allow a thorough understanding of the design implications. After 2036, Policy DH1 will no longer be a current policy and the NPPF will be the framework under which planning applications are determined. Although the proposed changes to the NPPF appear to reflect a move towards greater emphasis on 'beautiful' design, this would still lack the detail and specificity which is reflected in local level policies, particularly in a city like Oxford.

4.3 In addition to well-designed buildings, it is attention to walkability, landscaping, layout and availability of services that are vital to a positive experience of a place, wellbeing and health. The Oxford Local Plan 2036 identified areas of change. Without a new plan these areas of change may not provide guidance for the right areas.

4.4 Local level policies are able to focus on a level of detail which applies to the specific setting of the local area, for example Policy DH2 of the Oxford Local Plan 2036: Views and building heights, relates specifically to Oxford's view cones and it iconic skyline. In the absence of this local specificity in planning policies, there would be greater risk that the level of detail which the city needs in order to protect Oxford's uniqueness would be lost.

4.5 One of the legacies of the COVID-19 pandemic and the response to it has been a change in the way that people use the public realm, arguably engendering a greater appreciation of what is, and is not, on one's doorstep. There are clear links between urban design and health and wellbeing, and it is more important than ever that places are designed with an awareness of the impacts on these. In times of social distancing, design can also help reduce perceptions of risk. Designs that allow for safe social interactions and that help to instill a sense of community are very important. This means places designed to give space for people to interact safely and to feel comfortable in, with access to nature and opportunities for outdoor recreation and with an emphasis on designing spaces for people, not cars.

4.6 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford. Design should respond to the challenges of climate change. Buildings will need to help adaptation to climate change, for example by being well insulated and naturally ventilated to deal with potentially hot summers, reducing the risks and damages of flooding events, ensuring biodiversity is maintained, ensuring there are green spaces to absorb rainwater and reduce flood risk, and to provide natural shade in the summer.

4.7 In terms of our contribution to climate change, the running of buildings is responsible for 81% of carbon emissions of Oxford, 29% of the total being from the running of residential dwellings[2]. In Oxford there is a careful balance that needs to be struck between preserving heritage value and retro-fitting buildings to reduce their carbon contributions. However, we take as a starting point that historic buildings are inherently sustainable. The inherent embodied energy (i.e. the energy expended and encapsulated within the fabric of a building in its construction) of historic buildings means that their retention and care is consistent with modern concepts of sustainability and with the ambitions of reducing carbon emissions. The 'whole building approach' seeks to save energy, sustain heritage significance, and maintain a healthy indoor environment through understanding the building in its context.

5. Key Issues addressed through the Local Plan 2045

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to green infrastructure. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. In some cases the review of the options has resulted in changes to the names or references of the policy taken forward to the 2045 plan. The running order of the policies in the plan may also have been amended from the Regulation 18 stage.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Overall approach to different types of historic assets

5.3 At Regulation 18 stage, the preferred option was for the plan to include a suite of policies separately addressing each type of designated heritage asset were proposed in order that the nuances of the local context relevant to each can be more clearly conveyed.

Following the consultation, it was noted that while the historic environment of Oxford is of particular national significance and uniqueness, the proposed policies directly reflect national policy approaches with no deviation of note. Although not having policy could not be justified because of the unique environment, it was considered that that the best approach for the Plan would be to have a consolidated policy that addresses all relevant types of heritage asset within the city – to avoid unnecessary repetition and facilitate conciseness. Nuances and specifics on the local context can be captured in the policy supporting text or within site allocation policies as required.

5.4 There are a number of locally significant heritage assets which the Local Plan also sets out protections for through policy HD4. These non-designated heritage assets may or may not be identified in the Oxford Heritage Asset Register but still have a local relevance that, whilst not being of merit for national-level designation, is still important for supporting the wider character of the city. The policy protection afforded to these assets is not as strong as national designated assets but sets out requirements for mitigating impacts and avoiding their loss in line with the level of significance that they are deemed to warrant.

5.5 There is a significant archaeological presence across the city as was flagged earlier in the paper, and where possible it is important that this is preserved from loss through inappropriate development. At times, information is limited to there being knowledge of potential for archaeology only, thus the policy seeks to ensure that where necessary applicants undertake the appropriate investigation to identify any potentially valuable finds and undertake suitable mitigation to prevent their loss. In particular, the policy flags the City Centre Archaeological area as an area with known high concentrations of archaeology.

Promoting the principles of good design

5.6 National guidance on good design is clear that heritage considerations are an important contextual factor which should inform good design, and as such the Council is keen to ensure that these are factored into the design process for development in Oxford. The Local Plan includes an overarching design policy (policy HD1) which sets out principles of good design for Oxford including requiring applicants to utilise the design guidance held within the appendix to ensure a comprehensive approach to design of new development. This design guidance includes a checklist to prompt applicants to take appropriately address the relevant design considerations within the design rationales for their schemes.

5.7 The emphasis of the assessment will be on a design process that is clearly explained and justified, and a demonstration that the proposed development is one that works well for its intended uses and is responsive to the immediate and wider context.

Appendix A – Regulation 18 Policy options sets

- A number of potential topics for policies derive from the analysis set out in the previous sections. These will be important for delivering upon the various Local Plan 2045 objectives that seek to ensure that development at all scales in the city is of the highest design quality, and that Oxford's visual character and street scene, and its unique skyline and views in and out of the city are preserved and enhanced.

- The Local Plan 2045 therefore includes proposed policies to address aspects both protection and enhancement of different elements of the historic environment as well as a number of policy areas seeking to guide applicants towards high-quality design.

- For each potential policy, options for the specific approach that could be taken for the Local Plan 2045 have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

- Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). A summary of this screening process is included at the end of each options set table.

Policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets

- A cornerstone of good design is about ensuring proposals are informed by an understanding of existing context and designed to respond to this positively. In Oxford, a key part of this context is defined by the presence of heritage assets, and many of these have been designated for their national and local importance. There are a variety of designated assets in the city, from conservation areas and historic parks/gardens, to listed buildings and scheduled monuments, and their protection is not only about the features of the assets themselves, but often also about their wider setting.

Table A.1 - Policy options set 011a: Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a set of policies relating to designated assets that reflects the NPPF (including Conservation Areas, Listed Buildings, Registered Parks and Gardens, and Scheduled Monuments), that set out how impacts on designated heritage assets will be assessed, when mitigation is required, and how harm should be balanced against benefits, including Oxford-specific detail in relation to what harm and benefits may be for different types of assets in Oxford/in different parts of Oxford.	This could set out Oxford-specific considerations, giving local detail to the direction of the NPPF and helping to ensure local context is considered in proposals and decision making. It gives more clarity for applicants.	A list of potential harms and benefits in Oxford could never be definitive and will not precisely fit all situations. It is important it does not take over from case-by-case consideration based on specifics of the case.
Option b Include a policy or set of policies for designated heritage assets (e.g. listed buildings, conservation areas) that reflects the NPPF but does not include	Ensures that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist.	Policy wording covers a lot so is long and can be unwieldy to read through and understand. This approach relies on overarching principles that may not address specific design issues. The policy would not have to include all

Oxford-specific detail in relation to harm and benefits.		designated assets, for example there is not scope for a policy that does much more than repeat national guidance in relation to scheduled monuments and important parks and gardens. Generally, this approach of largely repeating national guidance is unnecessary.
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on delivering well-designed places, which it is not necessary to repeat.	It might be difficult to ensure proposals reflect Oxford context,risk of non – compliance with NPPF by not having more specific policies.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A or b or c **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about protecting designated heritage assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and b prioritise the protection of Oxford's designated heritage assets, ensuring the assessment, prevention or where necessary mitigation of harm. Option c would provide no local steer on the protection of designated heritage assets, but rely on national policy and guidance. The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option c would have a more neutral impact as it would rely on national policy. There is no direct national policy,

but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Designated Heritage Assets – draft policy HD1, HD2, HD3, HD4

- The preferred approach for the Local Plan 2045 policy is to have a local policy that elaborates on the NPPF, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

- As such the preferred option is option A. A suite of draft policies in proposed, that explain how the NPPF approach should be applied to different types of designated heritage asset, and which includes more detail than the NPPF and will enable the supporting text to include Oxford-specific information. This will help ensure Oxford's designated heritage assets are understood and responded to appropriately in the planning process.

Policy options set 011b (draft policy HD5): Non-Designated Heritage Assets

- There are several historic buildings and other assets which do not meet the requirements for protection of a national designation, but which are of importance to the city for their locally significant heritage values. Oxford City Council maintains a list of local heritage assets known as the Oxford Heritage Asset register (OHAr). The OHAr provides the opportunity to identify those elements of Oxford's historic environment particularly valued by local communities. Locally important heritage assets can be added to the list when they are identified, if they meet the criteria. The current policy ensures that heritage assets of local importance will be a material consideration when determining planning applications. Buildings and structures on OHAr are not given any statutory protection from demolition.

Table A.2 - Policy options set 011b: Non-Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach

Option a Include a policy that requires development to consider heritage assets of local importance. The policy would also set out criteria for assessing whether an asset has locally important heritage interest, and how to identify non-designated heritage assets.	This is very helpful in adding clarity and highlighting the importance of local assets and ensuring something of their significance is reflected in new proposals.	There is a risk the list could be seen as definitive, and it is then considered that anything not on the list has no heritage value.
Option b No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on local heritage assets, so it is not necessary to repeat it and that would aid conciseness of the Plan.	It might be difficult to ensure proposals reflect Oxford context, or to argue that something is a heritage asset if it is not clear that they are considered important in Oxford and what the criteria for defining them is.

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Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A or B **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about how to protect local heritage assets in a manner appropriate to their significance. Option a would add clarity and highlight the importance and significance of such assets within a local context, whereas option b would rely solely on national policy and guidance. Option a would score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the option would also require new design to mitigate against any potential harm, and respond to local context. Option b would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good

design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Non-designated Heritage Assets – draft policy HD5

- The preferred approach for the Local Plan 2045 policy is to have a local policy that elaborates on the NPPF approach to non-designated heritage assets. The policy approach needs to align with the NPPF, but by including a policy there is the opportunity to reference the Oxford Heritage Asset Register and also to reiterate how non-designated heritage assets may be identified.

- As such the preferred option is option A. A draft policy is proposed that sets out how non-designated heritage assets will be considered, which is accordance with the NPPF. In addition it sets out routes by which a non-designated heritage asset may be identified.

Policy options set 011c (draft policy HD6): Archaeology

- Just as with its built environment, Oxford has a rich archaeological heritage that has been progressively built up from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. New development presents opportunities to unearth and discover new archaeological remains which need to be fully realised, equally, it has the potential to harm or destroy these assets where their presence is not appropriately investigated, and impacts are not carefully mitigated.

- The policy options are intended to address the presence of archaeology, our preferred approach is to continue to define the City Centre Archaeological Area and require a holistic management plan for the colleges which are areas of known archaeological significance whilst also flagging those important features could be found elsewhere in the city. Where features could be present, we would require appropriate assessments and information gathering that can define character, significance and extent of any deposits so that these are not missed or lost. We would also positively support proposals which are designed to enhance or to better reveal the significance of the asset.

Table A.3 - Policy options set 011c: Archaeology

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the City Centre Archaeological Area. For all sites where archaeological deposits or features are suspected, require the incorporation of sufficient information to define the character, significance and extent of such deposits including a heritage assessment and full archaeological desk-based assessment if the initial assessment suggests this is relevant.	There are known to be archaeological deposits of significance across the whole city centre area, so defining this area to flag this up front and ensure assessments are carried out from the start of the process would help to bring certainty. This sets out from the start exactly what is expected which aids certainty for developers.	By defining an area there is a danger that areas outside of this will not be considered from the outset for their potential archaeological importance. To mitigate this a policy would also need to ensure it was made clear that there is potential for archaeological deposits across the city. This adds length and detail to the policy.
Option b Require a holistic management plan for key historic college owned and occupied sites in the City Centre Archaeological Area when development is proposed. These should take a holistic view of the whole college site and should consider features that should guide the location of new development within the site, including best location for basements in terms of impacts on archaeology (and cumulative impacts).	Colleges sites are almost certain to have archaeologic interest, as well as being long-term owners with extended interest in their significant sites, which they are custodians of. Where developing in an area with such significant archaeology it is important that development is considered holistically and located in the best way within a site.	This does require up front work from the colleges.
Option c Where proposed development would impact on archaeological or	This follows the NPPF approach so adds clarity that this would be expected. If the other parts of the	This adds length and detail to the policy which may not be necessary as

paleoenvironmental features and deposits, it will only be supported where the harm to such deposits and features can be eliminated or where, by agreement, mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures).	NPPF approach are to be in a policy tailored to Oxford then it would be confusing not to include this also.	it is at least partly covered in the NPPF.
Option d Map more areas as archaeological areas where it is known there are likely to be deposits/not allocate sites where archaeological deposits or features are expected to be present and require heritage assessments with potential desk-based assessments if needed.	There are other known areas of deposits, although none to the extent of the city centre. We could define these on the policies map to help flag the high likelihood of deposits in these areas, which would ensure they weren't overlooked and would add certainty for developers from the start of the process.	This risks suggesting that areas that aren't mapped are unlikely to have deposits. It might be safest to rely on initial investigations for individual sites as they come forward, which can be done in advance for allocated sites.
Option e Do not include a policy about archaeology but rely on national policy instead.	This avoids any repetition with national policy and keeps the plan focused on things that are not already covered in national policy.	Given the importance of the heritage of Oxford and its rich archaeological record it should be highlighted in the local plan. Having no specific policy would miss the opportunity to highlight this importance from the start or to tailor the policy approach to Oxford.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A, b, c, d, or e, or a combination of a, b, and c **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about protecting archaeological and paleoenvironmental assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and c would have a positive impact, options b and d do not directly apply restrictions and therefore are more likely to be neutral on their own. Option e does not provide local context, but relies solely on national policy and guidance. The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option e would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Archaeology – draft policy HD6

- The preferred approach for the Local Plan 2045is to have a local policy that defines the city centre archaeological area and that also provides guidance for when archaeological deposits are impacted. The city centre area has such a wealth of deposits, that it is almost a certainty that development will impact on them. Therefore, it is worth being upfront and setting out the starting point that deposits are likely to be found. The sets out a clear expectation that there is efficient use of land in all schemes. The policy sets out criteria to be considered in determining a site's capacity, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

- As such the preferred option is option A combined with Option C.

Policy options set 011d (draft policy HD7): Principles of high-quality design of buildings

- High quality design needs to show a good response to its surroundings as well as considering how buildings and spaces interact and function. From the materials selected to build a structure, to the provision of green open space, layout of pedestrian routes and provision of shops/amenities, design of places needs to take account of and balance many considerations in order to be successful.

Table A.4 - Policy options set 011d: Principles of high-quality design of buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that requires high quality design and include a checklist to set out key principles of what this means in detail (including principles for materials, layout, potentially secure by design, etc.), requiring that the Design and Access statement or other submission alongside the planning application covers the relevant aspects of good design. Exempt householder applications and changes of use without external alteration from needing to include answers to the relevant checklist questions in their submission.	Would help ensure that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist. Sets standards for high quality design for relevant schemes, reflects importance placed on creating distinct places in planning framework.	Types of development that checklist may apply to are limited e.g. householders and change of use not covered. Householder applications should still aspire to high design quality. Checklist can be generic, with overarching principles that may not address design quality issues affecting specific development types e.g. residential dwellings, hotels etc. The alternative is to expand the scope of checklists including becoming more prescriptive. Assessment of schemes may rely on some level of subjective judgement which might be point of contention with applicants and lead to drawn out negotiation and argument. May be onerous to apply and may require extensive officer time.

Option b Include householder applications and/or changes of use applications in the requirement to follow the checklist.	Even if there are no significant external changes of use, they may have an impact on the character of an area. Householder extensions also have an impact. Smaller applications are not necessarily simple and the cumulative impact of poor-quality design and a low expectation for householder applications can have a significant impact on the overall quality, character and particularly appearance of a place.	The impacts on design can be assessed without a checklist for these smaller applications. Many of the urban design principles will not be applicable to these or householder extensions. This approach could be quite onerous without necessarily adding significant value.
Option c include a generic design policy but be less specific e.g. have requirements for good quality design but do not rely on a checklist.	Potentially more flexibility for developers to bring forward compliant schemes and more quickly. Easy to compare requirements to NPPF and other authority baselines.	It might be difficult to ensure proposals reflect Oxford context.
Option d No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF update has more specific direction on delivering high quality design.	It might be difficult to ensure proposals reflect Oxford context, risk of non-compliance with NPPF by not having more specific policies.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b, c, or d **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No

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Rationale: Options a, b, and c are all alternatives and generally cover how far a policy goes with setting design guidance/requirements (e.g. detailed checklist or more simple). Option C would be considered as an addition to either option a or b and would expand the types of applications it applies to.

In terms of sustainability impacts... Most directly the options would impact **criterion 11. Urban Design**, but depending on the implementation of the options, they are likely to impact other criteria in the SA framework also (e.g. sustainable construction, greening, health and wellbeing etc). Option d and E are likely to have a neutral impact, but options A and B are likely to have a more positive impact because they are more prescriptive and specific about what would be considered good design in the city, potentially, option A might achieve a significant positive for this reason. Overall, the sustainability impacts between the options are similar to each other from a sustainability perspective, it is not considered necessary to scope in for detailed appraisal.

Principles of high-quality design of buildings – draft policy HD7

- The preferred approach for the Local Plan 2045 is to have a local policy that requires high quality design and that links to a checklist that sets out what needs to be considered in order to demonstrate high quality design. This policy approach is not prescriptive, but does ensure a thorough consideration is given to all aspects of high quality design.

- As such the preferred option is Option A. Option B is very similar, but would also require use of the checklist for householder and change of use (with no external alterations). This is not justified, because the approach would not be proportionate to the scale of those developments. Option C or D would not provide sufficient design guidance.

Policy options set 011f (draft policy HD9): Views and Building Heights

- Oxford has an iconic skyline, which includes the ‘dreaming spires’, as well as several special views into the historic core which are detailed in the Oxford View Cones assessment. These features mean that the city is particularly sensitive to the impacts of taller buildings, and care needs to be taken over the design and placement of such development where it is proposed so that taller buildings do not negatively impact on views of the iconic skyline.

Table A.5 - Policy options set 011f: Views and Building Heights

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area. This area contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m in height will intrude into the skyline. Require that any buildings above this height are limited and bulk, only thin, delicate and of the highest design quality, demonstrated by stringent appraisals to inform and explain design choices.	This option gives a nuanced approach to assessing heights, which aims to avoid harmful uniform heights but also ensure positive impacts. It does not prevent unwanted intrusion into the skyline because there is a rigorous process to prevent it, but it also still allows fantastic additions to the skyline.	Uniform heights can still occur. An element of judgement is introduced without a set height limit (even though a rigorous policy and process should prevent harm).
Option b Continue to refer to the High Buildings Technical Advice Note (TAN) (or an updated version) as the key evidence base for deciding appropriate heights, designing higher buildings and appraising applications.	The High Buildings TAN contains useful guidance specific to Oxford that helps positively shape design choices in relation to building heights. The guidance is already in place and has been used successfully to inform many applications and decisions.	The guidance can't itself prevent designs that are harmful to character and not justified and this would need to be in conjunction with other policy requirements. It will be necessary to make it clear that local townscape considerations still apply too.
Option c Continue to define view cones, which are the areas within a view from historic viewing places from where the 'dreaming spires' can be most clearly seen. Include a policy that requires	This approach has been successful over a long period of time. Although views of the spires may have altered over time because of growth of vegetation, there are not buildings in the view cones that prevent the viewing, enjoyment and understanding	The approach is limited to views from defined viewing points.

design within the view cones to avoid harming the views of the spires.	of the spires. These are long established as the key viewing points, and the protection, especially in combination with policies relating to the central area, has conserved the important views over time.	
Option d Include an absolute height limit in the city centre that does not interfere with the spires.	This would protect the views of the historic spires as they are.	An absolute height limit can be set lower than it potentially needs to be in order to make sure everywhere is low enough not to interfere with the dreaming spires. Any innovation or change is stifled. This approach can lead to uniform heights, leaving unwanted horizontal line that harms the foreground of views and the setting of historic assets and prevent the spires and towers to be properly discerned, detracting from their significance.

1450

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations of options e.g. option a, a+b, a+b+c, b+c+d **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** Of the options – option a does potentially allow higher buildings, meanwhile option d is a hard restriction in heights in the city centre. Option B is about making reference to the high buildings TAN to guide design considerations and option C is about incorporating view cones into a policy and including particular considerations in relation to applications within these zones.

In terms of sustainability impacts – key criteria these options are relating to is criterion 11. Urban Design/Historic Environment. All the options would likely have a positive impact for this criterion (at least in terms of supporting the historic environment). The options also potentially have an impact on criterion 12. Economic Growth, because option a is not a hard restriction, it is likely to have a neutral impact on economic growth. Option D is likley to be a negative impact. Option C potentially also has a minor negative impact for criterion 3. Efficient use of land – limiting heights potentially limits development options/density?

Overall, there are unlikely to be significant sustainability impacts from the options that would warrant testing through a detailed Sustainability Appraisal.

View Cones and High Buildings - draft policy HD9

- The preferred approach for the Local Plan 2045 policy is to have a local policy that sets guidance for what a high building is and sets criteria for guiding appropriate height and analysing impacts. The preferred approach is also to define an area within 1,200m radius of Carfax tower as needing very strong justification for any building over a set height. The preferred approach is also to continue to define view context. Taken together, these elements of the draft policy ensure that the important skyline is protected, but do also allow flexibility for well-designed schemes of height, with supporting guidance showing how to determine appropriate heights in different parts of the city.

- As such, the preferred option is a combination of a, b and c. An absolute height limit is not considered appropriate as it does not offer flexibility and could have other significant negative impacts, such as uniform height being introduced.

Policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features

- It is important to ensure that new development is designed with appropriate consideration for bin and bicycle storage and also external servicing features. The Local Plan 2045 seeks to increase the uptake of cycling further to help Oxford achieve its ambitions of improving air quality, reducing congestion and encouraging healthy lifestyles. The Local Plan also seeks to ensure that bins and external servicing features are considered at the initial stages of the design process so they can be designed in

at an early stage rather than being considered as an afterthought which can result in negative impacts on the appearance and amenity of an area. The policies in Chapter 6 of the Local Plan include guidance on bin, bicycle storage and external servicing features whilst the policies in Chapter 7 include bicycle parking design standards.

- The policy options set out below include requirements for the design of these areas. There is also an alternative option of having no locally set policy on bin and bicycle storage and external servicing features.

Table A.6 - Policy options set 011g: Bin and Bicycle Stores and External Servicing Features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Requires that bin and bicycle stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs but do not detract from the overall design, that external servicing features are integrated into the design or positioned to minimise their impact and that high quality materials are used. Include compulsory requirements, setting out binding design codes depending on location, building type etc, and requiring fire-safe spaces with adequate electric supply for charging.	Applying a discrete policy ensures considered design of these areas and not just as an afterthought; it helps alignment with other objectives of plan e.g. encouraging active, sustainable travel; effective waste management etc. This can bring in a far greater level of clarity in terms of design requirements, ensuring high design quality, public amenity etc. There is less chance for this area to be overlooked or for poorer quality to be introduced by stealth or negotiation. There are many consistent key principles that can be written into policy, to raise the awareness of the need for good design of these areas from the outset, and to be consistent with increasing e-bike ownership, etc.	Adding further burden to developers in bringing forward schemes; may be too onerous to apply or enforce.
Option b		

No specific policy, rely on NPPF.	NPPF update has specific direction on delivering high quality design.	It may be difficult to ensure proposals reflect Oxford context; difficult to ensure consistent standards and design quality if proposals are always assessed on case-by-case basis; difficult to require a minimum level of servicing without policy.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? - Option a or Option b **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option a or Option b are alternatives to each other and represent the choice between having a specific local policy or not. In terms of sustainability impacts, the two options relate to **criterion 11. Good urban design, criterion 8. to reduce traffic and associated air pollution and criterion 1. car emissions.** Option a would have a minor positive impact for all criteria above. It would help with urban design, potentially reducing the risk of bin storage being unsightly and could help encourage the use of active travel modes. Option b would have a minor negative impact as whilst there is national policy on delivering high quality design, this is not specific to the Oxford context and could result in poor quality design of either bin storage and/or cycle storage areas. Poorly designed cycle storage could deter the use of bicycle which could exacerbate congestion or air quality issues if people chose to travel by car instead. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Bin and Bicycle Stores and External Servicing Features – draft policy HD15

- The preferred approach for the Local Plan 2045 policy is to have a local policy that requires bin and bicycle stores and external servicing features to be considered at the outset of the design process. This will help to ensure a higher quality design. It would also help to meet other Local Plan 2045 objectives including encouraging active travel and effective waste management.

- As such the preferred option is option A. The draft policy includes a set of criteria that should be considered. Option B is to not have a bespoke policy but to rely on the NPPF. This may result in inconsistent standards of bin and bicycle storage provision, which may have negative implications including on the urban realm.

Background paper 012

Transport

This paper addresses: Oxford's circumstances around Transport and Movement
Relevant Local Plan Objective(s): • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040 8. To reduce **traffic and associated air pollution** by improving travel choice, encouraging active travel, shortening journeys, and reducing the need to travel by car/lorry.
SEA themes: Air, Climatic Factors, Material Assets

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1. Introduction

1.1 This paper focuses on Oxford's transport system. It provides a context for considering this subject by providing a brief summary of the relevant national and local plans, policies and

programmes that currently exist and will influence change in the future. There is a section on the current situation which includes some key information about existing and emerging strategies. As part of an assessment of the current situation some of the key challenges and future trends that are likely to impact on the transport system are identified. The next section explores what would happen without a new Local Plan and the potential difficulties that the city would face in terms of transport and connectivity. Finally, it discusses what the emerging Local Plan 2045 could do to meet the objectives of both existing and emerging policies and strategies.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

Plans Policies and Programmes

National Planning Policy Framework (NPPF)

2.1 The NPPF (December 2024) indicates (paragraph 109) that transport issues should be considered from the earliest stages of plan-making. This should involve identifying and pursuing opportunities to promote walking, cycling and public transport use. It states (paragraph 111) *"Planning policies should: [...] b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils […] d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)."* In terms of parking, the framework specifies (paragraph 112-113) that policies should take into account the availability and opportunities for public transport.

Regional Policy and Strategy

2.2 England's Economic Heartland (EEH), the subnational transport body stretching from Swindon in the west to Cambridge in the east published its Transport Strategy: Connecting People, Transforming Journeys in February 2021. Although a non-statutory document, this strategy sets out a policy framework designed to deliver the EEH's ambition to support sustainable growth and improve quality of life and well-being through a world-class, decarbonised transport system which harnesses the region's global expertise in technology and innovation to unlock new opportunities for residents and businesses, in a way that benefits the UK as a whole. Informed by a programme of technical work, taken forward in collaboration with partners within the Heartland and Government, the strategy is guided by four key principles:

- Achieving net zero carbon emissions from transport no later than 2050, with an ambition to reach this by 2040;
- Improving quality of life and wellbeing through a safe and inclusive transport system accessible to all which emphasises sustainable and active travel;
- Supporting the regional economy by connecting people and businesses to markets and opportunities; and

- Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact.

2.3 There are various relevant strategies listed below:

- The EEH have produced multiple connectivity studies (see here: https://englandseconomicheartland.com/publications-and-papers/publications) for areas in Oxfordshire which helps to identify opportunities for partnership working and develop the case for regional funding and further scheme development.
- Transport mode-based evidence studies and strategies have also now been produced. These include:
    - The Active Travel Strategy (Part 1 (March 2022) and Part 2 (July 2023)) which identifies cross boundary opportunities to improve active travel;
    - The Regional Bus Strategy (July 2022) which identifies opportunities to improve cross boundary bus movements;
    - The Mobility Hubs Business Case Guidance (March 2023) which provides practical guidance and advice in developing business cases and undertaking appraisal for mobility hub proposals;
    - The Improving the North Cotswold Line strategic narrative (January 2025) and The case for reinstating Oxford-Swindon-Bath-Bristol rail services (January 2025) which both aim to improve services along their corridors, Hereford, Worcester and Oxford and Oxford-Swindon-Bath-Bristol respectively.

Local Transport and Connectivity Plan (LTCP)

2.4 The LTCP, adopted in July 2022 and updated in November 2024 is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents.

2.5 The headline targets in the LTCP include:

By 2030:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire;
- Reduce car vehicle miles driven in Oxfordshire by 10%;
- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week; and
- Reduce road fatalities or serious injuries by 50%.

By 2040:

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

By 2050:

- Have zero, or as close as possible, road fatalities or serious injuries; and
- Deliver a transport network that contributes to a climate positive future

2.6 These are to be achieved by reducing the need to travel, discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice. The LTCP vision and policies will be used to influence and inform how we manage transport and the types of schemes implemented. The latest LTCP monitoring report covering 2023-2024 was published in November 2024.

2.7 The LTCP is supported by a number of strategies and plans which are relevant to Oxford. These include the Active Travel Strategy (July 2022) which focuses on active travel modes; the Mobility Hub Strategy (July 2023) which focuses on transport interchanges across the county to improve the way we travel and to better integrate different transport modes; the Freight and logistics strategy (July 2022) which addresses some of the challenges with the movement of goods in Oxfordshire; the Innovation Framework, (October 2021) which sets out guidance as to how to consider innovation within planning and development; the Digital Infrastructure Strategy (updated summer 2022) which sets out how to continue to improve both fixed and mobile digital connectivity in collaboration with partners, suppliers, and central government, the Central Oxfordshire Travel Plan (COTP) (August 2023) which sets out the transport plan for the central Oxfordshire area from 2023 to 2050, with a focus over the period to 2032 and the OxRAIL 2040: Plan for Rail (November 2025) which aims to deliver on high-level policies on rail and public transport described in the LTCP.

Central Oxfordshire Travel Plan (COTP)

2.8 The COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors (Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley). The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets. For Oxford these include the following:

- an expanded zero emission zone (ZEZ) - an expansion of the pilot ZEZ launched in February 2022;
- strategic traffic filters - intended to reduce traffic levels in Oxford by managing the use of certain roads in the city by private cars; and
- a workplace parking levy - an annual charge to businesses with 11 or more staff parking spaces within the Oxford ring road. The funds raised from a WPL would be set aside to improve transport in and around the city.
- Improving priority and safety of sustainable modes through implementation of the Oxford Local Cycling and Walking Infrastructure Plan (LCWIP) (March 2020) and the Oxfordshire Strategic Active Travel Network (SATN) sets out priority infrastructure measures fundamental to achieving a step change in cycling and walking in Oxford in terms of infrastructure. This includes low traffic neighbourhoods (LTNs), and the introduction of active travel routes (Quickways,

Quietways and Connector Routes). Whilst there are no specific targets for improving overall walking levels, the LCWIP supports measures to provide appropriate infrastructure for those with mobility issues, children and older people.

- The introduction of a Central Oxfordshire Movement and Place Framework (COMPF). A joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration.

Oxfordshire Housing and Growth Deal

2.9 The Oxfordshire Leaders Joint Committee (formerly the Future Oxfordshire Partnership) secured £215 million of Government investment for new homes and infrastructure across Oxfordshire in 2017, of which £60m is for affordable housing and £150m is for infrastructure improvements. Within Oxford City, funding from the Housing and Growth Deal is being used alongside match funding and other developer funding to fund technical work for infrastructure improvements that include a number of measures set out in the COTP, as well as complementary development work to support the reopening of the Cowley Branch Line; a new pedestrian and cycle bridge between Oxpens and Osney Mead and the Environment Agency's planned Oxford Flood Alleviation Scheme (OFAS).

Department for Transport's Local Growth Fund and Homes England's Housing Infrastructure Fund (HIF)

2.10 Oxfordshire County Council has secured funding from the above for improvements between Eynsham and Oxford. The A40 improvement programme which will improve the commutes of current and future residents as well as visitors to Oxford, includes a new bus lane between Eynsham and Oxford and upgraded walking and cycling facilities along the route.

Bus Service Improvement Plan (BSIP)

2.11 In March 2021 the Department for Transport published a new long-term national strategy for buses in England titled Bus Back Better. This asks local authorities and bus operators to work in partnership to develop ambitious plans to deliver better bus service in their area. Oxfordshire's Bus Service Improvement Plan was adopted in October 2021. It is reviewed annually with the latest update in June 2024. The Oxfordshire BSIP delivery plan 2025-26 which includes improvements in the Oxford City area was approved in March 2025.

2.12 In March 2022, Oxfordshire County Council was awarded funding from the government's Zero Emission Bus Regional Areas (ZEBRA) scheme. With additional funding from the council and bus companies Stagecoach and the Go Ahead Group, the ZEBRA scheme will deliver 159 electric buses and supporting charging infrastructure to Oxfordshire. Electric buses are now operational on many routes covering Oxford, helping to improve air quality within the city, reduce CO2 emissions and make bus travel a more attractive option.

Oxfordshire Rail Corridor Study

2.13 The Oxfordshire Rail Corridor Study (ORCS) (June 2021) was jointly funded by the Department for Transport, Future Oxfordshire Partnership (now named the Oxfordshire Leaders Joint Committee) and other partners. It focuses on the movement of people and goods across the rail network in Oxfordshire, with particular emphasis on how rail can support growth and development across the County and the wider region and inform strategic decisions. The study identifies several strategic capacity requirements on the rail network as well as a need for better connectivity between key rail hubs within the county. For Oxford City, the introduction of East-West rail services from Milton Keynes/ Bletchley to Oxford require improvements to the capacity and upgrades at Oxford Rail Station which are being undertaken. Further service enhancements are also identified to enable new passenger services via the Cowley Branch Line to London with two new stations on the Branch Line. The study also identified a need for increases in freight path availability particularly between Didcot and Oxford, including 4- tracking of the rail line between Oxford Station and Radley.

Oxfordshire Connect

2.14 Oxfordshire Connect is a programme to upgrade Oxford Station and includes expanding the railway infrastructure and improving the local road network. The works include the replacement of the Botley Road bridge to enable upgrades to Oxford station, the wider railways and road, cycle and pedestrian routes as well as signalling and track upgrades. The outcomes the programme will bring include:

- A bigger, better station for everyone;
- More services with East West Rail;
- Additional rail capacity for the future; and
- An improved and safer road layout.

Electric Vehicle (EV) Charging Strategy

2.15 The Oxfordshire Electric Vehicle Infrastructure Strategy (OEVIS), adopted by Oxfordshire County Council in March 2021 sets out policies and plans to support the transition to zero emission road transport. This will help Oxfordshire to achieve net zero carbon, reduce air pollution, and deliver key transport initiatives such as the Oxford Zero Emission Zone (see above). The strategy is among the first of its kind in the UK and has been a collaborative piece of work between the County and five district councils of Oxfordshire.

2.16 Of the 17 OEVIS policies, those of most relevance to policy makers are Policy EVI 7 and Policy EVI 8:

Policy EVI 7: The Councils will seek to include statements & policies supportive of EV charging infrastructure and, where appropriate, references to the Oxfordshire Electric Vehicle Infrastructure Strategy in their planning standards and guidance;

Policy EVI 8: The Councils will benchmark nationally, and between themselves, each seeking to set minimum standards for the quantity of EV charging to be provided in developments in their planning requirements.

2.17 Oxford City has adopted its own Electric Vehicle Infrastructure Strategy (July 2022) and has installed a number of EV charge points across the city as part of the 'Go Ultra Low Oxford' project.

Transport/ Traffic Modelling

2.18 The transport/ traffic model used to inform the Oxford Local Plan 2045 is the County Council's Oxfordshire Strategic Model (OSM). Background Paper 012a provides a discussion of how that model has been used to inform plan-making in the city.

Oxford Local Plan 2036

2.19 The Oxford Local Plan 2036 is the current adopted Local Plan. The plan aims to reduce carbon emissions, encourage the use of sustainable transport modes and make the best use of land. Section 7 contains strong policies to help realise this strategy:

- Policy M1 seeks to promote sustainable transport choices by prioritising walking, cycling and public transport.
- Policy M2 seeks the submission of Transport Assessments/Statements and Travel Plans from development proposals that will have significant transport implications, with the intention of reducing car travel and encouraging the use of sustainable transport.
- Policy M3 requires new residential development to be car free in Controlled Parking Zones and no increases in parking provision and ideally a reduction, in all other areas. For non-residential developments the policy aspirations are to keep parking levels to an operational minimum, with a shift towards more sustainable travel modes. A low standard for car parking provision means that a greater proportion of scarce land can be used for providing homes and avoids issues of parking creating poor urban design. Reduced car parking, and therefore car ownership and car trips, is likely to reduce air pollution and noise levels. Fewer cars using the roads improves the attraction of walking, cycling, and spending time in the public realm.
- Policy M4 seeks the provision of electric charging points in new developments.
- Policy M5 addresses cycle parking provision.

Corporate Plan

2.20 Oxford City's Council's Strategy 2024-28 was approved by the Council's Cabinet in July 2024. Its five priority areas of focus are:

- Good, affordable homes;
- Strong, fair economy;
- Thriving communities;
- Zero Carbon Oxford; and
- Well-run Council.

2.21 The strategy identifies that achieving a Zero Carbon Oxford will require a citywide effort, involving local and national government, businesses, institutions and citizens. To help achieve a Zero Carbon Oxford, priorities for the City Council include:

- Decarbonising homes and other buildings and securing the additional funding required to meet the target of becoming a zero carbon council by 2030 and a net zero city by 2040;
- Maintain and improve parks, green spaces, biodiversity and access to nature; and
- Develop low carbon infrastructure and support households, businesses and institutions to save energy and cut emissions.

2.22 Commitments to achieve these priorities include:

- Ensuring all homes and other buildings are built to high standards with good energy efficiency;
- Maintain and improve biodiversity in our green spaces and access to nature in the city; ensure building projects support biodiversity by providing land for OX Place and other developers to use for Biodiversity Net Gain locally when exceptional circumstances mean it cannot be delivered on the building site itself; and
- Working with partners to deliver a Local Area Energy Plan for Oxford to support decarbonisation and infrastructure development.

2.23 To help enable a strong fair economy, the City Council commits to maximising the local benefit from investment in a new station for Oxford, and continuing to work for the Cowley Branch line extension (which received £120m of government funding in October 2025).

2.24 The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. It is underpinned by the Medium-Term Financial Strategy 2026-27 to 2028-29 that sets out the financial priorities and commitments over the next three years. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators (see the Annual Business Plan 2025 to 2026). In turn the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

Oxford Climate Emergency

2.25 In January 2019, Oxford declared a climate emergency and in autumn 2019 was the first city to hold a Citizen's Assembly on Climate Change. Since 2019 work has continued to tackle the climate emergency and Zero Carbon Oxford is the goal for Oxford to achieve net zero carbon emissions across the city as a whole by the year 2040, 10 years ahead of the legal deadline set by Government.

2.26 In February 2021, the Zero Carbon Oxford Partnership was created, comprising a group of leaders from Oxford's main institutions and employers, including the universities, hospitals, businesses and other organisations. The Zero Carbon Oxford roadmap and Action Plan

was published in July 2021 outlining how the 2040 target can be achieved. Zero Carbon Oxford projects include Energy Superhub Oxford, Europe's most powerful electric vehicle charging hub; Oxford Zero Emission Zone (see above), introduced by Oxfordshire County Council and Oxford City Council to improve air quality, cut carbon emissions, and move towards zero emission travel in the city; and Go Ultra Low Oxford which provides electric car charging solutions for Oxford residents who do not have a driveway.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 Oxford is a city recognised for its high levels of walking and cycling however, the LCWIP identifies that cycling conditions, provision and routes are often very poor. The cycling section of the Active Travel Strategy and the Oxford LCWIP sets targets to increase both commuter cycling and all cycling trips in Oxford by 50% by 2031.

3.2 Figure 3.1 shows the number of cycle trips per week in Oxford City between 2016 and 2023. This data is calculated using Sport England's Active Lives Survey. The data shows that the number of cycling trips per week in Oxford fell from 2019 to 2021, which is most likely because of the Covid 19 pandemic. Since 2021 the number of trips has increased but have not returned to those recorded pre pandemic. Notably, the surveys were conducted during different months in each year which does have an impact upon cycling take up.

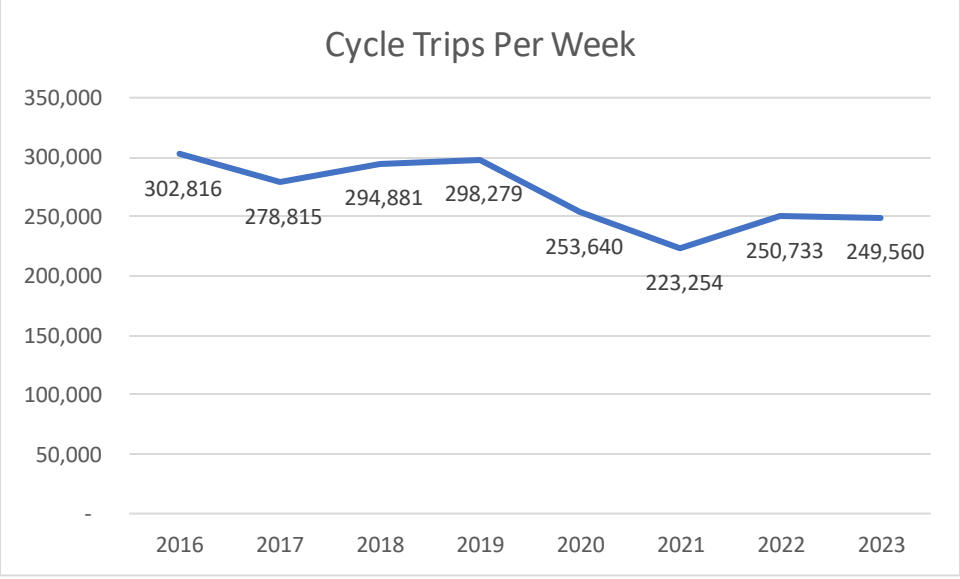

Figure 3.1 - Total number of cycle trips per week 2016 – 2023

3.3 Figure 3.2 shows the number of walking trips per week in Oxford City between 2016 and 2023. This data is calculated using Sport England's Active Lives Survey. The data shows that the number of walking trips per week has fluctuated over the years, with the lowest

number of trips occurring during 2017. More recent data shows that the number of trips has been increasing since 2021 and now exceeds the previous recorded high in 2018.

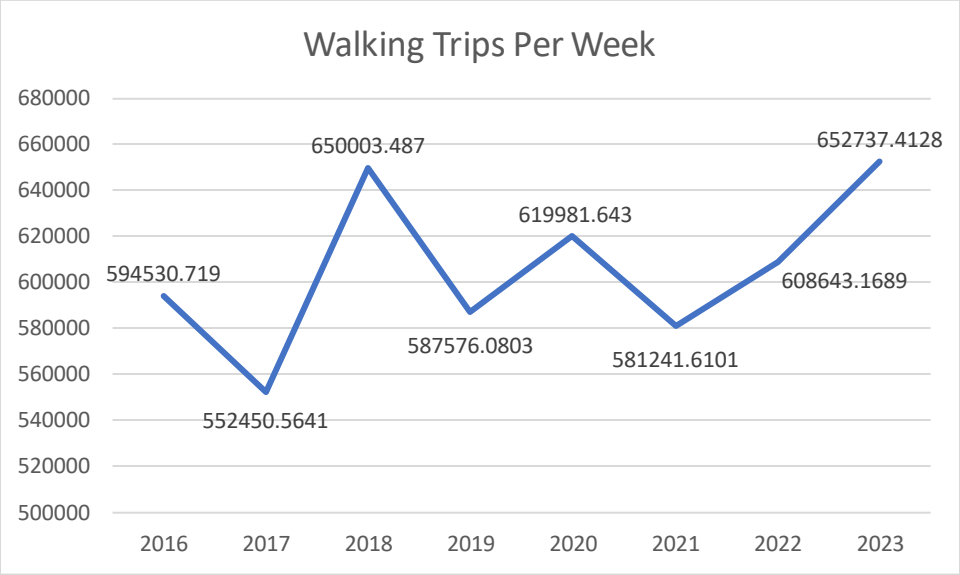

Figure 3.2 - Total number of walking trips per week 2016 – 2023

3.4 In terms of commuter travel, Figure 3.3 shows a comparison of the transport mode share of Oxford with the rest of Oxfordshire and nationally. This comparison uses data from the 2021 census which was undertaken during the COVID-19 pandemic. Census Day was in March 2021 during the national lockdown and although the census addressed questions related to Travel to Work, it did not collect any workplace address information for those working at home, including those following government guidance to do so. Furthermore there were large numbers of people still being supported by government furlough schemes and it is not clear whether the Office of National Statistics (ONS) guidance issued in relation to this question was followed; some people may have provided travel information for the last time they worked, or they may have answered with their behaviours on Census Day.

3.5 Notwithstanding the above, the data which includes a 'working from home' category (that accounts for residents who live in Oxford and work remotely (i.e. do not commute)) shows that when compared to the rest of the Oxfordshire and nationally, Oxford has a much higher share of people commuting to work on foot and by bicycle or bus. Consequently, the percentage of people travelling to work by train, or by car or van is much lower than national averages.

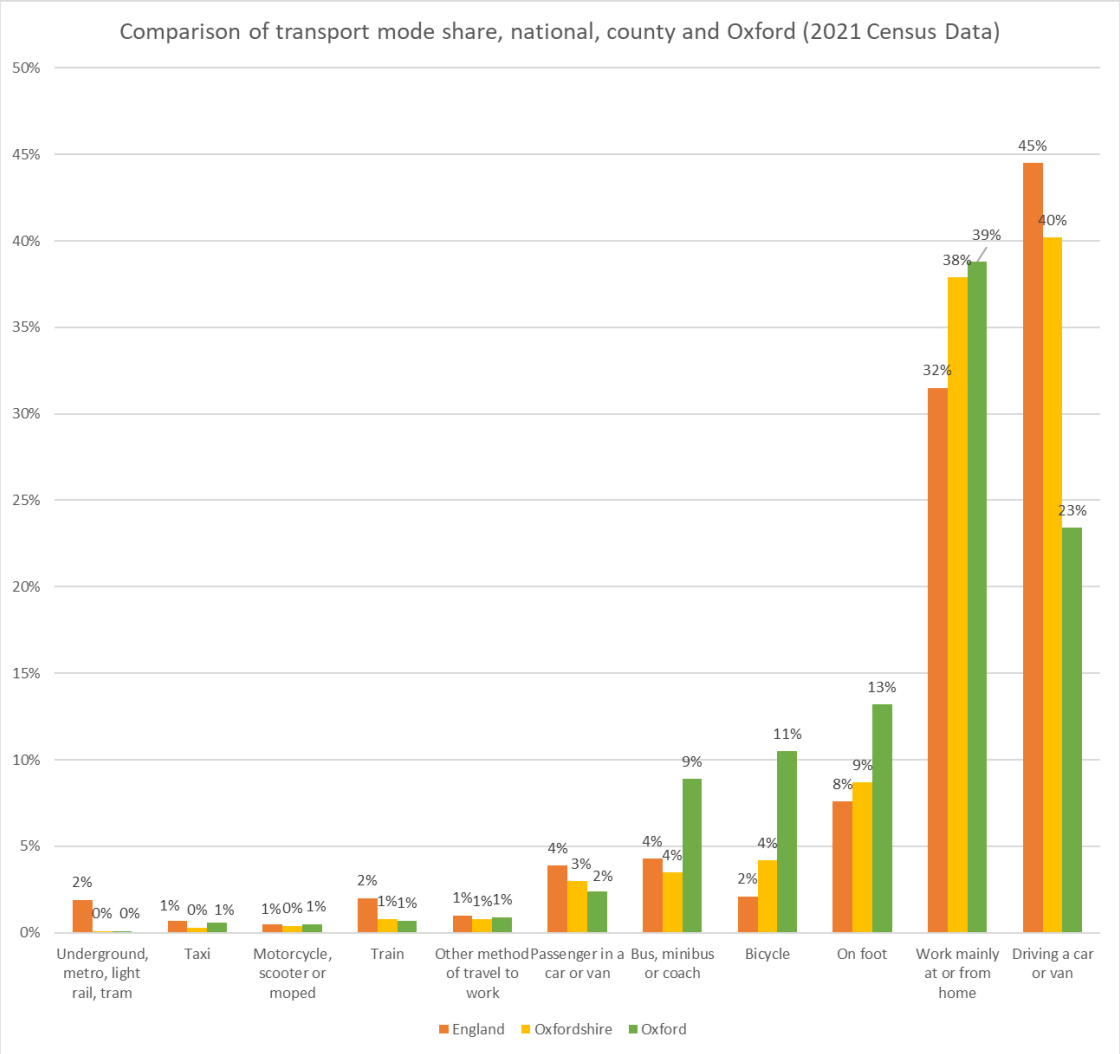

Figure 3.3 - Transport mode share for Oxford, Oxfordshire and England (2021 Census)

3.6 Whilst it is not possible to analyse origin destination by mode of transport from the 2021 census dataset, it is possible to review the journey origin data for commuters to Oxford. At the time of the 2021 census, a total of 92,047 people worked in Oxford, including 34,732 who worked from home or had no fixed place of work, and 28,973 who travelled within the area. Excluding those 'working from home' and those 'who lived within the Oxford boundary', the largest movement into Oxford was from the Vale of White Horse, followed by Cherwell and South Oxfordshire as shown in Figure 3.4 below.

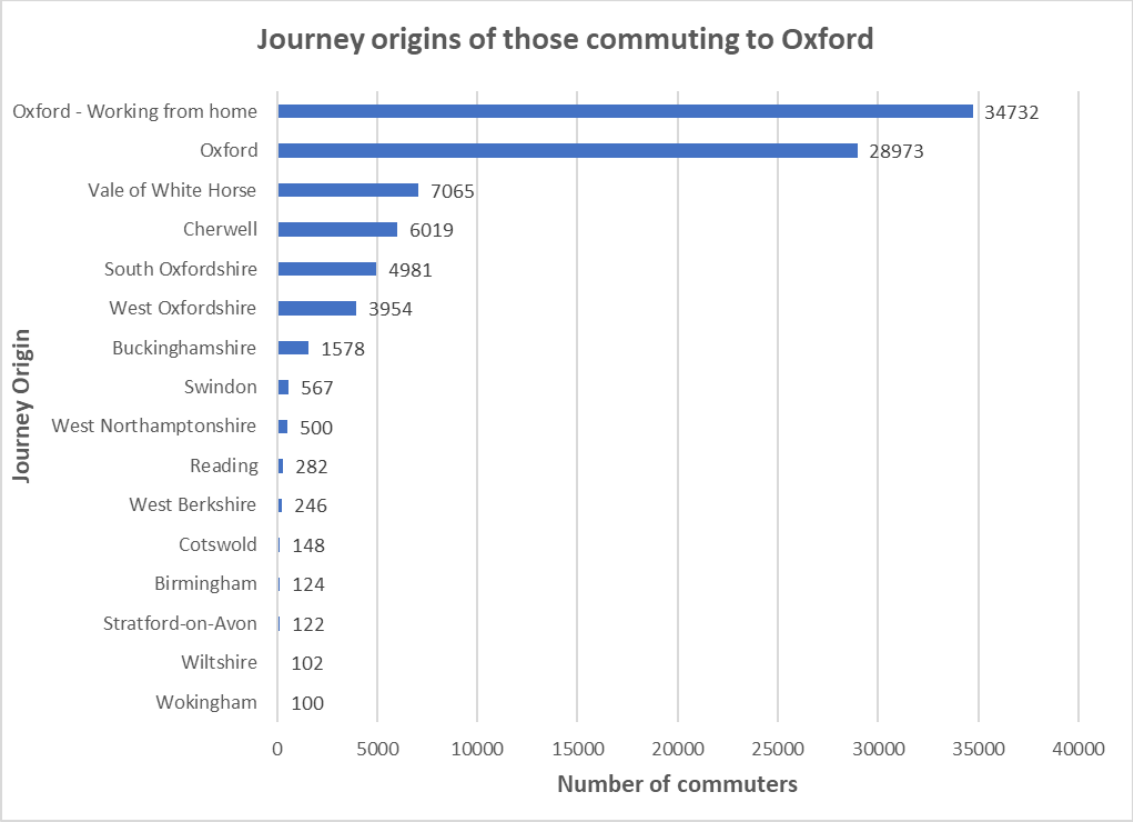

Figure 3.4 - Journey origin data for commuters to Oxford.

3.7 Within Oxford itself, it is possible to review the origin and destination of working people within specific wards of the city by using the Origin-Destination Explorer and then using the Census 2021 Maps to identify Middle Super Output Areas (MSOAs). Table 3.1 below identifies origin and destination data for wards in the east of the city that are either near or contain areas of employment (e.g. the Science Park, ARC Oxford (former Oxford Business Park), BMW, and the Headington hospitals). The data set for Oxford (all wards) has also been included as a reference point.

Area (MSOA)	Lived here	Worked here	Lived and worked here	Travelled to another area to work	Travelled from another area to work	Go (out) to work to:	Come to work from:
Oxford	***73,324***	***92,047***	***63,705***	***9,619***	***28,342***	***Vale of White Horse (2,292), South Oxfordshire (1,702), and Cherwell (1,638)***	***Vale of White Horse (7,065), Cherwell (6,019), and South Oxfordshire (4,981)***
Littlemore & Rose Hill	5,500	5,293	2,484	3,016	2,809	Oxford Central (418), Lye Valley and Cowley East (403), Headington (374)	Greater Leys (160), Blackbird Leys (157), Cowley South and Iffley (151)
Blackbird Leys	3,116	2,240	1,062	2,054	1,178	Lye Valley and Cowley Easy (386), Headington (261), and Oxford Central (257)	Greater Leys (123), Littlemore and Rose Hill (106), and Lye Valley and Cowley East (79)
Greater Leys	3,332	1,479	1,098	2,234	381	Lye Valley and Cowley East (348), Headington (284), and Oxford Central (253).	Blackbird Leys (64), Littlemore and Rose Hill (42), Cowley South and Iffley (26)
Cowley North	4,076	2,862	1,938	2,138	924	Oxford Central (452), Headington (316), and Lye Valley and Cowley East (223)	Cowley South and Iffley (66), Littlemore and Rose Hill (57), Lye Valley and Cowley East (49)

Cowley South and Iffley	5,482	4,478	2,611	2,871	1,867	Oxford Central (549), Lye Valley and Cowley East (429), Headington (335)	Littlemore and Rose Hill (205), Greater Leys (121), and Blackbird Leys (118)
Lye Valley and Cowley East	4,064	8,713	1,916	2,148	6,797	Headington (533), Oxford Central (316), and Churchill (203)	Cowley South and Iffley (429), Littlemore and Rose Hill (403), and Blackbird Leys (386)
Headington	5,166	16,693	3,402	1,764	13,291	Oxford Central (345), Churchill (273), East Central Oxford (78)	Barton (821), Churchill (723), and Risinghurst and Sandhills (693).

Table 3.1 - Origin Destination Data for city wards

3.8 Table 3.1 shows that the largest movement of people out of Littlemore and Rose Hill, Cowley North and Cowley South, Iffley and Headington was to Oxford Central. The largest movement of people out of Blackbird Leys and Greater Leys was to Lye Valley and Cowley East, and the largest movement of people out of Lye Valley and Cowley East was to Headington.

3.9 The strategic road network around Oxford is primarily served by the A34, A40, A420, and the ring road. Within Oxford, key arterial routes accommodate large amounts of vehicular traffic; sharing these with strategic bus routes that connect Oxfordshire's principal towns and settlements (such as Abingdon, Banbury, Bicester, Didcot, Kidlington, Thame, Wantage, and Witney) as shown in Figure 3.5. Banbury, Bicester, and Didcot, as well as a number of smaller villages are also connected to Oxford via the railway network. Together, the bus and railway network provide opportunities for commuter traffic from neighbouring authorities to access the city by sustainable modes. National Cycle Routes 5 and 57 also provide access to the National Cycle Network, with connections to Bicester, Didcot, Kidlington and Thame; as well as several smaller villages on these routes.

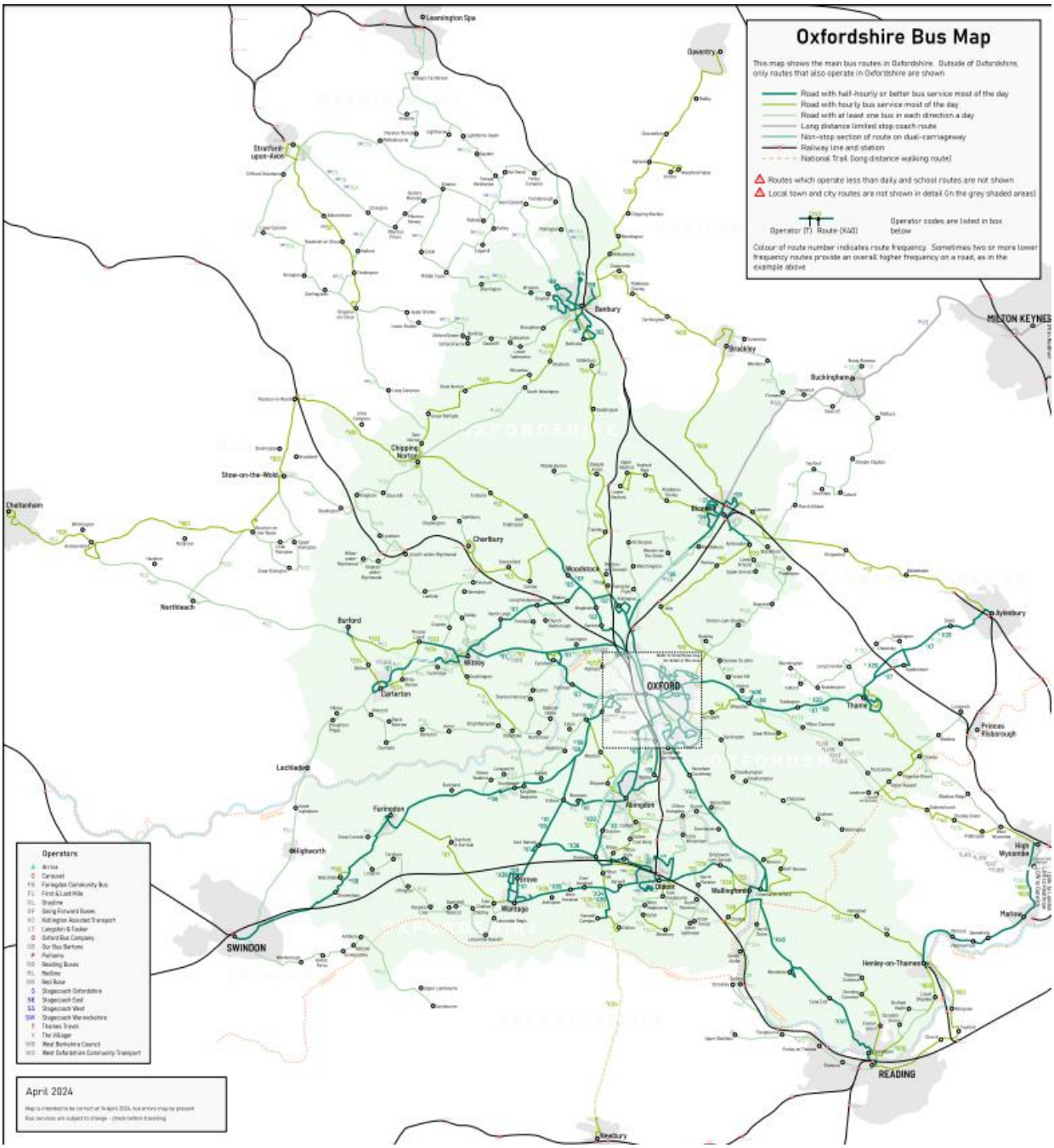

Figure 3.5 - Oxfordshire Bus Map (reproduced here with permission of Oxfordshire County Council)

3.10 Despite having very good bus services and higher levels of cycling and public transport use than many comparable cities in the country, congestion on Oxford's main roads is endemic. The entire city of Oxford has been a designated Air Quality Management Area (AQMA) for NO_2 since 2010 and whilst air pollution levels have significantly improved in the city over the last few years, Oxford City Council is aware that there's still more to be done. The latest Air Quality Annual Status Report (published June 2025 and reporting on 2024 observations) indicates that the transport sector continues to be the largest contributor (44%) to total emissions of Nitrogen Oxides (NO + NO_2) in the city, followed by combustion from industry

and services (30%), domestic combustion (26%), and others: waste, agriculture, solvents, nature (<1%). The Natural Resources background paper (BGP.9) provides more information on air quality in the city and the strategies that are in place to improve it.

Motor Vehicle Parking

3.11 In a compact city like Oxford where there are many competing demands on space, it is important to consider whether using large areas of land for parking of vehicles is appropriate. Vehicle parking is usually an inefficient use of land. However, there will be those who need to drive or who drive to access certain areas at certain times and for particular types of trips. The needs of people to access services and potential impacts on local centres if there is not enough parking must be balanced against the negative effects of car traffic generation.

Public Car Parking in City and District Centres

3.12 With regards to public parking provision, the current Local Plan's strategy is that in the city centre, levels of public parking will be maintained at approximately the same levels, with a discouragement of arrivals during network peaks. Meanwhile, within district centres it is to maintain roughly current levels of public parking.

Residential Parking

3.13 The current Oxford Local Plan 2036 permits only low levels of residential parking for new residential developments. The majority of the city has an excellent existing level of public transport provision, as well as good connectivity by walking and cycling, therefore, in certain circumstances, Policy M3 of the Local Plan requires residential developments to be "car free"; that is they will have no general parking spaces provided for residents. Policy M3 allows for some parking however, for example for disabled and visitors, ensuring there are not negative consequences for accessibility for the elderly, disabled and vulnerable groups.

Controlled Parking Zones (CPZ)

3.14 Large parts of the city are already covered by a CPZ (an area where parking is only permitted in designated parking bays, and the rest of the kerbside space is restricted by yellow lines) as shown on the map in Figure 3.6 below. Where CPZs have been implemented they have been extremely successful in removing commuter parking. Further expansion of CPZs is currently being rolled out by Oxfordshire County Council, and Oxford City Council supports these measures and efforts to ensure that increases in residential population and/or in visitors do not bring about increases in the number of vehicles parked in an area. In CPZs, new developments with little private parking are less likely to have a negative impact on surrounding areas, as parking cannot be displaced to the street. Over time it is likely that most streets in the city will be covered by parking restrictions.

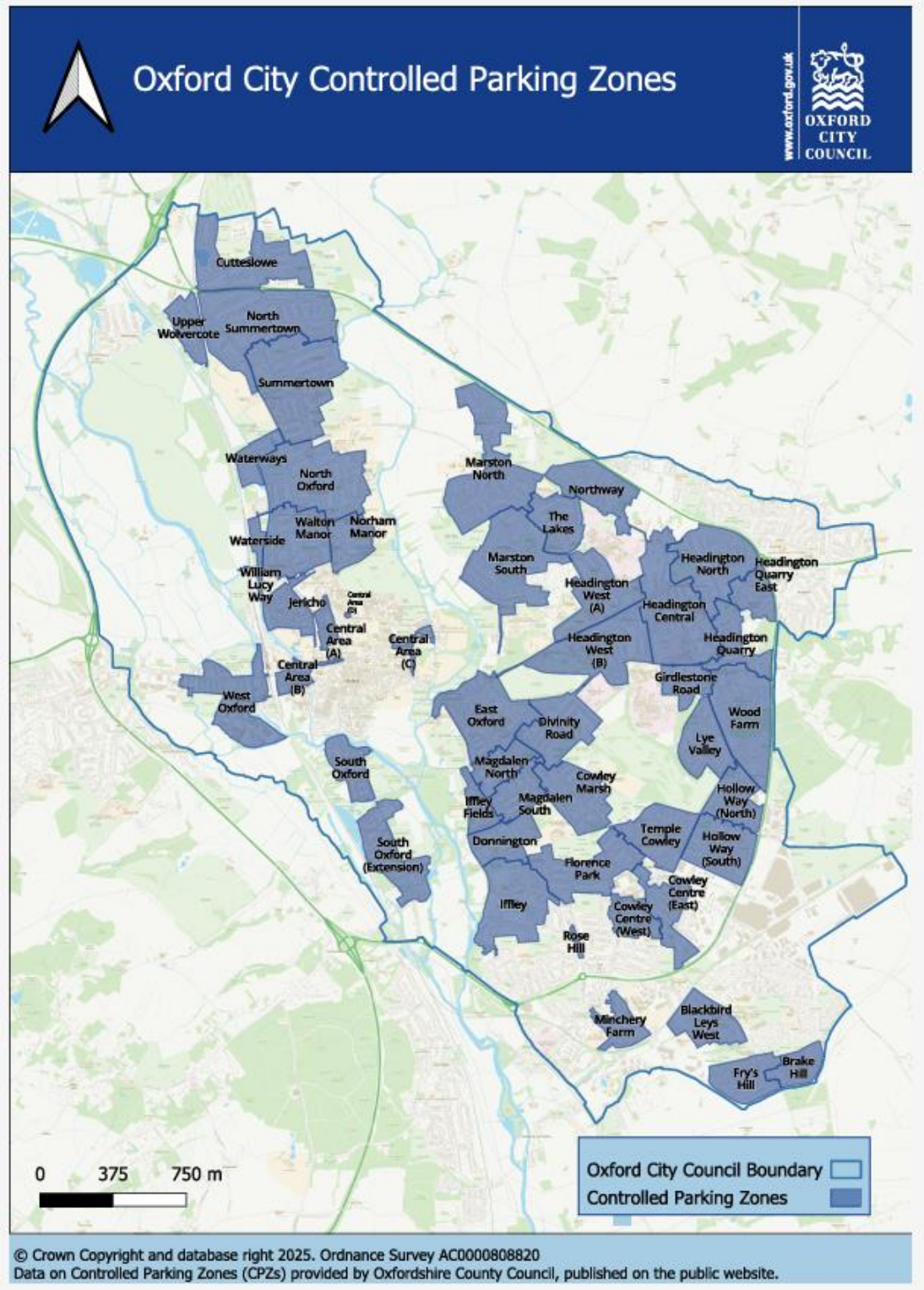

Figure 3.6 Controlled parking zones in Oxford (November 2024 Oxfordshire County Council)

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 Without a new Local Plan, the policies within the current Local Plan 2036 would remain in place until 2036 or until they become otherwise out of date. At this point the National Planning Policy Framework would take over as a default. These policies should help deliver increased use of sustainable modes of transport within Oxford. The residential car parking policies should help reduce car ownership on new build developments. Other policies seek to safeguard land for the reopening of the Cowley Branch Line for passenger services and support the redevelopment of Oxford Rail Station.

4.2 With the population and job growth envisaged for Oxfordshire, a continuation of existing levels of car use would threaten to over-burden the transport network. Both Oxfordshire County Council and Oxford City Council are preparing detailed measures for implementing the Central Oxfordshire Travel Plan. This will include traffic filters, the introduction of a workplace parking levy, and an extended zero emission zone in the city centre.

4.3 Without a new Local Plan, these measures will still come forward, but the existing policies will remain as drafted when the plan was adopted in 2020 and in time, will become out of date whereas the evidence base and influencing strategies as described above, will have continued to develop and evolve, and the urgency with which we need to address the climate emergency will also have increased. A new Local Plan provides the opportunity for the existing policies to evolve and be further developed to ensure that the issues affecting Oxford are addressed.

5. Key issues addressed through the Local Plan

Introduction

5.1 The analysis set out in the previous sections of this background paper indicate that the Local Plan 2045 will need to take account of existing and emerging transport strategies for Oxford including those that the County Council as LHA are leading on. These strategies will help shape policies that encourage travel by sustainable modes, such as walking, wheeling, cycling, and public transport, helping to continue to address the transport sector's contribution to climate change in Oxford.

5.2 The Regulation 18 consultation identified a number of transport and movement topics that could be addressed through implementation of a policy. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The tables identified potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and helped inform the preferred position set out for consultation.

5.3 Additionally, the options sets were considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

5.4 The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period. The tables are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan 2045.

5.5 This section will now discuss the key issues that are being addressed through the Local Plan 2045 in response to the topics and how the policies respond to them. The proposed policies are as follows:

- Transport Assessments/Statements, Travel Plans and Service and Delivery Plans,
- Cycle Parking and Powered Two Wheeler Parking,
- Motor Vehicle Parking Design Standards, and
- Electric Vehicle Charging

Transport Assessments/Statements, Travel Plans and Service and Delivery Plans

5.6 The Plan sets out the requirements relating to the submission of Transport Assessments/ Statements, Travel Plans, Delivery and Service Management Plans and Construction Management Plans in support of development proposals. This has been included to ensure that major new development proposals seek to optimise active travel and public transport opportunities and aim to limit the increase in car journeys which would contribute to air pollution and congestion.

5.7 The requirements for Transport Assessments/ Statements are set out in Policy C6 and Appendix 7.2. Travel Plan requirements are set out in Policy C6 and Appendix 7.3. The requirements for Delivery and Service Management Plans and Construction Management Plans are set out in Policy C6.

Cycle and Powered Two Wheelers Parking

5.8 The Plan seeks to ensure that adequate parking provision is made for these modes of transport in new developments. The parking design standards for cycle and powered two wheelers is set out in Policy C7 and Appendix 7.4. The standards largely align with Oxfordshire County Council's Parking Standards for New Developments, with

some elements tailored to the local context. Following feedback from the Regulation 18 consultation the title of the policy has been amended from 'Bicycle' to 'Cycle' as this is considered a more inclusive term. The direct reference to 'Motorcycle' within the policy title has also been removed as was not considered necessary as 'Powered Two Wheeler' includes motorcycles.

Motor Vehicle Parking Design Standards

5.9 The Plan seeks to reduce opportunities for parking in different types of development across the city. The parking standards for residential and non residential developments are set out in Policy C8 and Appendix 7.6. The standards align with Oxfordshire County Council's Parking Standards for New Developments.

Electric Vehicle Charging

5.10 Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. To ensure that chargers are well located and designed for ease of use, the requirements for electric vehicle charging for both residential and non residential developments are included in Policy C8 which includes reference to the Oxfordshire County Council Street Design Guide to ensure suitable provision for off-plot parking.

Appendix A – Policy options and preferred approaches

Policy options set 012a (draft Policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

Key tools to appraise and determine the transport impacts of a development proposal are Transport Assessments (TA)/Statements (TS), Travel Plans (TPs), Construction Management Plans (CMPs) and Service and Delivery Plans (SDPs). TA/Ss are a comprehensive and systematic approaches to ensure that the transport impacts of the development are properly considered and where appropriate include measures to help mitigate development impact. TPs are a package of measures tailored to suit the needs of an individual site and focus on reducing dependence on the private car. CMPs set out measures to minimise and mitigate the impacts of construction traffic and SDPs set out measures that will be introduced to minimise impacts of servicing and delivery traffic and are required to be submitted for development proposals that will affect the city centre or district centres and also for sites in close proximity to residential areas.

The options for the policy that have been considered for the LP2045 relate to the extent of requirements for submission of TAs/TSs, TPs, Construction Management Plans and SDPs in support of development proposals.

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Table 1 - Policy options set 012a: Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require transport assessments/ statements and travel plans to review transport impacts and show transport measures proposed to mitigate them, for all development that is likely to have significant transport implications.	This approach will encourage measures that reduce the need to travel and manage congestion. In addition, more sustainable modes of travel are promoted as part of these assessments. Transport Assessments/Statements should include, for example, targets associated with the proportion of journeys made to and from the development site by travel modes more	These requirements could be seen as an extra burden on developers and those assessing applications. Travel Plans, to be effective, need monitoring, managing and where necessary enforcing. If the proposal is for employment activities, employers need to ensure that employees abide by the Travel Plan with appropriate sanctions for non-compliance.

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
	sustainable than the private car, and measures such as bus passes.	
Option b Require transport assessments/statements to also include construction management plans and service and delivery plans, where relevant.	Including construction management plans and service and delivery plans as part of the assessment process will also help to mitigate the impacts of construction, freight and service vehicles by requiring consideration of measures to minimise any issues that may arise, such as managing delivery times or construction materials. This is particularly important in busy and confined areas such as the city centre and for sites near residential areas.	These requirements could be seen as an extra burden on developers and those assessing applications.
Option c Do not include a policy requiring transport assessments/statements, travel plans, construction management plans or service and delivery plans.	Not requiring these reduces the burden on developers and assessors.	The assessment and mitigation of transport impacts of development schemes are crucial to their success or failure. Requiring an assessment as part of a planning application is the only way to secure the required information on which to make a sound planning decision. Without a requirement to assess and manage traffic impacts there may be an increase in congestion and a lack of encouragement and provision for active travel.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option a & b or Option c **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option a could either be stand alone or incorporated alongside option b. Option b is not strictly an alternative, but rather an additional option that could be added to a policy. Option c is the alternative. In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution and criterion 6. to provide accessible essential services and facilities** and the level of sustainability impact is unlikely to vary significantly between option a and b. Both option a and option b would have a minor positive impact for access. Option a and b would have a minor positive impact for air quality; however, option b would potentially have a slightly more positive impact as it would also require consideration of construction traffic management and service and delivery plans which could result in further traffic reduction and associated air pollution (dust and fumes from equipment). Option c would have a minor negative impact as there is no direct national policy, and without any requirements in place it could exacerbate current congestion and air quality issues. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

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

For the Local Plan 2045, the preferred approach is to take forward a combination of **Options A and B**. Together these options will help to encourage measures that reduce the need to travel, manage congestion and consider from the outset how more sustainable modes of travel can be promoted. The requirement for Construction Management Plans and Service and Delivery Plans will also help mitigate the impacts of the development.

Policy options set 012b (draft Policy C7): Bicycle Parking Design Standards

If travel by sustainable modes of transport such as bicycle is, to be encouraged, it is important to ensure that there is secure bicycle parking in residential and employment developments. The options for the policy relate to how far the Local Plan 2045 should go in relation to levels of parking required for bicycles.

Table 2 - Policy options set 012b: Bicycle Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require high levels of secure bicycle parking either indoors or external for residential and non-residential schemes to achieve best design outcomes.	The provision of a high level of well-designed cycle parking will help to encourage cycling across the city which brings positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthy lifestyles. This could increase the number of people cycling to work, to the shops, for health appointments, to school etc. as they will be confident that their bike will be parked in a safe secure way which would reduce the risk of theft or vandalism. This is particularly important with the rise in e-bikes. Also well designed bike parking can enhance the public realm.	Providing well designed secure cycle facilities could add to build costs and take up space within the development which could be used to enhance the design in other ways and may result in the loss of public amenity areas.
Option b Set more specific requirements for the type of bicycle parking for residential developments and workplaces to make sure e-bikes, trailers, tricycles etc. can be accommodated. Require higher levels of well-designed and secure bicycle parking and ensure that showers and lockers are provided to support staff.	More specialist types of bikes are increasingly common providing the option of cycling to a wider range of people. They also have more complex storage and charging requirements which won't necessary be met if the requirement for them is not set out clearly. Although showers are currently required for offices over 500m2 and most other non-residential uses over 2500m2	This adds an extra requirement for space and potentially cost, which may compete with other requirements.

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	this approach encourages more provision for cyclists.	
Option c Lower the residential and non-residential bicycle parking standards from existing levels.	There is no loss of amenity space or indoor living space. This approach would help to reduce build costs for the scheme.	If insufficient or poorlydesigned bicycle parking is provided in new development, it is likely that bicycles will be parked informally in inappropriate areas causing clutter and obstruction. It provides no encouragement for future residents to consider cycling and embracing a more active and healthier lifestyle – lower levels of cycle parking may make it more difficult for people to store bikes and as such bike ownership could drop as travelling by bike is not practical without secure storage. There are already concerns across the city about bicycle parking stress and concerns about security particularly from those with more expensive bikes which are more at risk from being stolen. If Oxford is to become a cycling city reducing the levels of parking provision would be a disincentive to people who might be considering how to travel around the city other than by private car.
Option d No local policy standards	Not requiring these reduces the burden on developers.	Bicycles may be parked in inappropriate areas, potentially reducing the space available for parking motor vehicles and/or causing an obstruction.

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Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option b, Option c or Option d **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** All options are standalone and represent various levels of cycle parking that the local plan could ask for. In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (supporting active travel options) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting active travel). Option a and option b would both have a minor positive impact for all the criteria however option b's prescriptive approach will depend on site context and could be harder to achieve on smaller sites, and easier to achieve on bigger sites thus whether it has slightly more or slightly less positive effect than option a will depend on implementation. Option c would have a neutral impact, it has the potential to provide some cycle space but what is provided could be unusable as for example it could be of poor quality. Option d is likely to have a minor negative impact against all three criteria, as whilst there is potential for a developer to still provide cycle parking provision this could be as an afterthought and may be of poor quality or poorly located so that it is unattractive. Under option d it is assumed that occupiers would be pushed to other less sustainable forms of transport e.g car. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

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Policy options set 012c (draft Policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards

Parking provision for motor cycle and powered two wheelers is also important and should be considered at the design stage to ensure the most efficient use of land and encourage the use of this mode of transport. The options for the policy relate to how far the Local Plan 2045 should go in relation to levels of parking for these vehicles.

Table 3 - Policy options set 012c: Motorcycle and Powered Two Wheelers Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a	The provision of a high level of well-designed parking would	Providing well designed secure facilities could add to build costs and take up

Require high levels of secure motorcycle and powered two-wheeler parking for residential and non-residential schemes to achieve best design outcomes.	reduce the risk of theft or vandalism. Also well designed parking can enhance the public realm.	space within the development which could be used to enhance the design in other ways and may result in the loss of public amenity areas.
Option b Set more specific requirements for the type of parking for residential developments and workplaces and ensure that showers and lockers are provided to support staff who use these modes of travel.	Although showers are currently required for offices over 500m2 and most other non-residential uses over 2500m2 this approach encourages more provision for those who use motorcycles and powered two wheelers.	This adds an extra requirement for space and potentially cost, which may compete with other requirements.
Option c Lower the residential and non-residential motorcycle and powered two-wheeler parking standards from existing levels.	There is no loss of amenity space. This approach would help to reduce build costs for the scheme.	If insufficient or poorlydesigned parking is provided in new development it is likely that motorcycles and powered two wheelers will be parked informally in inappropriate areas causing clutter and obstruction.
Option d Do not set any parking standards for motorcycles and powered two wheelers.	Not requiring these reduces the burden on developers.	Motorcycles and powered two wheelers may be parked in inappropriate areas potentially reducing the space available for parking motor vehicles and/or causing an obstruction.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option b, Option c or Option d **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No

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Rationale: All options are standalone and represent various levels of parking for motorcycles and powered two wheelers that the local plan could ask for.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (reducing reliance on the private car) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting travel). Option a and option b would both have a minor positive impact for all the criteria however option b's prescriptive approach will depend on site context and could be harder to achieve on smaller sites, and easier to achieve on bigger sites thus whether it has slightly more or slightly less positive effect than option a will depend on implementation. Option c would have a neutral impact, it has the potential to provide some parking provision but what is provided could be unusable as for example it could be of poor quality. Option d is likely to have a minor negative impact against all three criteria, as whilst there is potential for a developer to still provide parking for motorcycles and powered two wheelers this could be as an afterthought and may be of poor quality or poorly located so that it is unattractive. Under option d it is assumed that occupiers would be pushed to other forms of transport e.g. car. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

1483

Cycle and Powered Two Wheelers Parking Design Standards – Policy C7

For the purposes of the Local Plan 2045 it was considered that merging the requirements of both Cycle and Powered Two Wheeler Parking into the same policy would be the best way forward. The preferred approach for Cycle parking is a combination of **Option A and Option B** which together are considered to bring positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthier lifestyles. The preferred approach for powered two wheeler parking is **Option A** which is considered to bring positive benefits as the provision of well designed and dedicated parking areas reduces the risk of theft or vandalism and can also provide enhanced public realm for example by reducing opportunity for inappropriate parking of these types of vehicles.

Policy options set 012d (draft Policy C8): Motor Vehicle Parking Design Standards

Setting the right level of parking for motor vehicles can positively influence design outcomes, ensure the most efficient use of land and encourage residents to consider alternative options to using a private car. If standards are too low, a potential unintended effect is that parking is displaced to surrounding streets that do not have any parking restrictions. Although Controlled Parking Zones (CPZs) can prevent this from happening there are still parts of the city that are not included within a CPZ or where parking restrictions are not in

place 24 hours a day, 7 days a week. Whilst the LP2045 will have limited influence over the implementation of new or review of existing CPZs within the city, where planning permission is required, the levels of parking for motor vehicles can be considered.

The options set out below therefore focus on how parking levels could be considered in applications for both residential and non residential developments. For residential developments, low car would mean no car parking spaces allocated to a particular housing unit, instead, only a number of shared spaces and spaces for blue badge holders, service and delivery vehicles, including for working drivers. For non-residential developments, low car would mean either a reduction in existing car parking spaces where there is good accessibility for the area or provision of a number of shared spaces and spaces for blue badge holders, service and delivery vehicles. Parking standards assumes the Council would apply County standards. This means that for residential, there will be more parking provision per household (e.g. one space per dwelling). For non-residential development, the standards seek car free development or operational use only with supporting evidence, which means applicants are able to justify higher levels of provision according to their site's needs which can result in significantly more provision.

Table 4 - Policy options set 012d: Motor Vehicle Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.	A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car ownership and car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements could encourage people to walk and cycle as they may feel safer, and parents may feel more confident allowing their children to cycle or walk if there is less traffic on the roads.	Although sites are low car it could result in parking being displaced to other streets which are not restricted. In some parts of the city outside of the centres there are insufficient realistic alternative transport options other than using the car. Some occupations require employees to have a vehicle or take a vehicle home – many such jobs are low paid (e.g. mobile carers; maintenance trades; mini-cab drivers; etc.). Many households also work outside of the city; away from the

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	Supports the use of car clubs across the city. Supports the most efficient use of land, opportunity to create well designed external spaces. Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.	city or district centres; have children to take to school on the way to work; or work outside of the usual operating hours for bus services. Households that include persons in these occupations risk being excluded from housing that might best meet their needs, if low car schemes become predominant in new housing developments. Having low car parking provision for larger family dwellings for sale may impact on the viability of schemes, and the ability to deliver affordable housing.
Option b Adopt parking standards for residential developments	Ensures that the design of car parking is properly considered and encourages private car ownership. Levels of car parking provision would be consistent with other developments throughout the City.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.
Option c Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.	A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements could encourage people to walk and cycle as they may feel safer.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution. The inadequate provision of parking at a site could lead to displaced parking on nearby streets creating parking stress elsewhere if there is no CPZ in operation.

	Supports the most efficient use of land, opportunity to create well designed external spaces. Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.	
Option d Adopt parking standards for non-residential developments.	Ensures that the design of car parking is properly considered Levels of car parking provision would be consistent with other developments throughout the City.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.

1486

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a + c, Option a + d, Option b + c, Option b + d **High-level screening conclusion? - the options are likely to have significant sustainability impacts** **Screened in for detailed appraisal? - Yes** **Rationale:** The options represent various levels of motor vehicle parking that the local plan could ask for. Assuming that options b and d are allowing a greater level of parking on sites than low car as in options a and c. In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (reducing reliance on the private car) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting travel). Whilst all options allow for parking, options a and c could be neutral to positive as this would likely drive reductions in the amount of parking across residential and non-residential sites. Options b and d would potentially be neutral to negative in terms of impact against the same criteria, this would depend upon implementation e.g.

being more neutral where a site already has car parking and the standards would not allow for increases, but negative where provision is currently below the standard and there would be scope to increase levels of car parking.

In addition, option b may also have an indirect positive impact on **criterion 4 Local housing needs,** improving viability of new residential development because increased car parking can be provided. Option c, may have indirect impacts on **criterion 12 economic growth**, depending upon implementation, potentially having a neutral impact in terms of viability on new non-residential development where there is existing parking provision, or a more negative impact where there is no existing provision and they are unable to provide as much car parking which could impact viability.

Overall, there are varying sustainability impacts across the criteria depending on whether low car options are selected or not. As there is uncertainty about the impacts and whether they will be significant or not, the options should be screened in for further detailed appraisal.

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Motor Vehicle Parking Design Standards – Policy C8

For the Local Plan 2045, the preferred approach is to have a policy that is supportive of parking design standards.

The preferred option is a combination of **Options A and B and Option C** as they push for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to public transport but accept that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability.

The options set was tested through the Sustainability Appraisal with the options having varying impacts. Seeking low car where possible will help to maximise positive sustainability impacts but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward.

Policy options set 012e (draft Policy C9): Electric Vehicle Charging

The increase in ownership and use of electric vehicles has placed greater demand for charging infrastructure in both residential and commercial developments as well as in public spaces such as public car parks, leisure centres and shopping centres. The current

local plan does not include a policy to address Electric Vehicle Charging and although the delivery of infrastructure for charging vehicles is now covered by Building Regulations the options considered for LP2045 relate to how much further local design standards could go beyond what is being asked for in national building regulations.

Table 5 - Policy options set 012e: Electric Vehicle Charging

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek the provision of electric vehicle charging infrastructure on all new residential developments with a dedicated parking space and on all non-residential development providing additional car parking bays. Where there is no dedicated parking space and on street parking is proposed, appropriate infrastructure should be incorporated to enable the charging of electric vehicles on the street. All blue badge and car club parking bays must be electrified.	The NPPF indicates that when setting parking standards, policies should take into account an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. The provision of electric vehicle charging infrastructure for residential and non-residential developments supports the NPPF. It may also increase the market value of homes and non-residential developments. Demand on the electricity grid can be assessed at the time of application.	The requirement for the provision of EV infrastructure could lead to additional costs being incurred by developers for example there may not be adequate grid capacity
Option b Specify design standards for EVs being installed – e.g. in relation to impact on streetscape, safety etc.	This could help to ensure that a particular local context is considered (e.g. minimising harm to heritage assets or cluttering the street).	Design standards could change quite rapidly as technology develops. It might be challenging to be too specific at the Local Plan level (e.g. site context could differ a lot across the city). It might be better to direct applicants to other guidance/TANs.

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Option c Do not seek any electric vehicle charging infrastructure on new residential developments or on non-residential developments and do not set any local design standards.	Associated costs of providing this infrastructure are not incurred by landowners/ developers.	Residents of new developments or employees at workplaces who have electric vehicles would not have access to charging infrastructure at their own property

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option a + b, or Option c **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option a is about requiring new EV charging points, Option b is about adding design considerations to the policy, and option c is an alternative to option a (or a+b) and essentially leaving standards to national regs. In terms of sustainability impacts, the options relate to **criterion 8. Traffic and Air Pollution**, as well as **criterion 11 Urban design** (reducing harm to the amenity and local context from new EV equipment) and **1. Carbon emissions** (supporting occupiers to adopt lower carbon transport options). Options a and b both have minor positive impacts for criteria 8 and criteria 1 because they can support occupiers to choose low carbon transport options. Option a potentially has a minor negative impact on criterion 11, particularly where new EV equipment clutters up streetscape or causes harm to nearby heritage assets due to poor quality design. Option b would have a neutral impact for criterion 11 because it helps to ensure the harm to urban realm and heritage is mitigated. Option c would have a neutral impact for criteria 8 and 1, because Buildings Regs will require charging infrastructure to support EVs for most new development, however it would again potentially have a minor negative impact for criterion 11, for the same reasons as discussed under option a above. In conclusion, the sustainability impacts arising from the different options would be minor, and are not considered to warrant a detailed appraisal.

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Electric Vehicle (EV) Parking – Policy C8

For the purposes of the Local Plan 2045 and following feedback received at Regulation 18 it was considered that merging the EV parking requirements with the Motor Vehicle Parking Design Standards would be the best way forward. The preferred approach is a

combination of **Option A and Option B**. Whilst recognised that EV infrastructure is part of Building Legislation, the NPPF makes it clear that if setting parking standards, policies should take into account the provision of spaces for charging plug-in and other ultra low emission vehicles. Option A seeks the provision of EV infrastructure on all residential developments and on non-residential developments that would provide additional parking spaces. It also includes the provision of EV parking for blue badge and car club parking bays. Option B goes further by including reference to design standards that could help to ensure that EV infrastructure does not cause harm to a particular local context, for example in Conservation Areas.

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Background paper 012a

Transport: Traffic and Air Quality Modelling

This paper addresses: Transport Modelling
Relevant Local Plan Objective(s): • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040 8. To reduce **traffic and associated air pollution** by improving travel choice, encouraging active travel, shortening journeys, and reducing the need to travel by car/lorry.
SEA themes: Air, Climatic Factors, Material Assets

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1. Introduction

1.1 This topic paper supplements Transport Background Paper (012). This paper begins by providing a short contextual summary of Oxford's traffic issues. It then goes on to discuss the traffic modelling undertaken (using the County Council's Oxfordshire Strategic Model)

in relation to the strategic and local road networks. It also highlights, in the case of the Strategic Road Network, discussions with relevant key stakeholders. It sets out how the use of traffic modelling has informed the development of the Oxford Local Plan 2045. Finally, it considers the implications of transport modelling that has been undertaken, on Oxford's Local Plan 2045, drawing some conclusions based on the findings.

Context

1.2 As a medieval city, Oxford's often narrow streets are unsuited to motorised vehicles – particularly to high levels of motorised vehicle use. In fact, peak period traffic congestion has been a persistent problem. Within the city centre for instance, a clear conflict exists between cars, buses and delivery vehicles, all of which compete for the limited available space with pedestrians and cyclists. The city's tightly drawn administrative boundary means that access to the Strategic Road Network (SRN) is limited to several junctions on the A34. More details can be found in Background Paper 012: Transport.

Traffic Modelling

1.3 The City Council has undertaken bespoke traffic modelling to look specifically at the impacts of planned growth contained within the Oxford Local Plan 2045, on the Strategic Road Network (SRN). This was carried out using the County Council's Oxfordshire Strategic Model (OSM). The OSM model outputs are expressed in terms of the change in Annual Average Daily Traffic (AADT) flows. This means they can be used to assess the impacts of planned growth in Oxford on the section of the SRN closest to Oxford – i.e. the A34. It is important to note that they are also very helpful in informing the air quality assessment as required by the Habitat Regulations Assessment (HRA).

1.4 In order to assess the impact of the Local Plan on the Local Road Network, the City Council has benefited from access to the local network modelling carried out by the County Council: Oxford Trail Traffic Filters Transport and Traffic Forecasting Report (October 2022). This modelling carried out to assess a proposed demand management intervention (see Background Paper 012: Transport for more details) takes account of assumed future growth across the five Districts of the County. For Oxford this modelling uses the levels of growth proposed in the Local Plan 2036, this included higher land use assumptions than are being proposed through the Oxford Local Plan 2045 (see section 4 below).

2. Strategic Road Network

Modelling outputs

2.1 Significance thresholds are used to determine when changes in traffic volume - often from new development - require further assessment. The "significance" thresholds for both transport assessment work and air quality work are 1,000 AADT or more for cars/ LGVs (Light Goods Vehicles) and 200 AADT or more for HDVs.

2.2 Table 2.1 below shows the predicted change in Annual Average Daily Traffic (AADT) flows on the A34 resulting from the growth proposed in the Oxford Local Plan 2045. These outputs show that the two-way change for cars/ LGVs, on the A34 (northbound and southbound) is 274 AADT, while the change in Heavy Duty Vehicles (HDVs) is –49 AADT.

2.3 The AADT changes identified in Table 2.1 are therefore below their respective "significance" thresholds, both for air quality assessment work and for transport assessment work. This means that as the modelled outputs are below each of their respective thresholds, the impacts are not likely to be significant. In this instance, the change in AADT is used as a proxy for changes to the critical load or level of certain pollutants (e.g., Nitrous Oxides – NOx).

2.4 An advice note, published by Natural England entitled 'Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitat Regulations' sets out that widely acknowledged Environmental Benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to the thresholds for changes in traffic flow, as set out in the Design Manual for Roads and Bridges.

Table 2.1 Change in AADT on the A34 resulting from the Oxford Local Plan 2045

	AADT (DS-DM) Cars/ LGVs	AADT (DS-DM) HDVs
A34 (northbound)	-48	-7
A34 (southbound)	+322	-42
Total (Two-way change)	**+274**	**-49**

Source: Oxford City Reg. 19 Habitat Regulations Assessment

Discussions with key stakeholders: National Highways

2.5 Following representations made by National Highways at Regulation 18 stage of the Local Plan (a summary of which is contained in the Oxford Local Plan Regulation 18 Stage Consultation Report), City Council Officers met with colleagues from National Highways on 15 October 2025 to discuss the key issues raised.

2.6 At the meeting, officers explained that the neither the total (two-way) change, nor the individual (northbound or southbound) carriageway changes in AADT, exceeded the significance thresholds set out above (i.e., 1000AADT or more change for cars/ LGVs; or 200 or more change for HDVs). At the meeting, both parties agreed that all of the issues raised as part of the National Highways response to the Regulation 18 consultation had been satisfactorily resolved. Following the meeting, the City Council Officers provided colleagues from National Highways with a short note of the meeting which set out the key issues that were discussed, a short, written response those issues, and a note of the outcomes of the meeting.

2.7 On 4 November 2025, National Highways confirmed that they were happy with the note, which confirmed that all the issues raised within National Highways' response to the Oxford Local Plan Regulation 18 consultation had been satisfactorily resolved. One final point to note is that, at the meeting, both parties recognised the value of producing a Statement of Common Ground as a way of formally documenting the agreed position of each organisation going forward. The intention is to agree a Statement of Common Ground between National Highways and Oxford City Council on the Oxford Local Plan 2045 to accompany submission.

Discussions with key stakeholders: Natural England

2.8 Following the Regulation 18 consultation, the City Council received a response from Natural England. City Council Officers have met with Natural England on a number of occasions. A detailed account of the correspondence with Natural England is set out in the Regulation 19 version of the Habitat Regulations Assessment.

3. Local Road Network

Modelling Outputs

3.1 The recent traffic modelling undertaken by Oxfordshire County Council (for the traffic filters project) has shown that, without intervention (i.e inclusive of predicted growth, but without the traffic filters project), there would be a negligible overall change to the current situation. Table 2.2 (below) includes data from the Oxford Trial Traffic Filters Transport and Traffic Forecasting Report (October 2022). It shows the predicted change in demand for car use both within, and to/ from the city between 2018 (the model base year) and 2024 (the assumed start year for the scheme (but without its implementation)).

Table 2.2 Sectorised demand for car use (12-hour period, 2018 BY vs 2024 DM)

Mode/ Sector	2018 BY	2024 DM	Change	% Change
Car (person trips)				
Within city	130,675	123,307	-7,368	-6%
To/ from city	159,323	164,909	5,586	4%
Combined	**289,988**	**287,785**	**-2,213**	**-1%**

(Source: Oxfordshire County Council, Oxford Trial Traffic Filters Report (October 2022)

3.2 Additional spatial analysis undertaken within the report showed the main changes in the city were the result of re-routing due to the six East Oxford Low Traffic Neighbourhood Schemes. The report noted that elsewhere in the city, there was generally no change in traffic flows, or in some cases, small increases and recognised that maintaining the existing situation would not address the existing challenges faced by the city.

Demand Management Measures

3.3 The County Councils "Core" Transport Schemes are a suite of transport demand management measures. These measures are needed because, on much of the city's road

network, the amount of traffic has resulted in significant congestion, and associated problems relating to air quality, public transport service reliability and cycle and pedestrian safety issues. On-going traffic congestion issues also impact the ability of the County Council to achieve the vision, aims objectives and headline targets set out in the Local Transport and Connectivity Plan, which include to:

- Reduce 1 in 4 car trips by 2030
- Deliver a net-zero transport network by 2040 and
- Have zero, or as close as possible, road fatalities or life-changing injuries by 2050

3.4 Given Oxford's medieval origins, there is insufficient physical space to overcome the city's long-standing traffic and congestions problems through engineering efforts (e.g., through increasing road capacity or the introduction of basic bus priority measures. The implementation of the comprehensive suite of transport demand management measures (included within County Council's "Core" transport schemes) has been shown to reduce demand for private car use in the city. The Core transport schemes include:

- Traffic Filters
- Low Traffic Neighbourhoods
- Workplace Parking Levy
- Zero Emission Zone

3.5 The Oxford Trial Traffic Filters Report (October 2022) considered the change in overall demand for a variety of different sectors. Table 2.3 (below) shows the predicted change in demand for car trips within and to/ from the city. It shows the changes in demand both with (2024 DM) and without (2024 DM) scheme implementation for the assumed scheme start year (2024).

Table 2.3 Sectorised demand for car use (12-hour period, 2024 DM vs 2024 DS)

Mode/ Sector	2024 DM	2024 DS	Change	% Change
Car (person trips)				
Within city	123,307	98,541	-24,766	-20%
To/ from city	164,909	162,973	-1,936	-1%
Combined	**287,785**	**261,514**	**-26,271**	**-9%**

(Source: Oxfordshire County Council, Oxford Trial Traffic Filters Report (October 2022)

3.6 The report shows that implementation of the traffic filters would reduce car person trips within the city by 20%. The spatial analysis accompanying the data shows that as a result of the route restrictions, car journeys through the city would be discouraged. This would result in a clear reduction of traffic volumes in the city centre, and on the majority of main 'arterial' routes into and out from the city centre, (e.g., Abingdon Road, London Road, Cowley Road). The report also showed reductions in traffic volumes at the Eastern Arc.

3.7 The reduction in some car person trips (particularly those to the city centre) would mean that some drivers would change their behaviour and travel by alternative modes (i.e., bus, rail, Park and Ride, walk or cycle). However, the report did note that there may be some

increases of traffic of the ring road, as drivers chose to divert their route away from the restricted roads. In this context, it is important to note that the Traffic Filters modelling impacts were factored into the assessment of the growth proposed in the Oxford Local Plan 2045 on the Strategic Road Network, discussed above.

4. What this means for Oxford's Local Plan 2045

4.1 Oxford is in a somewhat unique position in identifying site allocations, they tend to be located in with existing access to (or at least close proximity to) the current road network, thus not requiring critical site-specific infrastructure interventions to be delivered. The site allocations proposed within the Local Plan 2045 are generally of a non-strategic nature, i.e., no sites are allocated for more than 500 homes, and no 'new' land is proposed for employment uses. In addition, many of the plan's site allocations were previously allocated within adopted development plans.

4.2 The County Council's comprehensive suite of demand management measures, mean that even with the inclusion of the predicted level of growth, the modelled outputs have demonstrated sizeable reductions in car trips associated with the city's resident population.

4.3 The Oxfordshire Strategic Model (OSM) (which was used to undertake the traffic and transport modelling and analysis that underpins the County's assessment of the traffic filters) contains within it, regularly updated housing and jobs figures for Oxford city. At the time the traffic filters transport and traffic modelling report was produced (i.e., October 2022), the OSM contained the housing and jobs numbers (or 'land use assumptions') that were used to inform the adopted Local Plan 2036.

4.4 The traffic modelling undertaken to inform the Local Plan 2036 included higher land use assumptions than are being proposed through the Oxford Local Plan 2045. As such, the County Council's assessment of traffic filters included assumptions that 11,724 homes would be delivered in the plan period, and 944,939sqm of commercial floorspace. The Local Plan 2045 however has a lower housing requirement (9,267 homes) and less commercial floorspace (circa 550,000sqm) than was assessed in the County Council's traffic and transport modelling that was undertaken to support the traffic filters. Therefore, even with the later end date and accounting for previous delivery, the transport model factors in the assumed growth level to 2045.

4.5 As such, given that the traffic and transport modelling undertaken that underpins the suite of demand management measures being implemented by the County Council already includes, embedded with the modelled scenarios, more homes and jobs than are proposed within the Oxford Local Plan 2045. This, coupled with the inclusion of the bespoke traffic modelling undertaken for the primary purposes of Habitat Regulations Assessment. Also, by virtue of the location of the Oxford Meadows SAC, has assessed the impact of the Local Plan 2045 on the SRN.

4.6 As set out above, the package of demand management measures being implemented by the County Council, is the most suitable intervention for the levels of growth proposed in the Local Plan 2045 and the specific circumstances (outlined above) within Oxford.

4.7 It is worth noting that although the traffic filters trial has not yet commenced, the County Council has introduced a temporary congestion charge at the locations where the traffic filters are to be sited. While the temporary congestion charge was only introduced in October 2025 so, at the time of writing has only been operational several months, early indications are that traffic volumes in the city (particularly in the city centre), are lower, with associated traffic reductions at the main arterial routes into and out from the city. This, as predicted in the report, has increased the reliability of bus services as well as reducing traffic congestion, and its associated issue.

Background paper 013

Liveable city

This paper addresses community and cultural facilities, healthcare, schools, leisure and recreation and retail.
Relevant Local Plan 2045 Objectives: • Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night.
Relevant SA Objective(s): 6. To provide accessible essential **services and facilities**.
SEA theme(s): Material Assets, Human Health

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1. Introduction

1.1 This paper focuses on Oxford as a liveable city looking more specifically at the community and cultural facilities that help foster a sense of community and belonging, enhancing health and wellbeing.

1.2 The paper provides a context for considering the subject by providing a brief summary of the relevant national and local plans, policies and programmes that currently exist and will influence change in the future. This paper identifies some of the key challenges and future trends that will impact on these facilities. The paper then explores what would happen without a plan and the potential difficulties that the city would face.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National and international context

National Planning Policy Framework (NPPF)

2.1 The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 recognises that this comprises achieving three overarching objectives, which are independent but need to be pursued in mutually supportive ways. These comprise economic, social and environmental objectives. The social objective is required 'to support strong, vibrant and healthy communities, ... and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being' (para 8b); 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of development, and make sufficient provision for:... c) community facilities (such as health, education and cultural infrastructure)' (para 20). 'Non- strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level....' (para 29). Chapter 8 of the framework addresses the promotion of healthy and safe communities suggesting that planning policies and decisions should aim to achieve healthy, inclusive and safe places which 'enable and support healthy lives...' (para 96c).

2.2 The framework also states that 'to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should a) plan positively for the provision and use of shared spaces, community facilities(such as

local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services' (para 98). Finally the framework suggests that 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed' (para 200).

Oxford Local Plan 2036

2.3 The Oxford Local Plan 2036 is the current adopted Local Plan. The policy approach to cultural and community facilities is to make accessible a diverse range of facilities; seek to protect existing facilities; and support improvements and more intensive use of existing sites. Section 8 contains strong policies to help realise this strategy:

2.4 Policy V7 on infrastructure and cultural and community facilities seeks to improve access to social and community infrastructure in particular from new development and protect and retain existing cultural and community facilities. The policy also indicates that planning permission will be granted for the alteration and expansion of existing schools, primary healthcare facilities and community centres; and that new schools, primary healthcare facilities and communities centres will receive planning permission where the City Council is satisfied that a number of criteria have been met.

2.5 Policy G5 on existing open space, indoor and outdoor sports and recreation facilities seeks to protect indoor sport and leisure facilities. The policy also indicates that the City Council will, where the opportunity to do so arises, seek public access to private and institutional facilities (e.g. those owned by colleges and private schools) through sharing schemes and joint user agreements. This is considered further within the Public Open Space and Outdoor Sport topic paper.

Corporate Plan

2.6 Oxford City's Council's Strategy 2024-28 was approved by the Council's Cabinet in July 2024. Its five priority areas of focus are:

- Good, affordable homes;
- Strong, fair economy;
- Thriving communities;
- Zero Carbon Oxford; and
- Well-run Council

2.7 To help support thriving communities the Council Strategy aims to focus on areas of highest inequality to improve health, wellbeing, skills and employment opportunities and equal access for everyone. The priorities are:

- working in partnership with communities, organisations, and agencies to reduce inequalities and create thriving communities
- Championing diversity and inclusion in our own work and community partnerships
- Helping people live healthily by providing services, support, and facilities to prevent and manage physical and mental health conditions

2.8 The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators. In turn, the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

Oxford City Council's Thriving Communities Strategy

2.9 The Thriving Communities Strategy 2023-2027 brings together leisure, culture, and Oxford City Council's work with communities to tackle inequalities. These inequalities are detailed in Oxfordshire's Joint Strategic Needs Assessment (June 2023) which provides information about the county's population and the factors affecting health, wellbeing, and social care needs. The City Council aims to tackle inequalities by encouraging well-designed neighbourhoods and parks where healthy lifestyles are the norm (sometimes called healthy place shaping), developing skills, ensuring growth is inclusive, strengthening communities and improving access. The strategy is about connectivity and collaboration – ensuring we effectively join up our efforts to help create a more equal city. The strategy sits alongside the Housing, Homeless and Roughsleeping Strategy, Citizen Experience Strategy, Oxford's Economic Strategy, and the Net Zero Action Plan.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Existing community and leisure facilities

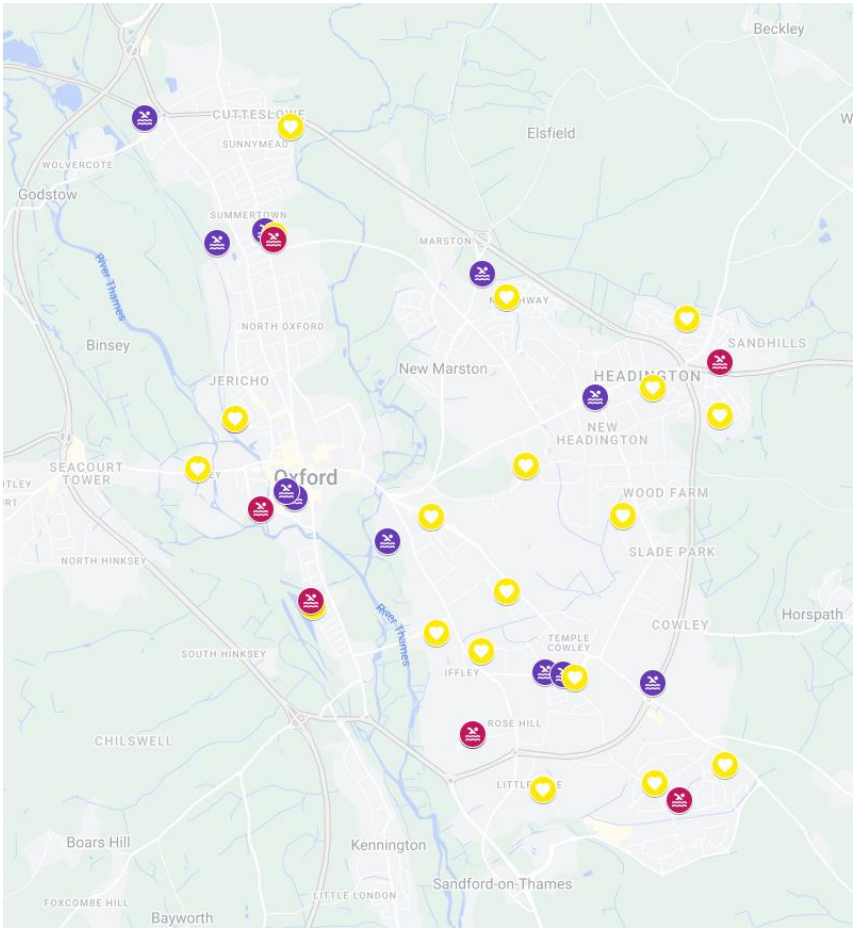

Figure 1. Existing community and leisure facilities (Google, 2024)

City Council leisure centre

Commercial leisure centre

Community centre

3.1 Oxford's leisure centres provide a range of indoor sports including swimming pools, gyms, sports halls, crèches, spinning studios, children's soft play, community and group exercise halls and squash courts. A number of these leisure centres operate on a commercial basis (e.g. provide private membership options). Some leisure centres also provide opportunities for outdoor sports but this is not addressed within this topic paper.

3.2 Oxford City Council Leisure Centre Locations:

- Barton Leisure Centre,
- Ferry Leisure Centre,
- Leys Pools and Leisure Centre,
- Rose Hill Community Centre Gym,
- Hinksey Heated Outdoor Pool,
- Oxford Ice Rink

3.3 There are 23 community centres located across the city owned by the City Council but managed by Community Associations: Barton Neighbourhood Centre, Blackbird Leys, Bullingdon, Cheney, Cuttleslowe, Donnington, East Oxford, Florence Park, Headington, Jericho St Barnabas, Jubilee 77, Littlemore, North Oxford, Northway Sports Centre, Regal, Risinghurst, Rose Hill, South Oxford, The Asian Cultural Centre, The Venue@Cowley, West Oxford, and Wood Farm Community Room. These community centres offer welfare, educational and recreational activities that residents can get involved in. These can include health and fitness opportunities (e.g. yoga classes), sports (e.g. judo and dance), dedicated groups/sessions for parents and children and the elderly, junior and youth entertainment (e.g. Scouts and Guides) and religious groups. Tenants are granted community leases subject to a number of criteria being met by applicant organisations.

3.4 In addition to leisure and community centres there are a number of commercial facilities in the City that overlap with leisure. These include cinemas and theatres, public houses (including social enterprise venues), live music- venues, nightclubs, bowling, karting, laser kombat, private leisure centres/ gyms, children's soft play areas (Partyman), escape rooms, indoor golf and cricket and climbing walls.

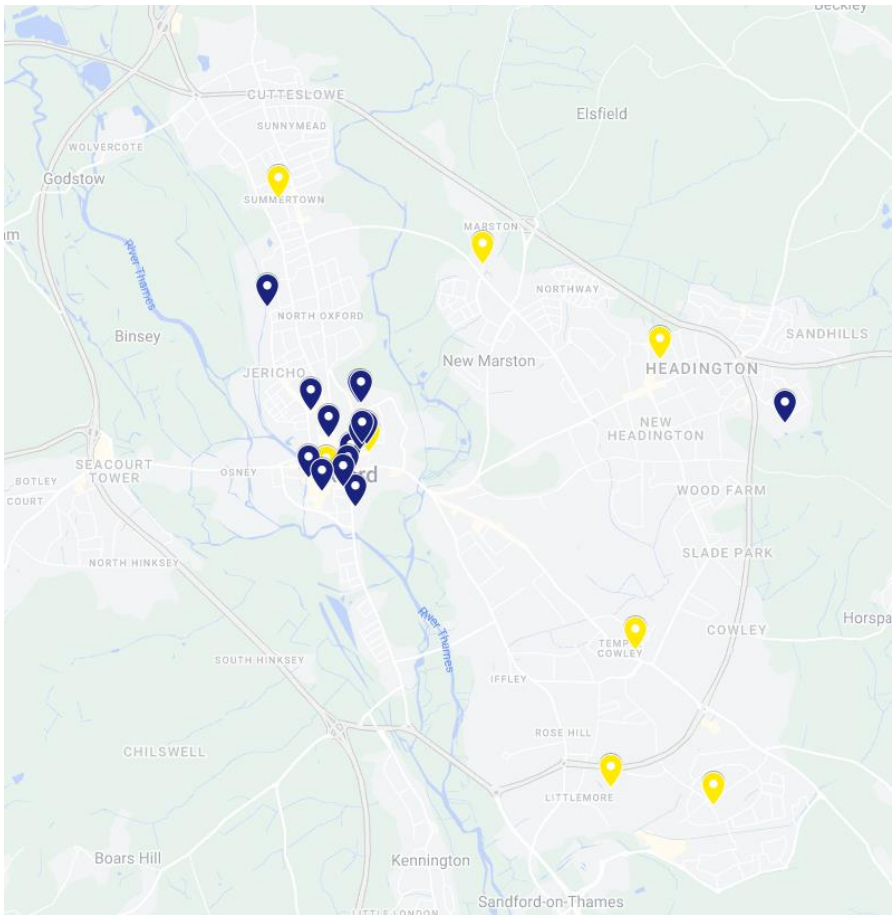

Figure 2: Existing Cultural facilities in Oxford (Google 2024)

Museums and Attractions Libraries

3.5 Cultural facilities in the city include 8 libraries (Barton, Blackbird Leys, Cowley, Headington, Littlemore, Old Marston, Oxford Westgate and Summertown), 13 museums and numerous places of worship. Some of these facilities are commercial, e.g. Theatres, and some venues are linked to the universities. Oxford City has a rich variety of religious communities. As well as offering dedicated places of worship many of the religious facilities offer opportunity for more general community use in a similar way to community centres e.g. church halls.

3.6 There are also a number of leisure and community facilities across the City's schools and universities which are made available for community use through user agreements. There are clearly links between leisure and community facilities and infrastructure: further information can be found in the Infrastructure Topic Paper (015).

Existing Schools and Colleges

3.7 Oxford has over 50 primary schools which are well distributed across the city, allowing easy access to local schools. Secondary schools in Oxford are also distributed fairly evenly across the city, meaning they are also easily in reach of where people live. Secondary schools include Cheney School, Greyfriars Catholic School, Matthew Arnold School (just outside the city boundary, in Botley), Oxford Spires Academy, The Cherwell School, The Oxford Academy, and The Swan School. In addition, there are a number of public schools across the city. The secondary schools vary considerably in terms of their performance. In 2025 (the most recent year performance comparison information is available for) the Cherwell School had an attainment 8 score of 58.3, well above the English state school average of around 46. At the other end of the scale, The Oxford Academy had an attainment 8 score of 33.5, which is below average.

Existing GP practices

3.8 The 2022 Health and Care Act set up new Integrated Care Systems (ICSs) across England, with each ICS having two core parts, an Integrated Care Board (ICB) and an Integrated Care Partnership (ICP). Oxford city is part of the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB). The ICB decides how to spend the NHS budget and plans how to improve people's health, deliver high quality care and get better value for money.

Importance of retail to Oxford's economy

3.9 Oxford is a sub-regional centre which provides a wide range of services and facilities to both the city's residents and those living in the sub-regional catchment area. As such it plays an important role in Oxford's economy. The vibrancy and vitality of Oxford's centres needs to be maintained and enhanced in the future to ensure that they can continue to perform their function and continue to make a significant contribution towards the economic, social and environmental objectives for achieving sustainable development. Oxford is a world-class city with a prosperous economy and a historic core that attracts tourists from around the world. The city centre fulfils many functions both regional and local and will continue to be the main focus for retail together with a wide range of leisure and cultural uses.

Changes in shopping habits

3.10 Retail patterns and behaviours have been changing in recent years with a growth in online shopping, which was only accelerated by the impacts of the Covid-19 pandemic. However, market predictions indicated that there will still be an important role of destination shopping where shopping becomes part of a broader day out linked with eating out and other

leisure activities. When online shopping is so easy there must be other draws to encourage people to visit centres.

Footfall and vacancy rates

3.11 The continued success of Oxford city centre is highly reliant on footfall from tourists, students and office workers, although the impact on spend is not that closely linked to footfall in Oxford, as many of those who usually visit the city centre are not high spenders. For example, students, day tourists and office workers contribute to a lot the footfall in the city centre in normal times, but do not spend very much money. The Authority Monitoring Report 2023/24 shows a city centre footfall comparison of the 2022/23 and the 2023/24 monitoring periods. This comparison shows that for the majority of the year footfall is higher each month during 2023/24 than 2022/23. On average 2023/24 saw more than 100,000 more people per month than in 2023/24. The highest footfall was in August 23, with about 3 million people recorded over that month, surpassing pre-pandemic levels. The vacancy rate of units in the city centre was 5.6% in 2023, compared to an average of 12.5 across the south. This compares to 12.6% in September 2020.

3.12 Therefore, there are many signs that change can be managed in a way that is bespoke to the city's needs, and that will maintain a successful and vibrant centre. The flexible policies introduced in the Oxford Local Plan 2036 have enabled us to respond to the changing retail scene in a way that is appropriate to Oxford; for example the conversion of the Boswell's department store to a hotel has maintained an active frontage with a restaurant open to the public on the ground floor.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of the Sustainability Appraisal)

4.1 It is important that we continue to protect and enhance the city's existing leisure and community facilities, otherwise there is a risk that these facilities could be lost to or replaced with another land use (e.g. housing). This could be detrimental not only to people's health but also their wellbeing. In the absence of a new Local Plan, we would be reliant on the planning policies within the existing Local Plan 2036. Beyond 2036 it would only be national policies that would offer protection and these may not necessarily be detailed or specific enough to protect the diverse range of leisure and community facilities across the city. It seems that demand for retail and service floorspace in key locations such as the city centre and district centres may reduce and change in the future, reflecting the continued growth in online shopping and changes to working practices.

5. Key issues addressed through the Local Plan 2045

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to liveable city objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. The approaches in the submission draft Plan align with the preferred approaches at Regulation 18.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

5.3 The retail and service sector play an important role in Oxford's economy and help to offer a range of job opportunities to local people. The city centre is an important destination for visitors from both overseas and the UK, and is attractive for business trips and conferences. The city centre, district centres and local centres provide a diverse range of uses and services, including retail, pubs, restaurants and offices, together with cultural and entertainment venues, which are important to the functioning of a city and people's well-being. These help to meet the needs of local residents, visitors to the city and those working in Oxford.

5.4 Opportunities for new cultural, community and entertainment uses, together with those in the hospitality sector and residential where appropriate could potentially be at the forefront of a renaissance in the city's key centres.

Town centre uses

5.5 Whilst there may be a move to online shopping, our city centre and local centres have been and will continue to be important for people socially. There are also advantages in terms of clustering uses that attract a lot of people in accessible locations so that a variety of needs can be met in one place, making travel simpler and more likely to be by sustainable modes. The uses also then help to support each other and maintain the strength of these centres, helping them thrive.

5.6 Policy C1 requires new town centres uses to follow a sequential test that looks to locate town centre uses in the defined centres first, and only if it can be shown that there

are no suitable opportunities in these centres may edge of centre and then other locations be considered. This is to try to keep a concentration of uses in the centres, trying to avoid competition that draws people away from established centres, and trying to avoid town centre uses in locations that are not well served by sustainable travel modes. Town centre uses are defined in the NPPF and include a wide range of uses such as shops, restaurants, gyms, health centres and offices. Applicants would be required to demonstrate how they have applied the sequential approach if they are proposing town centre uses outside the centres.

5.7 Retail is no longer a specific Use Class, and the introduction of Use Class E for most commercial uses allows significant flexibility in existing centres. In the Oxford Local Plan 2036, retail frontages were protected. The approach of the Oxford Local Plan 2045 Policy C2 is to protect active frontages at ground floor level, with a threshold percentage of Use Class E. This is to ensure continued activity and interest in these centres so they continue to support and offer a range of facilities and act as a hub.

5.8 To be able to apply this approach it is necessary to define the centres. Being a compact city, Oxford already has a range of centres that are in easy reach of people across the city. If local centres are defined, these should be considered the same as district centres and the city centre in terms of them being a preferred location for town centre uses. However, the NPPF is very clear that it should not include small parades of shops of purely neighbourhood significance.

Community, cultural, leisure and learning facilities

5.9 The importance of adequate availability of community and cultural facilities is evident. The functions they provide can be as a meeting place, a place for leisure and fitness, a place for community and interest groups to meet and so on. Cultural community and leisure facilities help to support strong communities, healthy lifestyles, wellbeing, and a sense of community and belonging. There has been a change in the cultural and leisure landscape as a result of Covid-19, which has in some ways perhaps just accelerated changes. It is important that we continue to protect and enhance the City's existing cultural, educational, leisure and community facilities, otherwise there is a risk that these facilities could be lost to or replaced with another land use. This could be detrimental not only to people's health but also their wellbeing Policies C3, C4 and C5 set criteria to ensure new facilities are located appropriately and potential impacts are mitigated. Existing facilities are also protected. Some flexibility is built-in to ensure changes in needs can be responded to, and to allow, for example replacement facilities that are equally accessible that are achieved by combining and sharing spaces in an enhanced and improved facility, ensuring the most efficient use is made of assets.

Appendix A- Policy options and preferred approaches

Policy options set 013a (draft policy C1): Focusing Town Centre Uses in Existing Centres

Table 1: Policy options set 013a: Focusing Town Centre Uses in Existing Centres

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Allow and protect town centre uses in the city centre, and district centres first.	This supports the city centre and district centres and encourages them to be placed at the heart of their communities. This promotes sustainable travel, and helps ensure that facilities are focused in these locations that can be easily reached by sustainable modes. The concentration of uses also means various needs can be fulfilled in one trip, encouraging people to stay longer. This approach helps to ensure town centre uses are concentrated in existing centres, where there are already good transport facilities (and other facilities such as public toilets, as well as parking for those who need to use it).	The wide range of uses allowed in district centres could lead to competing demands or a particular use could become dominant, which may not be that which is most needed by the community (for example student accommodation or hotels). The policy options relating to active frontages, below, will be important in mitigating this. Use Class E covers a wide variety of facilities, and it includes healthcare such as GPs. This approach would mean new GP surgeries would be expected to be located in district centres and would need to work through a sequential test to show other options are not feasible, which may limit options for locating GPs. However, it is important that GPs are easily accessible, so this approach is justified.
Option b As well as larger district centres, also define local centres.	Local centres are significantly smaller than the district centres, with less variety of uses, but they should be supported as they provide facilities locally in enough variety to serve a range of needs and they help ensure local access. These locations are less likely to be transport hubs and are more tightly woven into residential areas, so may need a slightly different policy approach to district centres.	These local centres vary in character. Defining them as centres means that restaurants and gyms could be introduced into quieter areas and they may attract more people than can easily access the centres.

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Option c Apart from for town centre uses, distinguish between city and district centres and local centres in terms of the other types of uses permitted. For example, do not allow student accommodation in local centres, but in larger centres only (if local centres are defined, according to the NPPF they are 'town centres' and so suitable for all main town centre uses).	This ensures that the uses that are most likely to be unsuitable for smaller centres are concentrated only in larger centres, minimising disruption and negative impacts, whilst still encouraging town centre uses in smaller centres to maintain good access to facilities and services.	This limits sites available for sui generis uses, which might still be popular locally.
Option d Do not distinguish between centres at all and allow the same uses in any defined centre.	This increases the range of uses that would be accepted in local centres and increases the locations where needs for student accommodation, hotels and visitor and cultural venues could be met.	Local centres are small and not as suitable for hotel uses, visitor attractions and student accommodation. They generally don't have such strong accessibility and uses that attract a lot of people at once and are less compatible with quiet residential areas could create negative impacts.
Option e Require an impact assessment for retail and leisure proposals outside of centres of a smaller threshold than the default 2,500m2 in the NPPF (currently required in OLP2036 for those of 350m2 or more), demonstrating that there will be no adverse impact on the vitality and viability of the existing centres, and that there is good accessibility by walking, cycling and public	In the context of Oxford, a proposal of 2,500m2 is large, and much smaller proposals outside of centres could potentially have negative impacts. This approach would pick up a larger number of proposals, ensuring negative impacts are avoided or mitigated.	This approach involves an oversight of a larger number of retail and leisure proposals.

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transport, and potentially including other criteria such as that there would not be unacceptable harm to adjoining land uses.		
Option f Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.	The NPPF sets out this approach, so there may be no need to repeat it in local policy.	The NPPF references accessibility and connectivity to centres as criteria for assessing proposals but there are no other locally specific criteria. The Local Plan gives the opportunity to define centres and expectations for them.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, a with b, c with a&b, d with a&b, e with a/a&b/a&b&c, f **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The NPPF directs town centre uses to town centres. The local plan can define these areas where town centre uses are to be directed. Town centres may or may not include local centres. There are uses that are not town centre uses that may be most suited to accessible locations. The options explore various ways of defining centres and suitable uses. The options relate primarily to criterion 6. Essential facilities, and criterion 12. Economic growth. Also, they are supporting of the air quality/transport criterion, because protecting centres/guiding uses to these areas helps to support a public transport network and helps people access their needs in sustainable ways. There are slightly different approaches within the options, but largely they all represent minor positives, apart from option for no policy which will be neutral.

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Focusing Town Centre Uses in Existing Centres – Proposed policy C1

The preferred approach for the Local Plan 2045 is to include a policy that defines the city centre, district centres and local centres. These centres should be the focus for new main town centre uses. There preferred approach is to distinguish between the larger centres and the local centres particularly in terms of student accommodation, which would not be considered suitable in the local centres.

The preferred approach is therefore a combination of **options A, B, C and E.**

Policy options set 013b (Draft Policy C2): Maintaining vibrant centres

As well as considering what types of uses should be permitted in what types of centres, it is necessary to consider how to protect those existing centres so that they remain vibrant and sustain people's local access to facilities and services.

Table 2: Policy options set 013b: Maintaining vibrant centres

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Designate frontages in the city centre and all district and local centres and require that a high proportion of this remains as Use Class E on the ground floor. The proportion to be set based on maintaining current thresholds, with some leeway for flexibility.	Having 'active' uses at the ground floor helps maintain the vibrancy of centres. Commercial, business and services are uses that attract a lot of people, so these are most beneficially located in the centres, where there are good transport connections, and where there is the benefit of people accessing a variety of facilities at the same time. There would still be a lot of flexibility with this approach to have other uses such as housing on the upper floors.	Permitted development rights that allow a change from Use Class E to housing could mean that the policy threshold is breached without any planning permissions being granted, and that would remove any flexibility for the remaining frontage, and limits the potential of the policy to maintain an active frontage. This will need a strong definition of an active frontage.
Option b Designate frontages in the city centre and all district and local centres but do not require a proportion to remain as commercial, business and services uses - only set criteria for what is expected in a ground floor frontage to bring activity and vibrancy to centres in terms of design and uses.	This approach allows complete flexibility, in the spirit of the change to the Use Class Order. It has flexibility to be applicable whatever future changes to the Use Class Order may occur. Criteria can help to ensure that shop fronts contribute to the design and character of existing buildings and their surroundings and give protection to Oxford's historic shopfronts.	Because the locations where many commercial uses can be located will be so limited, it is important to try to protect them where they are most suitable. Without this protection, there could be a weakening of district centres and the city centre as places where people can access a broad range of facilities at once, and easily, by walking, cycling and public transport.

Option c Do not designate active frontages.	Checking the proportion of active frontages, or assessing whether a proposal maintains an active frontage, does take some time, which would be avoided with this approach.	This approach does nothing to protect the vitality of local centres, so would not help to achieve the aim of a 15-minute city.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b or c, or a with elements of b **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Key criteria are **6. Services** and **12. Economic growth** (keeping high streets alive), potentially indirect impacts on 11. Urban design. Option a and b are both likely to have a minor positive for criterion 6 and criterion 12 because it would support protecting thriving centres (local and district) and maintaining a vibrant street atmosphere. Option b potentially also might have a minor positive impact against 11. Urban Design because incorporating criteria could include considerations about design of shop fronts and reflecting local character. Option c (no local policy) means no protection and would be scored as a neutral impact (it would not actively make the frontages disappear, just means no further protection through local policy). Overall, these are not scoped in for detailed appraisal because impacts are unlikely to be significant.

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Active Frontages – Proposed policy C2

The preferred approach for this topic is to include a policy that sets thresholds for the proportion of Use Class E (commercial use) to remain at ground floor level, and also to set criteria to ensure an active frontage. Ensuring a level of activity at street level is vital for the continued success of the centres, as is trying to maintain a range of commercial activity.

The preferred approach is therefore **Option A,** with elements of **Option B.**

Policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities

Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

Table 3: Policy options set 013c: Protection and Alteration of Existing Local Community facilities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect local shared spaces and community assets with a policy that would resist their loss, unless set criteria can be met, for example they are to be replaced.	This approach recognises the importance of local community assets and shared spaces and that these make a valued contribution to the health and wellbeing of local residents. The starting position is that these should be protected from loss. The approach recognises that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate market-led research and evidence to be provided to underline this case. Promoting 15-minute city concepts is a key aspiration for the Local Plan, defining accessibility in these terms will help to ensure that any re-provision does not force people to use less sustainable modes of transport to continue to use the facility (e.g. car).	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need or overriding demand. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.

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Option b Include a policy where planning will be granted for alteration and expansion of existing local community assets with relevant evidence from market research, although potentially preventing F2 shops from expanding so they become Use Class E and could be lost to housing or other commercial uses.	This would recognise the particular importance of community assets to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service.	The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit.
Option c Do not have a policy protecting local community assets - rely on national policy, or future national development management policies.	The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support communities. It highlights the importance of achieving healthy, inclusive and safe places which 'enable and support healthy lifestyles' and 'promote social interaction'. It is likely that new national development management policies could set out a framework for when loss of facilities is acceptable and may make a local policy redundant.	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

1516

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No

Rationale: With the absence of a specific national policy, it would be appropriate to consider having a policy. The local context supports the inclusion of such a policy, with several potential approaches for its formulation. The options under consideration by the Council explore different strategies for protecting and modifying existing community facilities. These approaches aim to safeguard these facilities, ensuring they are preserved unless it can be demonstrated that they are no longer needed or that a suitable replacement exists.

In terms of sustainability impacts, the different options all score against **criterion 5. inequalities** and **criterion 6. services and facilities** and the level of sustainability impact is unlikely to vary significantly between the options. Option a would have a neutral impact as it offers a cohesive approach to protecting existing local community facilities and outlines a strict criterion which needs to be met in order for the loss of a facility. However, there is still a chance that a community facility could be lost which poses social inequality and health threats, outlined in criterion 5, as communities won't have easily accessible facilities to socialise and exercise. Option b offers a minor positive impact as there is opportunity to expand and alter existing facilities without the risk of development becoming all Class E, preventing the loss of community facilities to housing and commercial use. This also limits the likelihood of social and health inequalities occurring. Option c would have a neutral impact as it would rely on national policy. Although there is no direct national policy, the NPPF does promote healthy and safe communities - it just doesn't outline how to achieve this. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

1517

Protection, alteration and new local community facilities – Proposed policy C3

The preferred approach for policy addressing community facilities is to generally support new facilities in accessible locations, encouraging community use of facilities if they are private. The preferred approach is also to protect existing facilities unless strict criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities to local communities.

The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013d and A and B of option set 013c.**

Policy options set 013d (proposed policy C3): Provision of New Local Community Facilities

Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

Table 4: Policy options set 013d: Provision of New Local Community Facilities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Generally, support the provision of new local community assets in the city. These should be in an accessible location by walking, cycling and public transport.	These facilities can form an important part of the social fabric of an area, and can support positive health and wellbeing both physical and mental. In combination with option A of Protection and Alteration options above, which seeks to protect existing space, this option would support new facilities coming forward where these would make a positive contribution to the city. Promoting active travel through walking/cycling as part of an accessible city is a key aspiration in the Local Plan.	Whilst this option would support provision, it would not define exactly what is needed and where. Community assets would not always automatically be approved, which would be because they were not suitable, but which may limit opportunities.
Option b Seek to secure community use agreements on all new community and leisure facilities, particularly those within schools and colleges, as well as existing facilities that come forward for redevelopment.	There are a range of private sports facilities in the city which offer limited public use as well as those that are entirely restricted to members of those institutions, including schools and colleges. Where access is opened up to the wider community, this could help improve the range of access to facilities.	Management and operational requirements of certain private facilities, such as those belonging to schools and colleges may restrict wider access for safety/ security reasons. It is likely that community use agreements would need to be explored on a case-by-case basis.
Option c Do not have a policy addressing provision of new local community assets; rely	The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this

on national policy, or future national development management policies.	communities. It highlights the importance of achieving healthy, inclusive and safe places.	requirement is planned for to meet the needs of both existing and future demand.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, it would be appropriate to consider having a policy as there is no specific national policy or guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy for the provision of new local community facilities. In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it allows new facilities to come forward. Option b would also have a slight positive impact as it would ensure public access to new or existing and expanded facilities. Option c would have a neutral impact as it would rely on national policy. There is no direct national policy, but it does promote healthy and safe communities Whilst option a represents a cohesive policy approach, some of the options (options b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could be stand alone, it could also be incorporated alongside option b as this would be less likely to stand alone and option c is less likely to be incorporated at all. There is also a sustainability impact link to **criterion 5. inequalities** as option a is trying to encourage new facilities to come forward and option b is looking at opening up access to previously private facilities to the wider community. This can facilitate social inclusion and access to recreational facilities which in turn links to good health. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

1519

Policy options set 013e (proposed policy C4): Protection and Alteration of Learning and Non-residential Institutions

Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

Table 5: Policy options set 013e: Protection and Alteration of Learning and Non-residential Institutions (including Schools, Libraries and Places of Worship)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect existing learning and non-residential institutions with a policy that would resist their loss, unless justified by meeting a set of criteria such as that there is no longer a need or it is no longer feasible in that location, and/or that suitable re-provision can be made.	This approach recognises the importance of learning and other non-residential institutions. These make a valued contribution to the health and wellbeing of local residents and also are important in learning and skills development, potentially helping overcome inequalities. The starting position is that these should be protected from loss, but this approach is flexible, recognising that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate evidence to be provided to underline this case.	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.
Option b Set out that permission will be granted for alteration and expansion of existing learning and non-residential institutions.	This would recognise the particular importance of learning and non-residential institutions to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service.	The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit.

1520

Option c Do not have a policy protecting learning and non-residential institutions- rely on national policy, or future national development management policies.	The NPPF does provide support for the provision and use of community facilities (such as public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. It identifies that planning policies should guard against the unnecessary loss or valued services and facilities, particularly where this would reduce the communities ability to meet its day-to-day needs. It is likely that new national development management policies could set out a framework for when loss of facilities is acceptable and may make a local policy redundant.	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

1521

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b, a and b, or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -**No **Rationale:** The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for educational infrastructure (paragraph 20). Previous evidence suggests that it is likely that need over the plan period can be met on existing sites, but it will be important that sites ae protected. The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing learning and non-residential institutions. In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and **criterion 5 to reduce poverty, social exclusion and health inequalities**. The level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it protects existing uses in most cases. Option b would also have a slight positive impact as it would support expansion of existing facilities. Option c could have a negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.

Protection, alteration and new learning and non-residential institutions – Proposed policy C4

The preferred approach for policy addressing learning an non-residential institutions is to generally support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities unless, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013e and A of option set 013f.**

Policy options set 013f (proposed policy C4): Provision of New Learning and Non-Residential Institutions

Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

Table 6: Policy options set 013f: Provision of New Learning and Non-Residential Institutions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include criteria for assessing the suitability of proposals for learning and non-residential institutions such as schools, with criteria for assessing the suitability of unallocated sites that may be proposed for these uses, which will include issues such as likely impacts on amenity and traffic and whether they can be mitigated, including access,	Whilst these uses will always bring benefits to the community, there is potential for them to be sited in unsuitable locations, where traffic is generated, where there are problems with access or it causes disruption to local residents; this approach would prevent that happening.	This could prevent much needed uses coming forward if the site is assessed as not suitable.

accessibility, size of site and neighbouring uses.		
Option b Restrict the locations where these uses would be allowed, for example to defined centres only, or to arterial roads and centres.	Some broad location types will, by their nature, be more likely to be suited to this kind of use, and this policy approach is upfront about those, reducing the need to assess against broad critiera.	This may rule out sites which would be very suitable for these beneficial uses.
Option c Do not have a policy for provision of new learning and non-residential institutions.	These uses bring benefits for the community, and this approach maximises the flexibility for them to be brought forward, in any location (suitable as long as other policy requirements are met).	This could lead to proposals in unsuitable locations, which generate traffic, have access issues, which are not close to other facilities for linked trips and which are not as easily accessible.

1523

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b, a and b, or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -**No **Rationale:** The NPPF says that a positive approach should be taken to meeting communities' needs in terms of education and development that will widen choice in education. However, it is also the case that not all locations are likely to be suitable for this type of development. Options are therefore set out that explore potential policy approaches to new learning and non-residential institutions, that supports them to varying degrees and that also ensures they are in appropriate locations. The options that the Council have considered represent various approaches to setting policy for the provision of new learning and non-residential institutions. In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inequalities.** The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option c, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Provision of the facilities depends on them coming forward, so all options have a neutral to mildly positive impact.

Policy options set 013g (Draft Policy C5): Protecting Cultural, Social and Visitor Attractions

Most cultural venues and visitor attractions such as theatres, nightclubs, pubs, casinos and concert halls are classed in the planning system as 'Sui Generis', which means use cannot switch to or from them without planning permission and proposals can all be considered on their own merits. These attractions can be important to people's experience and enjoyment of the city, both for visitors and residents, which may warrant their protection, with varying needs of flexibility as it will be necessary to respond to changing interests and demand.

Table 7: Policy options set 013g: Protecting Cultural, Social and Visitor Attractions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect cultural, social and visitor attractions in their current use, and include a criteria-based policy that only allows their loss or change to another attraction or community use if justified against a clear set of criteria that includes requirements for viability and marketing evidence, or replacement.	This approach would help guard against the loss of valued social, recreational and cultural facilities. It would help ensure that such facilities are able to develop and modernise and are retained for the benefit of the community. It is important that evening economy uses can flourish and co-exist with other uses especially where they are found near one another.	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.
Option b Protect cultural, social and visitor attractions for those uses (but not necessary the exact use they are in, for example a cinema could be	This approach continues to protect facilities that may be important to people in the local area, or wider area, whilst allowing greater flexibility to respond to changing tastes and demand, for example if visitor numbers to cinemas has fallen so much as to affect their	This would mean that facilities such as pubs, which can be very important to local communities, could potentially change to an attraction that may attract more visitors, but which does not perform the same community function. Facilities such as pubs are often not in centres, so their change to

lost to a pub, or even loss to a community facility could be set out as acceptable in principle). This approach would still include a criteria-based policy that only allows their loss if justified against these.	viability, a currently more popular use would be allowed in principle (subject to other policies and criteria being met).	another use, which is essentially a new use, could conflict with policies that try to direct these uses that attract lots of people to the defined centres.
Option c Do not include a policy that protects existing venues.	This approach leaves the market to respond flexibly to demands and market conditions.	This approach would not help guard against the loss of valued facilities and venues.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, a and b or c **High-level screening conclusion? -** the options are similar to each other and are unlikely significant sustainability impacts. **Screened in for detailed appraisal? -** No **Rationale:** The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for cultural infrastructure (paragraph 20). The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing cultural, social and visitor attractions. These options most directly relate to criterion **12. Economic growth,** particularly the element that relates to cultural provision and tourism and to **criterion 6. to provide accessible essential services and facilities** and **criterion 5 to reduce poverty, social exclusion and health inequalities**. Having a policy has a minor positive impact, helping to ensure these facilities are protected for the benefits they provide in terms of jobs, attracting visitors to the city and contributing to social and cultural well-being. Option c could have a minor negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.

1525

Policy options set 013h (Draft Policy C5): Provision of New Cultural, Social and Visitor Attractions

Related to options set 013g about protecting cultural, social and visitor attractions, this options set considers provision of new attractions – what types and where they might be most suitable, and bring most benefits.

Table 8: Policy options set 013h: Provision of New Cultural, Social and Visitor Attractions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a 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. This may specifically encourage some Sui Generis uses that are considered will fill gaps in provision or be particularly beneficial.	Potential benefits include prevention of impacts such as congestion and providing economic opportunities from locating new uses in accessible and sustainable locations.	The design of new facilities would need to be carefully considered otherwise there could be a potential for conflict with Oxford's historic assets, which has the potential to undermine the city's historic character. Allows for possibility of locating tourist assets away from existing transport hubs.
Option b Allow new cultural, social and visitor attractions in defined centres only.	This approach would continue to encourage new facilities in the most sustainable and accessible locations. In these locations, they also have potential to attract people who will use the other existing facilities of these centres and help to support them. This gives further potential to enhance the vibrancy of the city and district centres.	Potentially increases pressure in these centres as so many uses would only be allowed there. That may also limit these facilities because of competition for a limited number of sites. Has the potential to reduce variety of uses in these locations.

Option c Do not allow new cultural, social or visitor attractions	This could limit the negative impacts of visitors and tourists on Oxford's transport system and communities.	This approach would have a potential negative impact to Oxford's tourism industry and economy. It may not limit visitors, but would just limit their experience. It was also limit opportunities for residents. It could contribute to a decline of the city centre and district centres, with fewer visitors. It would limit opportunities for new attractions that may contribute to the wider understanding and appreciation of Oxford's unique history or increase its accessibility to people and opportunities for enjoyment.
Option d No Policy. Rely on other policies in the Local Plan and national policies where applicable.	Provides flexibility for the provision of these uses.	Reliant on other policies to mitigate any potential negative impacts on transport, heritage, and wider environment.

1527

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, a & b, b, c, d **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -**No **Rationale:** The NPPF says that plans should take into account and support the delivery of local strategies to improve society and cultural well-being. Therefore it is appropriate for options to explore potential policy approaches to support these facilities to varying degrees and that also ensures they are in appropriate locations. Visitor attractions and cultural facilities can attract large numbers of people and therefore have impacts on local amenity, and it is important they are accessible. The options that the Council have considered represent various approaches to setting policy for the provision of new cultural, social and visitor attractions. In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inqualities and 12. Economic growth,** particularly the

element that relates to cultural provision and tourism. The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option d, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Option c allows no new facilities, but would not affect directly existing facilities, which already ensure a range of provision.

Protection, alteration and new learning and non-residential institutions – Proposed policy C5

The preferred approach for policy addressing protection, alteration and provision of cultural venues and visitor attractions is to support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities as cultural and visitor attractions (allowing flexibility amongst these types of uses) unless criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

1528

The preferred approach in the draft Local Plan is therefore a combination of **option A of option set 013g and A and B of option set 013h.**

Background paper 014

Grey and Digital Infrastructure

This paper addresses the provision of grey infrastructure (including roads, rail, sewers and energy) and digital infrastructure (including telecoms and broadband) to meet the community's needs and support the growth of the city.
Relevant Local Plan 2045 Objectives: • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city. • Curate a built environment that supports and enables people to be physically and mentally healthy. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040. 6. To provide accessible essential **services and facilities**. 8. To reduce **traffic congestion and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. 9. To achieve **water** quality targets and manage water resources.
SEA theme(s): Water, climatic factors, material assets, human health, landscape, population and air.

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1. Introduction

1.1 Infrastructure generally consists of facilities and services that meet the needs of the local population and help support development and growth.

1.2 Infrastructure is often broken down into broad sub-groups. These sub-groups are usually made up of following infrastructure categories:

- Physical infrastructure (such as transport, utilities infrastructure);
- Social infrastructure (such as schools, healthcare and community centres);
- Green and blue infrastructure (such as parks, waterways and cemeteries) and
- Digital infrastructure (such as high-speed internet, mobile telecoms and smart grid energy)

1.3 Infrastructure needs can arise from deficiencies in current provision; additional requirements to support new development; or as the result of increased demand due to population growth. This topic paper focuses on physical and digital infrastructure. It sets out an overview of the policy context relating to transport infrastructure provision. However, a more detailed discussion on transport infrastructure can be found in Background Paper 12 – Transport. A discussion about social infrastructure can be found in Background Paper 013 - Liveable city and a discussion on green and blue Infrastructure is covered in Background Paper 005a – Green Infrastructure.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (NPPF)

2.1 Infrastructure provision and delivery to support new development has become increasingly recognised as an important national planning priority in recent years. The most recent NPPF (December 2024), acknowledges the importance of new, upgraded, and/ or expanded infrastructure that is required to support the developmental aims and ambitions of the Labour administration.

2.2 Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk, and provision of minerals and energy; and community facilities (such as health, education and cultural infrastructure).

2.3 Paragraph 35 of the NPPF sets out that Plans should set out the contributions expected from development and that this should set out the levels and types of infrastructure required providing such policies do not undermine the viability of the plan. Both physical and digital infrastructure (both of which are relevant to this topic paper) are included.

2.4 Paragraph 77 off the NPPF sets out that the supply of large numbers of new homes should be “supported by the necessary infrastructure and facilities”. While Chapter 6 of the NPPF sets out the Government’s approach to the supporting economic growth through the planning system. The NPPF now includes digital infrastructure as one of the Government’s five named key sectors supported by the NPPF to “meet the needs of a modern economy”. It also sets out that planning policies should make provision for “new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries”. While Paragraph 86 sets out the importance of delivering infrastructure and associated improvements, where it is recognised that identified inadequacies are a potential barrier to investment.

2.5 Chapter 10 of the NPPF recognises the importance of digital infrastructure and sets out that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also stresses the importance of plans supporting the expansion of next generation mobile technology and sets out that full fibre connections should be prioritised to existing and new developments.

Planning Practice Guidance (PPG)

2.6 The Planning Practice Guidance section on Plan-making refers to infrastructure within several different contexts. A selection of these are set out below:

- The potential need for additional cross-boundary infrastructure;
- Understanding if there are barriers to investment (e.g., lack of housing, infrastructure, etc.);
- In working out developer contributions, a proportionate evidence base should include a plan-level viability assessment;
- Providing confidence that new homes will be supported by appropriate infrastructure in a timely manner and providing policy support for identified deficiencies.
- To be able to demonstrate that any critical infrastructure required to support the level of growth proposed in the plan is deliverable within a reasonable timeframe;
- To use the Infrastructure Funding Statement to support infrastructure delivery throughout the plan period.

Oxford Cambridge Growth Corridor

2.7 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government’s ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxfordshire Local Transport and Connectivity Plan (LTCP)

2.8 The LTCP5 was published in July 2022 and follows on from the previous Local Transport Plan 2015-2031 (LTP4). The vision is of a net zero travel system for the county that protects the environment and makes for a better quality of life for communities that live there.

2.9 The LTCP is supported by a number of supporting strategies. The objectives of these strategies are to reduce the need to travel, reduce reliance on individual private car use and to promote alternative modes of transport such as walking, cycling and public/ shared transport as natural first choices.

2.10 There is a strong emphasis on promoting a 'decarbonised' transport network, air quality and productivity on a sustainable basis, which includes highlighting role of digital infrastructure in enhancing connectivity and reducing the need to travel.

Local Cycling and Walking Investment Plan (LCWIP)

2.11 Local Cycling and Walking Investment Plans (LCWIPs) are being prepared for several parts of Oxfordshire. The Oxford City LCWIP was adopted by Oxfordshire County Council in March 2020. The plan sets out evidence in relation to achieving a 50% increase in cycling in Oxford. The City LCWIP:

- Lays out a comprehensive cycle network to focus expenditure for best value;
- Identifies a list of infrastructure improvements for both walking and cycling based on best practice and the Cycle and Walking Design Guides;
- Summarises the evidence for supportive measures, such as Low Traffic Neighbourhoods and controlled parking zones; and
- Provides cost estimates for these schemes that can be used in future bids and in planning decisions.

Local Area Energy Plans for Oxfordshire

2.12 In February 2025 an announcement was made that all the Oxfordshire authorities including all district councils and the county council (supported by the Oxfordshire Leaders Joint Committee) are to deliver a Local Area Energy Plan (LEAP) for the county. This will help address climate change and provide recommendations for the development and improvement of energy-related policies, regulations and incentives including securing cleaner, more affordable energy.

Oxford Local Plan 2036 (Infrastructure Policies)

2.13 The Oxford Local Plan 2036 contains several policies relating to infrastructure. These policies help support new development by ensuring that appropriate infrastructure is provided in

a timely manner. For instance, Policy V8 – Utilities, requires planning applications to be supported by information that capacity issues have been explored with the appropriate utilities providers and sets out that development will not be supported without sufficient evidence regarding utilities capacity. Whereas Policy V9 – Digital Infrastructure, supports development that delivers full-fibre broadband connection speeds and appropriate electronic communications infrastructure provided that a set of criteria are met.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 Infrastructure investment usually either comes directly from new development in the form of developer contributions or direct delivery, or indirectly, through the attraction of central and local government funds associated with new development. Through Local Growth Funds 1 and 2, the Oxfordshire Local Enterprise Partnership (LEP) secured £118.4m to support dynamic economic growth funding numerous infrastructure projects. They were also awarded £24.16m, as part of Local Growth Fund 3, enabling the support more projects to benefit local people and business.

Infrastructure needs can change over time, for instance, as changes in demographics occur, or new technologies emerge, investment in infrastructure does not always keep up with the pace of development, especially in areas where the cumulative effects of smaller developments are felt more acutely, such as in Oxford. When this happens, a deficit is created which can impact on the existing and future population.

3.2 Figure 1 shows the development pressure arising from the planned growth set out in the Local Plan 2036. This area-based analysis divided the city into four broad sectors, each of which has planned housing growth of more than 1,000 units. Development pressure also exists adjacent to the boundary of the city with new around 4,800 new homes planned adjacent to the city's South Infrastructure Area. In addition, there are more than 1,100 homes proposed outside the East Infrastructure Area. A similar number of new homes are also planned (around 1,400) adjacent to the Oxford's North Infrastructure Area. Although these developments are outside the city there is the potential for them to put pressure on existing infrastructure facilities and services in the city.

3.3 Figure 1 also shows the locations of the city's Category 1 employment sites. This shows that there is a cluster of existing employment sites located in the south of the city, which is presently not well-served by public transport. Important infrastructure projects such as the redevelopment of Oxford Station and the re-introduction of passengers on the Cowley Branch Line will improve the connectivity and accessibility of these, and other employment sites in the south of the city across the county and the wider growth corridor.

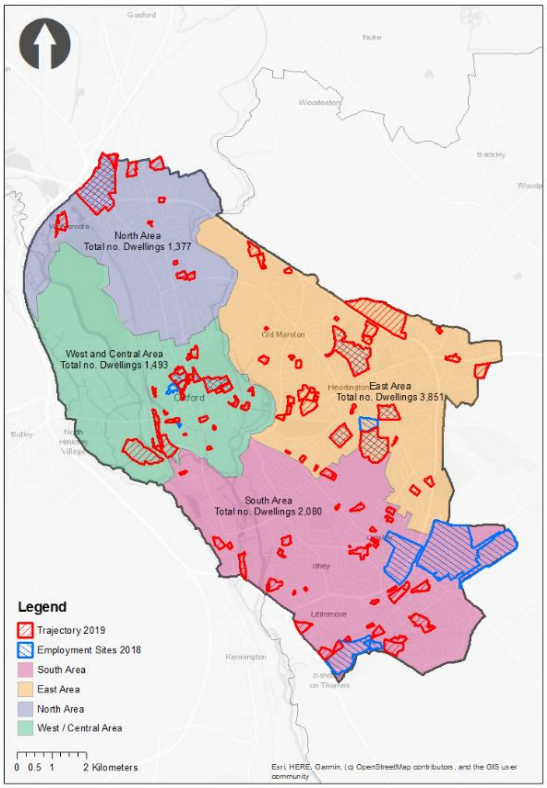


Figure 1: Area-based analysis of the Local Plan 2016-2036 requirements for ca. 11,000 new homes and 25ha of new employment land in Oxford. This map only shows Category 1 employment sites (LP2036)

How is infrastructure funded?

3.4 Currently in Oxford, Section 106 (S106) agreements and the Community Infrastructure Levy (CIL) are the main mechanisms in place for generating funds from development to be invested in infrastructure to help mitigate the impacts of development. S106 agreements can set out legal obligations for on-site infrastructure needs, are often on major sites and can include affordable housing contributions. CIL is a charge levied on the new floor space of new developments and is accumulated from developments across the city to be reinvested into infrastructure needs of the city.

3.5 The City's Infrastructure Funding Statement (IFS) summarises the amount of developer contributions obtained, allocated and spent in the previous financial year. CIL receipts for the 2023/24 monitoring year were just over £5.67 million and S106 contributions in 2023/24 were just over £190,000. The S106 money received was put towards a variety of contributions including affordable housing, highways management, air quality monitoring, and community facilities. Non-financial S106 contributions included public open space, affordable housing and footpath links.

3.6 Oxfordshire County Council's Infrastructure Funding Statement (IFS) is also available online and identifies income and expenditure for education, highways and public transport, fire service, libraries and other county responsibilities.

Analysis of current infrastructure provision

Utilities: Water resources

3.7 Thames Water has a duty to maintain the security of the water supply, and every five years they produce a Water Resources Management Plan (WRMP) which sets out how they plan to meet customer's needs while protecting the environment over the plan period. The latest version WRMP24 published in October 2024 looks ahead to 2075.

Utilities: Wastewater treatment

3.8 The Oxford sewer network manages demand from over 250,000 customers sited in Oxford and the surrounding areas. The catchment is served by the Oxford Sewage Treatment Works (STW), located just outside the city boundary to the south of the city, and Littlemore Pumping Station.

3.9 The Oxford STW is one of the most important structural assets with respect to future development in Oxford. In the past, it has benefitted from some increases in capacity. However, recently further upgrades to the Oxford STW facility have been shown to be needed. These upgrades are to ensure that the Oxford STW is able to both meet current and future demand for growth in the city and the surrounding area.

3.10 Thames Water, the Environment Agency and Oxford City Council met several times in 2024 to discuss the progress of the upgrades required to improve treatment capacity at the Oxford STW. The purpose of these meetings was to provide confidence and evidence that the planned and proposed growth in the surrounding area can be realised in full (and any wastewater arising from it could be satisfactorily dealt with at the Oxford STW). Thames Water has kept Oxford City Council updated and involved in its capacity upgrade discussions. On 20 March 2025, following a rigorous process to find a solution to unlock new homes, an announcement was made that the EA, Thames Water and Oxford City Council agreed a scheme to provide the capacity needed at the Oxford STW. Thames Water has presented a clear, fully costed and funded programme of work that provides the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, allowing projected growth to come forward.

3.11 The City Council has commissioned a new Water Cycle Study to accompany the preparation of the Local Plan 2045 which will analyse the current situation in the water environment, The Water Cycle Study looks at how the likely development proposed through the new Local Plan could potentially impact the water environment.

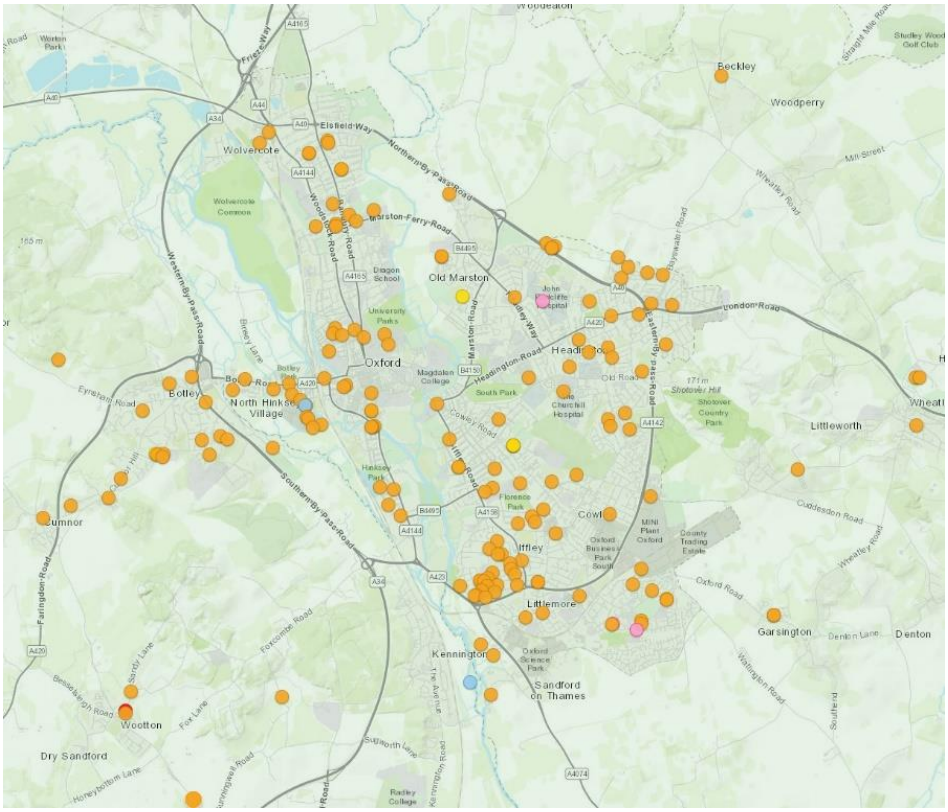
Utilities: Energy

3.12 Scottish Southern Electricity Networks (SSE) is responsible for delivering electricity distribution across southern England, including Oxford. Throughout the development of the Local

Plan 2036 the Council liaised with SSE in relation to the likely impacts of proposed development allocations in the plan on their networks; and to ensure that any upgrades to the network that may be required to serve the proposed levels of development will be provided in a timely manner. Continuing these conversations to support the production of the Local Plan 2045 are an important part of infrastructure planning especially as more details are known about the quantum and distribution of development.

3.13 Oxford has set out ambitious objectives in relation to cutting carbon emissions and moving towards being a net zero city by 2040. Renewable energy generation technology is likely to play an important role in this endeavour and there is a variety of renewable energy infrastructure schemes around the city.

3.14 The online platform 'The Peoples Power Station' which was developed by the Low Carbon Hub maps a variety of renewable energy and energy efficiency projects across Oxfordshire and a snapshot of the distribution for Oxford is included in Figure 2, which shows that most installed schemes in the city involve small-scale solar photovoltaics. This reflects the constrained nature of Oxford, and the relatively high density of the existing built-up area means that there are limited opportunities for some larger-scale renewable energy projects (e.g., solar farms). However, the city's higher densities also present opportunities for certain renewable energy projects (e.g., district heating), which need numerous potential users within close proximity to one another.


Beckley
Woodperry
Wolvercote
Elsfield Way
Northern By-Pass Road
Wolvercote Common
Old Marston
Oxford
Botley
North Hinksey Village
Headington
Littleworth
Cumnor
Iffley
Cowley
Littlemore
Kennington
Sandford on Thames
Garsington
Denton
Wootton
Dry Sandford
Southern By-Pass Road
Western By-Pass Road
London Road
Headington Road
Marston Road
Cowley Road
Oxford Road
Abingdon Road
Botley Road
Iffley Road
Wheatley Road
Mill Street
Old Road
Shotover Hill
Shotover Country Park
Magdalen College
South Park
Florence Park
Henley Park
Oxford Science Park
Oxford Business Park South
Mini Plant Oxford
County Trading Estate
Chiltern Hospital
John Radcliffe Hospital
University Parks
Dragon School
Worton Park
Studley Wood Golf Club
Ridley College
Farringdon Road
Foxcombe Road
Shotover Lane
Fox Lane
Honeysuckle Lane
Sandford Lane
Kennington Road
Watlington Road
Southfield
Denton Lane
Cuddesdon Road
Binsey Lane
Eynsham Road
Cumnor Hill
Seven Barrows Road
Straight Mile Road
Wheatley Road
Mill Street
Hollymeade Road
A34
A420
A4142
A4144
A4158
A4074
B4495
B4150
B4027
A4165
A44
A40

3.15 Renewable and low-carbon energy technologies are currently secured in new developments to comply with the policy requirements of the Local Plan 2036. As such they are usually negotiated through commitments secured through the development management process and are therefore generally funded and provided by developers.

3.16 As well as electricity, gas supply is often regarded as an essential utility provision in new development. The national high pressure gas transmission system is owned by National Grid, but the lower pressure local distribution network in the Oxford area is owned by Scotia Gas Network (SGN).

3.17 As part of the development of the Local Plan 2036, SGN assessed all identified sites to identify if there would be any likely issues with the gas network. The results of the network capacity assessment showed that most of the sites would be unlikely to have any issues connecting to the gas network. It will be important to ensure that any new sites identified through the Local Plan 2045 are able to be satisfactorily accommodated within the existing network.

Digital Infrastructure

3.18 Oxfordshire County Council's Digital Infrastructure Programme aims to improve digital infrastructure across the county and their work includes bespoke projects such delivering GigaHubs with Full Fibre broadband including at more remote locations including village halls, GP surgeries, schools and other public buildings. Other important work involves the delivery of gigabit-capable broadband to around 10,000 premises in Oxfordshire and driving to deliver 5G technology in Oxfordshire as part of a wider regional project across England's Economic Heartland.

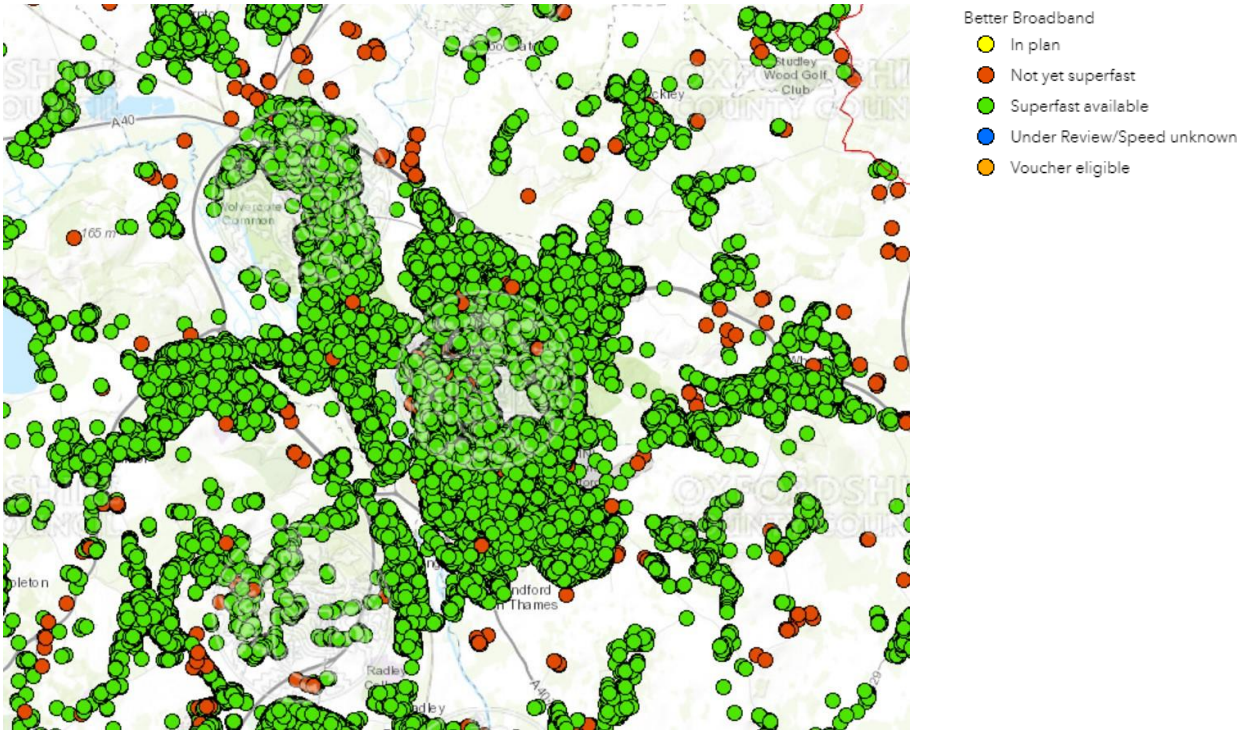


Figure 3: Map of broadband coverage in Oxford City. Source: Digital Infrastructure Oxfordshire.

3.19 Good broadband connections are essential for many highly skilled jobs. Oxford is well covered by superfast broadband connections (speeds of >24Mps). Figure 3 shows the availability of superfast connections across the city is now widespread, although there are still some areas where improvements are needed. Good broadband connections can help support a range of employment opportunities including supporting opportunities that enable flexible and hybrid working styles.

3.20 The County Council has been undertaking work in relation to the roll out of full fibre for commercial buildings, with the aim that this will also support the delivery of high-quality digital infrastructure to surrounding residential properties. Another County Council project is supported by a funding source available from central government which can only be used for the 'final 20%' harder to reach properties and ensure that they have 'superfast' connectivity. Although it is often used to support the delivery of broadband outside of urban areas the fund may apply to some areas of Oxford.

Another important aspect of digital connectivity is coverage of telecoms and mobile phone networks. Coverage varies across the city based upon which of the four main mobile network operators are being used to provide this service, with higher generations of network (up to 5G which is currently being rolled out nationally), being able to offer increased performance and download speeds.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 Infrastructure is needed to mitigate the impacts of new development and support its delivery. A new Local Plan provides an opportunity to review and update the existing infrastructure requirements identified to support the current adopted plan. Without a new plan, any infrastructure schemes needed to support the delivery of new additional development (not previously identified within the current Local Plan) may not be delivered in a timely manner.

4.2 Discussions with key stakeholders and infrastructure delivery partners is an important aspect of the plan-making process because key stakeholders can identify infrastructure and funding gaps needed to support development. Having a clear and up-to-date understanding of the likely future development in an area can assist infrastructure partners with infrastructure planning and funding programmes which often do not align with the Local Plan making process. The likely trends without a new Local Plan could mean that key critical infrastructure issues are not identified at an early stage and this could result in delays to infrastructure delivery. A new Local Plan provides an opportunity to identify and address issues with infrastructure providers and key stakeholders to ensure that infrastructure is delivered in a timely manner to support mitigate the impacts of development.

5. Key Issues through the Local Plan 2045

Overall policy approach to infrastructure provision

5.1 Infrastructure is often delivered by third party providers, whose delivery plans are not always synchronised with the development planning process. Therefore, the Local Plan provides an opportunity to update third-party providers with development projections. The inclusion of infrastructure policies provides a framework by which specific infrastructure needs for different types of development can be identified as much as possible in a transparent and predictable way. Overall this can assist with ensuring infrastructure is delivered in a timely manner to support development.

Land Safeguarded for Infrastructure Policy

5.2 The plan includes a new policy (policy I2: Land Safeguarded for Infrastructure), which did not form part of the Regulation 18 consultation document. The purpose of the policy is to show within the Local Plan 2045, certain infrastructure schemes that are covered by other consenting regimes which fall outside of the jurisdiction of Oxford City

Council's planning powers. The Policy itself covers two specific infrastructure schemes – the Oxford Flood Alleviation Scheme, and East West Rail. The County Council is the determining authority for the Oxford Flood Alleviation Scheme, while East West Rail is a Nationally Significant Infrastructure Project (NSIP). Both infrastructure schemes are at stages within their respective consenting regimes where it is appropriate to include information relating to these schemes within the city's Local Plan 2045. Each scheme is considered in turn. The land safeguarded for the East West Rail Project was the subject of a Safeguarding Direction in November 2025 which introduced specific procedural requirements for development proposals within the affected area. While the Oxford Flood Alleviation Scheme is at an advanced stage in the County Council's development management process.

5.3 Effectively, there are two policy options that were considered. Either to include a policy or not. Neither option is considered to have any significant effects on the sustainability objectives identified within the SA Framework. This is because the safeguarding of land identified within either infrastructure scheme does not significantly affect the ability of locations identified for development that have been identified in the Oxford Local Plan 2045, to come forward. Also, any assessment of whether there was a policy or not would be likely to be broadly similar. However, the inclusion of a policy would be likely to help to support a more transparent and joined-up approach between the different consenting regimes.

5.3 Policy I2: Land Safeguarded for Infrastructure is therefore a policy which provides information about strategic infrastructure schemes (i.e., that cover more than one local authority area) and provides bespoke procedural undertakings for each of the identified schemes The City Council considers that, on balance, given that such a policy would not give rise to any likely significant effects, and would be likely to help support a more transparent approach, the City Council has therefore included such a policy within the Local Plan 2045.

Appendix A – Regulation 18 Policy options sets

- The Local Plan 2045 includes proposed policies that aim to facilitate provision of physical and digital infrastructure in support of development in Oxford. For each potential policy, options for the specific approach that could be taken for the Local Plan 2045 have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

- Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). A summary of this screening process is included at the end of each options set table.

Policy Option set 014a (draft Policy S3): Infrastructure Delivery in New Development

5.6 National policy requires local plans to make sufficient provision for a range of different types of infrastructure. This option set looks at two options - Option A considers introducing a policy to require development proposals make a contribution towards or deliver the infrastructure required to meet identified needs. Option B, in contrast considers the positive and negative consequences of not introducing such a policy.

Table 5.1 Policy options set 014a – Infrastructure Delivery in New Development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Include a policy that sets out how and when development proposals are expected to contribute to, or deliver the infrastructure required to meet identified needs. Make specific reference in the policy to the Infrastructure Delivery Plan (IDP) and set out a selection of specific infrastructure projects. Support the use of on- and off-site contributions and identify appropriate delivery mechanisms (e.g., S106, S278, CIL) to support the timely delivery of infrastructure.	Provides clear advice about how and when infrastructure delivery is needed to mitigate the impacts of development. The IDP forms a key part of the evidence base which helps to demonstrate that there is a funding gap and that contributions from development can be sought. Setting out the specific infrastructure projects in the policy can help the plan achieve its vision.	No specific reference about how best to delivery infrastructure projects that are themselves resilient to future climate change impacts. Policy only explicitly mentions rail and bus infrastructure requirements.
Option B Do not include a policy that supports infrastructure delivery in new development.	Limited or uncertain positive consequences of this approach	Likely to cause uncertainty about future infrastructure requirements and associated costs, all of which need to be negotiated through the development management process. This could lead to delays in the infrastructure provision and result in a more resource-intensive development management process, which could

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		increase the time taken to determine planning applications. Would not identify and may not result in the delivery of key infrastructure projects required to support the plan's vision.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option A **High-level screening conclusion?** Significant effects unlikely **Screened in for detailed appraisal?** No **Rationale:** Option A is unlikely to have significant effects on the SA objectives. This is in part because the policy provides a mechanism to support the timely delivery of infrastructure, which itself mitigates the identified impact the level of growth proposed in the plan. When considered against the SA objectives, option is likely to have neutral or minor positive effects on SA Objective 6 Services and Facilities, and may support increased accessibility and connectivity through delivering rail, bus and active travel measures which are likely to have an overall neutral or minor positive effect on SA Objective 8 Transport and air quality as a shift away from non-car modes is more likely with the delivery of improved rail, bus and active travel infrastructure.

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Infrastructure Delivery in New Development – draft Policy S3

The preferred approach for the Local Plan 2045 draft policy to take forward is **option A.** This is because the local plan needs to enable infrastructure to be delivered in order to mitigate the impact of the development it proposes. The draft policy provides the mechanism to seek contributions for, or deliver the identified infrastructure needed to support the growth proposed in the plan.

Policy Options Set 014b (draft Policy I1): Digital Infrastructure to support New Development

Table 5.2: Policy options set 014b: Digital Infrastructure to support New Development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require the provision of high-speed digital infrastructure (integration of gigabit ready physical infrastructure, future proofed construction to allow for integration if not immediately available) in all development, including residential, employment and conversions.	Ensures that development schemes connectivity is delivered in a consistent and measurable manner. Compliance with NPPF (para 119) and building regs.	There may not be any need for specific policy as building regs and NPPF already contain provisions for digital infrastructure and connectivity.
Option b Have no specific policy on digital infrastructure, rely on national planning policy.	NPPF already has permissive approach to communications infrastructure (paras 119 – 123), and local authorities are directed to make decisions on planning grounds only, which can already be covered by other relevant policies in plan. There is already growing provision of high quality infrastructure.	NPPF only addresses the provision of infrastructure by service providers, with no specific requirements for levels of connectivity and access at individual user level. NPPF also requires a specific policy so not having one will be in contravention.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options most directly influence **criterion 6. Services and Facilities** and may also have relevance t**o criteria 5. Inequalities,** as uneven access to high quality digital services may be an indicator of spatial and socioeconomic inequality. There may also be relevance to **criteria 1** and **8** as enhanced connectivity could potentially reduce the need for some journeys**.** The impacts are not

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expected to be more than minimal in the context of the other policies in the plan. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Digital Infrastructure for new development – draft Policy I1

The preferred approach for the Local Plan 2045 draft policy is to take forward **option A**. This approach ensures compliance with the NPPF, which is supportive of infrastructure provision and requires a specific policy. It also allows the local plan to make specific requirements and set standards at individual scheme level with regards the type of development, level of connectivity, access and type. It will be possible to ensure delivery of infrastructure at a consistent level that can be effectively monitored, and which is response to the local/regional needs of the city's employers and residents.

New Policy Options Set 014c added since Regulation 18 (draft Policy I2): Safeguarding land for infrastructure

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Table 5.2: Policy options set 014c: Safeguarding land for infrastructure

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy setting out land safeguarded for provision of infrastructure (specifically the Oxford Flood Alleviation Scheme and East West Rail)	Ensures clarity and flags upfront where provisions from other regimes will require involving other bodies. Helps to be clear about what land is needed for successful delivery of these specific infrastructure schemes. The inclusion of a policy would be likely to help to support a more transparent and joined-up approach between the different consenting regimes.	There may not be any need for specific policy as land is already safeguarded outside the Planning regime.
Option b	The land is already safeguarded so there is no need to bring a policy into the Local	Not including the policy or adding the safeguarded land to the policies map

Have no specific policy safeguarding land for infrastructure, rely on national planning policy and other regimes.	Plan to ensure that the land is protected from other development that would prevent the infrastructure being developed.	misses the opportunity to flag this issue at an early stage so that landowners can design their proposals accordingly.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options most directly influence **criterion 6. Services and Facilities**. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal. The safeguarding of land identified within either infrastructure scheme does not significantly affect the ability of locations identified for development that have been identified in the Oxford Local Plan 2045, to come forward.

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Digital Infrastructure for new development – draft Policy I1

The preferred approach for the Local Plan 2045 draft policy is to take forward **option A**. This approach ensures compliance with the NPPF, which is supportive of infrastructure provision and adds clarity to the Plan. It helps support a more transparent approach, and ensures the need to respond to the safeguarding requirements is flagged at an early stage.

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Oxford City Council

Habitat Regulations Assessment: Screening Update and Appropriate Assessment

Regulation 19 Report | November 2025

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1. Introduction

1.1 This report includes Stage 1 (Screening) and Stage 2 (Appropriate Assessment) of the Habitat Regulations Assessment (HRA) for the Oxford Local Plan 2045 Regulation 19 "Proposed Submission" Document (hereafter the "Reg.19 Plan").

1.2 This HRA report should be read in conjunction with the Oxford City Council Stage 1 HRA Screening Report (hereafter the Oxford HRA Screening Report) published to support the Local Plan Regulation 18 Consultation (27 June – 08 August 2025). The Oxford HRA Screening Report is included at Appendix 1 of this Report.

1.3 This HRA Report (hereafter the "Reg. 19 HRA Report") is presented in two sections:

- Section 1 – HRA Screening, includes:
    - An update of the HRA screening categorisation schedule to reflect the policies and site allocations contained within the Reg. 19 Plan;
    - A discussion about the site allocation screening process;
    - How Natural England's formal response to the Oxford Local Plan Regulation 18 consultation has been addressed; and
    - An update to the Air Pollution Impact Pathway analysis that considers the levels of growth proposed within the Oxford Local Plan Reg. 19 Document and reflects on whether there are any implications of the changes to the dates of the twenty-year plan period.
- Section 2 – Appropriate Assessment includes:
    - A summary of the policies and site allocations contained within the Reg. 19 Plan that were carried forward for further investigation as part of the HRA Stage 2 Appropriate Assessment;
    - A more detailed analysis of likely significant effects of certain identified policies and site allocations in view of the site's conservation objectives;
    - The identification of suitable mitigation measures to avoid or minimise the likelihood of any such effect arising.

Requirements of the Habitat Regulations

1.4 Local Authorities preparing development plan documents must consider whether the relevant plan, either alone or in combination with other plans or projects, is likely to have significant effects on "European sites" that are protected by the Habitat

Regulations. This generally means considering whether the plan would be likely to significantly affect the conservation objectives or the designated features of the site.

1.5 According to Government Guidance on How to carry out an HRA (February 2021), the HRA process can have up to three stages. The stages are:

1. Screening – to check if the proposal is likely to have a significant effect of the site. This will usually involve consideration of likely significant effects in view of the site's conservation objectives and its designated features, for example. If not, you do not need to go through the appropriate assessment or derogation stages.
2. Appropriate Assessment - to assess the likely significant effects of the proposal in more detail in view of the site's conservation objectives and identify ways to avoid or minimise any such effects.
3. Derogation - to consider if proposals that would have an adverse effect on a European site qualify for an exemption.

1.6 This guidance provides advice and recommendations about how to understand and comply with the Conservation of Habitats and Species Regulations 2017 SI No 1012 and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 SI No 579.

1.7 This part of the report covers Stage 2 (Appropriate Assessment). Oxford City Council has undertaken the HRA process 'in- house'.

Key HRA Stages explained

Screening for Likely Significant Effects

1.8 Screening is the process which identifies whether a plan or project is likely to result in significant effects to European sites, either alone or in combination with other plans or projects. Government guidance on HRA Screening sets out that when assessing likely significant effects of a proposal on European site, *"You must check if the proposal could have a significant effect on a European site that could affect its conservation objectives"*. There needs to be a causal connection or link between the plan or project and the qualifying features of the site which could result in significant effects - this may be direct or indirect.

1.9 Government Guidance on Appropriate Assessment sets out the implications of the the People over Wind Judgement for Habitat Regulations Assessments. This judgement

clarified that when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account mitigation measures. Instead, mitigation measures can only be taken into account as part of an appropriate assessment itself.

1.10 All draft policies and potential sites being proposed for inclusion in the Oxford Local Plan 2045 were the subject of an HRA screening for likely significant effects on European sites.

Appropriate Assessment

1.11 The purpose of the Appropriate Assessment stage is to further analyse likely significant effects identified during the screening stage, as well as those effects which were uncertain or not well understood and taken forward for assessment in accordance with the precautionary principle. If required, an Appropriate Assessment evaluating the implications of the plan, either alone or in combination with other plans or projects, in view of the conservation objectives of affected European sites, should accompany the Regulation 19 stage of plan preparation.

1.12 If mitigation measures are needed to overcome any likely significant effects identified through the HRA process, the People Over Wind Judgement clarified that a competent authority may only take account of mitigation measures intended to avoid or reduce the harmful effects of a plan or project as part of an appropriate assessment (rather than at the initial screening stage).

Derogation

1.13 If the Appropriate Assessment stage identifies a significant adverse effect (or effects) on the integrity of a European site, that cannot be suitably mitigated, the plan or project cannot go ahead unless it can be shown to be in the overriding public interest. This is known as 'derogation'.

In-combination effects

1.14 Other plans and projects being prepared or implemented in the area may have the potential to cause adverse effects on European sites. These effects may act in-combination with the effects of the Local Plan, possibly leading to an insignificant effect becoming significant. It is therefore important to consider which other plans and projects could generate similar effects as development within Oxford city, at the same European sites, and which may act in-combination.

1.15 The following list sets out the plans and projects with the greatest potential for in-combination effects with the Oxford Local Plan 2045:

Oxford City Council:

- Oxford Local Plan 2036 (Adopted June 2020)

Cherwell District Council:

- Cherwell Local Plan (adopted November 1996) – saved policies
- Cherwell Local Plan 2011-2031 Part 1 (adopted July 2015)
- Cherwell Local Plan 2011-2031 Part 1 Partial Review – Oxford's Unmet Housing Need (adopted September 2020)
- Cherwell Local Plan 2042 (emerging)

West Oxfordshire District Council

- West Oxfordshire Local Plan 2011-2031 (adopted September 2018)
- Salt Cross Garden Village Area Action Plan (emerging)
- West Oxfordshire Local Plan 2043 (emerging)

South and Vale District Council

- South Oxfordshire Local Plan 2035 (adopted December 2020)
- Vale of White Horse Local Plan 2031 Part 1 (adopted December 2016)
- Vale of White Horse Local Plan 2036 Part 2 (adopted October 2019)
- South and Vale Joint Local Plan 2041 (emerging)

Oxfordshire County Council

- Oxfordshire Minerals and Waste Local Plan (adopted July 1996) - saved policies
- Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (adopted September 2017)
- Oxfordshire Minerals and Waste Local Plan (emerging)
- Oxfordshire Local Transport and Connectivity Plan (LTCP) (adopted July 2022)
- Oxfordshire Traffic Filters (trial due to commence following the re-opening of the Botley Road Bridge in 2026)

Other Plans and Projects

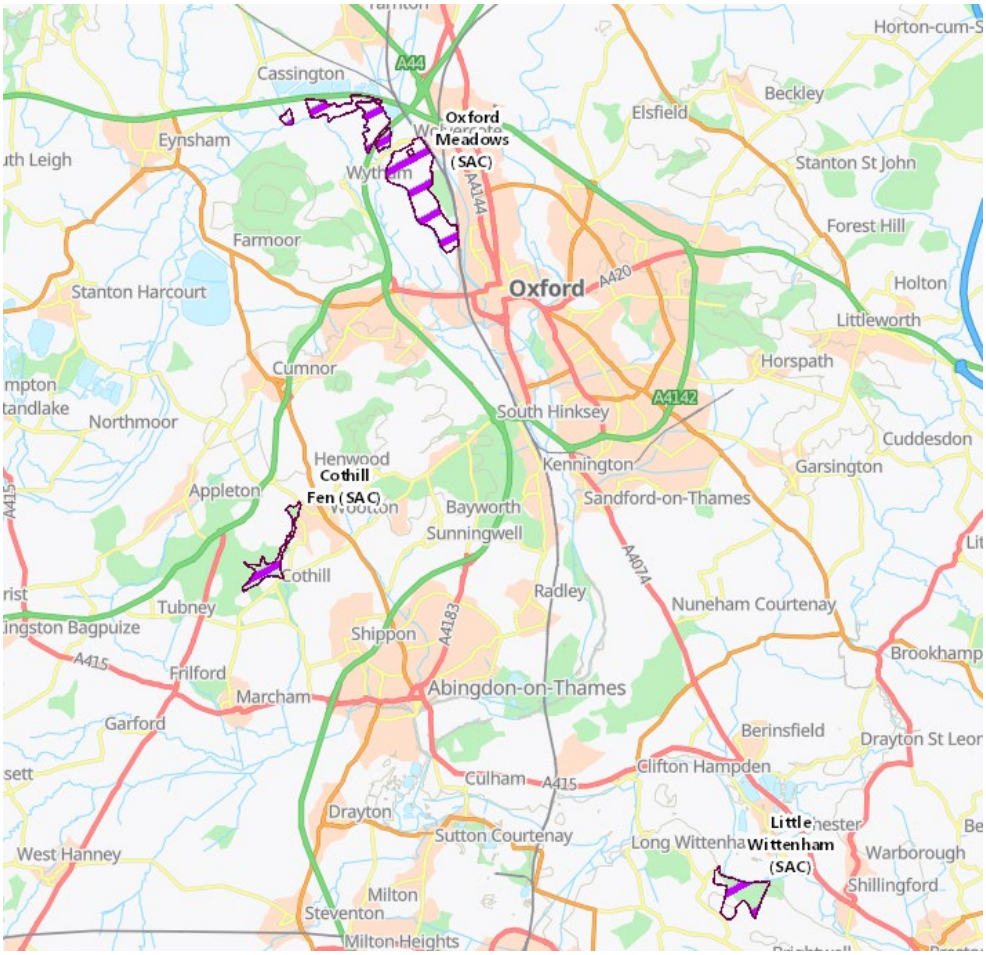
- Oxford Flood Alleviation Scheme (Environment Agency)
- East West Rail Project
- Thames Water Drought Plan, Thames Water (2022)

- Thames River Basin Management Plan, Environment Agency (2025)

European Sites

1.16 Oxford City Council prepared a Stage 1 HRA Screening Report in June 2025, which set out that there are the three European sites within 10km of the Oxford City Council administrative boundary. Figure 1.1 shows the locations of the three European sites within 10km of the Oxford City Council Boundary.

Figure 1.1 Locations of European sites within 10km of Oxford



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Source: Magic Maps

1.17 The three sites within 10km of the Oxford City Council Boundary are as follows:

- Oxford Meadows SAC (within and adjacent to Oxford city)
- Cothill Fen SAC (over 5km from city boundary)
- Little Wittenham SAC (over 8km from city boundary)

Qualifying Features

1.18 European sites are designated to conserver a wide variety of habitats of international importance as well as species populations of high conservation significance.

1.19 Each SAC contains protected species (excluding birds), habitats or both. These protected habitats and species are the “qualifying features” as to why each site has been designated. Table 1.1 sets out the qualifying features for each of the "European sites” within 10km of the city.

Table 1.1 European sites within 10km of Oxford City Council Boundary

Name of Site	**Description**	**Qualifying Features**
Oxford Meadows SAC	Together with North Meadow and Clattinger Farm, also in southern England, Oxford Meadows represents lowland hay meadows in the Thames Valley centre of distribution. The site includes vegetation communities that are perhaps unique in the world in reflecting the influence of longterm grazing and hay-cutting on lowland hay meadows. The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. Oxford Meadows is selected because Port Meadow is the larger of only two known sites in the UK for creeping marshwort Apium repens.	Qualifying Habitats: 6510 **Lowland Hay Meadows** (Alopecurus pratensis, Sanguisorba officinalis) Qualifying Species: 1614 **Creeping marshwort** Apium repens
Cothill Fen SAC	This lowland valley mire contains one of the largest surviving examples of alkaline fen vegetation in central England, a region where fen vegetation is rare. The M13 Schoenus nigricans – Juncus subnodulosus vegetation found here occurs under a wide range of hydrological conditions, with frequent bottle sedge Carex rostrata, grassof-Parnassus Parnassia palustris, common butterwort Pinguicula vulgaris and marsh helleborine Epipactis palustris. The alkaline fen vegetation forms transitions to other vegetation types that are similar to M24 Molinia caerulea – Cirsium dissectum fenmeadow and S25 Phragmites australis – Eupatorium cannabinum tall-herb fen and wet alder Alnus spp. wood.	Qualifying Habitats: 7230 **Alkaline Fens**

Little Wittenham SAC	One of the best-studied great crested newt sites in the UK, Little Wittenham comprises two main ponds set in a predominantly woodland context (broad-leaved and conifer woodland is present). There are also areas of grassland, with sheep grazing and arable bordering the woodland to the south and west. The River Thames is just to the north of the site, and a hill fort to the south. Large numbers of great crested newts Triturus cristatus have been recorded in the two main ponds, and research has revealed that they range several hundred metres into the woodland blocks.	Qualifying Species: 1166 **Great crested newt** Triturus cristatus

Source: Joint Nature Conservancy Council www.jncc.org.uk

1.20 Natural England's SSSI condition assessment shows that the majority of SSSI units that make up the three SACs within 10km of Oxford are in a favourable condition. Appendix 1 of the Oxford HRA Screening Report provides further details.

Conservation Objectives

1.21 The Habitat Regulations require the appropriate authority to maintain, or where appropriate, restore habitats and species populations of European importance to favourable conservation status. European site conservation objectives are referred to in the Habitat Regulations. They are used where there is a need to undertake an "appropriate assessment" under the relevant parts of the respective legislation. The conservation objectives are set for each qualifying feature (habitat or species) of each European site (SAC or SPA). Where the conservation objectives are met, the site can be said to demonstrate a high degree of integrity and makes a full contribution to meeting the legislative aims.

1.22 The Oxford HRA Screening Report (Appendix 1 of this document) provides more details about the conservation objectives for each of the SAC in Section 2.

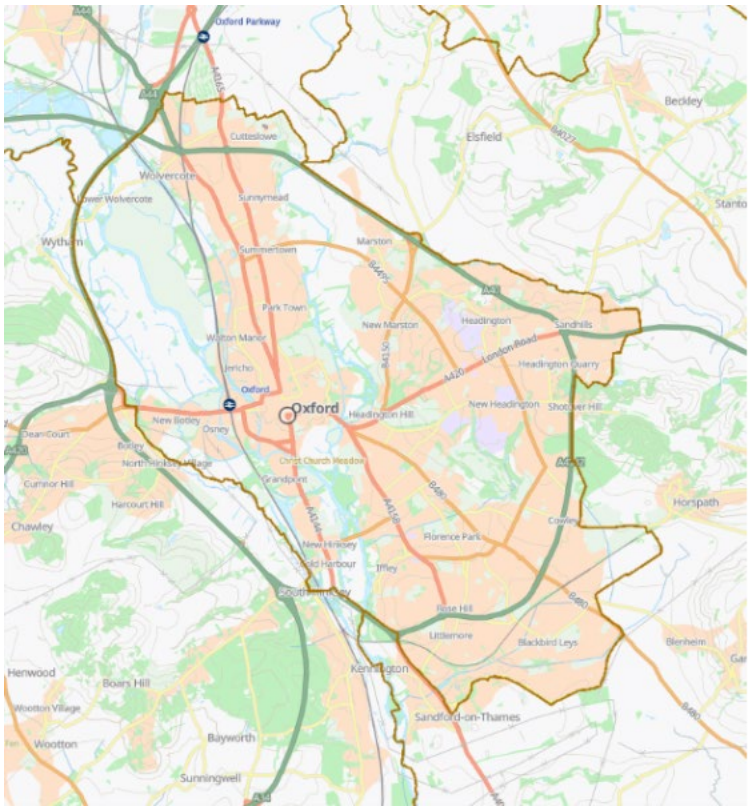
2. Oxford Local Plan 2045 Regulation 19 Document

Context

2.1 Oxford is a small and compact city with a population of 165,200 (according to ONS mid-year population estimates for 2023, released in July 2024). Oxford's total area is only 46 sq km (17.6 sq miles). While some parts of the urban area are densely developed, more than half of the city is open space and more than a quarter lies in the Oxford Green Belt.

2.2 Oxford benefits from a wide range of historic city parks, a unique built heritage which is intrinsically linked to the surrounding hills, and important sites for nature conservation. The city's river corridors (River Thames and Cherwell) are sometimes referred to the as the city's "green lungs" as they make a valuable contribution to the Oxford's green and blue infrastructure by providing space for wildlife to thrive away close to the city's dense urban area. Figure 2.1 shows a map of the Oxford. The salmon pink colour area represents the urban area while the administrative boundary is shown in brown.

Figure 2.1 - Map of Oxford



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Oxford Local Plan 2045

2.3 Oxford City Council has produced a Local Plan 2045 Regulation 19 Document. This "Proposed Submission" consultation document sets out the proposed strategy for development in the city until 2045. It includes site allocation policies and a suite of development management policies.

2.4 The Local Plan 2045 Regulation 19 Document:

- Sets a capacity-based housing target which aims to meet as much of the city's identified housing need (using the Government's Standard Method), as possible within the city, with the appropriate consideration of other policy aims.
- Makes provision for more than 9,200 homes under Policy H1: Housing Requirement.
- Seeks to meet identified employment land needs using existing employment sites and through supporting employment at highly accessible locations, namely the city and district centres.
- Enables the modernisation, intensification and regeneration of existing Key Employment Sites, while supporting their diversification (particularly those in accessible locations), by allowing an element of housing delivery subject to specific criteria being met.
- Allows poorly performing existing employment sites to be redeveloped for other uses including housing.

Amendment to the plan period

2.5 For a number of technical reasons, we have amended the plan period to 2025-2045, rather than 2022-2042. Paragraphs 4.8-4.11 consider the implications of this change in date for the HRA.

3. Stage 1 Screening

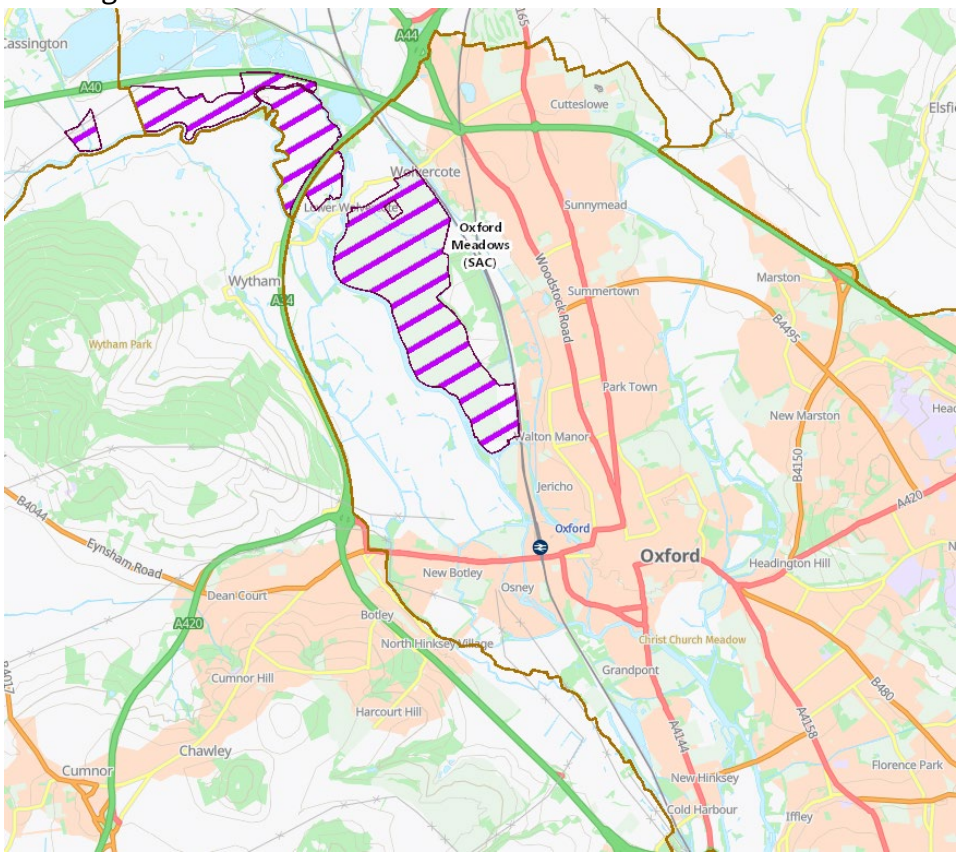
3.1 The Oxford HRA Screening Report published at Reg. 18 sets out that, of the three European sites within 10km of the Oxford's administrative boundary, Cothill Fen SAC and Little Wittenham SAC, were screened out from further assessment. The 10km distance is a widely used, precautionary buffer zone used in HRA screening . The 10km buffer has been widely accepted where European sites contain non-mobile qualifying features (such as the different plant communities found at the Oxford Meadows SAC).

3.2 The Oxford HRA Screening Report found at Appendix 1 of this HRA Report provides more information and details the reasoning and rationale for having done so. This HRA report therefore focuses on the Oxford Meadows SAC.

Oxford Meadows SAC

3.3 Table 1.1 in this report, sets out the reasons for which the Oxford Meadows has been designated an SAC while Figure 3.1 shows a map of the Oxford Meadows SAC.

Figure 3.1 showing the location of the Oxford Meadows SAC



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3.4 As set out in Chapter 4 of the Oxford HRA Screening Report, in HRA terms, 'impact pathways' are the potential routes or mechanisms by which a plan or project could affect a European site.

3.5 Impact pathways provide a structed approach for assessing whether a plan or project is likely to give rise to significant effects on a European site. If potential significant effects are identified (or cannot be ruled out through the HRA Screening process), then an Appropriate Assessment will be required.

3.6 Each designated site has its own unique set of impact pathways which need to be considered. At a meeting with Natural England in June 2022, it was agreed that the following impact pathways should be considered as part of the HRA Screening to assess the likely significant effects of the Oxford Local Plan on the Oxford Meadows SAC:

- Atmospheric/ Air Pollution
- Recreational pressure/ disturbance
- Water quality and quantity (Balanced Hydrological Regime)

3.7 These are considered in turn below. It is worth noting a discussion of these issues is also considered at Paragraphs 4.18-4.46 of the Oxford HRA Screening Report.

Atmospheric/ Air Pollution

3.8 Atmospheric pollution is a widespread issue. Background air quality is heavily influenced by large point-source emitters including from transboundary sources. Local pollutant sources can also affect designated sites (particularly in relation to protected habitats within SACs), often from road traffic emissions.

3.9 The Oxford Local Plan 2045 is unable to influence some of the underlying causes of background atmospheric pollution (e.g., large point sources). However, the location, amount, type and scale of development proposed through the policies in the Oxford Local Plan 2045 has the potential to affect locally emitted pollutants reaching the Oxford Meadows SAC.

3.10 According to the Air Pollution Information Systems website (APIS), and the Institute of Air Quality Management (IAQM) guidance (2020), the main pollutants affecting vegetation are as follows:

- Nitrogen oxides (NO_x) produced through the combustion process (approximately half of UK emissions are from road traffic; and
- Ammonia (NH_3), the main source of which is usually from agriculture (e.g., from manures and fertilisers).

3.11 These gases can result in direct effects to vegetation through exposure, and indirect effects through deposition to soil and freshwater (dry deposition) or with precipitation (wet deposition).

3.12 Direct exposure of vegetation to NOx and NH3 is harmful, especially in areas close to sources, such as roadside verges. Some vegetation (including lichens, mosses, etc.) is particularly vulnerable to these sorts of toxic effects, which can result in changes to plant growth, difficulties in the plant's ability to assimilate CO2, and other bio-chemical effects.

3.13 Indirect effects through deposition include:

- **Acid deposition**: acid deposition is most likely to affect vegetation indirectly through changes to soil properties. NOx and ammonium (from NH3) react with rain or cloud water to form nitric (or sulphuric) acid. Increases in soil acidity can increase the mobility of certain toxic metals which can result in root damage, stunted growth and reduced microbial activity. These effects can lead to changes in species composition.
- **Eutrophication by nitrogen deposition**: dry deposition of NOx is greatest within large conurbations and close to major roads. Whilst nitrogen is essential for plant growth, excessive amounts can become toxic, as instead of acting as a nutrient, nitrogen becomes a pollutant. Many semi-natural plants are unable to assimilate nitrogen when there is too much available. As a result, these (semi-natural) plants can be outcompeted by plants that can tolerate elevated levels of nitrogen (such as many grass species). This can lead to long-term changes in vegetation and reduced diversity.

3.14 As approximately half of UK NOx emissions are associated with road traffic, nitrogen emissions from traffic generated by residential and commercial development form the focus of this part of the assessment.

Air Pollution at the Oxford Meadows SAC

3.15 As the Oxford Meadows is bisected by the A34 and the A40 runs adjacent to parts of the site, there is the potential for air quality to be impacted by changes in traffic flows associated with the development proposed in the Reg. 19 Plan.

3.16 Chapter 4 of this report includes an update to the air pollution impact pathway HRA Screening (as originally presented in Chapter 5 of the Oxford HRA Screening Report (found at Appendix 1 of this report).

Recreational Pressure/ Disturbance

3.17 Population growth associated with residential development brings the potential for additional visitor pressure on European sites. There are a number of impact pathways which bring the potential for significant effects including:

- Species disturbance (modifying behaviour, increasing predation, reducing feeding and breeding success);
- Habitat trampling/ wear (soil compaction, erosion, direct damage to habitats, expansion of path networks, churning up sediment in water bodies);
- Fire (resulting in direct mortality, habitat removal, long-term changes to vegetation structure);
- Contamination (including litter, nutrient enrichment through dog fouling, pollution from dogs entering watercourses, spread of alien species and pathogens, greywater from caravans, etc.)
- Harvesting (e.g., collection of wood, fungi);
- Grazing issues (impacts on grazing animals, e.g., from feeding worrying by dogs, open gates, road traffic accidents; and
- Visitor expectation including pressure for facilities and public perceptions of management resulting in difficulties achieving necessary habitat and species protection.

Recreational pressure at the Oxford Meadows SAC

3.18 In relation to the Oxford Meadows SAC, the qualifying species likely to be impacted by increased recreational pressure – A. repens (creeping marshwort) - is not particularly sensitive to trampling. It is, however, sensitive to increased nutrient enrichment associated with dog-fouling.

3.19 Chapter 6 of this report presents the Stage 2 Appropriate Assessment for this impact pathway which was carried on the policies and site allocations for which likely significant effects could not be ruled at the Screening Stage. Chapter 6 also includes the findings of the visitor survey undertaken in May 2025 and considers whether

bespoke mitigation measures are required for each of the relevant site allocations and policies.

Water Quantity

3.20 Water Quantity plays a vital role in the health of biodiversity and river catchments. Water levels (depth and volumetric flow) and velocity in the river, and water table levels in the floodplain. These properties can influence rates of siltation and erosion, dissolved oxygen, and pollutant and nutrient concentrations. Low flow rates affect food availability for riparian fauna, may limit migration and dispersal, and can alter the structure, composition and condition of vegetation communities. New homes can require the development of new infrastructure, including the provision of fresh water supply. Increases in water demand can impact the locations where water is abstracted.

Water Quantity at the Oxford Meadows SAC

3.21 Direct rainfall, surface water and groundwater flowing in from outside the area are the three main sources of water that help to maintain a "balanced hydrological regime" at the Oxford Meadows SAC. The Oxford HRA Screening Report concluded that the amount of surface water reaching the Oxford Meadows SAC is unlikely to be affected by the policies and site allocations in the plan. Direct rainfall is important to helping maintain a balanced hydrological regime at the SAC, but is generally considered to be outside the influence of the planning system.

3.22 However, the Oxford HRA Screening Report was unable to rule out likely significant effects of certain site allocations in relation to their potential to influence groundwater recharge and the flow of groundwater to the Oxford Meadows SAC. Chapter 7 of this report presents findings of the Stage 2 Appropriate Assessment, and considers whether mitigation measures are required.

Water Quality

3.23 Water quality is important in relation to the proper functioning of many habitats. The quality of water can be affected by a number of key factors including nutrients, contaminants and dissolved oxygen availability. The two key nutrients of interest in the water environment are phosphates and nitrates:

- Phosphates can be organic and inorganic. Phosphates contribute to the eutrophication of receiving waters and are generally considered to be the "problem" nutrient regarding freshwater. These problems arise as an excess of

phosphate can result in the accelerated growth of certain types of algae. This can lead to direct competition with vascular plants for light and nutrients. This can result in a loss of nutrient sensitive species, and a reduction in the species composition, extent and condition of riverine communities.

- Ammonia is a form of nitrogen which aquatic plants can absorb. While nitrate is the stable "end-product" of nitrification (i.e., the conversion of ammonia into nitrite and ultimately nitrate). Both nitrate and phosphate can contribute to the eutrophication of receiving waters. Nitrates are generally more of a problem in saline coastal regions, where phosphates are considered to have a lesser role.

3.24 New development can alter the quality of the water environment through direct contamination at locations that are hydrologically connected to designated sites. Changes in demand for wastewater treatment can also result in changes to the quality of the water environment.

Water Quality at the Oxford Meadows SAC

3.25 As set out in paragraphs 3.21above, the Oxford HRA Screening Report recognised that direct rainfall, surface water and groundwater flowing in from outside the area are the three main sources of water that help to maintain a balanced hydrological regime at the Oxford Meadows.

3.26 However, the Oxford HRA Screening Report was unable to rule out likely significant effects of certain site allocations in relation to their potential to influence water quality at to the Oxford Meadows SAC. Chapter 8 of this report presents findings of the Stage 2 Appropriate Assessment, and considers whether mitigation measures are required.

4. Oxford City HRA Screening Update

Introduction

4.1 This chapter of the report should be read in conjunction with the Oxford HRA Screening Report, published in June 2025. The Oxford HRA Screening Report is also presented in Appendix 1 of this Report. It provides an update on following topics:

- HRA screening categorisation schedule update to reflect policies and site allocations contained within the Oxford Local Plan Regulation 19 "Proposed Submission" Document
- Natural England's formal response to the Oxford Local Plan Regulation 18 consultation.
- Air Pollution Impact Pathway update that looks at changes to levels of growth and considers whether there are any implications of using a different twenty year plan period.

HRA Screening Categorisation Update

4.2 The Oxford HRA Screening Report (Appendix 3) provides an assessment of the draft policies and site allocations as set out in the Regulation 18 consultation document, based on the screening categorisation schedule recommended by Natural England. It is important that the HRA Screening update considers the policies and site allocations proposed in the Reg. 19 Plan against the screening categorisation schedule to capture any changes made to policies in the plan between the statutory consultation stages.

4.3 The screening categorisation schedule allows policies within no likely significant effects on European sites to be screened out from further assessment so that the assessment process can focus on policy areas and site allocations where there are potential effects.

4.4 The following schedule has been provided by Natural England to screen policy areas:

A – Policies or proposals cannot have any negative impact
B – Effects will be addressed 'down the line' including project level HRA
C – Could have an effect, but would not be likely to have a significant (negative) effect, (alone or in-combination with other plans or projects)
D – Likely to have an effect alone and would require an Appropriate Assessment
E – Likely to have an effect in combination with other plans or projects and which require Appropriate Assessment of those combinations

F – Likely to have a significant effect, alone or in combination with other plans and projects but which would not adversely affect the integrity of a European site

G – Likely to have a significant effect, alone or in combination with other plans or projects and for which it cannot be ascertained that they would not adversely affect the integrity of a European site

4.5 The results of the screening categorisaiton assessment (Reg. 19) update are are presented in Appendix 2 of this HRA Report.

4.6 Finally, it is worth noting that all the policies in the plan were screened against the impact pathways as agreed with Natural England (see paragraph 3.6 above). A summary of the policies and site allocations for which likely significant effects were not able to be screened out following the are presented in Chapter 5 of this Report. As part of the policy screening assessment process, consideration was given to whether or not the policies in the plan would result in any likely direct physical effects on the Oxford Meadows SAC (e.g., land-take). None of the policies or site allocations proposed in the plan resulted in direct physical impacts at the Oxford Meadows SAC. As such, there are unlikely to be likely significant effects from direct physical impacts resulting from the policies and site alloctions proposed in the Reg. 19 Plan on the the Oxford Meadows SAC.

Natural England's formal Reg. 18 Response to Stage 1 Screening

4.7 Natural England responded to the Local Plan Regulation 18 consultation on several issues, including the Habitat Regulations Assessment (HRA) Stage 1 Screening Report (June 2025). Natural England stated:

> *We have reviewed the Habitats Regulations Assessment Screening report June 2025 submitted with the consultation and look forward to receiving the Appropriate Assessment in due course.*
>
> *We cannot currently agree with the conclusion of the Air Quality Screening which concludes that the Oxford Local Plan 2042 is unlikely to have a significant effect on air quality at the Oxford Meadows Special Area of Conservation either alone or in-combination with other relevant plans and projects.*
>
> *We recognise that the Oxford City Local Plan Screening report models a small impact alone. However when considered in combination with other Local Plans and planning applications in Oxfordshire out to consultation, Natural England consider that the cumulative impact from these live plans and applications may highlight a more significant issue and therefore we will require further information at the Appropriate Assessment stage regarding the approach to the 'in-combination' assessment of air quality impacts.*

4.8 Following receipt of this response, Oxford City Council met with Natural England in September 2025 to discuss the issues outlined above and to try to find a way forward that would be satisfactory to both parties.

4.9 At the meeting, which took place on 16 September 2025, Natural England agreed the following, which were subsequently communicated via email on 24 September 2025:

- *We agree to the use of the 2023 traffic modelling data, undertaken as part of the draft 2040 Oxford Local Plan submission as the overall housing numbers are lower for the 2042 Plan in comparison to the previous plan, so this is precautionary.*
- *We agree with the Appropriate Assessment screening conclusion in relation to the Oxford City alone figures which show that they are below the AADT screening threshold.*

4.10 Natural England also provided the following advice in their email dated 24 September 2025 in relation to the 'in-combination' assessment:

- *We advise that further work be undertaken in relation to the in-combination assessment, with inclusion of the latest figures modelled by South and Vale. We suggest Oxford City contact the South and Vale directly to discuss.*
- *We advise that Oxford City use the figures submitted by Cherwell at Regulation 19 stage as part of their 2042 submission when undertaking the in-combination assessment.*
- *There may be other plans and projects to consider in-combination which have arisen in between submissions… so you may need to consider the findings… in-combination*

4.11 It was also agreed at the meeting that the City Council and Natural England would continue to work together to progress a Statement of Common Ground.

4.12 In response to the advice outlined above, the City Council contacted South and Vale to request the latest traffic modelling figures expressed as AADT. South & Vale replied on 19 September 2025 setting out that the latest figures from their modelling were not in the public domain. In a subsequent email on 24 September 2025, South and Vale confirmed that the figures presented in the "Explanatory Note" (see Appendix 6 of the Oxford HRA Screening Report (presented in Appendix 1 of this Report)) are still "current".

4.13 Following a series of letters between the Planning Inspectorate and South and Vale Councils, published on the South and Vale Joint Local Plan Examination webpages, the

most recent dated 07January 2026, the South and Vale Joint Local Plan 2041 examination remains ongoing.

4.14 At the time of writing, the most up-to-date, current and publicly available traffic modelling data for South & Vale remains that, which was presented in the 'Explanatory Note', and which was presented in the Oxford HRA Screening Report.

4.15 Natural England also advised Oxford City to use the "figures submitted by Cherwell at Regulation 19 Stage as part of their 2042 submission". Cherwell's published air quality assessment is not compatible with the city's. This is because the methodology presented in their published HRA (November 2024) does not present its findings as traffic modelling outputs (i.e., AADT). Instead it relies on air quality modelling.

4.16 The most recent compatible publicly available assessment of traffic modelling data from Cherwell was therefore the data contained within the "Explanatory Note" (see Appendix 6 of the Oxford HRA Screening Report (presented in Appendix 1 of this Report)) .

4.17 Natural England's final piece of advice was involved ensuring that there were no additional plans or projects (i.e., planning applications) that had been submitted which potentially may require a project level HRA. At the time of writing, there are no additional plans or projects to consider.

Air Pollution Impact Pathway Update

4.18 This section of the report should be read in conjunction with Chapter 5 of the Oxford HRA Screening Report, published in June 2025. The Oxford HRA Screening Report is also presented in Appendix 1 of this Report. This update is meant to supplement that report, and it seeks to consider the implications of any relevant changes that have taken place between the publication of the Regulation 18 Plan (June 2025), and the Regulation 19 "Proposed Submission" Plan for Oxford.

4.19 The Oxford HRA Screening Report was produced to support the Regulation 18 stage consultation process. As such, the housing numbers and jobs/ employment floorspace figures contained within it were subject to change. This section looks at changes to the levels of growth (i.e., changes to the number of homes and the amount of commercial floorspace (jobs). It also considers whether there are any implications of using a different twenty year plan period.

4.20 Table 4.1 (below) shows the total number of dwellings and commercial floorspace (from which the residential and commercial land use assumptions in the traffic modelling were derived) and compares these figures with the levels of growth proposed through the Oxford Local Plan Reg. 18 Document. This table replicates Table 5.7 of the Oxford HRA Screening Report.

4.21 Table 3.1 shows that a higher number of dwellings and more commercial floorspace were assessed using the agreed the traffic modelling, than were proposed in the Regulation 18 Document. As such, the City Council considered that the traffic modelling took a precautionary approach as it assessed more homes and commercial floorspace than was likely to come forward in the Local Plan Regulation 18 Document.

Table 4.1 – Total dwellings and floorspace (Reg 18 Plan)

	Oxford Local Plan Regulation 18 Document	**Traffic Modelling (DM+DS Scenario)**
Dwellings	9,851	11,491
Commercial Floorspace	500,000sqm	1,172,372sqm

Source: 2023 Atkins Report and Oxford Local Plan Reg. 18 Document

4.22 The next step is therefore to compare the housing numbers or commercial floorspace contained within the Regulation 19 Document with those assessed in the traffic modelling. This is shown in Table 4.2

Table 4.2 – Total Homes and commercial floorspace (Reg. 19 Plan)

	Oxford Local Plan Reg. 19 Document	**Traffic Modelling (DM+DS Scenario)**
Dwellings	9,267	11,491
Commercial Floorspace	550,000sqm	1,172,372sqm

Source: 2023 Atkins Report, Oxford Local Plan Reg. 19 Document and evidence base

4.23 As can be seen in Table 4.2, the number of homes and the amount of floorspace proposed in the Oxford Local Plan Reg 19 document have both changed slightly from the Reg. 18 Plan, however they are both comfortably within the amounts tested through the traffic modelling.

4.24 The City Council therefore considers that the traffic modelling used within the Oxford HRA Screening Report (June 2025) maintains a robust and precautionary

approach in its assessment of the housing numbers and commercial floorspace proposed through the Regulation 19 Plan and that it is still appropriate to rely on it.

Amendment to the plan period

4.25 For a number of technical reasons, we have amended the plan period to 2025-2045, rather than 2022-2042. This next section considers whether there are any implications of this change on the traffic modelling evidence, which underpins the HRA.

4.26 The City Council does not consider that there are any implications for continuing to rely on the existing traffic modelling. This is because, as set out above, the number of homes and floorspace proposed within the traffic modelling is greater than the that proposed in the Plan.

4.27 The traffic modelling also takes a precautionary approach to technical aspects of its design. For instance (as discussed in paragraphs 5.25-26 of the Oxford HRA Screening Report) the traffic modelling uses a base year of 2018, which shows a higher concentration of NOx levels at the Oxford Meadows SAC than the most recent Air Pollution Information Systems (APIS) dataset (modelled data from 2021).

4.28 Given that APIS data is presented as a 3-year average, as such the modelled data from 2021 (i.e., between 2020-2022) could have been impacted by movement restrictions resulting from national lockdowns imposed during the Covid-19 pandemic. Using 2018 as the base year for the transport model means that the base year traffic flows used in the transport model were not affected by lower emissions associated with the pandemic. As such, the continued reliance on the current traffic modelling remains suitably precautionary.

4.29 It is worth noting that the Oxford HRA Screening Report (paragraphs 5.22-5.24) provides an overview of the DEFRA Background Mapping Data for Local Authorities. The Oxford HRA Screening Report recognises the advice provided in paragraph 4.30 of Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitat Regulations (June 2018) (hereafter "NE Air Quality Advice Note 2018) which sets out that background pollutant levels should should be considered later in the process should an appropriate assessment be needed.

4.30 The DEFRA Background Mapping Data provides estimations of background concentrations of specific pollutants (including NOx) This mapping data, like the APIS mapping data, is based on 1km grid squares. The two datasets are broadly aligned for the 2018 and 2021 years and both datasets show NOx levels rates falling by a similar amount over the same time-perid.

4.31 Interestingly, the DEFRA Background Mapping Data provides predictions about future changes in pollutant levels over a longer time-horizon than the APIS dataset. The DEFRA Background Mapping Data predicts that the long-term trend for background NOx levesl at the Oxford Meadows SAC show continued reductions that fall to below 10µg/m^3 by 2040.

Conclusions of the Screening Update

4.32 As the level of growth proposed in the Oxford Local Plan 2045 is comfortably within the level of growth assessed within the traffic modelling, and the base year information contained within it remains suitably precautionary, the conclusions drawn in relation to the 'alone' assessment of air quality impacts (as set out in Chapter 6 of the Oxford HRA Screening Report) remain valid.

4.33 For completeness, this next section sets out the modelled outputs for the Local Plan 2045. Please refer to Chapter 6 of the Oxford HRA Screening Report for further details).

'Alone' Assessment

4.34 Tables 4.3 and 4.4 below show the changes in AADT on the 'affected roads' (i.e., the A34 and A40) resulting from the Oxford Local Plan 2045 'alone'.

4.35 As can be seen from the Tables 4.3 and 4.4 (below) which show the results of the traffic modelling presented within the 2023 Atkins Report, the Oxford Local Plan 2045 'alone' is below the screening thresholds for general traffic flow (i.e., cars and light goods vehicles (LGVs)) and below the screening threshold for Heavy Duty Vehicle (HDVs) on both the A34 and the A40. As such, the City Council considers that the effects of the Oxford Local Plan 2045 'alone' can be screened out from further assessment.

Table 4.3 Change in AADT on the A34 resulting from the Oxford Local Plan 2045 'alone'

	AADT (DS-DM) Cars/ LGVs	AADT (DS-DM) HDVs
A34 (northbound)	-48	-7
A34 (southbound)	+322	-42
Total (Two-way change)	**+274**	**-49**

Source: 2023 Atkins Report

Table 4.4 Change in AADT on the A40 resulting from the Oxford Local Plan 2045 'alone'

	AADT (DS-DM) Cars/ LGVs	AADT (DS-DM) HDVs
A40 (westbound)	-25	+2
A34 (eastbound)	+39	-15
Total (Two-way change)	+14	-13

Source: 2023 Atkins Report

'In combination' Assessment

4.36 In order to calculate the likely effects of Oxford City's Local Plan 2045, 'in combination' with the other emerging local plans, the 'alone' traffic modelling results (as shown above) have been considered cumulatively with the two 'alone' assessments for South and Vale and for Cherwell's Local Plans (this is discussed in more detail in Chapter 6 of the Oxford HRA Screening Report).

4.37 Tables 4.5 and 4.6 show the cumulative two-way change in AADT flows on the A34 and A40 respectively for Oxford City's Local Plan 2045 'in combination' with the South and Vale Local Plan 2041 and the Cherwell Local Plan 2042.

Table 4.5 Two-way change (AADT) on A34 resulting from the Oxford Local Plan 2045 'in combination' with the South and Vale Local Plan 2041 and the Cherwell Local Plan 2042

	AADT (DS-DM) Cars/ LGVs	**AADT (DS-DM) HDVs**
Oxford Local Plan 2045	+274	-22
South and Vale Local Plan 2041	-73	-22
Cherwell Local Plan 2042	-330	-165
Total	**-129**	**-235**

Source: Atkins 2023 Report and Oxford HRA Screening Report

Table 4.6 Two-way change (AADT) on A40 resulting from the Oxford Local Plan 2045 'in combination' with the South and Vale Local Plan 2041 and the Cherwell Local Plan 2042

	AADT (DS-DM) Cars/ LGVs	**AADT (DS-DM) HDVs**
Oxford Local Plan 2045	+14	-8
South and Vale Joint Local Plan 2041	-22	-13
Cherwell Local Plan 2042	-448	+26
Total	**-456**	**+5**

Source: Atkins 2023 Report and Oxford HRA Screening Report

4.38 As can be seen from these tables, the total change in AADT resulting from the Oxford Local Plan 2045 'in-combination' with the South and Vale Local Plan 2041 and the Cherwell Local Plan 2042 results in a change below the identified screening threshold (i.e., less than 1,000AADT for cars/ LGVs and less than 200AADT for HDVs).

Conclusions of the Air Quality Screening Update

4.39 Given the changes in AADT resulting from the Oxford Local Plan 2045 (both 'alone' and 'in-combination' with other plans and projects falls below the screening thresholds for cars/ LDVs and HDVs, the City Council therefore considers that the Oxford Local Plan 2045 is unlikely to have a significant effect on air quality at the Oxford Meadows SAC, either 'alone' or 'in combination' with other relevant plans and projects.

5. Stage 2: Appropriate Assessment

Introduction

5.1 . This next part of the HRA considers those policies and site allocations contained in the Oxford Local Plan 2045, for which it was not possible to rule out likely significant effects on the following impact pathways:

- Recreational Impacts;
- Water Quantity; and
- Water Quality.

5.2 An 'alone' assessment (i.e., looking at the likely significant effects of certain policies and site allocations proposed in the Oxford Local Plan 2045), and an 'in-combination' assessment (i.e., that takes into account a range of other plans and projects) was carried out in relation to each impact pathway.

5.3 The following chapters make up the Stage 2 Appropriate Assessment for each respective impact pathway.

- Chapter 6 considers Recreational Impacts
- Chapter 7 considers Water Quantity
- Chapter 8 considers Water Quality

6. Recreational Impacts

Introduction

6.1 Creeping marshwort (Apium repens) is a low-growing plant which is only found in two naturally occurring locations in the UK – Oxford Meadows SAC being one - and which relies on trampling by cattle to enlarge its territory. Natural England has previously confirmed that A. Repens is not particularly sensitive to trampling but is sensitive to dog-fouling. The increased population that would be housed in Oxford resulting from the Local Plan 2045 could own dogs, and those dogs could potentially have a significant effect on the integrity of the Oxford Meadows SAC. As such, significant effects could potentially arise relating to the increase in Oxford's population, as projected by Policy H1, and some proposed site allocations. Significant effects could also arise due to the potential increase in residential dwellings on the city's employment sites, as set out in Policy E1.

6.2 The following site allocations and Key Employment Sites (Policy E1) are therefore considered as part of the Stage 2 Appropriate Assessment for Recreational Impact.

<u>Site Allocations:</u>

- *Policy SPN1 – Diamond Place and Ewert House*
- *Policy SPN2 – Elsfield Hall, Elsfield Way*
- *Policy SPN3 – Oxford North Remaining Phases*
- *Policy SNP4 – OUP Sports Ground, Jordan Hill*
- *Policy SPN5 – Pear Tree Farm*
- *Policy SPCW1 – Banbury Road University Sites – Parcel B*
- *Policy SPCW2 – Botley Road sites around Cripley Road including River Hotel and Westgate Hotel*
- *Policy SPCW3 – Canalside Land, Jericho*
- *Policy SPCW5 – Jowett Walk (South)*
- *Policy SPCW8 – Osney Mead*
- *Policy SPCW12 – West Wellington Square*

<u>Key Employment Sites (Policy E1):</u>

- *Oxford North*
- *Radcliffe Observatory Quarter (ROQ site)*
- *Oxford University Press*
- *Oxford University Science Area and Keble Road Triangle*
- *Osney Mead*
- *Jordan Hill Business Park*
- *Botley Road Retail Park*

6.3 Findings from public consultation undertaken in 2005 by Scott Wilson as part of their 'Oxford City Green Space Study' revealed that residents of Oxford were generally willing to walk approximately 1,900m to large green spaces. More recent evidence to support the Local Plan 2045 (Green Infrastructure Study, Ethos) considered that the "access standard" for "Destination Parks" such as Port Meadow (which forms part of the Oxford Meadows SAC was 960m (straight-line distance). While the age (circa 20yrs old) of the data underpinning this recreational impacts assessment is acknowledged, and the availability of more up-to-date information, the 1,900m distance screening threshold, was applied at the HRA Screening Stage, and as such, it is used on a precautionary basis for the remainder of this HRA. However, given the age of the underlying data, the City Council will look to update this threshold for the next round of plan-making.

6.4 A 1,900m straight-line distance was therefore applied to the site allocatons proposed in the Reg. 19 Plan on a precautionary basis as the screening threshold for recreational impacts. (See Table A2.2 at Appendix 2 of this HRA Report)

Screening for Recreational Impacts

6.5 All site allocations that exceeded the 1,900m screening threshold were screened out from further assessment.

6.6 A number of sites that exist within the 1900m threshold were also screened out from further assessment. These are the site allocations are located within the West End of the city centre. These sites often propose a mix of uses that include residential development including student accommodation, given their location within the city centre.

6.7 Previous HRA work undertaken by the City Council concluded that sites within the West End benefit from a variety of alternative locations that are more accessible to dog-walkers than the Oxford Meadows SAC. Alternative accessible greenspaces located within and surrounding the West End include the following: Oxpens Meadow, Christchurch Meadow, University Parks, Oatlands Road Recreation Ground, Botley Park, Grandpont Nature Park, Grandpont Recreation Ground and Hinksey Park.

6.8 The following site allocations were therefore "screened out" by virtue of their location with Oxford's West End:

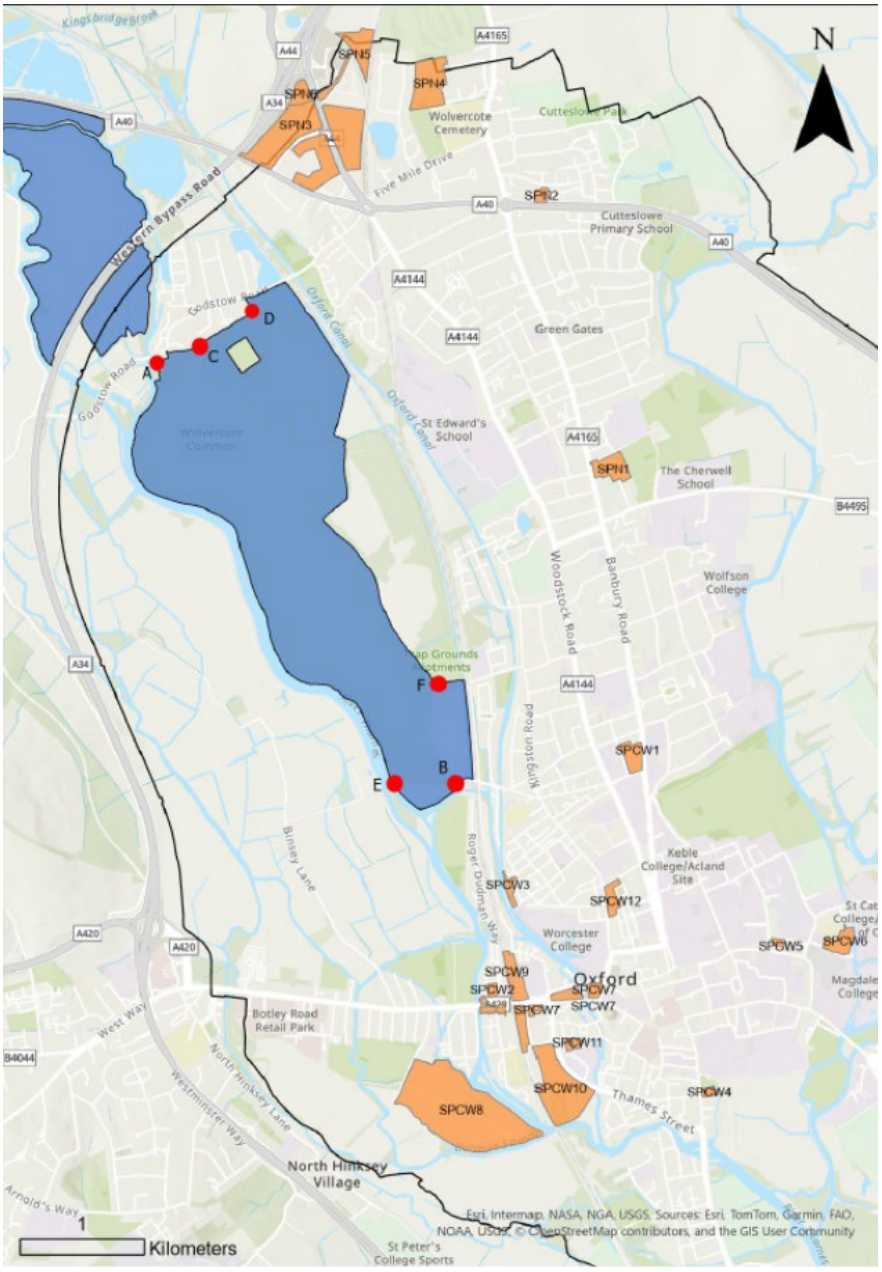
- Policy SPCW7 – Nuffield Sites

- Policy SPCW9 – Oxford Railway Station and Becket St Car Park
- Policy SPCW10 – Oxpens
- Policy SPCW11 – St Thomas School and Osney Warehouse

'Alone' Assessment

6.9 Figure 6.1 shows the locations of site allocations proposed in the Reg. 19 Plan within 1,900m of the Oxford Meadows SAC.

Figure 6.1 – Map showing site allocations within 1,900m from the Oxford Meadows SAC



6.10 Table 6.1 lists the site allocations where residential development could take place, located within 1,900m of the Oxford Meadows SAC.

Table 6.1 Residential site allocations proposed within 1,900m of Oxford Meadows SAC

Site Name	Distance from SAC (m)	No. of Dwellings	Type of development proposed
North Infrastructure Area			
Policy SPN1 Diamond Place and Ewert House	1,280	135	Mixed use inc. Residential or Student Acc.
Policy SPN2 Elsfield Hall, Elsfield Way	1,490	20	Residential
Policy SPN3, Oxford North Remaining Phases*	715	161	Mixed use inc. Residential
Policy SPN4 OUP Sports Ground, Jordan Hill	1,060	90	Residential
Policy SPN5 Pear Tree Farm	1,285	111	Residential
Central and West Infrastructure Area			
Policy SPCW1 Banbury Road University Sites	800	54	Residential or Student acc.
Policy SPCW2 Botley Road sites around Cripley Road including River Hotel and Westgate Hotel	1,070	20	Residential
Policy SPCW3 Canalside Land, Jericho	500	18**	Residential
Policy SPCW5 Jowett Walk (South)	1,800	14	Residential or Student Acc.
Policy SPCW8 Osney Mead	1,360	247***	Residential (including employer linked affordable housing) or Student acc.
Policy SPCW12 West Wellington Square	900	13	Residential (including employer linked affordable housing) or Student acc.
TOTAL Residential		**883**	

** Previous HRA mitigation measures (agreed with Natural England as part of the HRA for the Northern Gateway AAP) are included in Policy SPN3.*

*** Precautionary approach to site capacity - figure taken from approved planning application*

**** subject to further flood risk work*

6.11 It is worth noting that several sites considered as part of the Oxford HRA Screening Report were not taken forward as site allocations as part of the Reg. 19 Plan. These sites are set out below:

- 579 ROQ Site (Radcliffe Observatory Quarter)
- 657 Clarendon Centre

6.12 As recommended by Natural England, a visitor survey to inform the Reg. 19 HRA Report was carried out on six days in May 2025, resulting in 486 interviews. The aim of the survey was to understand how the Oxford Meadows SAC was used by residents of Oxford and by visitors from outside of the city. Appendix 3 shows the results of the visitor survey in full, and they are summarised at Table 6.2. The survey replicates the visitor surveys carried out in 2011 and 2017, which resulted in 332 and 575 interviews respectively.

Table 6.2 – Summary of visitor survey

Total number of visitors recorded during the survey	908
Number of surveyed access points	2
Mean number of visitors per access point	454
Number of hours surveying per access point	48
Total number of access points to the SAC	6

6.13 To interpret the survey data and project the total number of visitors to the site, the calculation shown in Table 6.3 was carried out. The methodology broadly follows that used by Bracknell Forest DC in the Thames Basin Heaths SPA analysis, as recommended by Natural England as best practice.

6.14 Table 6.3 suggests that, as a result of the Oxford Local Plan 2045, the Oxford Meadows SAC could see an increase of 5,213 – 6,951 visits, representing a 1.70-2.27% increase over current numbers.

6.15 The two access points (marked A and B on Figure 6.1) were used as survey points. As these access points are located nearest to the two existing car parks, this means that the survey results have the potential to be skewed towards arrivals by car. There is also the potential to overestimate visitor numbers, as larger numbers are likely to arrive via the car parks than via the other entrances to the site.

6.16 There are 6 access points to Oxford Meadows, shown at Figure 6.1:

- A Wolvercote car park;
- B Car park off Walton Well Road,
- C Godstow Road,
- D right of way at the entrance to Wolvercote off Godstow Road,
- E bridge across the river from Binsey, and
- F bridge at Aristotle Lane.

Table 6.3 Projected visitor numbers based on visitor survey

	Calculation/ reference		Result
Total number of visits over survey period	From survey data	A	908
Percentage of visits over survey period from within postcode sectors OX1 and OX2[1]	From survey data	B	70.4%
Projected total number of visits per annum	See note 2	C	306,600
Projected total number of visits from within postcode sectors OX1 and OX2 per annum	(C ÷ 100) x B	D	215,846
Population of postcode sectors OX1 and OX2	Taken from 2021 Census (see Note 3)	E	68,549
Projected visits per head of OX1 and OX2	D ÷ E	F	Max 3.1
Projected future population arising from new potential development.	See Table 6.1 and Note 4	G	Max: 2,208 Potential to own dogs: 1,656
Projected visits per annum arising from projected future population	G x F	H	5,213 – 6,951
% of projected future visits, as it relates to current projected total visits	(H ÷ C) x 100	I	**1.70 – 2.27%**

Notes:

1. These postcodes broadly represent a 1,900m radius around the Oxford Meadows SAC
2. Mean number of visitors per surveyed access point, per hour = 454/48 = 10
   Total active hours in a day (06:00-20:00) = 14
   Projected mean number of visitors per access point per day = 10 x 14 = 140
   Projected mean number of visitors per access point per year = 140 x 365 = 51,100
   If all six access points had similar numbers of visitors, then projected total number of visits, per year = 6 x 51,100 = 306,600
   This maximum includes small children, elderly people, etc. Most likely the number is less than this figure.
3. Population of Postcode sector OX1 – 27,136 (Census 2021)

Population of Postcode sector OX2 – 41,413 (Census 2021)

4. Average household size at the time of the 2021 Census was 2.5. The maximum number of homes proposed (883 from Table 6.1) multiplied by 2.5 people per household = 2,208. Removing students and employer-linked affordable accommodation (assuming these comprise 25% of new residents), would result in a future population of 1,656 that could own dogs.

6.17 It is not visitor numbers however that are the potential problem, but the impact of dog fouling on the Apium repens. A 2007 Report estimated that dog ownership in Oxford was a maximum of 24%. The survey results showed that 32% of groups visiting the SAC came with a dog, and 30% of respondents came with the main purpose of dog-walking. Although dog-walkers are more likely to visit the SAC, and probably more likely to visit on a daily basis than other visitors. This would re-balance the numbers in the opposite direction.

6.18 Dog-walkers visiting the Oxford Meadows SAC are either likely to visit by car or on foot. Car journeys to the Oxford Meadows SAC are limited by the number of parking spaces available. There are two public car parks linked to the Oxford Meadows SAC. One at the southern end of Port Meadow (close to Jericho), and the other provides parking and visitor access to Port Meadow via Wolvercote. As there are no plans to increase parking at either car park during the plan period, visitors by car will be limited by the number of parking spaces available. In addition to the two public car parks, a very limited amount of on-street parking is available on Godstow Road with direct access to Port Meadow. Lower Wolvercote is not currently the subject of a Controlled Parking Zone (CPZ) and the latest programme for the rollout of new CPZs is currently being worked on by the County Council. However, as no additional on-street parking is planned in this location, visitors to the site are restricted by spaces available.

6.19 Student accommodation does not allow pets, so this accommodation can be screened out of the assessment process. It can also be expected that at least some of the employer-linked accommodation provided by the universities would be for visiting academics coming for short periods, and who are also unlikely to have dogs.

6.20 Additionally, as set out in Table 6.1 (above), most of the proposed sites are further than 500m from the SAC, reducing the likelihood of their residents regularly using the SAC; other recreational facilities will be available to most of the sites. This Stage 2 Appropriate Assessment makes recommendations for site allocation policies proposed in the the Local Plan 2045. It alsy proposes mitigation measures especially to reduce recreational impacts on the SAC, where appropriate.

6.21 The subsequent paragraphs consider each of the sites listed in Table 6.1 with respect to the issues highlighted above:

North Infrastructure Area

6.22 Policy SPN1: Diamond Place and Ewert House is allocated for 135 dwellings and is more than 1,200m away from the SAC. The site allocation policy includes a requirement for at least 10% public open space to be provided on-site. This site is nearly 2km from the SAC on foot (via Aristole Lane footbridge) or 2.5km by car (Port Meadow Car Park South, Walton Well Road). Public open space provided on-site would be usable by residents of the new development and dog walkers who currently use the SAC. Although there is not a prolific amount of public open space in Summertown itself, alternative existing public open space in the locality includes Sunnymeade Meadow (and the adjacent Sunnymeade Park) which is around 1,300m away (on foot) or 950m as the crow flies. The footpath along the River Cherwell to the west also provides an alternative to the SAC. These alternative areas are likely to be more attractive to dog-walkers than the SAC, as the route to the SAC involves crossing the (often busy) Banbury and Woodstock Roads.

6.23 Policy SPN2: Elsfield Hall, Elsfield Way proposes 20 dwellings and is approximately 1.5km away from the SAC as the crow flies. The site allocation is 1.8km (approx.) on foot from the Oxford Meadows SAC principally via sections of the car- dominated A40 North Way. As such, trips to the SAC would most likely need to be undertaken by private car. Alternative public open space exists at Cuttlesowe Park, which is a short walk away (approximately 500m on foot), which represents a much more attractive alternative for dog-walkers. Sunnymead Park is another alternative public open space that is also more accessible from this site than the SAC.

6.24 Policy SPN3: Oxford North Remaining Phases is allocated for 161 dwellings and is 715m away from the nearest entry point to the SAC as the crow flies. This policy benefits from previously agreed mitigation carried forward from the recommendations of the HRA for Northern Gateway Area Action Plan. That HRA recommended specific policy wording to deliver a higher amount of public open space associated with any residential development occurring as part of the development in order to ensure that recreational impacts. Policy SPN3 therefore includes the following policy wording:

> *Planning permission will only be granted for developments that provide usable, well designed and good-quality publicly accessible green open space. At least 15% of the*

total site area must be provided as green public open space; this must be distributed so that at least 15% of any parcel proposed for residential development is green public open space.

6.25 Policy SPN4: OUP Sports Ground, Jordan Hill proposes 90 dwellings and is more than 1km away from the SAC, as the crow flies. This residential capacity figure assumes that the cricket pitch is retained on site. This site is expected to deliver at least 10% public open space on-site, which would be usable by not only the residents of the new development but also dog-walkers who currently use the SAC. Alternative exiting public open space provision in the area includes Cuttleslowe Park, which is a more accessible recreation area than the Oxford Meadows SAC. Access from this site to Cutteslowe Park is via quiet side-roads, whereas accessing the Oxford Meadows SAC would involve crossing the busy Wolvercote roundabout.

6.26 Policy SPN5: Pear Tree Farm proposes 111 dwellings and is 1,300m away from the nearest access point at the Oxford Meadows SAC (as the crow flies). Other alternative opportunities for dog walking exist nearby at equally or more accessible locations to the site allocation (e.g. Cuttleslowe Park, Five Mile Drive Recreation Ground). Also, an increased provision of public open space for dog walking has been secured at Oxford North. Given the distance of the site from the SAC (1,300m straight line), trips to the SAC would most likely need to be undertaken by private car. As there are no proposals to increase the number of parking spaces at the Oxford Meadows SAC, there would not be an increase in visitors to the SAC by car. Thus, policy compliant open space provision should be made onsite.

<u>Central and West Infrastructure Area</u>

6.27 Policy SPCW1: Banbury Road University Sites proposes 54 dwellings and is 800m away from the SAC as the crow flies. The proposed allocation is for a mix of uses including academic institutional uses, student accommodation, and/or residential development. It is likely that the site will come forward for student accommodation which is unlikely to generate any dog-walking activity. University Parks is more accessible from this site than the Oxford Meadows SAC.

6.28 Policy SPCW2: Botley Road sites around Cripley Road including River Hotel and Westgate Hotel proposes 20 dwellings and is over 1km away from the SAC as the crow flies. Alternative public open space exists at Botley Park, which is a short walk away (approximately 550m on foot), which represents a much more attractive alternative for dog-walkers.

6.29 Policy SPCW3 Jericho Canalside. While the site allocation policy proposes does not provide a minimum number of dwellings, at the time of writing an extant planning permission for 18 dwellings exists for this site. Given existence of this extant permission, a precautionary approach has been taken for this site. As such, Table 6.1 assumes that the site has the potential to deliver 18 dwellings. This site is approx. 510m from the Oxford Meadows SAC (as the crow flies).

6.30 The allocation policy for this site should include the following provisions to ensure that should residential development be brought forward at this site, it is able to mitigate any significant effects at the Oxford Meadows SAC.

> *"Development proposals involving residential development should be accompanied by an assessment of potential recreational pressure on the immediate setting including the canal towpath and the Oxford Meadows SAC that may arise from increased numbers of visitors, along with plans to mitigate this impact as necessary."*

6.31 Policy SPCW5 Jowett Walk (South) is allocated for 14 dwellings and is more than 1.7k away from the SAC as the crow flies. The proposed allocation is for residential or student accommodation. As the housing at the site would likely be for students it is likely to generate limited (if any) dog walking activity. University Parks represents a more accessible public open space should any dog-walking activity be generated from the site.

6.32 Policy SPCW8: Osney Mead proposes 247 dwellings (unless further flood risk work undertaken cannot find a solution to ensure the safety of residents). A precautionary approach has been taken (for this site) and an assumption has been made that the residential development is possible (This assumption is for HRA purposes only).

6.33 Osney Mead is more than 1.2km away from the SAC as the crow flies and is proposed for a mix of employment-generating uses, academic institutional uses and residential (including employer-linked affordable housing) and student accommodation. The delivery of student accommodation or employer-linked affordable housing is likely to generate limited (if any) dog-walking activity. The site is close to range of different types of publicly accessible open space, including an extensive network of publicly accessible fields heading towards South Hinksey. While access to the SAC is possible, either via a 2km walk along the bank of the River Thames and across Bailey Bridge, or via a 2km drive along Binsey Lane followed by an 800m

walk to access Port Meadow via Fiddler's Island. It is considered that most future residents would be unlikely to make this journey on a regular basis.

6.34 Policy SPCW12: West Wellington Square is allocated for 13 dwellings and is more than 800m away from the SAC as the crow flies. The site is proposed for academic institutional, student accommodation, and residential including employer-linked affordable housing. As the housing at the site would likely be for students and academics, it is likely to generate limited (if any) dog walking activity. University Parks is also more accessible from this site than the Oxford Meadows SAC.

6.35 In addition to Oxford North, several Key Employment Sites are also located within 1,900m of the Oxford Meadows SAC. These are set out in Table 6.4 below:

Table 6.4 Key Employment sites within 1,900m of the Oxford Meadows SAC

Key Employment Site (name)	**Distance from Oxford Meadows SAC (m)**
Radcliffe Observatory Quarter (ROQ site)	650
Oxford University Press	750
Oxford University Science Area & Keble Road Triangle	1,010
Osney Mead	1,240
Jordan Hill Business Park	1,260
Botley Road Retail Park/ Science District	1,310

6.36 Of the above sites, only Osney Mead has a bespoke site allocation policy, which already makes provision for a mix of uses that include residential (including employer-linked affordable housing) and student accommodation. Osney Mead has been assessed in the preceding paragraphs (see paragraph 4.24-25)

6.37 The two Key Employment Sites nearest to the SAC are the Radcliffe Observatory Quarter (ROQ) on Walton St/ Woodstock Road, and the Oxford University Press (OUP), on Walton St. OUP is a long-standing publishing company with its offices located in the heart of the city. Given the constrained nature of OUP, it is unlikely that residential development could be accommodated at the site. Whereas the ROQ is in the final stages of its transformation from its former use – the Old Radcliffe Hospital – to a modern teaching and research campus for the University of Oxford. As a teaching campus, any residential development delivered at the site is likely to either be student accommodation or employer-linked affordable housing as such, any potential increases in dog-walking are likely to be limited. Also, there is minimal remaining

available land at the site following the completion of the Schwarzman Centre for the Humanities.

6.38 The other sites listed are all more than 1km away from the SAC as the crow flies and are all close to existing alternative public spaces that are more accessible that the SAC or would deliver forms of residential that would result in limited (if any) increase in dog-walking (i.e., student accommodation/ employer-linked affordable housing). As such, any impact of supporting housing delivery on the city's employment sites would be likely to be minimal.

'In-combination impacts'

6.39 The Proposed Submission Draft of the Cherwell Local Plan 2042 Policy KID1 Kidlington Area Strategy provides the policy framework for the site allocations within Cherwell District Council's administrative area that nearest the Oxford Meadows SAC. Policy KID1 sets out that policies PR6a-PR9 from the extant Cherwell Local Plan 2011-2031 are to be retained.

6.40 Policy PR6a – Land East of Oxford Road; and PR6b – Land West of Oxford Road are the only sites within the Cherwell Local Plan that are within 1,900m of the Oxford Meadows SAC. The site allocation policies for these sites are contained within the Cherwell Local Plan 2011 2031 Part 1 Partial Review.

6.41 Policy PR6a – Land East of Oxford Road allocates this 48ha site as a residential-led "urban extension to Oxford city". The policy provides for a net increase of 690 dwellings, a primary school, local centre and the delivery of 11ha public open space as an extension to Cutteslowe Park. In addition, Policy PR6a requires the creation of a green infrastructure corridor on 8ha of land (in addition to the extension of public open space at Cutteslowe Park). PR6b – Land East of Oxford Road is allocated for a residential-led development for 670 dwellings on 32ha of land.

6.42 These are the only sites contained in Cherwell's Local Pan that are within 1,900m of the Oxford Meadows SAC. The number of residential dwellings allocated across the two sites is 1,360 homes. Given average household size is 2.5 (Census 2021), it is likely that this would lead to an additional 3,400 residents (all of whom have the potential to own dogs).

6.43 Table 6.5 shows the 'in-combination impacts' resulting from the population growth resulting from the two residential-led developments proposed through the Cherwell Local Plan 2042.

Table 6.5 Projected 'in-combination impacts'

	Calculation/ reference		Result
Projected future population arising from 'in-combination' impacts	See para. 1.33	J	3,400
Projected visits per annum from projected future 'in-combination impacts' population	F* x J	K	10,706
% of projected 'in-combination impacts' visits, as it relates to current projected total visits	(K ÷ C**) x 100	L	3.49%

** F = 3.1 (see Table 6.3 for further details)*

*** C =306,6600 (see Table 6.3 for further details)*

6.44 The cumulative impact of the additional visits resulting from the Oxford Local Plan 2045 (4,517-6,022 or 1.70-2.27%) and the Cherwell Local Plan 2042 (10,706 or 3.49%) equates to between 15,919-17,657 visits or 5.19-5.76%).

6.45 As set out above, the site allocations within Cherwell propose the creation of additional recreation provision. Policy PR6a includes a requirement for the provision of public open space as an extension to Cutteslowe Park on 11 hectares of land. It is likely that this extension would serve as a more accessible alternative recreation space for dog-walkers than the Oxford Meadows SAC for both the Cherwell site allocations. Given the size and proximity of this recreation provision to the two Cherwell sites, it is considered that this would be suitable recreation provision likely to encourage new residents (in particular, dog-walkers) to use it as an alternative to the Oxford Meadows SAC.

Conclusions

6.46 It is interesting to compare the findings of this year's study, with previous studies. Table 6.6 below shows the key findings from each of the surveys.

6.47 Table 6.6 shows that since 2011, there has been an apparent decline in total visitor number at the Oxford Meadows SAC. While the 2017 survey, which informed the

adopted Local Plan 2036 resulted in a slightly higher number of future 'alone' and 'in-combination' visit and that these resulted in a lower percentage score.

Table 6.6 comparison of findings from previous visitor surveys

	2011	2017 (OLP2036)	2025
Projected total visits per annum	525,600	429,240	306,600
Visits per annum from new population from planned development ('alone')	5,612	10,573 – 14,098	5,213 – 6,951
% of projected future visits as it relates to current visits	1.07%	2.5-3.3%	1.70-2.27%
Visits per annum from new population arising from from 'in-combination' and 'alone' development	8,364	14,977 - 19,378	15,919 - 17,657
% of projected future visits 'alone' and 'in-combination' as it relates to current vists	**1.59%**	**3.5-4.5%**	**5.19-5.76%**

6.48 There is no indication that current visitor numbers are having a detrimental effect on the condition of Apium repens at the Oxford Meadows SAC. The assessment recognises that the majority of site allocations have alternative publicly greenspaces in equally more accessible locations. This, coupled with bespoke policy wording included within the Local Plan 2045, would be likely to result in minimal recreational impacts (dog fouling) at the Oxford Meadows SAC. As such, the Reg. 19 Plan is unlikely (both 'alone' and 'in-combination') to result in significant effects, either alone, or 'in-combination' on the integrity of the Oxford Meadows SAC in relation to recreational impacts.

7. Water Quantity

Introduction

7.1 This next section looks at the impact pathway of water quantity. Maintaining a balanced hydrological regime at the Oxford Meadows SAC is important as Apium repens relies on seasonal flooding to support its growth.

7.2 It is generally recognised that there are three main sources of water that support the plant communities on the Oxford Meadows SAC. These are direct rainfall, surface water, and groundwater that flows in from outside the area. Any of these sources, or a combination, may contribute to the soil water, which supports the plant communities found at the Oxford Meadows SAC.

7.3 Of the three sources of water which support the plant communities at the Oxford Meadows SAC, groundwater recharge and flow has the potential to be directly or indirectly influenced by the policies and site allocations within the Reg. 19 Plan. This is because part of Oxford has been shown to as having some hydrological connectivity with the Oxford Meadows and as such new development in this location has the potential to affect groundwater recharge and flows.

7.4 The policy areas and site allocations for which it was not possible to conclude no likely significant effects in relation to the impact pathway of water quantity are as follows:

Policy Areas:

- *Policy S1 – Spatial Strategy*
- *Policy H1 – Housing Requirement*

Site allocations

- *Policy SPN1 – Diamond Place and Ewert House*
- *Policy SPN2 – Elsfield Hall, Elsfield Way*
- *Policy SPCW1 – Banbury Road University Sites – Parcel B*

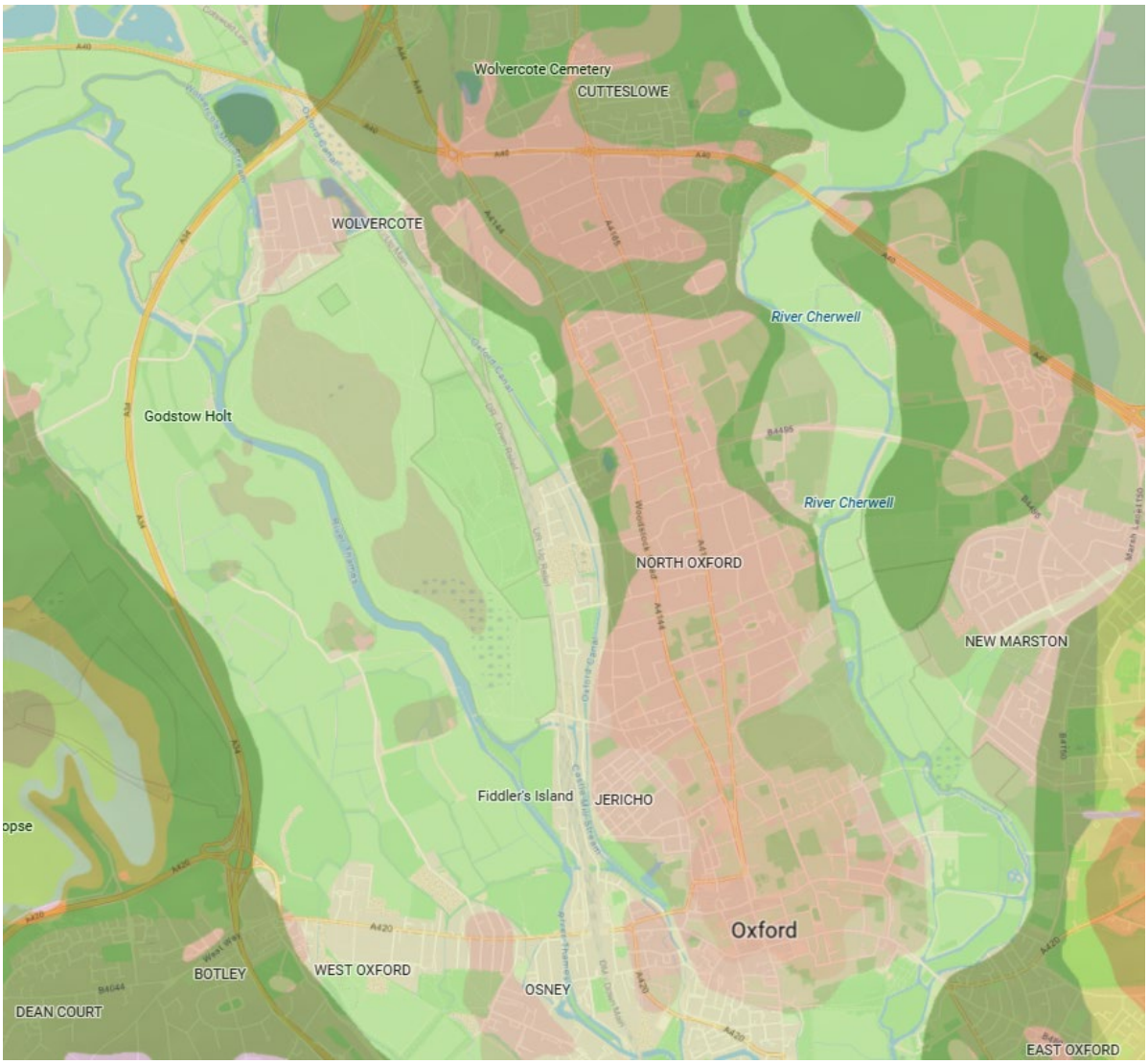
Screening for Water Quality Impacts

7.5 The Botantical Society of Britain and Ireland (BSBI) species account for Apium repens (2016) considers that water level fluctuation at Port Meadow is influenced by an underground aquifer, with the water table raised and lowered depending on the amount of rainfall flowing through the river gravels. The river gravels located in North

Oxford (the North Oxford Gravel Terrace) has some potential for hyrological connectivity with the Oxford Meadows SAC. The sequence of maps of the following pages illustrates the issue.

7.6 Figures 7.1 and 7.2 (below) show the British Geological Survey (BGS) map of the North Oxford Gravel Terrace and a conceptual model of groundwater flow for Oxford that includes the Oxford Meadows SAC.

Figure 7.1 Map showing the North Oxford Gravel Terrace and Port Meadow within the context of Oxford

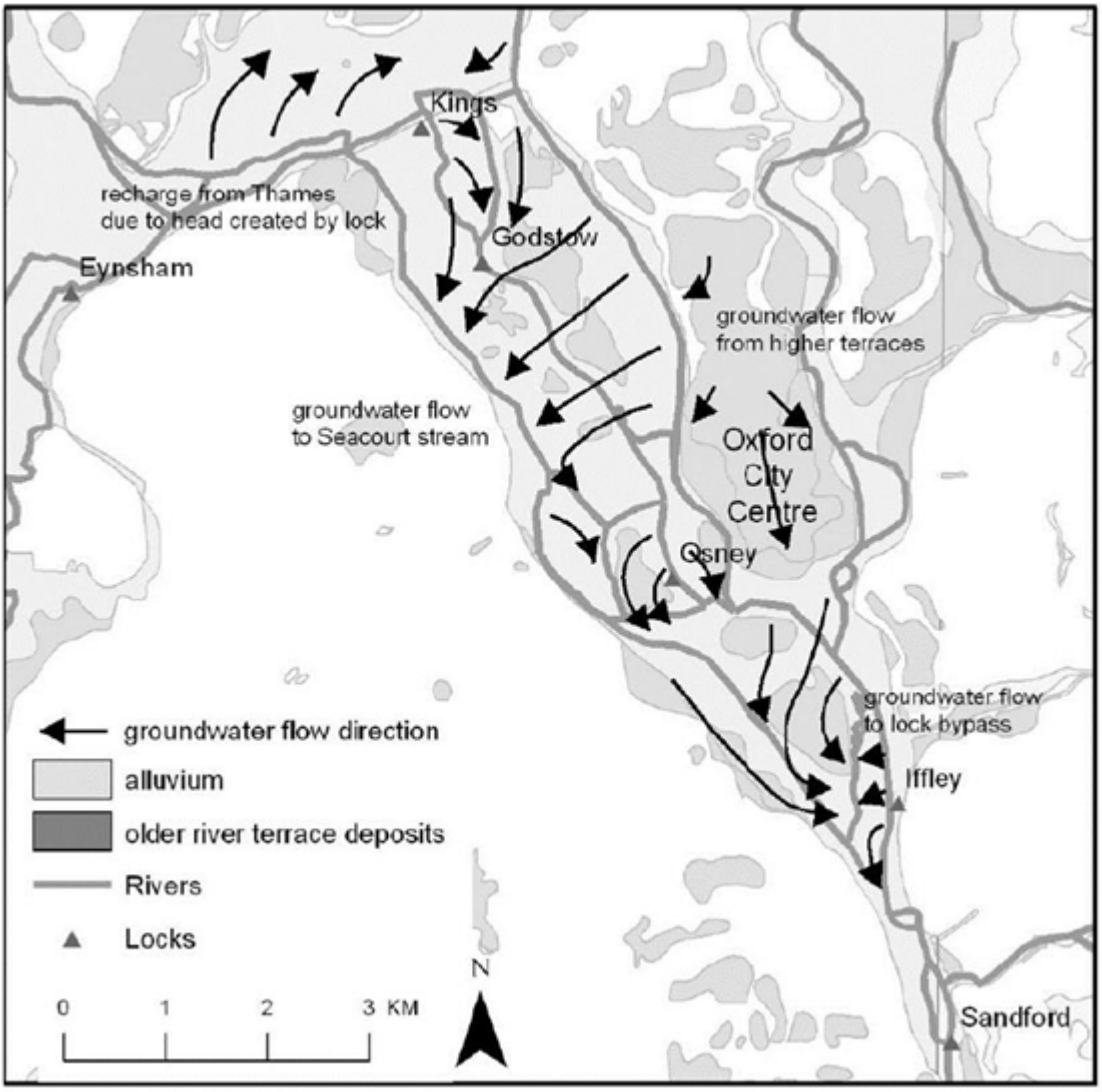


(Source: British Geological Survey – BGS Map Viewer Contains British Geological Survey materials © UKRI [2025])

7.7 Figure 7.1 (above) shows the geology of Oxford, including the Oxford Meadows SAC. The salmon pink colouring reaching from the city centre right up through Summertown and beyond to the north represents the North Oxford Gravel Terrace. While these deposits are a source of groundwater recharge to the Oxford Meadows. It is recognised that this is not the only source of groundwater recharge, as it is likely that there is a much larger groundwater catchment area that serves the Oxford Meadows SAC (HRA for the Northern Gateway Area Action Plan).

7.8 Figure 7.2 shows a conceptual model of groundwater flow for Oxford including the area surrounding the Oxford Meadows SAC.

Figure 7.2 - Conceptual model of groundwater flow in Oxford (2007)



Source: Oxford DEFRA Paper (2007)

7.9 Previous HRAs have taken a precautionary approach which assumes that the direction of groundwater flow follows the direction of travel shown here. The model in Figure 76. .2 shows that groundwater flows from the city centre away from the SAC. This means that proposed development at sites in this area will not affect the hydrology of the SAC since the direction of travel of the groundwater is away from the SAC.

7.10 There are two interlinked issues relating to groundwater. The first is in relation to groundwater recharge. Groundwater recharge is where the surface water recharges the supply of surface water beneath it. Previous HRA work considered the North Oxford Gravel Terrace to be a source of groundwater recharge for the Oxford Meadows SAC.

7.11 The second relates to the flow of groundwater itself to the Oxford Meadows SAC. Previous HRA work has considered that it is important that groundwater flow to the Oxford Meadows SAC is not interrupted. As such, only subterranean (i.e., basement development) is likely to impact the flow of groundwater. This is because the groundwater travels through the aquifer situated where the river gravels meet the underlying bedrock geology – predominantly made up of impermeable Oxford Clay.

7.12 As groundwater cannot flow upstream, any site allocations downstream (to the south) of the Oxford Meadows SAC will be unlikely to have significant effects on groundwater recharge and flow to the Oxford Meadows SAC. As such, site allocations located downstream from the Oxford Meadows SAC have not been considered further as part of this assessment. Site allocations not located on the North Oxford Gravel Terrace were screened out from further assessment.

'Alone Assessment'

7.13 The following sites are situated to the north of the Oxford Meadows SAC and located on the area known as the North Oxford Gravel Terrace:

- SPN1: Diamond Place and Ewert House
- SPN2: Elsfield Hall, Elsfield Way
- SPCW1: Banbury Road University Sites – Parcel B

7.14 Figure 7.3a shows the redline boundary for SPN1: Diamond Place and Ewert House while 7.3b shows the that the entire site is located on the North Oxford Gravel Terrace.

Figure 7.3a Redline site allocation boundary for SPN1: Diamond Place and Ewert House

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Figure 7.3b - the extent of Policy SPN1 located on the North Oxford Gravel Terrace

(Source: British Geological Survey – BGS Map Viewer Contains British Geological Survey materials © UKRI [2025])

7.15 Figure 7.4a shows the redline boundary of Policy SPN2 Elsfield Hall, Elsfield Way, while Figure 7.4b shows the part of the site to be located on the North Oxford Gravel Terrace.

Figure 7.4a – redline site allocation boundary for Policy SPN2: Elsfield Hall, Elsfield Way

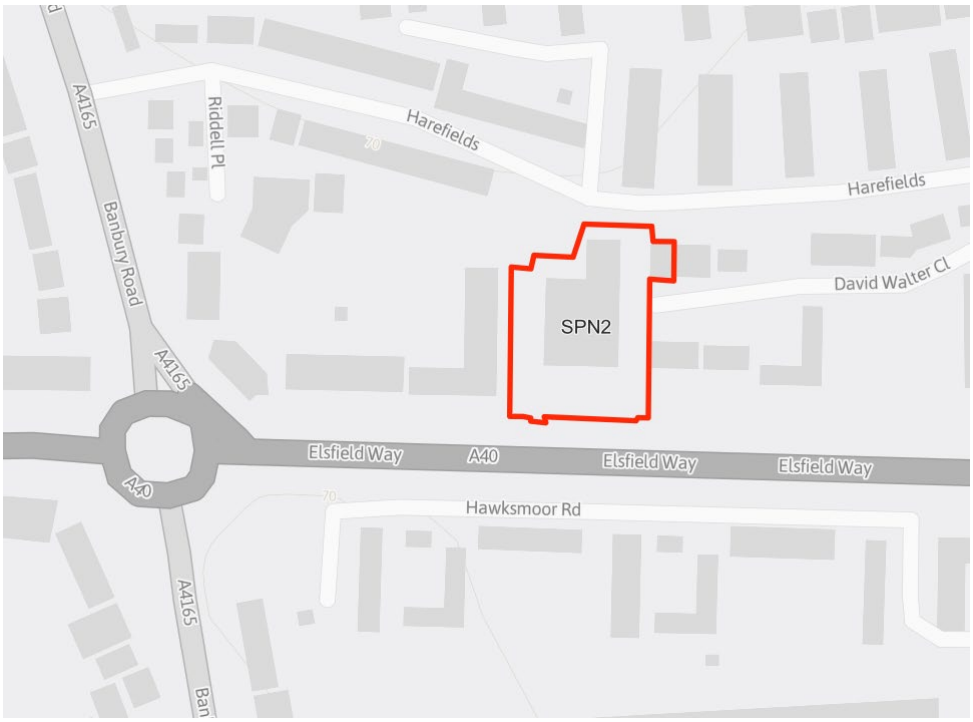

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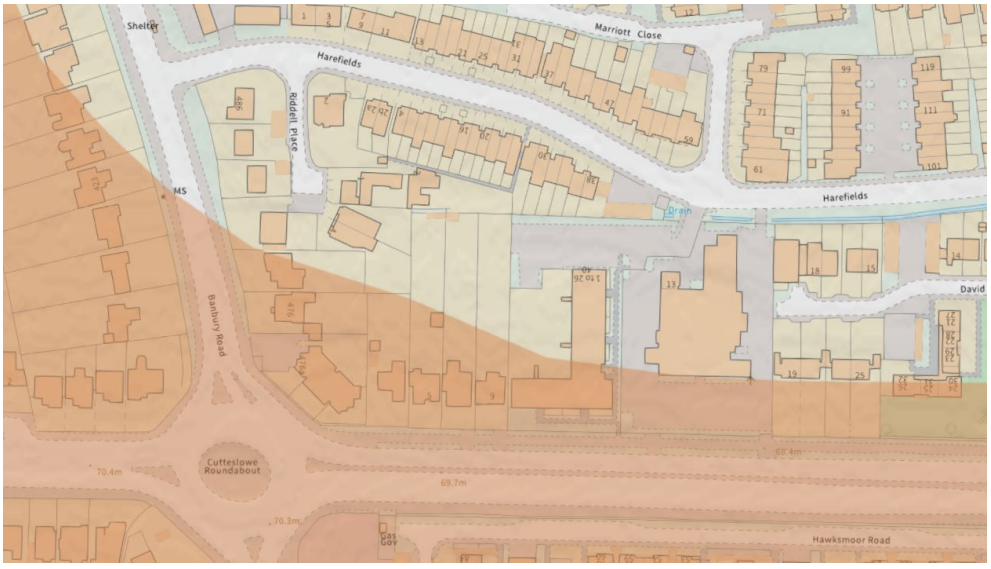
Figure 7.4b – the extent of Policy SPN2 located on the North Oxford Gravel Terrace



(Source: British Geological Survey – BGS Map Viewer Contains British Geological Survey materials © UKRI [2025])

7.16 Figure 7.5a shows the the redline boundary of Policy SPCW1 Banbury Road University Sites – Parcel B, while Figure 7.5b shows that the entire site is located on the North Oxford Gravel Terrace.

Figure 7.5a – redline site allocation boundary for Policy SPCW1: Banbury Road University Sites – Parcel B

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Figure 7.5b – the extent of Policy SPCW1 located on the North Oxford Gravel Terrace

(Source: British Geological Survey – BGS Map Viewer Contains British Geological Survey materials © UKRI [2025])

7.17 In order to ensure no likely significant effects on the Oxford Meadows SAC development proposals involving subterranean development (i.e., basements) need to be accompanied by a hydro-geological investigation to ensure that they do not adversely impact groundwater flow.

7.18 Similarly, to ensure that groundwater recharge is maintained , appropriately designed SuDS must be incorporated into the scheme.

7.19 The following wording has therefore been included in Policies SPN1 – Diamond Place and Ewert House; Policy SPN2 – Elsfied Hall, Elsfield Way and SPCW1 – Banbury Road University Sites – Parcel B and their supporting "information boxes".

Information box:
This site has been identified as being located in an area identified as having potential hydrological connectivity with the Oxford Meadows SAC

Policy text:
Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant through the use of appropriate measures including SuDS.

Development proposals involving subterranean development must include a hydrogeological investigation which must demonstrate that likely significant effects on groundwater flow have been avoided, or mitigated where relevant.

7.20 The City Council considers that, with the inclusion of the above policy wording within each site allocation policy, these policies will not result in likely significant effects on the impact pathway of water quantity (i.e., ensuring groundwater recharge and flow) at the Oxford Meadows SAC.

7.21 It is important that the Stage 2 Appropriate Assessment also considers how to address development proposals (that do not benefit from bespoke site allocation poliices but which could come forward in this part of the city) that involve basements or that have the potential to impact the amount of groundwater recharge.

7.22 As such Policy G6: Protecting Oxford's Biodiversity including the Ecological Network and the supporting text includes the following wording that relates to the Oxford Meadows SAC:

Extract from Supporting Text to Policy G6

Policy context

- *Oxford has a range of habitats and ecological sites, many benefit from levels of designation including:*
  - *International designations – the Oxford Meadows Special Area of Conservation (SAC), part of which is within Oxford's boundary and that contains certain habitats and species recognised for their importance across Europe…*
- *A number of sites in the city are particularly reliant upon specific hydrological conditions, which means that they are potentially vulnerable to changes in hydrology that could arise from development. For example:*
  - *Oxford Meadows SAC is potentially sensitive to changes in recharge, flows and quality of groundwater stemming from development on the North Oxford gravel terrace…*
- *A Habitat Regulations Assessment (HRA) has been produced to support the Local Plan 2045. This assesses the level of development proposed through the plan both 'alone' and 'in-combination' with other relevant plans and projects against the relevant conservation objectives for the Oxford Meadows SAC. The HRA includes a Stage 1 Screening, and a Stage 2 Appropriate Assessment which proposes mitigation measures to ensure there are no likely significant effects, either alone or in-combination, on the integrity of Oxford Meadows SAC.*

Policy implementation

- *The policy outlines particular considerations around impacts on surface and/or groundwater in relation to Oxford Meadows SAC, the Lye Valley and New Marston Meadows SSSI's. Proposals may need to consider impacts on water quality, as well as disruptions to the flows and quantities of water to these sites.*

Extract from Policy G6

Policy G6: Protecting Oxford's Biodiversity including the Ecological Network

Internationally and nationally designated sites and irreplaceable habitats

When determining planning applications potentially causing significant harm to biodiversity, then the approach set out in Paragraphs 193-195 of the NPPF (or the equivalent in any update) will be applied.

To ensure no likely significant effects on the Oxford Meadows SAC, proposals identified in an area identified as having potential hydrological connectivity with the Oxford Meadows SAC that:

a) *May negatively affect groundwater recharge and/or water quality must demonstrate that likely significant effects have been avoided, or mitigated where relevant through use of appropriate measures including incorporation of SuDS.*
b) *May negatively affect groundwater flow (subterranean development) must include a hydrogeological investigation, which must demonstrate that likely significant effects have been avoided, or mitigated where relevant.*

7.23 The City Council considers that with the addition of this wording within the supporting text and within Policy G6, in addition to the site specific policy wording included within the three site allocation policies, that there will not be likely significant effects on the Oxford Meadows SAC (in relation to the *water quantity* impact pathway).

'In-combination' Assessment

7.24 A number of "other plans and projects" have been considered as part of this 'in-combination' assessment. It draws on previous HRA work undertaken by the City Council and supplements this with a review of a range of plans and projects by third party organisations.

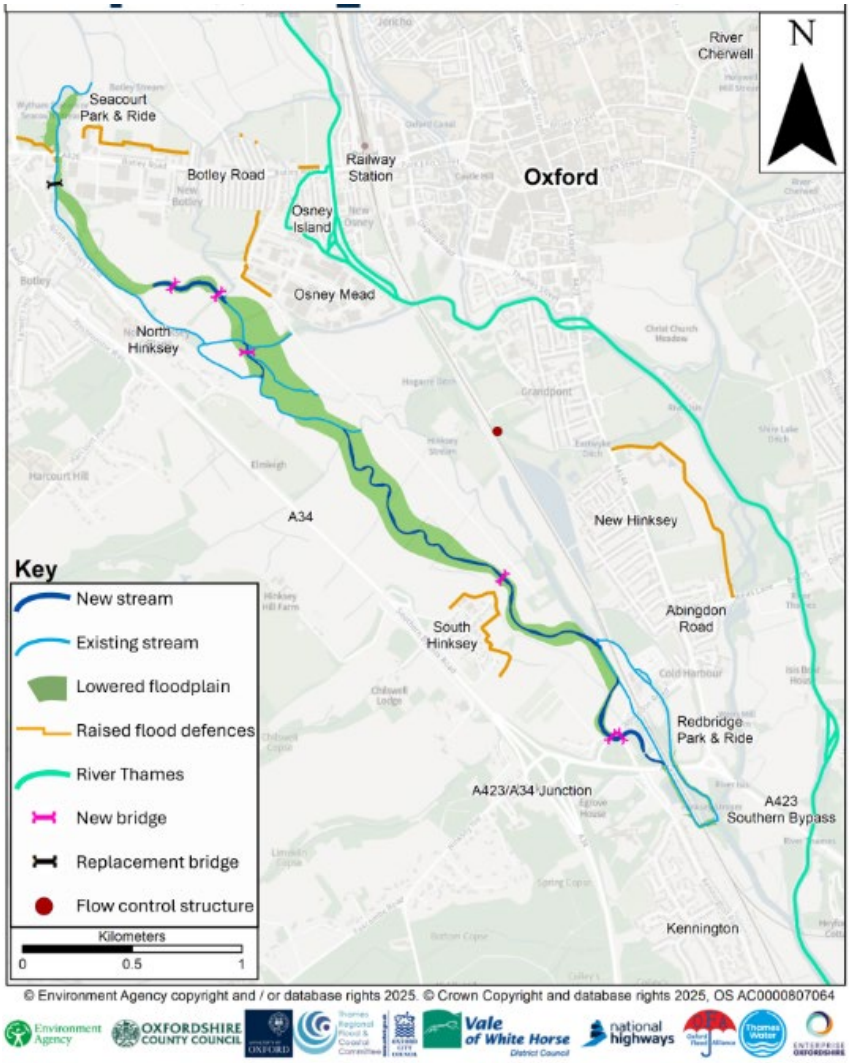
7.25 The HRA Screening Report undertaken to support Thames the Water Drought Plan (2022) confirms that no likely significant effects are anticipated from any of the proposed drought schemes (in particular at Farmoor Reservoir) on the Oxford Meadows SAC, either alone, or in combination with other licenses and consents.

7.26 Thames Water has produced a Habitat Regulations Assessment to support its Water Resources Management Plan 2024. This HRA assessed the likely impact of a variety of infrastructure project options on the numerous "European Sites" across the Thames Water area. As likely significant effects could not be ruled out for several project options at the HRA Screening stage, further HRA work was carried out in the form of a Stage 2 Appropriate Assessment. The Stage 2 Appropriate Assessment proposed various mitigation measures for each of the selected options and concluded that with the implementation of these mitigation measures, likely significant effects on the Oxford Meadows could be ruled out.

7.27 The Environment Agency's flood alleviation scheme for Oxford, which is likely to consist of enlargement of existing watercourse and/ or creating flood relief channels, may affect the flooding regime of the River Thames. Figure 7.6 below shows the map of the scheme design for the Oxford Flood Alleviation Scheme.

7.28 The Environment Agency's flood alleviation scheme for Oxford will create a flood relief channel downstream of the SAC.

Figure 7.6 – Map of the scheme design for the Oxford Flood Alleviation Scheme



(Source: Environment Agency website)

7.29 The Oxford Flood Alleviation scheme is downstream of the SAC, and Natural England has stipulated that a key requirement of the Oxford flood alleviation scheme is that it does not have an adverse impact on the Oxford Meadows hydrological regime.

7.30 Given the HRA work undertaken by other organisations to support their plans and projects concluded no likely significant effects on the Oxford Meadows SAC, there are unlikely to be 'in-combination' effects.

Conclusions

7.31 Given the mitigation measures proposed as part of the 'alone' assessment and coupled with the findings from the 'in-combination' assessment, the City Council considers that the Oxford Local Plan 2045 is unlikely to give rise to significant effects on water quantity (groundwater recharge and flow) to the Oxford Meadows SAC.

8. Water Quality

Introduction

8.1 As set out in Chapter 7 (above), the North Oxford Gravel Terrace is potentially hydrologically connected to the Oxford Meadows SAC. While it was established that maintaining groundwater flows and the amount of water that is recharged to groundwater is important for the plant communities that reside there, the quality of that water is the final impact pathway to be considered.

8.2 Table A2.3 of the Screening Categorisation Schedule (Appendix 2) highlights those policy areas and site allocations for which is was not possible to rule out likely significant effects. This chapter of the Appropriate Assessment therefore focuses on ensuring that the quality of water that is recharged to groundwater is maintained.

8.3 The policy areas and site allocations for which it was not possible to conclude no likely significant effects in relation to the impact pathway of water quality are as follows:

Policy Areas:

- *Policy S1 – Spatial Strategy*
- *Policy H1 – Housing Requirement*

Site allocations

- *Policy SPN1 – Diamond Place and Ewert House*
- *Policy SPN2 – Elsfield Hall, Elsfield Way*
- *Policy SPCW1 – Banbury Road University Sites – Parcel B*

Context

8.4 Oxford is located within the River Basin District covered by the Thames River Basin Management Plan15 (TRBMP). This was last updated by the Environment Agency in 2022. The aim of the River Basin Management Plans is to enhance nature and the natural water assets that are the foundation of everyone's wealth, health and wellbeing, and the things people value including culture and wildlife. The TRBMP describes the challenges that threaten the local water environment in the Thames River Basin District and how these challenges can be managed. It includes data on the condition of the waterbodies within the river basin, with surface waters being assessed for ecological status or potential and chemical status, and groundwaters assessed for quantitative status and chemical status.

8.5 The most recent assessment data available for the waterbodies within Oxford's administrative boundary is presented in Oxford City Council's Water Cycle Scoping Study. That data is represented here for completeness. Table 8.1 below provides a summary of the waterbody status for the main watercourses in Oxford.

Table 8.1 summary of the waterbody status for the main watercourses in Oxford

Waterbody name	Ecological	Chemical
Cherwell (Ray to Thames) and Woodeaton Brook	Poor	Fail
Bayswater Brook	Poor	Fail
Northfield Brook (Source to Thames) at Sandford	Moderate	Fail
Thames (Evenlode to Thame)	Poor	Fail

Source: Oxford City Council Water Cycle Study Stage 1 Report

8.6 Water body ecological status is either poor or moderate within the city. This is due to a range of factors including agricultural land practices, invasive species and drought. However, sewage discharge is a major contributing factor to the failure to reach good status in three of the four waterbodies. Sewage discharges by Thames Water into waterbodies are regulated by the Environment Agency (EA) through a series of permits and licences.

8.7 The Oxford City Council Water Cycle Study Stage 1 Report includes a detailed discussion about the reasons for the scores attributed to each main watercourse and provides suggestions about how and when issues can and should be addressed through the planning system. The overarching message is that any impacts on the quality of water flowing through watercourses in Oxford resulting from development proposals can be satisfactorly addressed through the appropriate use of Sustainable Drainage Systems (SuDS).

'Alone' Assessment

8.8 The 'alone' assessment considers the policy areas and site allocations set out in paragraph 8.3 in turn.

8.9 Policies S1 and H1 are overarching policies from which other policies are put forward to deliver. These policies are not likely to have an impact on the SAC. Instead, it is through the development of site allocation policies and windfalls (for instance, that make up a source of the housing supply set out in Policy H1) that have a potential to impact the Oxford Meadows.

8.10 Paragraphs 7.14-7.16 includes a series of figures that show the extent to which each of the three site allocations are located on the North Oxford Gravel Terrace.

- Policy SPN1 – Diamond Place and Ewert House (see Figures 7.3a and 7.3b)
- Policy SPN2 – Elsfield Hall, Elsfield Way (see Figures 7.4a and 7.4b)
- Policy SPCW1 – Banbury Road University Sites – Parcel B (See Figures 7.5a and 7.5b)

8.11 In order to ensure no likely significant effects on the Oxford Meadows SAC in relation to the water quality impact pathway development proposals must incorporate appropriately designed SuDs (in accordance with the recommendations of the Oxford City Council Water Cycle Study Stage 1 Report – see paragraph 8.7 above). The use of appropriately designed SuDs can satisfactorily address any impacts of development on water quality. In this context, the use of appropriately designed SuDs will ensure that there are no likely significant effects on the quality of water being recharged to groundwater as a result of the policies and site allocations within the Oxford Local Plan 2045.

8.12 As such, the three site allocation policies referenced in paragraph 8.4 (above), all include the wording set out at paragraph 7.19 above, specifically the inclusion of the reference to water quality and SuDS. The key section of the policy is duplicated below:

Policy text:

Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant through the use of appropriate measures including SuDS.

8.13 Paragraph 7.21 above highlights the importance of ensuring that development proposals that do not benefit from a site allocation, but that could still take place in this part of the city (i.e., on the North Oxford Gravel Terrace), do not result in likely significant effects on the Oxford Meadows SAC. While paragraph 7.21 focuses on the amount of groundwater recharge and groundwater flow, it is also important to ensure that the quality of the water is maintained. As such, Policy G6 : Protecting Oxford's Biodiversity including the Ecological Network and supporting text includes some text that relates to the Oxford Meadows SAC (see paragraph 7.22 for further details).

8.14 The entire of the supporting text and policy are not duplicated here, however the specific reference to water quality is duplicated to aid the reader.

Extract from Policy G6

Policy G6: Protecting Oxford's Biodiversity including the Ecological Network

To ensure no likely significant effects on the Oxford Meadows SAC, proposals identified in an area identified as having potential hydrological connectivity with the Oxford Meadows SAC that:

a. *May negatively affect groundwater recharge and/or water quality must demonstrate that likely significant effects have been avoided, or mitigated where relevant through use of appropriate measures including incorporation of SuDS.*

8.15 The Local Plan 2045 also includes a policy on SuDS. The text of Policy G8 Sustatinable Urban Drainage Systems: SuDS is provided in full below:

Policy G8: Sustainable Urban Drainage Systems: SuDS

All development proposals will be required where feasible to manage surface water through Sustainable Drainage Systems (SuDS). Details of the SuDS must be submitted as part of a drainage strategy or FRA where required as part of a planning application submission, and must be submitted prior to determination unless agreed otherwise by the LPA.

SuDS should be designed in a way that incorporates reuse, infiltration, retention or conveyance methods which utilise natural, green and blue infrastructure rather than unnatural, artificial components. Below ground features such as pipe systems or underground attenuation tanks will not be permitted, unless exceptional site conditions justify an alternative approach which has been agreed with the Council. Multi-functionality of SuDS should be maximised in their design, such as where they are incorporated into public open space.

Where a site has potential for contamination, SuDS that rely on infiltration will be discouraged and other suitable methods should be adopted to protect the water environment unless it can be demonstrated that there will be no pathway of contamination. Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable.

Surface water runoff should be managed to greenfield run-off rates as close to its source as possible, in line with the following drainage hierarchy:

a) store rainwater for later use; then:
b) discharge into the ground (infiltration); then:
c) discharge to a surface water body; then:

d) discharge to a surface water sewer, highway drain or other drainage system; and finally:

e) discharge to a combined sewer (only in exceptional circumstances).

For minor developments, SuDS should be designed in accordance with the City Council's latest SuDS design standards, or any equivalent replacement document. For major developments, SuDS should be designed in accordance with the national standards for sustainable drainage systems (or any national or county-level standards that supersede them). Details of the SuDS must be submitted as part of a drainage strategy or FRA where required as part of a planning application submission, and must be submitted prior to determination unless agreed otherwise by the LPA.

A SuDS maintenance plan should 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, maintenance responsibilities for all relevant parties, how frequently they will occur and for how long and will be secured by condition.

8.16 The inclusion of the specific wording in the specific site allocation policies and within Policy G6 (i.e., that development proposals *must demonstrate that likely significant effects have been avoided, or mitigated where relevant through use of appropriate measures including incorporation of SuDS)*, introduces a requirement for SuDS to be implemented when development proposals are located in area with potential hyrodological connectivity to the Oxford Meadows SAC.

8.17 Policy G8: Sustainable Urban Drainage Systems (SuDS), when read in conjunction with the requirements of Policy G6, provides suitable mitigation to ensure that any impacts of development on water quality can be satisfactoriy addressed so as not to result in likely significant effects on the Oxford Meadows SAC. Appropriately designed SuDS will also ensure that the amount of water being recharged to groundwater is maintained.

8.18 As such, the City Council considers that specific wording included within Policy G6 alongside the three site allocation policies, in conjunction with Policy G8: Sustainable Urban Drainage Systems (SuDS), will ensure that there are no likely significant effects resulting from the policies and site allocations in the Oxford Local Plan 2045 on the Oxford Meadows SAC, either in terms of water quality, or quantity.

‘In-combination’ Impacts

8.19 The other authorities’ Water Cycle Studies for this current local plan cycle are at various stages of production. As such, Water Cycle Studies to complement the most recent plan stages are not always available.

8.20 Table 8.2 sets out the most recent Water Cycle Studies for each local authority. Each Water Cycle Study presents where there are potential flow capacity or treatment issues for Wastewater Treatment Works (WWTW) in the respective districts. Of the other Oxfordshire authorities, only Cherwell has produced a Water Cycle Study for their most recent Local Plan. The other Oxfordshire authorities Water Cycle Studies are related to their current adopted plans (rather than their emerging plans).

Table 8.2 – Oxfordshire local authorities water cycle studies

Local authority	Date of WCS	Weblink for WCS
Cherwell	January 2023	https://www.cherwell.gov.uk/download/downloads/id/11025/water-cycle-study-stage-1-january-2023.pdf
South & Vale	September 2024	https://www.southandvale.gov.uk/app/uploads/2024/12/CEQ18-Water-Cycle-Study-WCS-Scoping-Report.pdf
West Oxfordshire	July 2025	https://www.westoxon.gov.uk/media/oxuf3hnd/whs10174-wodc-scoping-water-cycle-study_v2-0.pdf

8.21 Each Water Cycle study highlights where there are potential issues at WWTW in the respective districts. For instance, in Cherwell District Council there are potential capacity issues at four out of the twenty-five assessed WWTW, which will require intervention during the plan period. The South and Vale Water Cycle Study highlights capacity issues at six WWTWs which will require attention in the plan period. The West Oxfordshire Water Cycle study highlights that a number of WWTWs have been operating outside their permits in recent years. It also highlights that there are a number of schemes ongoing to address compliance issues.

8.22 As the above constraints are being taken into account by the local authorities, in discussions with Thames Water, they are not expected to act ‘in-combination’ with the Oxford Local Plan 2045.

8.23 It is worth noting that Oxford has one Wastewater Treatment Works at Sandford (downstream of the Oxford Meadows SAC). Thames Water has confirmed that upgrades to the Sandford Sewage Treatment Works are confirmed and are likely to take place in the first half of the plan period. Thames Water confirmed that these works are fully funded and costed and are not impacted by any external factors as they are scheduled to take place with the most recent Asset Management Plan cycle of projects.

9. Conclusions

9.1 The Reg. 19 HRA Report therefore re-affirms the conclusions presented with regard to air impacts in the Oxford HRA Screening Report – that the Local Plan 2045 will not give rise to likely significant effects on the Oxford Meadows SAC in terms of air quality impacts (either 'alone' or 'in-combination').

9.2 It also concludes that the Oxford Local Plan 2045 with the suite of mitigation measures proposed through the Stage 2 Appropriate Assessment, will give rise to likely significant effects on the Oxford Meadows SAC in terms of recreational (dog fouling) impacts, water quatliy impacts or water quality impacts (either 'alone' or 'in-combination').

Appendix 1 – Oxford HRA Screening Report (June 2025)

Available through the following weblink:

https://www.oxford.gov.uk/downloads/file/3794/habitat-regulations-assessment-screening-final-report-june-2025

Appendix 2: HRA Screening Categorisation Update (Reg.19)

Table A2.1 – Assessment of the policy areas within the Oxford Local Plan Regulation 19 "Proposed Submission" Document

Reg. 19 Policy Ref	Categorisation	Description of the policy area	Key environmental considerations likely to give rise to significant effects or not
Chapter 1			
Policy S1: *Spatial strategy and presumption in favour of sustainable development*		Strategic policy that sets the overarching ambition for the plan to support the delivery of new homes and jobs and to while protecting the city's important ecological and heritage assets	While this is a strategic policy that focuses on delivering homes and jobs in the city. It does not specifically allocate sites. Other policies in the plan articulate its ambitions through more detailed policy wording. This policy approach is considered to have no likely significant effects on the designated site but the allocations arising from it will need to be considered. As such, this Policy has been considered as part of the appropriate assessment.
Policy S2: *High Quality Design*	A	Policy promoting the use of design guides and design guidance	Unlikely to have significant effects
Policy S3: *Infrastructure delivery in new development*	A	Policy setting out the need for development proposals to make contributions toward infrastructure delivery	Unlikely to have significant effects
Policy S4: *Plan viability*	A	Policy setting out that the policies in the plan should not result development becoming unviable and the mechanisms	Unlikely to have significant effects

		for addressing development viability in individual schemes.	
Chapter 2			
Policy H1: *Housing requirement*		Policy setting out the housing requirement for the plan period. The plan makes provision for 9,267 homes to be delivered in the city.	Policy does not allocate specific sites. The overall housing requirement for the plan is calculated based on assessments of capacity of individual sites. The housing requirement for the plan-period is capacity-based. This means it is an output resulting from a series of technical assessments which consider the capacity, availability, and deliverability of each site. While this policy is considered to have no likely significant effects on the designated site, the site allocations that arise from it will need to be considered. As such, this policy has been taken forward for further assessment as part of the Stage 2: Appropriate Assessment.
Policy H2: *Delivering affordable homes*	A	Policy setting the requirements for the provision of affordable housing	Policy not locationally specific as requires a proportion of affordable homes to be provided as part of qualifying developments.
Policy H3: *Affordable Housing: contributions from other development types*	A	Policy setting out when contributions affordable housing contributions will be sought	Policy not locationally specific and sets out when affordable housing contributions will be sought from a range of development types.

Policy H4: *Employer-linked affordable housing*	A	Policy setting out which locations are suitable for employer-linked affordable housing instead of market housing	The sites referenced in this policy have all been assessed separately as part of the site allocations section. No need to duplicate that assessment.
Policy H5: *Mix of dwelling sizes (number of bedrooms)*	A	Policy setting out the appropriate mix of dwelling sizes to be provided as part of development proposals	Not likely to have significant effects as policy only applies to mix of dwellings.
Policy H6: *Development involving loss of dwellings*	A	Policy setting out approach for development proposals involving losses of dwellings.	Not likely to have significant effects as policy is only dealing with proposals involving the loss of dwellings.
Policy H7: *Houses in Multiple Occupation (HMOs)*	A	Policy setting out the approach taken in considering planning applications for the conversion or creation of new HMOs.	Not likely to have significant effects as policy is concerned with how the location of new HMOs impact the existing residential environment.
Policy H8: *Location of new student accommodation*	A	Policy that sets out appropriate locations in the city for new purpose-built student accommodation. Includes city and district centres.	Summertown is identified as a district centre. As such it is likely that some additional residential and non-residential development will be location on brownfield sites in this location. Any individual sites that are allocated for development in Summertown will be picked up through the technical work underpinning the site application selection process. Any bespoke policy wording needed to mitigate likely impacts of individual sites will be undertaken as a part of the appropriate

			assessment process. This policy, however, is screened out from further assessment.
Policy H9: *Linking new academic facilities with the adequate provision of student accommodation*	A	Policy linking the delivery of new academic floorspace at the universities to whether or not a certain number of students (for each university) is housed in purpose-built student accommodation.	Not likely to have significant effects as the policy does not allocate sites for development. Instead it seeks to ensure that additional academic floorspace that generates increases in student numbers is supported by sufficient student accommodation.
Policy H10: *Homes for Travelling Communities*	A	Policy setting out criteria to be met when considering new residential pitches for travelling communities	Policy unlikely to have significant effects on the Oxford Meadows SAC as it does not outline development proposals that could have a potential impact on the Oxford Meadows SAC.
Policy H11: *Homes for Boat Dwellers*	A	Policy setting out criteria to be met when considering proposals for new residential moorings.	Limited scope and capacity for additional moorings in close proximity to the Oxford Meadows SAC. As such policy unlikely to have significant effects.
Policy H12: *Older persons and other specialist accommodation*	A	Policy setting out criteria to be met when considering development proposals for new older persons and specialist accommodation.	Policy unlikely to have significant effects on the Oxford Meadows SAC as it does not specifically outline locations where there is a higher potential for adverse impacts
Policy H13: *Self-build and custom housebuilding*	A	Policy setting out requirements for delivery of self-build and custom-build housing as part of qualifying developments (sites over 100 homes)	Policy unlikely to have a significant effect as it promotes a requirement on larger residential development proposals, which will themselves be assessed separately as part of this process.

Policy H14: *Boarding school Accommodation*	A	Policy restricting suitable locations for new boarding school accommodation to sites either on, or immediately adjacent to a main teaching campus	Policy unlikely to have significant effects on the Oxford Meadows SAC as it limits new boarding school accommodation to sites very close to the main teaching campus.
Chapter 3			
Policy E1: *Employment Strategy*	D	Policy restricting new employment development to existing employment sites and the city and district centres. Policy also allows an element of housing to come forward on employment sites providing certain key criteria are met.	Summertown is identified as a district centre. As such it is likely that some additional residential an non-residential development will be located on brownfield sites in this location. Any individual sites allocated for development within Summertown district centre will be picked up through the technical work underpinning the site allocation selection process. Any bespoke policy wording needed to mitigate likely impacts of individual sites will be undertaken as a part of the appropriate assessment process. This aspect of the policy is unlikely to have significant effects on the Oxford Meadows SAC. Policy also allows an element of housing to come forward at existing employment sites. This aspect of the policy should be given further consideration as part of the assessment of residential impacts in the Stage 2 Appropriate Assessment.

Policy E2: *Warehousing, storage and distribution uses*	A	Policy restricting the location of warehousing storage and distribtution uses to existing key employment sites	Policy unlikely to have significant impact on SAC as relates to allowing specific type of employment development on sites where employment is already allowed.
Policy E3: *Community Employment and Procurement Plans (CEPPs)*	A	Policy requiring opportunities for local people in the construction and operational stage of developments and training opportunities etc.	Policy unlikely to have a significant impact on Oxford Meadows SAC as it relates to improving training and learning opportunities for local people
Policy E4: *Affordable workspaces*	A	Policy enabling certain key employment to help deliver affordable workspaces	Policy unlikely to have significant impact on SAC as it relates to delivering a certain type of employment floorspace where employment is already allowed.
Policy E5: *Hotel and short stay accommodation*	A	Policy sets out locations where new short-stay accommodation should be located in the city. Locations include city and district centre and main arterial routes into the city.	Summertown is identified as a district centre. As such it is likely that some additional residential an non-residential development will be located on brownfield sites in this location. Any individual sites allocated for development within Summertown district centre will be picked up through the technical work underpinning the site allocation selection process. This policy is unlikely to have significant effects on the Oxford Meadows SAC.
Chapter 4			
Policy G1: *Protection of Green Infrastructure*	A	Policy sets out approach for protecting and enhancing the GI network, defines residential	Policy unlikely to have impacts on the Oxford Meadows SAC as provides protection for GI

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		garden land and provides policy protection for trees and ancient woodland and other GI features (e.g., hedgerows)	network and features and provides a definition of residential garden land.
Policy G2: *Enhancement and provision of new green and blue features*	A	Policy about delivering new green and blue infrastructure features as part of new development proposals including public open space and management arrangements.	Policy unlikely to have impacts on the Oxford Meadows SAC as related to delivering opportunities for green and blue features and associated management arrangements.
Policy G3: *Provision of new green and blue features – Urban Greening Factor (UGF)*	A	Policy regarding delivering new GI features in new developments using urban greening factor metric.	Policy unlikely to have impacts on the Oxford Meadows SAC as related to delivering a range of on-site improvements for new developments.
Policy G4: *Delivering mandatory net gains in biodiversity*	A	Policy setting out the percentage of net gain to be delivered as part of developments in Oxford.	Policy unlikely to have impacts on the Oxford Meadows SAC as it sets the amount of net gain required to be delivered as part of new developments in the city.
Policy G5: *Delivering onsite ecological enhancements*	A	Policy seeking ecological enhancements as part of new development proposals	Policy unlikely to have an impact on the Oxford Meadows SAC as it requires developments to deliver a minimum amount of ecological enhancements.
Policy G6: *Protecting Oxford's biodiversity including the ecological network*	A	Policy providing protection of Oxford's ecological network of designated sites and other features of interest	Policy unlikely to have an impact on the Oxford Meadows SAC as seeks to provide for the safeguarding conservation and enhancement of biodiversity in Oxford

Policy G7: *Flood risk and Flood Risk Assessments (FRAs)*	A	Policy setting out how flood risk will be considered as part of development proposals, including when the LPA will require a flood risk assessment.	Policy unlikely to have an impact on the Oxford Meadows SAC as sets out the types of development that require a flood risk assessment.
Policy G8: *Sustainable Drainage Systems (SuDS)*	A	Policy setting out circumstances when Sustainable Drainage Systems (SuDS) will be required as part of development proposals and how SuDS should be incorporated into schemes.	Policy unlikely to have an impact on the Oxford Meadows SAC as it sets out when development proposals will require SuDs and how they should be delivered.
Policy G9: *Resilient design and construction*	A	Policy setting out how design and construction measures that help mitigate climate change have been incorporated into development proposals.	Policy unlikely to have an impact on the Oxford Meadows SAC as it relates ensuring the design of development proposals helps to mitigate the impacts of climate change.
Chapter 5			
Policy R1: *Net zero buildings in operation*	A	Policy setting out how development proposals are to achieve energy reductions to deliver net zero.	Policy unlikely to have an impact on the Oxford Meadows as concerned with how the developments will reduce energy use in their operational stages.
Policy R2: *Embodied carbon in construction*	A	Policy setting out how embodied carbon should be limited focusing on the construction process	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with limiting the amount of carbon used focusing on the construction process

Policy R3: *Retro-fitting existing buildings*	A	Policy supporting retrofit measures to help mitigate and adapt existing buildings to minimise climate change impacts.	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with delivering climate change mitigation and adaptation measures to existing buildings
Policy R4: *Air quality assessments and standards*	A	Policy setting out the circumstances when development proposals require an assessment of air quality to ensure that the impact of new development on air quality is minimised.	Policy unlikely to have an impact on the Oxford Meadows SAC as it sets the requirements when an air quality assessment is required as part of new development proposals.
Policy R5: *Water resources and and quality*	A	Policy to promote water efficiency, SuDS, and which sets out how to deal with wastewater as part of development proposals	Policy unlikely to have an impact on the Oxford Meadows SAC as it sets requirements for water efficiency, water quality and wastewater expected from new developments.
Policy R6: *Soil quality*	A	Policy setting out how development proposals are expected to demonstrate how any impacts on soils have been mitigated.	Policy unlikely to have an impact on the Oxford Meadows SAC as it sets out the requirements for addressing potential impacts on soil quality as part of development proposals.
Policy R7: *Land contamination*	A	Policy setting out the information required to be able to assess applications where there is the potential for impacts from contamination.	Policy unlikely to have an impact on the Oxford Meadows SAC as it sets out a requirement for additional information to be submitted where there is a risk of contamination as part of development proposals.

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Draft Policy R8: *Amenity impacts of development*	A	Policy setting out how amenity and environmental health impacts will be considered as part of development proposals.	Policy unlikely to have an impact on the Oxford Meadows SAC as it seeks to mitigate a range of factors which could have an impact on amenity.
Chapter 6			
Policy HD1: *Principles of high quality design*	A	Policy seeks to ensure high-quality design in development proposals.	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with ensuring development proposals are of the highest design quality
Policy HD2: *Making efficient use of land*	A	Policy setting out how development proposals on Listed Buildings should be considered in the planning process	Policy unlikely to have an impact on the Oxford Meadows SAC as it is concerned with how development proposals are assessed on Listed Buildings.
Policy HD3: Designated h*eritage assets*	A	Policy setting out how development proposals that have an impact on Designated heritage assets are assessed	Policy unlikely to have an impact on the Oxford Meadows SAC as it is concerned with the impact of development proposals on Designated heritage assets .
Policy HD4: *Non-designated heritage assets*	A	Policy defines a non-designated heritage asset and sets out the process by which these assets are to be considered when determining planning applications	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with how nondesignated heritage assets are considered during the planning process.
Policy HD5: *Archaeology*	A	Policy setting out how archaeological deposits will be	Policy unlikely to have an impact on the Oxford Meadows SAC as it addresses how

		considered as part of the application process.	archaeological deposits will be considered in development proposals.
Policy HD6: *Views and building heights*	A	Policy seeking to protect views of Oxford's historic skyline.	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with the heights and visual impact of development proposals.
Policy HD7: *Health Impact Assessment*	A	Policy setting out when a Health Impact Assessment should be submitted as part of development proposals and what it should contain.	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with when a Health Impact Assessment should be submitted to inform development proposals and what it should contain.
Policy HD8: *Privacy, daylight and sunlight*	A	Policy setting out how the impacts of development proposals will be assessed in terms of privacy, sunlight and daylight.	Policy unlikely to have an impact on the Oxford Meadows SAC as it relates to how the impact of development proposals will be assessed.
Policy HD9: *Internal space standards for residential development*	A	Policy setting out that internal space standards for residential developments will follow nationally described space standards.	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with quantity of internal space standards as part of new development proposals.
Policy HD10: *Outdoor amenity space*	A	Policy setting out requirements for outdoor amenity space to be delivered as part of development proposals.	Policy unlikely to have an impact on the Oxford Meadows SAC as concerned with amount of onsite amenity space required as part of development proposals.
Policy HD11: *Accessible and adaptable homes*	A	Policy setting out the amount of affordable and market homes to	Policy unlikely to have an impact on the Oxford Meadows SAC as it sets out the proportion of

		be delivered that comply with accessible standards.	accessible and adaptable homes to be delivered as part of development proposals.
Policy HD12: *Bin and bike stores and external servicing features*	A	Policy setting out how external servicing features (including bin and bike stores) will be considered as part of development proposals	Policy unlikely to have an impact on the Oxford Meadows SAC as is concerned with small scale onsite measures.
Chapter 7			
Policy C1: *City, district and local centres*	A	Policy setting out the types of uses suitable for Oxford's city, district and local centres. Policy also includes requirements for sequential test for town centre uses.	Summertown is identified as a district centre. As such it is likely that some additional residential an non-residential development will be located on brownfield sites in this location. Any individual sites allocated for development within Summertown district centre will be picked up through the technical work underpinning the site allocation selection process. This policy is unlikely to have significant effects on the Oxford Meadows SAC.
Policy C2: *Maintaining vibrant centres*	A	Policy sets out how development proposals within the city and district centres can maintain active frontages to help maintain the vibrancy of centres. Includes locally specific	Policy unlikely to have an impact on the Oxford Meadows SAC as related to protection of existing facilities and provision of new ones in suitably accessible locations.

		requirements for each of the city and district centres.	
Policy C3: *Protection, alteration and provision of local community facilities*	A	Policy setting out how local community facilities will be protected when they form part of development proposals. Also sets out support for new community facilities in appropriate locations.	Policy unlikely to have an impact on the Oxford Meadows SAC as related to protection of existing facilities and provision of new ones in suitably accessible locations.
Policy C4: *Protection, alteration ande provision of learning and non-residential institutions*	A	Policy setting out how learning and non-residential institutions will be protected when they form part of development proposals. Also sets out support for new learning and non-residential institutions in appropriate locations.	Policy unlikely to have an impact on the Oxford Meadows SAC as related to protection of existing facilities and provision of new ones in suitably accessible locations.
Policy C5: *Protection, alteration and provision of cultural venues and visitor attractions*	A	Policy setting out how cultural venues and visitor attractions will be protected when they form part of development proposals. Also sets out support for new cultural venues and visitor attractions in appropriate locations	Policy unlikely to have an impact on the Oxford Meadows SAC as related to protection of existing facilities and provision of new ones in suitably accessible locations
Policy C6: *Transport Assessments, Travel Plans and Service and Delivery Plans*	A	Policy setting out requirements for when Transport Assessments, Travel Plans and Service and Delivery Plans	Policy unlikely to have an impact on the Oxford Meadows as it relates to the conditions when

		should accompany a planning application.	certain applications should be accompanied by additional transport-related evidence.
Policy C7: *Bicycle and powered two wheelers parking design standards*	A	Policy setting out how bicycle and powered two-wheeler parking should be provided as part of development proposals.	Policy unlikely to have an impact on the Oxford Meadows SAC as it relates to the amount of cycle parking and parking for powered two-wheelers to be provided as part of development.
Policy C8: *Motor vehicle parking design standards*	A	Policy setting out how parking levels should be assessed as part of development proposals including providing requirements for low-car schemes.	Policy unlikely to have an impact on the Oxford Meadows SAC as provides car parking standards for development proposals including providing requirements for low-car schemes.
Chapter 8			
Policy I1: *Digital infrastructure to support new development*	A	Policy supporting the delivery of appropriate digital infrastructure as part of new development proposals	Policy unlikely to have an impact on the Oxford Meadows SAC as it supports the delivery of appropriate digital infrastructure as part of new development proposals.
Policy I2: *Land safeguarded for Infrastructure*	A	Policy requiring development proposals to undertake specific measures where they occur on of land required for specific named infrastructure schemes governed by separate consenting regimes	Policy unlikely to have an impact on the Oxford Meadows SAC as it requires development proposals to undertake specific measures where they occur on the land identified through this policy.

Table A2.2 – Assessment of site allocations within the Oxford Local Plan Regulation 19 "Proposed Submission" Document

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
		North Infrastructure Area	
	Northern Edge of Oxford Area of Focus (AOF)	The Area of Focus will not allocate specific sites but instead will set out broad infrastructure requirements and other non-site-specific policy aspects	No likely significant effects identified.
SPN1	Diamond Place and Ewert House	Site is located more than 200m away from SAC but within the buffer zone for recreational impacts (1,900m). Site lies within an area of potential hydrological connectivity with the SAC. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Potential for recreational impacts on SAC as site allocation policy includes a mix of uses including residential Potential for water quantity and quality impacts due to site's location on the North Oxford Gravel Terrace
SPN2	Elsfied Hall, Elsfield Way	Site is located more than 200m away from the SAC but within the buffer zone for recreational impacts (1,900m) and within an area of potential hydrological connectivity with the SAC. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling.	Potential for recreational impacts on SAC as site allocation policy includes residential Potential for water quantity and quality impacts due to site's

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
		Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	location on the North Oxford Gravel Terrace
SPN3	Oxford North Remaining Phases	Site is more than 200m away from the SAC. Site allocated for a mix of housing and employment uses. Previous HRA work for the site included screening and appropriate assessment stages. The appropriate assessment concluded that there would be no likely significant effects as a result of the mitigation measures proposed. These mitigation measures were embedded within the previous policy framework (AAP) and have been transferred into the Reg. 19 Plan policy for this site. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Previous HRA work suggested mitigation measures to reduce the risk of recreational impacts. Increased amount of public open space provided at the site. HRA for AAP also investigated impacts on balanced hydrological regime and concluded no significant effects.
SPN4	Oxford University Press Sports Ground, Jordan Hill	The site is located more than 200m away from SAC but within the buffer zone for recreational impacts (1,900m). Outside the area of potential	Potential for recreational impacts on SAC as site allocation policy includes residential

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
		hydrological connectivity with the Oxford Meadows SAC. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	
SPN5	Pear Tree Farm	The site is located more than 200m away from SAC but within the buffer zone for recreational impacts (1,900m). Outside the area of potential hydrological connectivity with the Oxford Meadows SAC. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Potential for recreational impacts on SAC as site allocation policy includes residential
SPN6	Red Barn Farm	The site is located more than 200m away from SAC but within the buffer zone for recreational impacts (1,900m) as Outside the area of potential hydrological connectivity with the Oxford Meadows SAC.	Policy E1 allows residential uses to be delivered at employment sites. As such potential for recreational impacts on SAC

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
		Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	
		South Infrastructure Area	
	Cowley Branch Line Area of Focus (AOF)	The whole of the Southern Infrastructure Area lies outside the buffer zones for recreational impacts and outside of the potential groundwater recharge zone for the SAC. Transport modelling that informs the air quality screening takes account of all sites in the plan.	Site allocations and development likely to come forward within this Area of Focus are unlikely to have a significant impact on the Oxford Meadows SAC.
SPS1	474 Cowley Road	All sites listed here are outside the buffer zones for recreational impacts (1,900m) and do not lie in an area of hydrological connectivity to the site.	Sites listed here are unlikely to have a significant impact on the Oxford Meadows SAC due to their location.
SPS2	ARC Oxford		
SPS3	Bertie Place Recreation Ground		
SPS4	Cowley Marsh Depot		
SPS5	Crescent Hall	Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Sites listed are screened out from further assessment.
SPS6	Former Iffley Mead Playing Field		
SPS7	Kassam Stadium		

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
SPS8	Land at Meadow Lane		
SPS9	Littlemore Mental Health Centre		
SPS10	MINI Plant Oxford		
SPS11	Overflow Car Park at Kassam		
SPS12	Oxford Science Park		
SPS13	Ozone Leisure Park		
SPS14	Redbridge Paddock		
SPS15	Sandy Lane Recreation Ground		
SPS16	Templars Square		
SPS17	Unipart Site		
		East Infrastructure Area	
	Marston Road and Old Road Area of Focus	The entire Marston Road and Old Road Area of Focus lies outside the buffer zones for recreational impacts (1,900m) and does not lie in an area of hydrological connectivity to the site. Air quality impacts of the whole plan (on SAC) have been assessed using transport modelling.	Site allocations and development likely to come forward within this Area of Focus are unlikely to have a significant impact on the Oxford Meadows SAC.

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Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
		Results presented in section 5 of this HRA Screening.	
SPE1 SPE2 SPE3 SPE4 SPE5 SPE6 SPE7 SPE8 SPE9 SPE10 SPE11 SPE12 SPE13 SPE14	Churchill Hospital East Oxford Bowls Club Govt. Buildngs and Harcourt Hse Jesus College Sports Area John Radcliffe Hospital Land surr. St. Clement's Church Lincoln College Sports Grnd Manzil Way Resource Centre Marston Paddock Extension Nuffield Orthopaedic Centre Oxford Brookes Marston Rd Rectory Centre Ruskin Campus Ruskin Field	All sites listed here are outside the buffer zones for recreational impacts (1,900m) and do not lie in an area of hydrological connectivity to the site. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Sites listed here are unlikely to have a significant impact on the Oxford Meadows SAC due to their location. Sites listed are screened out from further assessment.

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
SPE15 SPE16 SPE17 SPE18	Slade House Thornhill Park (phase 2) Union St Car Park Warneford Hospital		
		Central and West Infrastructure Area	
NCCAOF	University Areas North of the City Centre Area of Focus	Areas of focus will not allocate sites but rather set out broad infrastructure requirements and other non-site-specific policy aspects.	No likely significant effects identified.
WEBRAOF	West End and Botley Road Area of Focus	Areas of focus will not allocate sites but rather set out broad infrastructure requirements and other non-site-specific policy aspects.	No likely significant effects identified.
SPCW1 SPCW2 SPCW3 SPCW5 SPCW7	Banbury Road University Sites Botley Road sites around Cripley Road inc. River Hotel and Westgate Hotel Canalside Land, Jericho Jowett Walk Nuffield Sites	All sites listed here are within the buffer zone for recreational impacts (1,900m) and are not located in an area of hydrological connectivity with the SAC. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Sites allocated for a ranges of uses including residential. Some also allocated for student accommodation. Sites carried forward for further assessment as part of Stage 2 Appropriate Assessment for recreational impacts

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
SPCW8 SPCW9 SPCW10 SPCW11 SPCW12	Osney Mead Oxford Railway Station and Becket Street Car Park Oxpens St Thomas School and Osney Warehouse West Wellington Square		
SPCW4 SPCW6	Faculty of Music, St Aldates Manor Place	All sites listed here are outside the buffer zone for recreational impacts (1,900m) and are not located in an area of hydrological connectivity with the SAC. Air quality impacts of the whole plan (on SAC) have been assessed using traffic modelling. Results presented in chapter 5 of the Oxford HRA Screening Report and within the Screening Update in Chapter 4 of this HRA Report.	Sites listed here are unlikely to have a significant impact on the Oxford Meadows SAC due to their location. Sites listed are screened out from further assessment.
	Employment Sites		
		All employment sites more than 1,900m from the Oxford Meadows were screened out from the assessment.	

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
E1	Oxford North ROQ Site Oxford University Press Jordan Hill Business Park Banbury Road	All sites listed here are Key Employment Sites within the buffer zone for recreational impacts (1,900m) and are located in an area of potential hydrological connectivity with the SAC. Air quality impacts of the whole plan (on SAC) have been assessed using transport modelling. Results presented in section 5 of this HRA Screening.	Further investigation is needed for those employment sites less than 1,900m from the Oxford Meadows SAC as the plan's employment strategy now promotes an element of housing on all employment sites. As such the Stage 2 assessment will look at these sites in more detail. Potential for water quantity and quality impacts due to site's location on or near the North Oxford Gravel Terrace to be investigated further as part of Stage 2 Appropriate Assessment
E1	Osney Mead Botley Road Retail Park	All sites listed here are Key Employment Sites within the buffer zone for recreational impacts (1,900m) and are not located in an area of hydrological connectivity with the SAC. Air quality impacts of the whole plan (on SAC) have been assessed using transport modelling.	Further investigation is needed for those employment sites less than 1,900m from the Oxford Meadows SAC as the plan's employment strategy now promotes an element of housing on all employment sites. As such the Stage 2 assessment

Ref:	Name	If the policy has no effect, the reason why	Possible impacts on SAC
		Results presented in section 5 of this HRA Screening.	will look at these sites in more detail.

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Table A2.3 Sites and Policies within the Oxford Local Plan 2045 with potential impact pathways to the Oxford Meadows SAC

Impact Pathway	Policy areas and sites	Magnitude/ Duration / Location	Conclusions
Air Pollution	*Policy areas:* Policy S1 – Spatial Strategy Policy H1 – Housing Requirement *Sites:* Traffic modelling has been undertaken which considers how the development proposed through the Local Plan ('in-combination' with othe relevant plans and projects) is likely to impact air quality at the Oxford Meadows SAC.	Natural England Guidance on Air Quality suggests that increases in trips under 1,000 AADT (Cars/ LGVs) or under 200 AADT (HDV) can be screened out from further assessment. It is assumed that all sites will be developed within the Local Plan period. Any impacts would therefore occur within this period. Sites put forward across the city have the potential to change traffic flows on A34 and A40 which are adjacent to the Oxford Meadows SAC.	Traffic modelling has been undertaken to support the Local Plan. The results of this modeling are discussed as part of a "Screening Update" presented in chapter 5 of this HRA report. This updates the work previously undertaken as part of the Oxford HRA Screening Report.
Recreational Pressure	*Policy Areas:* Policy S1 – Spatial Strategy Policy H1 – Housing Requirement Policy E1 – Employment Strategy *Site Allocations* Policy SPN1: Diamond Place and Ewert House Policy SPN2: Elsfield Hall, Elsfield Way Policy SPN3 Oxford North Remaining Phases	Policy E1 supports an element of housing on Key Employment Sites Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential	Sites were screened out of this part of the assessment where they were more than 1,900m from the SAC.

	Policy SPN4: OUP Sports Ground, Jordan Hill Policy SPN5: Pear Tree Farm Policy SPCW1: Banbury Road University Sites – Parcel B Policy SPCW2: Botley Road sites around Cripley Road including River Hotel and Westgate Hotel Policy SPCW3: Canalside Land, Jericho Policy SPCW5 Jowett Walk (South) Policy SPCW8 Osney Mead Policy SPCW12 West Wellington Square <u>*Key Employment Sites*</u> *Oxford North* *Radcliffe Observatory Quarter (ROQ site)* *Oxford University Press* *Oxford University Science Area and Keble Road Triangle* *Osney Mead* *Jordan Hill Business Park* *Botley Road Retail Park*	Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential Mix of uses includes residential The Employment Strategy (Policy E1) creates an opportunity for housing to be delivered on the city's employment sites As such, all Key Employment Sites within 1,900m of the Oxford Meadows are taken forward for further consideration as part of the Stage 2 Appropriate Assessment	Where it was not possible to rule out residential on-site allocations proposed within the 1,900m "buffer zone", these sites were taken forward on a precautionary basis. Creeping marshwort (the Schedule 2 plant) found at Port Meadow is less sensitive to trampling. It relies on grazing (by cattle and horses in this instance) to limit competition and help create the conditions in which it can grow. However, dog fouling is considered more of an issue.
Water Quantity (groundwater flow and recharge)	<u>Policy Areas:</u> Policy S1 – Spatial Strategy Policy H1 – Housing Requirement <u>Sites:</u>	Where sites are located on the North Oxford Gravel Terrace, it is important that the same amount of surface water is able to recharge the groundwater after development is completed.	These sites are all on the North Oxford Gravel Terrace. Policy provision exists in the adopted Local Plan 2036 to ensure groundwater flow and

	Policy SPN1 – Diamond Place and Ewert House Policy SPN2: Elsfield Hall, Elsfield Way Policy SPCW1: Banbury Road University Sites – Parcel B	It is anticipated that all sites will be developed within the Local Plan period. Any impacts would therefore occur within this period. The sites listed are all on the North Oxford Gravel Terrace.	recharge are not impeded by development in this location. The Stage 2 Appropriate Assessment will consider further and make recommendations (as required) to ensure that there are no likely significant effects on the Oxford Meadows SAC resulting from the the policies and site allocations proposed in the Oxford Local Plan 2045.
Water Quality (groundwater recharge)	<u>Policy Areas:</u> Policy S1 – Spatial Strategy Policy H1 – Housing Requirement <u>Sites:</u> Policy SPN1 – Diamond Place and Ewert House Policy SPN2: Elsfield Hall, Elsfield Way Policy SPCW1: Banbury Road University Sites – Parcel B	Where sites are located on the North Oxford Gravel Terrace, it is important that the quality of surface water that is recharged to groundwater is maintained after development is completed. It is anticipated that all sites will be developed within the Local Plan period. Any impacts would therefore occur within this period. The sites listed are all on the North Oxford Gravel Terrace.	These sites are all on the North Oxford Gravel Terrace. Policy provision exists in the adopted Local Plan 2036 to that the quality of surface water that is recharged to groundwater is not significantly affected by development in this location. The Stage 2 Appropriate Assessment will consider further and make recommendations (as required) to ensure that there are no likely significant effects on the Oxford Meadows SAC resulting from the the policies and site allocations proposed in the Oxford Local Plan 2045.

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Appendix 3: Oxford Meadows Visitor Survey Report

Oxford Meadows Visitor Survey Report

Introduction

A visitor survey of Oxford Meadows was commissioned to understand how the site is currently used by the population of Oxford and by visitors from outside of the city.

Method

Through discussions with Natural England and investigations of best practice examples, an onsite visitor survey questionnaire was designed.

The survey was carried out:

- on 6 days including a range of weekend and weekday dates (18 May 2025, 19 May 2025, 20 May 2025, 25 May 2025, 26 May 2025, 27 May 2025)
- both within and outside the school "summer" half term
- during four 2-hour periods each day (07:00-09:00, 10:00-12:00, 13:00-15:00, 16:00-18:00)
- at two locations (one to the north at the Wolvercote car park off Godstow Road, and one to the south at the car park off Walton Well Road)

The survey questionnaire asked a series of 11 questions:

<u>About you:</u>

- Question 1: How many adults, children and dogs make up your group?
- Question 2: Which postcode have you travelled from to visit this site?
- Question 3: Which best describes you?

<u>About today's visit:</u>

- Question 4: How did you get here today?
- Question 5: How long have you spent / will you be spending here today?
- Question 6: What is the main purpose of your visit today?

<u>About other visits:</u>

- Question 7: How often do you visit this site?
- Question 8: Do you tend to visit this site at a certain time of day?
- Question 9: What time of year do you visit this site?

- Question 10: Aside from this location do you visit any other places for similar purposes?
- Question 11: What facilities do you think are important to your enjoyment of open spaces in the Oxford area?

Results

486 interviews were conducted, comprising a total of 908 visitors.

Question 1: Size of group as percentage of all interviews (486); and percentage of all interviews (486) with 1 or more dogs

Group size	1 person	2 people	3 people	4 people	5+ people
Total	48%	37%	7%	4%	4%

With dog
32%

Age of visitors, as percentage of responses given (905 visitors)

Age	Under 18	18-40	41-65	65+
Total	9%	36.4%	40.2%	14.5%

Question 2: Postcode of visitor origin, as percentage of responses given (486)

Oxfordshire	%	Outside Oxfordshire	%	Outside UK	%	Combinations	%
OX1	14.6	BS7	0.4	Canada	0.2	OX1/BS9	0.2
OX2	55.8	CB24	0.2	France	0.2	OX3/Manchester	0.2
OX3	6.6	Canterbury	0.2	Germany	0.4		
OX4	7.6	HP17	0.4	Luxembourg	0.2		
OX5	1.6	HP19	0.2	Russia	0.2		
OX7	0.4	HP22	0.2	Slovakia	0.2		
OX10	0.2	LE1	0.2	South Africa	0.2		
OX11	1	LE6	0.2				
OX12	0.4	Leamington	0.2				
OX13	0.8	London	0.2				
OX14	0.6	NN7	0.2				
OX16	0.4	NN11	0.2				
OX17	0.4	NN13	0.2				
OX20	0.2	RG6	0.2				
OX26	0.8	SL6	0.2				
OX29	0.2	SN1	0.2				

OX33	0.4	SO52	0.2				
OX44	0.2	SW3	0.2				
OX1/OX2	0.6						
OX1/OX4	0.2						
OX2/OX4	0.4						
OX2/OX3/OX5	0.2						
OX2/OX10	0.2						
OX5/OX29	0.2						
Total	**94**		**4**		**1.6**		**0.4**

Question 3: Resident or visitor, as percentage of responses given (908)

	Permanent resident of Oxford	Temporary resident of Oxford	Resident elsewhere in Oxfordshire	Visitor/holiday maker
Total	75.6%	9.2%	6%	9.1%

Question 4: Mode of travel to arrive at site, as percentage of responses given (819)

	Walk	Cycle	Bus	Car	Other
Total	49.5%	6.2%	3.7%	37.2%	3.4%

Question 5: Length of visit, as percentage of responses given (483)

	Less than 1 hour	1-2 hours	2-3 hours
Total	50.1%	38.9%	11%

Question 6: Purpose of visit, as percentage of responses given (504)

	Dog walking	Walking	Jogging/ running	Cycling	Family outing	Nature	Other
Total	30.4%	49.8%	5.4%	2%	3.8%	1%	7.7%

Question 7: Frequency of visit(s), as percentage of responses given (635)

	Daily	Weekly	Monthly	Occasionally	Don't know
Total	26%	45.7%	10.9%	11.7%	5.8%

Question 8: Time(s) of visit(s), as percentage of responses given (845)

	Before 09:00	09:00-12:00	12:00-14:00	14:00-16:00	After 16:00	Don't know/ First visit
Total	20.4%	15.6%	13.7%	19.1%	21.4%	9.8%

Question 9: Season(s) of visit(s), as percentage of responses given (520)

	Year-round	Spring	Summer	Autumn	Winter
Total	74.4%	9.4%	11%	4.8%	0.4%

Question 10: Other site(s)/area(s) visited for similar purpose(s), and number of independent mentions (279)

Site/Area	# of mentions	Site/Area	# of mentions
Uni Parks	148	Sunnymead	2
Cutteslowe	26	Acorn Field	1
Shotover	18	Bagley Woods	1
Christchurch	17	Bernwood	1
Florence Park	13	Godstow Nunnery	1
Wytham Woods	11	Iffley Lock	1
South Parks	7	Marston	1
Hinksey Park	5	New College	1
Botanical Gardens	4	Osney	1
Boars Hill	3	Otmoor	1
Cumnor Hurst	3	Radley	1
Abbey Meadows	2	River	1
Burgess Field	2	Thrupp	1
Marston Meadow	2	Trap Grounds	1
Oxford Canal	2	Warneford Meadow	1

Question 11: Rating of importance of individual factors in enjoyment of open spaces in Oxford area, as percentage of responses given (485)
(Key: V: very important / Q: quite important / N: not important)

	Benches			**Litter bins**			**Dog bins**		
	V	Q	N	V	Q	N	V	Q	N
Total	35.7%	14%	50.3%	75.3%	8%	16.7%	57.1%	7.6%	35.3%
	Information boards			**Parking**			**Cycle parking**		
	V	Q	N	V	Q	N	V	Q	N
Total	35.3%	16.9%	47.8%	39.8%	5.4%	54.8%	32%	12.2%	55.9%

	Toilets			**Signed trails**			**Well-maintained paths**		
	V	Q	N	V	Q	N	V	Q	N
Total	54.2%	10.9%	34.8%	34.2%	10.1%	55.7%	50.9%	13.6%	35.5%
	Length/variety of paths			**Wheelchair/pushchair access**			**Views**		
	V	Q	N	V	Q	N	V	Q	N
Total	52.6%	9.1%	38.4%	23.9%	8.2%	67.8%	90.1%	5.2%	4.7%

	Wildlife			**Habitats**			**Water**		
	V	Q	N	V	Q	N	V	Q	N
Total	90.1%	5.4%	4.5%	89.1%	5.4%	5.6%	74.2%	10%	16.1%
	Feeling safe			**Quietness**			**Dog off lead**		
	V	Q	N	V	Q	N	V	Q	N
Total	89.1%	6.4%	4.5%	66%	16.1%	17.9%	46.4%	8.2%	4.5%

Analysis

In order to interpret the survey data and project the total number of visitors to the site the following calculation was carried out. The methodology broadly follows that used by Bracknell Forest DC in the Thames Basin Heaths SPA analysis as recommended by Natural England as best practice.

	Calculation and/ or reference		Result
Total number of visits over survey period	Taken from survey data	A	908
Percentage of visits over survey period from within postcode sectors OX1 and OX2	Taken from survey data	B	70.4%
Projected total number of visits, per annum	See "Table 1" below	C	306,600
Projected total number of visits from within postcode sectors OX1 and OX2, per annum	(C/100) x B	D	215,846
Population of postcode sectors OX1 and OX2	Taken from 2021 Census	E	68,549
Projected visits per head of OX1 and OX2 population, per annum	D/E	F	3.1
Projected future population arising from new potential development	See Table 2 below	G	2,208
Projected visits per annum arising from projected future population	G x F	H	6,951
% of projected future visits, as it relates to current projected total visits	(H/C) x 100	I	**2.27%**
Projected future population arising from 'in-combination impacts'	See Table 3 below	J	3,400
Projected visits per annum arising from projected future 'in-combination impacts' population	F x J	K	10,706
% of projected 'in-combination impacts' visits, as it relates to current projected total visits	(K/C) x 100	L	**3.49%**
% of projected 'alone' and 'in-combination impacts' visits as it relates to current total projected visits	I + L		**5.76%**

Table 1

Total number of visitors recorded during this survey	908
Number of surveyed access points	2
Mean number of visitors per surveyed access point	454
Number of hours of surveying per access point	48
Mean number of visitors per surveyed access point, per hour	10
Total active hours per day (06:00-20:00)	14
Projected mean number of visitors per surveyed access point, per day	140
Projected mean number of visitors per surveyed access point, per year	51,100
Total number of access points to the SAC	6
Projected total number of visitors per year to the SAC	306,600

Table 2 – Local Plan 2045 'alone' impacts

'Site'	Number of units	Number of residents
Oxford Local Plan 2045 (sites within 1,900m of SAC	883	2,208

Table 3 – Local Plan 2045 'in-combination' impacts

'Site'	Number of units	Number of residents
Cherwell DC (sites within 1,900m of SAC	1,360	3,400

Points to be Noted:

The interviews were conducted in early summer and visitor access patterns may be different when compared to the rest of the year. The surveys included the school half term period in order to reflect the difference between school holidays and term-time.

The data shows that people going for a walk visit the site the most frequently (dog-walking was the second most frequent purpose of visit). As dogs need exercising on a daily basis, the dog walkers interviewed are therefore likely to represent a relatively constant sample of visitors, and usage would be likely to be similar throughout the year. During the winter, the proportion of dog walkers to other users may be higher as the numbers of people cycling, picnicking, etc., would likely be less.

There are 6 access points to Oxford Meadows (via the Wolvercote car park; via the right of way at the entrance to Wolvercote off Godstow Road; via Godstow Road; via the bridge at Aristotle Lane; via the bridge across the river from Binsey; and via the car park off Walton Well Road). The two survey points that were selected are both car parks and so it is possible that the survey results are slightly skewed towards arrivals by car – although this does not seem to be particularly evident for the southern access point that was surveyed.

Oxford City Council

Oxford Infrastructure Delivery Plan

Regulation 19 Report | November 2025

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1. Introduction

The role of the Infrastructure Delivery Plan

1.1 Infrastructure delivery and funding is complex. Establishing a reliable, concise and flexible Infrastructure Delivery Plan (IDP) is therefore important in ensuring that investment decisions are based on a sound understanding of infrastructure needs, maximising the return to the public. Having an up-to-date IDP in place offers greater certainty to service providers, funders and developers about how infrastructure will be delivered, enabling growth and encouraging investment.

1.2 The Local Plan covers the period from 2025 to 2045. It is clear in recognising the importance of identifying infrastructure needs and providing methods for funding and delivery. The preparation of the Local Plan is supported by this IDP, which identifies a number of infrastructure needs and schemes to help meet those needs.

1.3 IDPs should be treated as 'live documents' which provide a snapshot at a point in time. As such, they should be updated regularly as development proposals and other circumstances in the city change. This version of the IDP has been produced to support the Local Plan 2045 Regulation 19 Document, often referred to as the "Proposed Submission" version of the Plan.

2. Policy Context

Introduction

2.1 This policy context review is not exhaustive. It merely provides a flavour of some of the key policies, frameworks and organisations at the national and the local/ regional level which play an important role in infrastructure delivery and planning.

National Context

The National Planning Policy Framework (NPPF)

2.2 At the time of writing, the most recent version of the NPPF was published in December 2024. The NPPF sets out that local planning authorities should prepare robust and evidence-based Local Plans that seek to deliver sustainable development. In fact, infrastructure provision has been integrated within the overarching economic objective for sustainable development. As part of the statutory requirement to produce a Local Plan, national policy places particular emphasis on local planning authorities to plan for the delivery of infrastructure to support future growth.

2.3 The Infrastructure Delivery Plan (IDP) is therefore an important part of the evidence base required to support local plans. One of the purposes of the IDP is to demonstrate that the infrastructure requirements necessary to support the level of housing and employment growth proposed can be delivered.

2.4 IDPs also provide details of the level of funding required, highlight potential funding sources, and outline foreseeable funding challenges. IDPs are a key tool for local authorities when negotiating developer contributions through S106 agreements, or to help evidence the for charging under the Community Infrastructure Levey (CIL)

2.5 Paragraph 16 of the NPPF states that plans should be positively prepared, in a way which is aspirational but deliverable, while contributing to the achievement of sustainable development. Specifically, the NPPF considers that while strategic policies (paragraph 20) should set out the overall strategy for the pattern, scale and design quality of places and make sufficient provision for infrastructure including transport and community facilities, non-strategic policies (paragraph 29) also play an important role regarding infrastructure provision.

2.6 The NPPF considers planning policies should seek to address that lack of infrastructure as a potential barrier to economic growth and investment and highlights the importance of working with neighbouring authorities to develop cross-boundary infrastructure.

2.7 Paragraph 35 states:

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.

Planning Practice Guidance (PPG)

2.8 The Planning Practice Guidance (PPG) on Plan-Making (paragraph 059, reference 61-059-20190315) explains the role and function of a Local Plan in delivering infrastructure. It sets out that the Local Plan should identify what infrastructure is required and how it can be funded and brought forward.

2.9 At an early stage in the plan making process, discussion with infrastructure and service providers should be undertaken to collaboratively identify infrastructure deficits and requirements, and opportunities for addressing them. In doing so, local planning authorities should:

- Assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Policies should set out how identified deficiencies will be addressed; and
- Take account of strategic infrastructure, including nationally significant infrastructure, within these areas.

2.10 The PPG also provides that local authorities should ensure that the combined total impact of requests for developer contributions towards infrastructure, and development plan policies more generally, should not threaten the deliverability of the plan. With regards to CIL, the PPG (paragraph 001 Reference ID 25-001-20190901) states that:

The Community Infrastructure Levy (the 'levy') is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.

Levelling Up and Regeneration Act (2023)

2.11 The Levelling Up and Regeneration Act will strengthen infrastructure delivery, enabling a more strategic and unified approach to infrastructure planning and delivery and allowing planning authorities to plan for infrastructure that is required to support growth and demonstrate the deliverability of their plan.

Planning and Infrastructure Bill

2.12 According to the Guide the Planning and Infrastructure Bill, this piece of legislation is central to the government's plan to get Britain building again and deliver economic growth by speeding up and streamlining the delivery of new homes and critical infrastructure.

2.13 The Planning and Infrastructure Bill includes measures to speed up the delivery of 1.5 million homes and major infrastructure projects, reform the consenting process for Nationally Significant Infrastructure Projects (NSIPs), and proposes to introduce new tools for local planning authorities to help unlock growth.

Local and Regional Context

Oxford Cambridge Growth Corridor

2.14 Originally announced in January 2025, the delivery of the Oxford Cambridge Growth Corridor is predicted to boost the UK economy by up to £78 billion by 2035. More recently in October 2025, this has been supplemented by funding commitments to support key transformational infrastructure projects including the re-opening of the Cowley Branch Line to passenger services and the publication of an Investment Prospectus (October 2025).

Oxfordshire Infrastructure Strategy

2.15 Now in its third iteration, the production of the most recent version of this important strategy is well underway. With a focus on strategic infrastructure, it is anticipated that update to the Oxfordshire Infrastructure Strategy (OxIS) will once again provide useful support for infrastructure funding and delivery.

Oxfordshire County Council

2.16 Oxfordshire County Council is the upper-tier local authority covering Oxford City, Cherwell, South Oxfordshire, Vale of White Horse and West Oxfordshire districts. In this role the County Council is responsible for planning for minerals and waste, as

well as the delivery of education, transport, waste disposal, and community services such as social care and libraries.

2.17 The remaining infrastructure types included within the IDP are the responsibility of service providers and the City Council. The County Council produces a wide range of policy documents for each of its service areas.

Oxford Local Plan

2.18 Oxford City Council is producing a new Local Plan up to 2045. The Local Plan recognizes the importance of identifying and delivering appropriate infrastructure and community facilities to support the amount of development proposed.

2.19 In addition, the Local Plan acknowledges that the funding of infrastructure is crucial and must be delivered in a timely manner to support development. The Local Plan sets out that where development creates a need for new or improved infrastructure, contributions will be sought to make the development in planning terms.

Infrastructure Funding Statement

2.20 The Infrastructure Funding Statement (IFS) is a factual report which summarises the amount of developer contributions obtained, allocated and spent in the previous financial year.

2.21 This annual reporting requirement was introduced as part of the CIL regulations in 2019, with the objective of increasing transparency around how developer contributions are spent on infrastructure.

2.22 As required by the regulations, the contents of this report are divided into three key sections for the previous financial year:

- Information on CIL contributions
- Information on Section 106 Contributions
- Items of infrastructure that CIL is spent on in the next five years (according to the Council's Capital Programme at the end of the previous financial year).

2.23 The Oxford IFS is a live document and should be considered alongside the IDP and used for the Local Plan to inform future funding priorities. As an indication of key areas of expenditure.

2.24 The 2024/25 IFS noted that projects funded through a CIL contribution included:

- Blackbird Leys Regeneration;
- City-wide Cycling Improvements;
- East Oxford Community Centre;
- Oxford North Developer works.

2.25 In addition to this, 15% of CIL receipts can be passed directly to Parish Councils, or 25% in areas covered by a Neighbourhood Plan, to fund locally identified infrastructure. CIL contributions were provided for various organisations including:

- Blackbird Leys Parish Council
- Littlemore Parish Council
- Littlemore Parish Council
- Blackbird Leys Parish Council

3. Funding and Delivery

3.1 This IDP seeks to assess what infrastructure is required to meet growth identified in the Oxford Local Plan 2045, when these infrastructure interventions are required, and how much they will cost.

3.2 There are many sources of funding available for the provision of infrastructure. This section provides an overview of these funding sources to support the delivery of the required infrastructure to support the Plan.

Developer Contributions

3.3 Developer contributions assist in mitigating the impact of development, by providing funding or other non-monetary commitments (e.g., affordable housing provision) to make impacts acceptable in planning terms.

3.4 Developers may be asked to provide contributions for infrastructure in several ways. This may be through Community Infrastructure Levy (CIL) charges, Section 106 agreements with the local planning authority, and Section 278 agreements with the local highway authority for highway-related infrastructure works.

3.5 The previous Local Plan 2036 and its supporting IDP were prepared under the CIL (Amendment) Regulations 2014, which restricted the 'pooling' of separate Section 106 planning obligations. These restrictions meant that authorities were unable to combine more than five obligations to pay for a single piece of infrastructure.

3.6 This restriction was lifted as a result of the CIL (Amendment) Regulations 2019, meaning there is now more flexibility in terms of infrastructure which is able to be funded by Section 106 and CIL.

Community Infrastructure Levy

3.7 Oxford City Council is a Community Infrastructure Levy (CIL) Charging Authority. The Council's CIL Charging Schedule was adopted in 2013, since which time developers have been charged a fixed rate for each square metre (sqm) of new internal floor area that is created.

3.8 The CIL charging schedule is based upon studies of development viability within the city, with higher charges (£172.28 per sqm as of January 2025) for uses such as

residential and retail, and lower charges (£34.45 per sqm as of January 2025) for uses such as general industry and leisure.

3.9 In July 2025, the City Council formally adopted a revised CIL Charging Schedule, which came into force on 15 August 2025. The partial review focused on increasing CIL Rates for Office and R&D uses, which are now charged at the higher rate set out in the previous paragraph.

3.10 The City Council's Infrastructure Funding Statement (IFS) sets out the amount of CIL money process by the Council during each financial year. The 2024/25 IFS sets out that:

- £5.14million of CIL demand notices were issued to developers;
- £4.95million of CIL was received from developers; and
- £9.15million of CIL was spent during the year on projects including East Oxford Community Centre, Blackbird Leys Regeneration, Oxford North Developer works and City-Wide Cycling Improvements.

3.11 The IFS also sets out the schemes on which collected CIL monies will be spent – the Council currently holds just over £14.9 million of allocated CIL funding. This covers a wide range of infrastructure types including regeneration schemes and community facilities.

3.12 The Council allocates CIL to schemes on a case-by-case basis. This is done in response to business cases provided by infrastructure providers, an understanding of need, and the relative prioritisation given to each scheme. This update to the IDP provides important evidence to inform this case-by-case decision making.

Section 106 Contributions

Section 106 (S106) agreements can be made between developers and the Council to provide funding or infrastructure, or to make other legal commitments (e.g., affordable housing provision). Developer contributions are required to meet the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

3.13 The latest IFS sets out the amount of S106 money processed by the Council during the 2024/25 monitoring year:

- £351,089.94 of contributions were agreed with developers
- £856,701.04 of contributions were received from developers
- £1,046,290.11 of contributions were spent during the year
- 8 non-monetary contributions were also provided by developers through S106, including the provision of 201 affordable homes.

3.14 The City Council currently holds £13.94million of allocated S106 contributions. These will fund a wide variety of infrastructure types, including community facilities, highways/ transport and travel, green infrastructure and economic development. However, the majority of the unspent allocated contributions are for the provision of affordable housing.

Section 278 Agreements

3.15 Section 278 (S278) agreements can be made between developers and Oxfordshire County Council (as local highways authority) to make permanent alterations or improvements to a public highway, in connection with a planning approval.

3.16 The works covered by a S278 agreement could include changes to the highway to access a site (such as the provision of a new junction, traffic lights or other priority measures), as well as off-site works necessary to mitigate the impact of development (such as improvements to a nearby junction which will experience increased traffic flows).

3.17 A S278 agreement typically gives developers the authority to undertake works themselves (or for a contractor to do so on their behalf), with a requirement that works are completed to the satisfaction of the local highway authority. This means that all the costs associated with works under a S270 agreement are borne directly by the developer – money is not collected by the local authority.

Government Funding

3.18 It is typically expected that funding from developer contributions will not be enough to cover all the infrastructure costs for an area – particularly those which are not directly linked to the impacts of development. Funding from central government is therefore important in addressing funding gaps. These are typically competitive

processes, with funding bids required to demonstrate delivery against national objectives (such as increased rates of house-building or economic growth).

3.19 Government funding streams also tend to run as programmes and / or be awarded in rounds, meaning that the existence of a fund today cannot be taken that a fund will exist in the future.

3.20 Since 2014, OxLEP (now Enterprise Oxfordshire) has secured over £107.5m of investment to transform Oxfordshire businesses and communities through the government's Local Growth Fund. This had had a particular emphasis on infrastructure provision to support economic development. Specific schemes supported by the Local Growth Fund in Oxford include the Northway and Marston Flood Alleviation Scheme, the Centre for Technology and Innovation in Blackbird Leys, and Innovation laboratory space at the Wood Centre for Innovation.

3.21 Recent Government funding announcements include £120 million to re-open the Cowley Branch Line to passengers and create two new stations at Oxford Cowley and Oxford Littlemore.

Provision by Infrastructure Providers

3.22 Some infrastructure provision is made directly by infrastructure providers, as a result of external funding packages. This is particularly the case for utilities, where infrastructure providers develop investment packages for fixed periods of time (typically five years) in response to the levels of growth and pattern of demand changes that they expect. The costs associated with these are then agreed with the relevant industry regulator and reflected in bill payments by consumers.

3.23 Developers also pay connection charges to these providers, agreed between the two parties. They are known costs that should be factored in when considering the viability of development but are effectively third-party and the Council has no role in agreeing the charges nor seeking the money from developers.

Principles of cost apportionment

3.24 At present, according to the IFS, the City Council relies on CIL as the main source of developer funding for infrastructure. However, the City Council is able to supplement money collected through CIL with money collected through S106 for specific infrastructure schemes, where doing so would meet the tests set in

Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) - i.e., that the planning obligation is:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

4. Key Drivers of Change

4.1 There are a number of key drivers of change which will influence infrastructure planning within Oxford in the future and have therefore been important to consider throughout the preparation of the IDP. These key drivers of change have helped to frame discussions with stakeholders and inform many of the schemes set out in the Infrastructure Delivery Schedule.

Climate Change

4.2 The IDP must be considered within the context of the declaration of a climate emergency by Oxford City Council in January 2019, as well as the broader drive towards a zero carbon future to which Oxfordshire's local authorities, Enterprise Oxfordshire and the city's two universities are committed.

4.3 The Zero Carbon Oxfordshire Partnership (expanded from the Zero Carbon Oxford Partnership in March 2025) has an approved action plan to 2040 outlining the ways in which its wider targets can be achieved. The action plan also includes a set of immediate actions required before 2030 to remain on track. Net zero ambitions must inform decision making across all disciplines, which in turn, are likely to deliver subsequent co-benefits, such as achieving more inclusive growth, levelling up, and emphasising the importance of health and wellbeing.

4.4 While net zero targets must inform decision-making across all sectors, it is fundamental to the planning sector, with IDP's playing an important role in helping to ensure that new development meets these targets.

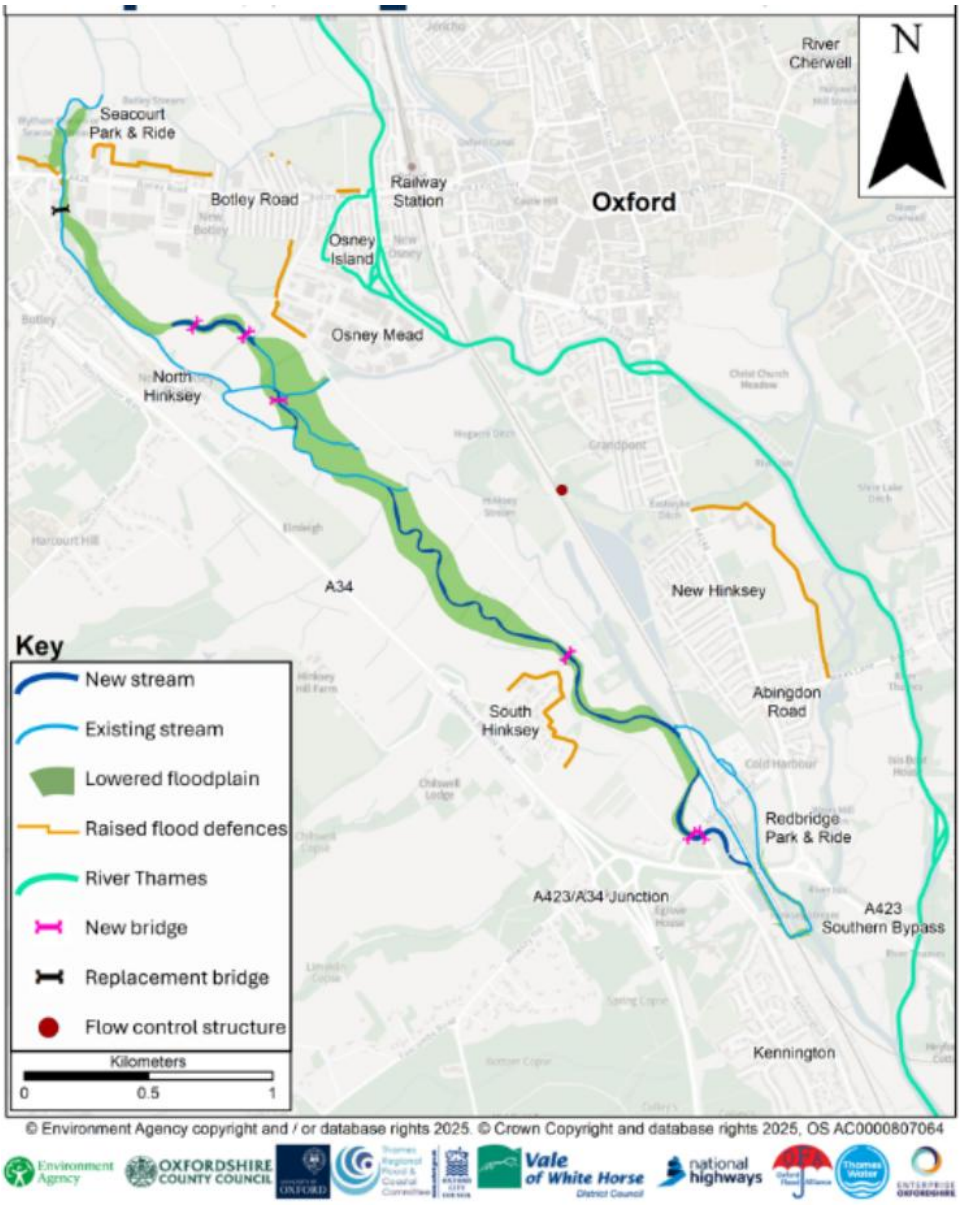
4.5 It is acknowledged that there will be an embedded carbon cost to many of the identified schemes included within the IDP. This includes all the CO2 emitted when producing the materials required to deliver infrastructure schemes, including emissions from construction, all the way through to the emissions produced at deconstruction and disposal at the end of the scheme's lifetime.

4.6 However, many of the identified schemes included within the Infrastructure Delivery Schedule will contribute to climate mitigation, and by delivering these schemes there is likely to be a reduction in carbon emissions compared to the 'do nothing' alternative. For example, without the delivery of sustainable and active travel networks, there is unlikely to be an reduction the amount of travel through

private cars – particularly in new developments. Where possible, the relative costs of carbon from different infrastructure approaches have been considered.

4.7 There is also a need to prioritise resilience to climate change within Oxford, particularly in terms of reducing the risk of flooding to existing properties. The Oxford Flood Alleviation Scheme (OFAS) is therefore an important scheme, the delivery of which, will contribute to climate change resilience. Figure 4.1 shows the proposed route (scheme design) for the OFAS scheme.

Figure 4.1 – Map of the scheme design for the Oxford Flood Alleviation Scheme



(Source: Environment Agency website)

4.8 According to the latest OFAS newsletter (November 2025) following on from the resolution to grant planning permission issued by Oxfordshire County Council's Planning and Regulation Committee in 2024 (subject to a satisfactory S106 Agreement), the Secretary of State approved the Compulsory Purchase Order (CPO) in May 2025. As no objections were received within the statutory six-week period for the CPO, the Environment Agency has been continuing to follow the processes required to implement it. The newsletter also sets out that the Environment Agency "anticipate that construction will start in late 2026". However, they acknowledge that all approvals will need to be secured (including finalising the planning permission).

Importance of Health and Well-being

4.9 Prioritising health and well-being is the second key driver of change that provides the context to the preparation of this IDP. Access to green spaces and spaces for physical activity plays a recognised role in relation to helping to address mental and physical health inequalities. Its availability also promotes and supports more healthy active lifestyles. As such, the provision of accessible outdoor green and recreational space, given the positive contribution they make to the health and well-being of is increasingly important.

4.10 Ensuring that key services and facilities are near to where people live and work also supports health and well-being as can encourage people to use active modes of travel, including walking and cycling, as opposed to relying on the private car for shorter journeys.

4.11 The importance of high-quality digital infrastructure provision within people's homes as well as their workplaces can support continued homeworking arrangements. The provision of high-quality digital infrastructure also has a role in maintaining reduced levels of travel demand for sectors where homeworking is supported. It can also enable digital ways of working for sectors including education, healthcare and business. As such, the rollout for 'full fibre' or 'fibre to the premises' should be prioritised, as identified in the Oxfordshire Digital Infrastructure Strategy.

4.12 It is worth noting that, at the time of writing, the Oxfordshire Digital Infrastructure Strategy is currently being updated, as such terminology, priorities or ambitions stated here may be revised or updated. Please refer to the most recent version of the Oxfordshire Digital Infrastructure Strategy for details.

5. Approach to Growth in Oxford

Oxford's spatial strategy

5.1 Growth in Oxford is constrained by a number of factors. Its historical and natural environment, in combination with issues such as flood risk, mean that many areas simply cannot be developed. The Local Plan 2045 recognises that growth should focus on making the best use of previously developed land. The strategy seeks to prioritise housing delivery across the city, while ensuring an appropriate range of uses can be delivered within the city and district centres to ensure their continued vibrancy and vitality.

5.2 While it can be shown that the city's employment land needs are being met through the modernisation and intensification of existing employment sites, Oxford continues to struggle to meet its identified housing need, which cannot all be accommodated within the city boundary. Accordingly, discussions are on-going with the districts.

5.3 The Local Plan 2042 sets out a number of key themes under which the wider spatial strategy and individual policies are set out:

- A healthy and inclusive city to live in
- A fair and prosperous city with a globally important role in learning, knowledge and innovation
- A green and biodiverse city that is resilient to climate change
- A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon
- A city that respects its heritage and fosters design of the highest quality
- A live-able city with strong communities and opportunities for all

5.4 The Local Plan sets out that in order to deliver each of these key elements, infrastructure needs to be funded and delivered in a timely manner to support development. This includes ensuring that roads, local services and facilities can cope with the increased demand resulting from the proposed growth. The Local Plan 2045 also sets out that where new development creates a need for new or improved infrastructure, contributions from developers will be sought to make the development acceptable in planning terms, as well as using CIL to ensure those

who benefit financially from a planning permission will pay towards the cost of funding the infrastructure needed to support that development.

Development sites within Oxford

5.5 This IDP considers the 53 proposed site allocations contained within the Local Plan 2045 Regulation 19 "Proposed Submission" Document. As a tightly constrained urban authority, the majority of the proposed site allocations are on previously developed land.

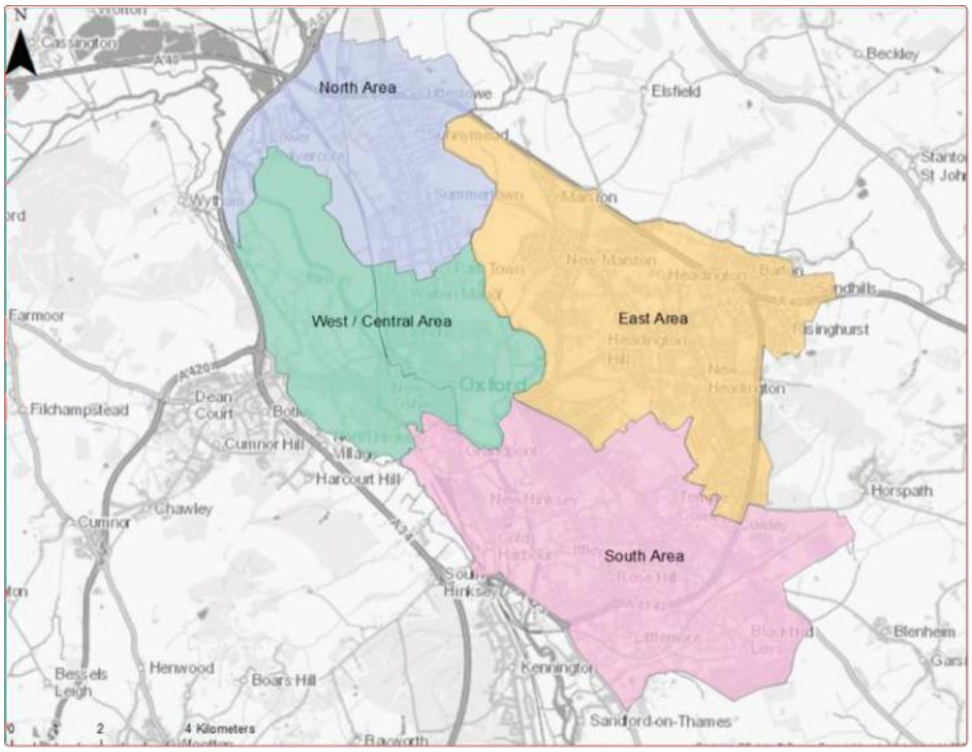
5.6 The distribution of growth across numerous smaller (i.e. non-strategic) sites can present a challenge for infrastructure planning, funding and delivery. Relying on numerous smaller sites often results in there being limited scope to provide on-site infrastructure. This can lead to a reliance on off-site solutions being required (often on third party land) in particular, for higher order infrastructure types which serve larger catchments (e.g., schools). It also means that, although smaller sites in isolation may generate much smaller infrastructure demands individually, the cumulative impact can be significant.

5.7 However, one advantage of the spatial strategy in infrastructure terms is that there is generally existing infrastructure provision in close proximity to development sites. This means that the emphasis is often the expansion of existing infrastructure, rather than on entirely new provision.

5.8 Both within the plan itself, and for the purposes of the IDP the city has been divided into four infrastructure areas (as shown in Figure 5.1). However, it is acknowledged that, due to the nature of development and its associated infrastructure needs (and delivery), it is difficult to draw "hard" boundaries. The four infrastructure areas are as follows:

- **North Area**: includes Summertown, Wolvercote, Cutteslowe and the *Northern Edge of Oxford Area of Focus*
- **South Area**: includes Grandpoint, Iffley, Florence Park and the *Cowley Branch Line and Littlemore Area of Focus*
- **East Area**: includes Marston, Headington, Barton and the *Marston Road and Old Road Area of Focus*
- **Central and West Area:** includes the city centre, Jericho and Osney Mead and also contains the *North of the City Centre Area of Focus* and the *West End and Botley Road Area of Focus*

Figure 5.1 Oxford's infrastructure areas



5.9 The Local Plan 2045 does not propose new employment site allocations, instead it relies on the city's existing network of employment sites to deliver new employment generating uses through an approach of modernisation and intensification. The plan seeks to protect Oxford's larger Key Employment Sites, which support the national and local economy, while introducing a more flexible approach in the city and district centres to support a range of appropriate uses.

Unmet housing need sites beyond the city boundary

5.10 The evidence base for the Oxford Local Plan 2045 demonstrates that Oxford is unable to meet housing need using the Government's Standard Method (NPPF, December 2024). As such, discussions have been taking place with the neighbouring district councils to see whether it would be possible to accommodate any unmet need in beyond what was previously agreed as part of the previous round of Local Plans. The Duty to Co-operate Statement sets out the formal position for all parties.

6. Approach and Methodology

6.1 The approach and methodology for this IDP builds on previous work, including that undertaken by Arup (published in 2022). As set out previously, the IDP is a 'live' document, which means that each iteration provides an opportunity to revisit and re-establish communications and discussions with key stakeholders. Each iteration also provides an opportunity to re-visit the Infrastructure Delivery Schedule to ensure that it contains the most up-to-date information relating to infrastructure requirements, including costs and delivery timescales for each project.

Research and Engagement

6.2 In addition to the consultation as part of the formal plan-making stages, a dialogue is maintained with key stakeholders to discuss infrastructure needs arising from planned development in Oxford. Table 6.1 below shows a broad range of stakeholders involved in infrastructure planning in Oxford and sets out their related infrastructure functions.

Table 6.1 Infrastructure providers involved in infrastructure planning in Oxford

Stakeholder	**Infrastructure Functions**
Oxfordshire County Council	Active Travel || Bus Services || Highways Rail Services Primary Education || Secondary Education Special Educational Needs Provision Social Care Provision Libraries Fire and Rescue Digital Infrastructure
Oxford City Council	Green Spaces || Playing pitches Community Centres || Leisure Centres Cemeteries
Highways England	Highways - Strategic Road Network (SRN)
Buckinghamshire Oxfordshire and Berkshire West Integrated Care Board (BOB ICB)	Primary Healthcare
Thame Valley Police	Policing
Scottish Southern Electricity (SSE)	Electricity Supply
Scotia Gas Networks (SGN)	Gas Supply
Thames Water	Water supply || Wastewater Treatment

Producing the Infrastructure Delivery Schedule

6.3 The Infrastructure Delivery Schedule is based on the most recent conversations with stakeholders. As the IDP is a 'live' document, the starting point for the current Infrastructure Delivery Schedule is the most recent previous iteration.

6.4 Regular ongoing discussions have taken place with members of the planning policy team and key relevant stakeholders, including those listed above, in order to refine the list. Chapter 8 sets out the details of the information included in the Delivery Schedule, the definitions used and the basis on which these were established.

Establishing demand

6.5 Most infrastructure providers are usually able to indicate what infrastructure will be required to support development. However, there are a small number of infrastructure types for which this is not possible (e.g., primary healthcare – see paragraph 7.27 and Appendix 1 for further details).

- **Primary healthcare:** see paragraph 7.27 and Appendix 1 for further details
- **Green infrastructure:** Chapter 4 of the Local Plan 2045 establishes a network of green infrastructure across Oxford. It sets out requirements for this network to be protected from development, and for new development to contribute to its enhancement. This reflects the large expanse of the city's green infrastructure network and means that ratio-based approaches to establishing green space requirements (i.e., a certain amount of space based upon the number of residents in an area) would be inappropriate. However, Policy G2 in the Local Plan 2045 does require 10% of new residential sites over 1.5ha to be delivered as new public open space.

Establishing Infrastructure Costs

6.6 The IDP usually uses the experience of infrastructure providers to establish the costs of each infrastructure item set out in the Infrastructure Delivery Schedule.

6.7 However, for some schemes it has not been possible to estimate a cost, either due to a lack of detail about the scheme at the present time, or because costs have not yet been formulated by the delivery body. In all cases, the costs set out in the infrastructure delivery schedule should be treated as indicative, with more detailed re-calculation being necessary at the time development comes forward, or as funding applications are made.

7. Conclusions by Infrastructure Theme

7.1 This chapter sets out conclusions for each of the infrastructure types considered throughout the preparation of the IDP. Under each theme, the following are set out:

- The pattern of existing provision for that infrastructure type, including any challenges and capacity issues that have emerged through the discussions undertaken with infrastructure providers
- A summary of the schemes set out within the Infrastructure Delivery Schedule (Chapter 9) which have been identified to address the impacts of the growth planned within the Local Plan 2045 or are otherwise required to address wider pressures.

Transport

7.2 This section considers all modes of transport provision within the city. Transport infrastructure is likely to be used by most residents (and visitors to the city) on a daily basis.

7.3 The provision of transport infrastructure, particularly that which supports the transition to zero carbon, therefore has a crucial impact on how the city operates – on the environment, on the economy, and on quality of life. The following infrastructure types are considered:

Existing Provision

Active Travel

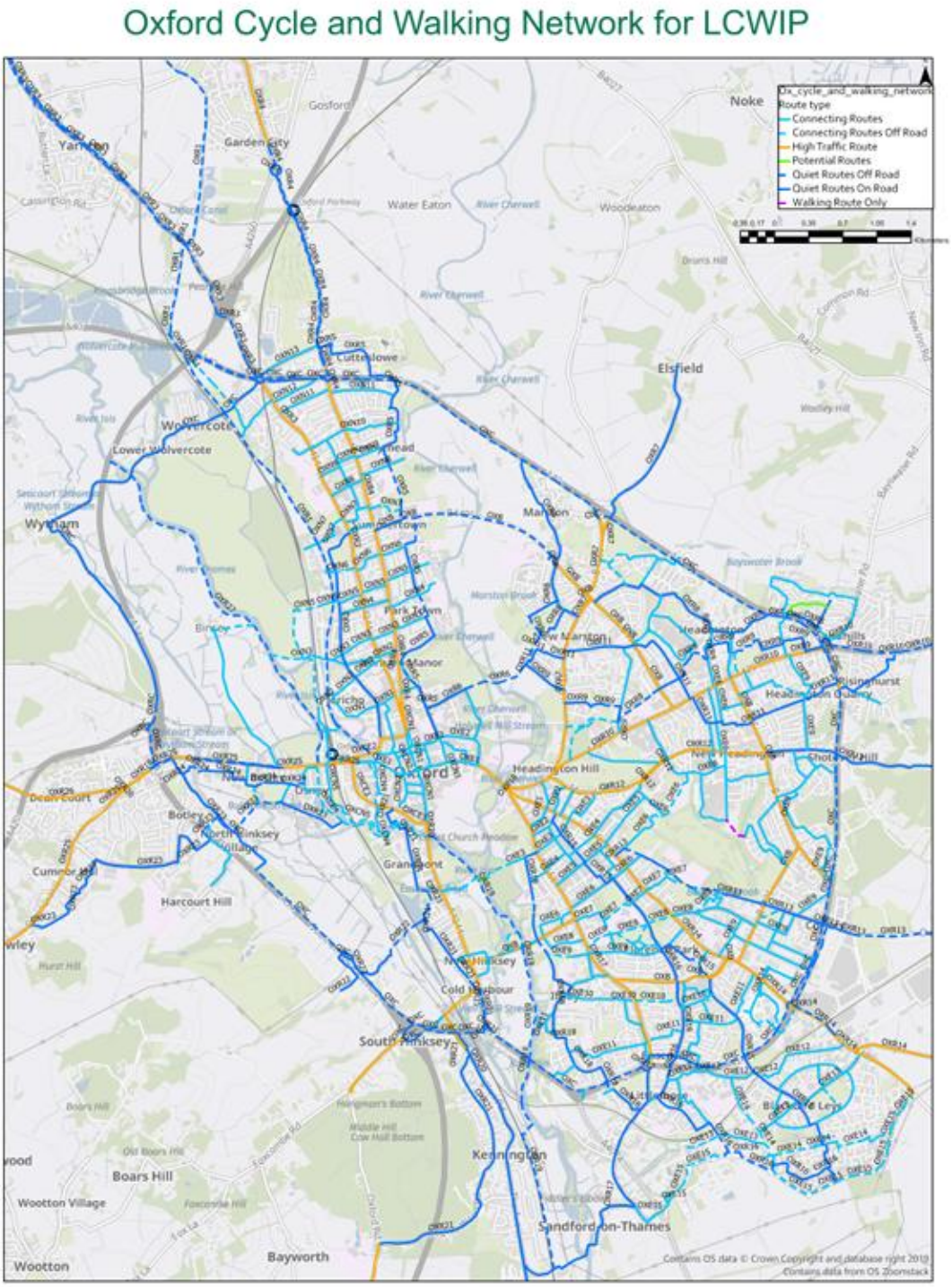
7.4 According to the Department for Transport Official Statistics Oxford has a very high rate of cycling – 35.1% of residents cycle at least once a week, compared to an average of 10% for England as a whole. Oxford's cycling rates are surpassed only by Cambridge at a national level.

7.5 The Local Cycling and Walking Infrastructure Plan (LCWIP) for Oxford (was approved by the County Council's Cabinet in March 2020). The LCWIP for Oxford sets out a series of measures and programmes to achieve a transformational change in the levels of cycling and the attractiveness of walking in Oxford.

7.6 Figure 7.1 on the following page shows a map of the LCWIP for Oxford. It shows a large number of low and zero traffic 'quiet routes', for example along the River

Thames corridor. However, the more direct active travel routes to and from the city centre are on street in mixed traffic.

Figure 7.1 – Oxford's Local Cycling and Walking Infrastructure Plan network



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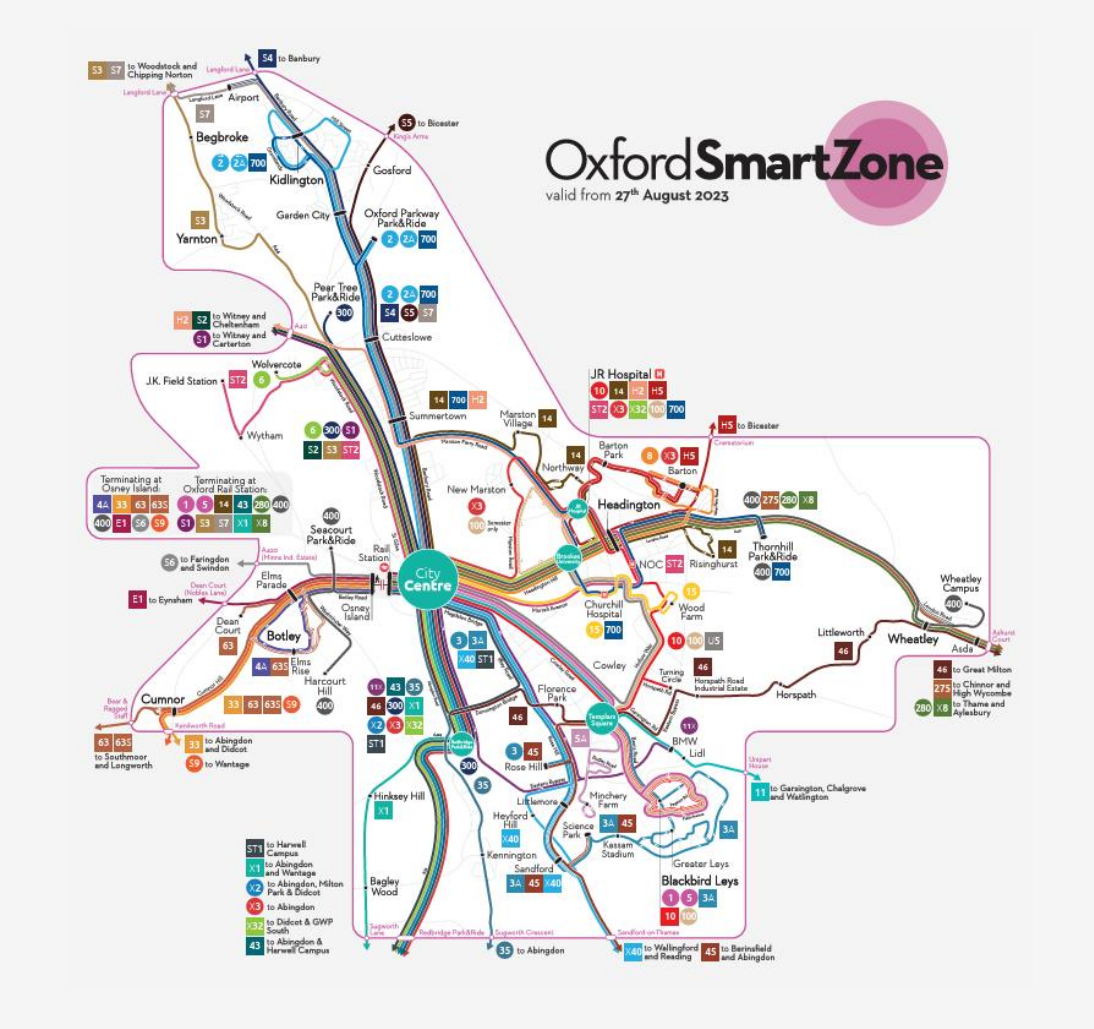
7.7 According to the Active Travel page County Council website LCWIPS will assist local authorities to:

- identify cycling and walking infrastructure improvements for future investment in the short, medium and long term
- ensure that consideration is given to cycling and walking within local planning and transport policies and strategies
- make a case for future funding for walking and cycling infrastructure.

Bus services

Figure 7.2 Bus services (all operators) within Oxford and adjacent neighbouring authorities



Source: www.oxfordbus.co.uk/services (2023)

7.8 Oxford benefits from a comprehensive network of bus services. Figure 7.2 shows that these primarily serve the arterial routes into and out from the city centre. In

fact, many of the routes multiple overlapping services into the city centre, with high combined service frequencies which generally operate on a 'turn-up-and-go' basis without the need to first check a timetable. More recently, the introduction of bus services There are a smaller number of circumferential services between North Oxford, East Oxford and South Oxford; providing access to major destinations such as the JR Hospital without the need to pass through the city centre.

7.9 Oxford is also served by a comprehensive network of park and ride sites on the edge of the city adjacent to the strategic road network, providing car drivers with viable alternatives to driving into the city centre. These can suffer from capacity constraints at peak times. Oxford's bus services are mostly provided by two operators – the Oxford Bus Company and Stagecoach. SmartZone inter-operator tickets are available, providing passengers with flexibility to catch any bus rather than having to wait for those of a specific operator. More recently, new bus routes including "Service 600" was launched (February 2025) which links the Redbridge and Thornhill park and ride sites, taking passengers via the Science Park, Cowley Centre, and the four main hospital sites, while avoiding the city centre.

Rail Services

7.10 There is currently one railway station within Oxford, located at the western edge of the city centre. This provides five main services, with direct connections to a large part of the UK:

- GWR services to Didcot, Reading and London Paddington.
- GWR services via the Cotswold Line to Worcester.
- GWR local stopping services to Banbury.
- CrossCountry services north to Banbury, Birmingham and Manchester; and s outh to Southampton and Bournemouth.
- Chiltern Railways services to Bicester, High Wycombe and London Marylebone.

7.11 Both the railway station and railway line through Oxford are significantly constrained and according to Network Rail the rail infrastructure in the Oxford Station area is near capacity, with limited flexibility in the event of delays and disruption.

7.12 At the time of writing work is underway to deliver a new "Western Station Entrance" for Oxford Station which includes expanding the rail infrastructure in the area such

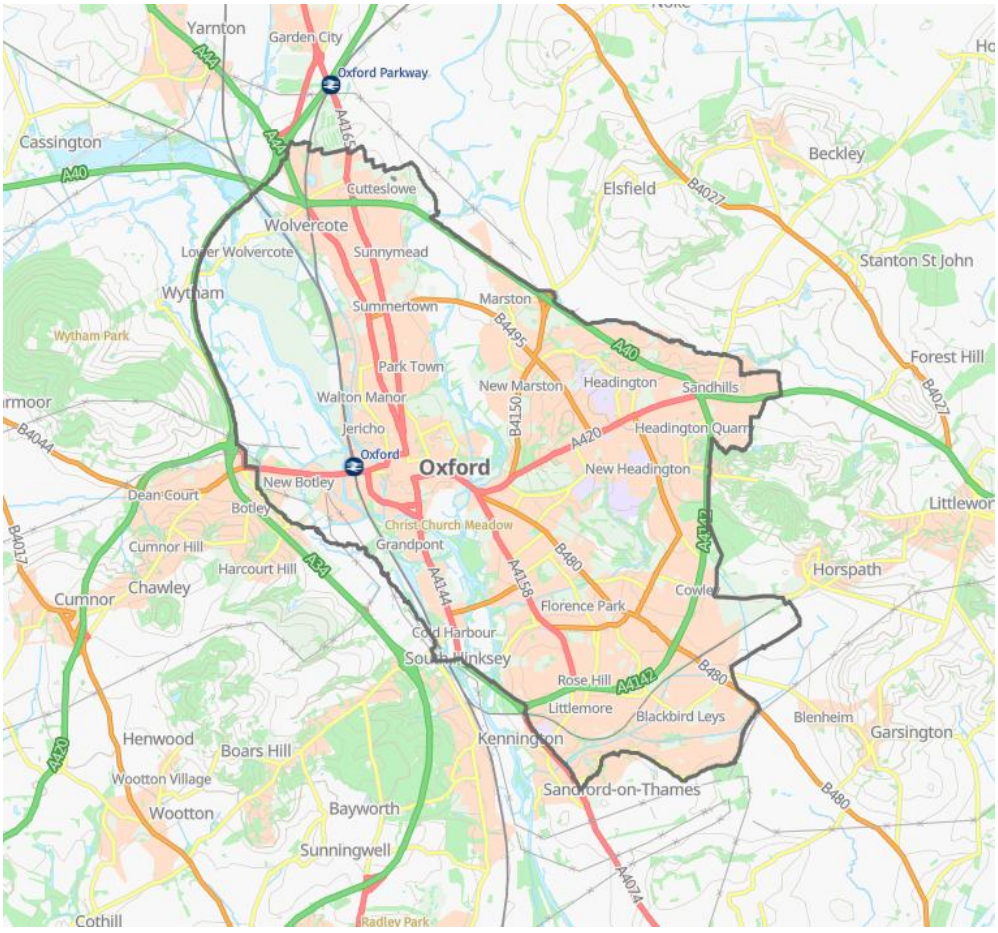
as delivering a new platform and providing additional capacity to delivery East West Rail services.

7.13 North Oxford is also served by Oxford Parkway Station, a short distance from the city's northern boundary within Cherwell District. This provides services on the Chiltern Railways route to London Marylebone.

Highways

7.14 Figure 7.3 shows Oxford's highways network. It has a clear pattern of arterial routes out from the city centre, with a relatively limited range of radial routes. The arterial routes connect to with the ring road which is partly within and partly outside the city boundary.

Figure 7.3 – Map showing the highway network in and around Oxford



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7.15 Despite high levels of active travel provision within the city and range of high-quality bus services, Oxford still suffers from vehicular congestion and its associated air quality impacts. This partly reflects the historic nature of much of the city, with

many streets physically incapable of handling larger amounts of traffic. This has resulted in the need to restrict through traffic from much of the city centre. Other traffic restrictions include Low Traffic Neighbourhoods (LTNs), and more recently (October 2025), the County Council introduced a "congestion charge" for Oxford applied on certain key routes around the city.

7.16 Part of the Strategic Road Network (SRN) also runs along the city's north-western boundary (A34). Both the A34, and the Oxford Ring Road need to accommodate long-distance vehicular flows as well as supporting local traffic, which can lead to congestion issues.

Schemes to address growth and other needs

7.17 The majority of schemes in the Infrastructure Delivery Schedule are transport schemes, and the majority of these are active travel schemes. The Oxford Local Cycling and Walking Infrastructure Plan (LCWIP) provides a comprehensive set of schemes to improve the active travel network around the city and provide connections to new development sites, with a mixture of on-street and off- street routes. Other notable schemes are the County Council's "Core Schemes" made up of several inter-related schemes including, Traffic Filters, the Workplace Parking Levy and the Zero Emission Zone.

7.18 A cluster of schemes are also included which will improve rail connectivity for Oxford (and the wider rail network). The County Council's recently published Rail Plan for Oxfordshire: OxRail 2040 sets out the scale of transformation required at Oxford Station and supports proposed new stations (including two new stations to support the recently announced Government funding commitment (£120m) to re-open the Cowley Branch Line to passenger services). The re-opening of the Cowley Branch Line to passenger services would enable faster journey times across the city and, in-combination with other rail-related measures (including East-West Rail), would facilitate improved connectivity with the rest of the country.

7.19 East West Rail is nationally important infrastructure project and forms a central part of the government's plans for growth supporting new homes and providing well-connected, sustainable communities across the Oxford-Cambridge corridor. The Secretary of State for Transport issued updated safeguarding directions for the land required for the proposed East West Rail project (part of which lies within the Oxford city boundary).

7.20 The implementation of Neighbourhood Plans in the city can provide opportunities to help address local infrastructure needs. For instance, the Headington Neighbourhood Forum (alongside Headington Action), has produced an Improvement Plan for the Headington's centre. This report suggests a number of potential infrastructure improvements in and around Headington district centre, including transport and public realm improvements.

7.21 Most highway schemes identified in the Infrastructure Delivery Schedule are focused on decarbonisation and reducing the environmental impacts from road traffic. For example, the provision of electric vehicle charging infrastructure and the delivery of the County Council's "Core Schemes" which include the creation of a zero emission zone within the city centre. Other than providing connections to a handful of development sites, there are very few highway schemes with a focus on improving access and reducing journey times for motorists.

Education

7.22 This section considers the full spectrum of education provision within Oxford. The provision of high- quality education infrastructure has a huge role to play in the social fabric of the city, and its location has important interactions with transport given the need to ensure sustainable patterns of movement for education. The following infrastructure types are considered:

Existing Provision

Primary Schools

7.23 There are 32 primary schools in the city, which are generally well distributed. From previous discussions with Oxfordshire County as local education authority, it is understood that the provision of new schools has typically kept up with rates of development in recent decades. Given changing demographics within the city, there is now some spare capacity within a number of the city's primary schools.

Secondary Education

7.24 There are 6 secondary schools around the city in total, again broadly evenly distributed. While no secondary schools are located within the Central and West Infrastructure Area, pupils living in the West Oxford are within a relatively short commute to Matthew Arnold School on Cumnor Hill (Vale of White Horse District). While pupils living in the city centre can access schools in other parts of the city by sustainable modes of travel. As with primary schools, it is understood from previous

discussions with Oxfordshire County Council that there is a spare capacity within the city's secondary schools.

Special Educational Needs Provision

7.25 Oxford has six schools providing special educational needs and disability (SEND) provision. Each of these schools provides specialised provision, reflecting that SEND is generally provided on a county-wide basis. This means that the city's SEND schools serve a wide catchment, with some pupils from Oxford travelling out of the city to schools elsewhere. Oxfordshire County Council has indicated that there are new SEND schools being provided elsewhere in the county at present, with no significant need for new SEND provision within Oxford at the current time.

Schemes to address growth and other needs

7.26 The Infrastructure Delivery Schedule contains two education schemes – both relatively minor (0.5 Form of Entry, equivalent to 105 new pupils) extensions to existing primary schools. The first, at Wolvercote Primary School, would serve growth across North Oxford; with an extension to the new Barton Park Primary School (passive provision for this extension was included as part of the new school's initial construction) serving growth across East Oxford.

Healthcare

7.27 This section considers healthcare provision within Oxford. The provision of the right healthcare infrastructure is crucial to wellbeing and quality of life. The following infrastructure types are considered:

Existing Provision

Primary Healthcare

7.28 According to BOB ICB there are six Primary Care Networks (PCNs) serving Oxford which cover 26 GP practices. Together they serve a registered patient population of 240,000 (July 2025). There is generally a good distribution of GP practices across the city, with some surgeries are clustered together (e.g., around Beaumont St in the city centre and around the John Radcliffe Hospital). From previous discussions with BOB ICB, some GP practices in Oxford are experiencing capacity constraints. These include where smaller existing practices are located in former residential dwellings, in some cases expansion of these property types would be either inappropriate or is simply not possible. Appendix 1 provides additional information regarding primary healthcare including sources of funding and challenges to delivery.

Secondary Healthcare

7.29 Oxford has three main hospitals – the John Radcliffe Hospital providing general care, the Churchill Hospital providing cancer treatment and other specialist care, and the Nuffield Orthopaedic Centre. Additionally, the Warneford Hospitalprovides mental health care (alongside Littlemore Mental Health Centre) while the Manor Hospital provides private care.

7.30 Five of the hospitals are located in relatively close proximity (in and around the Headington area). Together they represent a significant secondary healthcare cluster that serves a wider regional catchment as well as Oxford and Oxfordshire.

7.31 The Oxford University Hospitals Trust was given an *Overall: Requires improvement* rating by the Care Quality Commission (2019) this rating related to the specific condition of operating theatres which have since been addressed. The City Council maintains an on-going dialogue with the main secondary healthcare providers as part of the plan-making process. The Local Plan 2045 includes specific site allocation policies for hospitals within the Oxford University Hospitals and Oxford Health NHS Foundation Trusts.

Social care provision

7.32 The published evidence base for the Regulation 18 Local Plan consultation that took place in Summer 2025 included "Updated Specialist Housing Needs Evidence", which has been subsequently updated to support the Reg. 19 version of the plan. This evidence considered the current situation and demographic profile of the city and established levels of need for specialist housing for the plan-period based on the Government's Standard Method (NPPF, Dec 2024). This shows a need for both sheltered/ retirement housing and extra care housing. However, due the relatively small size of the majority housing allocations in the city, there is limited scope to specifically allocate sites for these purposes. The City Council continues to work with the County Council to secure appropriate opportunities should they arise.

Schemes to address growth and other needs

7.33 The Infrastructure Delivery Schedule includes one healthcare scheme. This is a proposal for a new health surgery in Summertown, North Oxford (BOB ICB's preferred option being for it to be within the Diamond Place redevelopment), allowing the merger and replacement of the existing Banbury Road Surgery and Summertown Surgery. This scheme has the potential to accommodate new patients

from development elsewhere in North Oxford. The BOB ICB has indicated its desire for this scheme to also allow a merger with the existing Wolvercote Surgery.

7.34 Development was completed in 2022 for Northgate within the City Centre, which provided a new surgery allowing the merger of several existing surgeries all located in the city centre. However, it is understood that this does not cater for additional new patient demand.

Green Infrastructure

7.35 This section considers all forms of green infrastructure provision within Oxford. Green infrastructure provides an important amenity for the city and is as important to plan for as what might traditionally be thought of as 'grey' infrastructure, such as utilities. It is likely to be enjoyed on a frequent basis by most residents and visitors – if not to physically use, as a backdrop and visual amenity that frames the city's unique sense of place.

7.36 Green infrastructure also plays a vital role supporting the physical and mental wellbeing of residents. It is key to helping ensure resilience to future climate change impacts. The following infrastructure types are considered:

Existing provision

7.37 Oxford benefits from a diverse array of green spaces including:

- Wide, open flood plain meadows such as those found along the river corridors that help to define the city's unique character;
- Large formal parks such as University Parks and South Park; and
- Smaller amenity green spaces around the city.

Green spaces

7.38 Many green spaces benefit from local, national and even international ecological designations that recognise their biodiversity value. Collectively, these sites serve as a key component of the wider ecological network

7.39 To support the production of the Local Plan, a Green Infrastructure (GI) Study was produced, which includes an audit of existing greenspaces as well as providing indicative costs for the creation and on-going maintenance of greenspaces such as allotments, parks and play-spaces.

7.40 The GI Study sets out a series of recommendations and provides an evidence-based approach for the categorisation of the city's GI network. It recommends that the city's existing GI network should be protected, enhanced (where needed) and recognises the importance of delivering new greenspaces, particularly as part of redevelopment proposals on larger development sites.

Playing Pitches

7.41 Oxford has a wide range of playing pitch provision across all parts of the city. However, not all playing pitches are publicly accessible – many are school playing fields or belong to one of the two Universities or the Oxford colleges. The City Council published a Oxford's Playing Pitch Strategy in 2022, which found that there is currently a shortage of playing pitch provision. However, the strategy does not suggest that additional new pitches are required to meet the shortfall. Instead, it suggests that once those unsecured pitches that have community use are added back in, and sites that are interested in starting to offer community use are considered, as well when planned third generation artificial pitch (3G) developments are included that there appears to be adequate provision for all sports.

Allotments

7.42 Oxford has a good range of allotment sites and sizes spread throughout the city, although it is noted that there are relatively fewer sites in North Oxford. It is understood that the Oxford & District Federation of Allotment Associations has a waiting list, suggesting that there is an undersupply of allotments at the present time, as well as many existing allotments requiring improvement.

Schemes to address other needs

7.43 The Infrastructure Delivery Schedule includes seven green infrastructure schemes. These primarily relate to specific short-term public realm and biodiversity enhancement schemes – some of these would address existing needs, whilst others would serve new development sites in the vicinity.

Community Facilities

7.44 This section considers all forms of community facility provision within Oxford. Community facilities form the backdrop to some of the most important events in our lives – they are places to gather, share ideas, relax, keep fit, learn and much more. Community facilities provide for many of our human needs, and contribute to

quality of life, through reducing loneliness, improvements in mental health and the building of social cohesiveness. The following infrastructure types are considered:

Existing Provision

Community Centres

7.45 Oxford has a large number of community centres that spread across the city. However, the majority of community centres are located within the South and East Infrastructure areas.

Leisure centres

7.46 Oxford has four indoor leisure centres providing a general range of sports and leisure facilities, in addition to two more specialist facilities – the Oxford Ice Rink in the City Centre, and Hinksey Outdoor Pool in South Oxford. These are considered to offer a relatively good coverage of provision, well located relative to growth locations. Some facilities are in need of refurbishment, while others have had projects completed fairly recently. For instance, in 2023, a state-of-the-art heat pump was installed to help heat Hinksey Outdoor Pool and reduce its carbon footprint. The pump extracts heat from the nearby Hinksey Lake and provides up to 79% of the pool's heating needs.

Libraries

7.47 Oxford has eight libraries, spread across all parts of the city. Even though the services offered have changed in response to demand in recent years, they are not generally considered to be constrained. However, a need for improvements at some libraries exists, and these are reflected in the Infrastructure Delivery Schedule.

Cemeteries

7.48 Oxford has four cemeteries – Botley Cemetery (Central and West Oxford), Headington Cemetery (East Oxford), Rose Hill Cemetery (South Oxford) and Wolvercote Cemetery (North Oxford). In addition, Oxford Crematorium is located close to Headington, within South Oxfordshire District.

Policing

7.49 Oxford has two police stations – St Aldates Police Station in the City Centre, and Cowley Police Station in the South Infrastructure Area. From previous discussions with Thames Valley Police, it is understood that these provide sufficient coverage for current policing requirements. However, the policing estate is kept under

regular review, and future development in Oxford brings with it the potential to increase pressure on the existing police infrastructure.

Fire and Rescue

7.50 Oxford has two fire stations – Rewley Road Fire Station in the City Centre, and Slade Park Fire Station in the East Infrastructure Area. From previous discussions with Oxfordshire Fire and Rescue Service and the County Council, these provide sufficient coverage for current fire and rescue requirements. Oxfordshire Council has indicated that the fire and rescue estate is kept under regular review, and that new development within the city has the potential to require new capital spend on fire and rescue. However, Oxfordshire County Council has not identified any specific requirements.

Schemes to address growth and other needs

7.51 The Infrastructure Delivery Schedule includes seven schemes for community facilities, across all community facility types (except policing and, fire and rescue). Six of these relate to the refurbishment or expansion of existing facilities, with only one being directly related to planned growth – a new community centre for the Barton Park development. This reflects the nature of the development planned in the city, which is generally set within and around existing communities. This provides an opportunity to fund and support the viability of valued facilities that already exist.

7.52 The need for capacity increases at existing cemeteries within Oxford is planned to be met at the Shotover Cemetery. In September 2024 Oxford City Council Cabinet allocated £2.4m to deliver a 17 acre “Burial Meadow” including new public green space on City Council owned land located in South Oxfordshire. The site is large enough to accommodate around 45 years of burials.

Utilities

7.53 This section considers all forms of utility provision within Oxford. Utilities infrastructure is essential to the effective day-to-day functioning of our homes, workplaces, leisure facilities and open spaces. The following infrastructure types are considered:

Existing provision

Electricity Supply

7.54 In June 2025, Scottish and Southern Energy (SSE) published their Cowley Grid Supply Point - Strategic Development Plan. The Cowley Grid Supply Point (GSP) (located with Sough Oxfordshire) serves a large area including Oxford. In fact, the majority of Oxfordshire is served by this GSP as well as parts of neighbouring counties including Buckinghamshire.

7.55 The Strategic Development Plan for Cowley GSP is driven by new planned homes and jobs as well as being required to support the transition to net zero. It includes a number of recommendations including immediate actions and longer-term options to address known network capacity issues. Where network specific reinforcements are required to address capacity issues in Oxford, these have been listed in the Infrastructure Schedule.

Gas Supply

7.56 From previous discussions with Scotia Gas Networks (SGN) it is understood that the city's gas supply network generally has capacity for the levels of development proposed in the city. This position would need to be confirmed at the point developers make connection requests to SGN (as capacity could continue to be consumed in the meantime), but this would be a matter between SGN and developers.

Water Supply and Wastewater

7.57 Following the agreement of planned upgrades to the Oxford Wastewater Treatment Works (WWTW), Thames Water are now progressing the planned upgrades in several phases. These phased upgrades will ensure that the Oxford WWTW has capacity for planned development up to 2041. After which, additional upgrades will be needed to ensure that the Oxford WWTW is able to accommodate the level of growth proposed after 2041. It is worth noting that the Oxford WWTW is located just outside the city boundary within South Oxfordshire. However, should rates of house-building increase in the area serving the Oxford WWTW (in line with national Government ambitions to deliver 1.5million homes), this could result in

Flood Risk Mitigation

7.58 Oxford lies at the confluence of two Rivers – the River Thames and the River Cherwell and parts of the city are prone to flooding, including the flood plain meadows either side of the rivers as well as within the parts of the existing built-up area. Climate change is increasing the risk of flooding with more frequent and severe flood events becoming more likely in the future. A Flood Alleviation Scheme

for Oxford has been developed and is being progressed through the planning system. However, delays to the scheme have resulted in increases to the originally estimated costs. Scheme costs have therefore been aligned within the most recent cost estimates from the Environment Agency.

Digital infrastructure

7.59 While the majority of properties in Oxford (99.3%) have superfast broadband and more than 90% are capable of receiving ultrafast broadband, some parts of city (including the city centre) have poor mobile network coverage. The likelihood of additional digital infrastructure schemes may also increase as technology changes. The Local Plan 2045 contains a specific policy about digital infrastructure.

Schemes to address growth and other needs

7.60 The Infrastructure Delivery Schedule contains fifteen utilities schemes, the majority of which relate to reinforcements of city electricity network to meet current and future demand. Two schemes are attributed to the Oxford Wastewater Treatment Works Upgrade. This is because the first scheme addresses wastewater capacity arising from planned development to 2041, whereas plan-period extends to 2045. As such a second scheme will be needed to address wastewater capacity arising post-2041. The Oxford Flood Alleviation Scheme (OFAS) is also included.

7.61 Two scheme relates to digital infrastructure – the progressive countywide rollout of full fibre broadband to commercial buildings and a scheme relating to improvements to the mobile network in Oxford. The first programme is a tactical approach by Oxfordshire County Council, as it paves the way for commercial providers to then extend fibre connectivity to nearby residential properties at their own expense, while the second is to address mobile connectivity issues experienced in Oxford.

8. Infrastructure Delivery Schedule

Schemes included in the Infrastructure Delivery Schedule

8.1 The Infrastructure Delivery Schedule sets out the details of each specific infrastructure scheme currently anticipated within Oxford over the plan period to 2045. These schemes have been identified through:

- Existing schemes already identified in the previous iterations of the IDP, which have not yet been provided, and continue to be needed.
- Engagement with infrastructure providers during the plan-making process.
- The identification of desired interventions and corporate priorities by Oxford City Council, where linked to growth or the need to address existing infrastructure deficits.

8.2 As Chapter 7 indicates, there is a need for new or improved infrastructure across most infrastructure types and themes. However, there are a number of infrastructure types where the IDP has identified a need, but stakeholder discussions have indicated that further evidence is required before specific schemes to meet that need can be identified. For example, whilst there is known to be a need for new GP surgery provision, further work needs to be undertaken by the BOB ICB to establish where and how that need can be met. The Infrastructure Delivery Schedule therefore does not include specific schemes for these infrastructure types, although they should be included in future iterations of the IDP once schemes are identified.

8.3 In total, the Infrastructure Schedule includes 101 separate schemes. Around two-thirds of these are transport schemes, with the remainder covering the other infrastructure themes considered in the IDP. The total combined value of schemes for which it is possible to estimate a cost is some £1.12 billion (excluding Oxford Railway Station, East West Rail, and the various electricity network reinforcements). This is a significant amount, many times more than the levels of funding currently collected through developer contributions by the Council (see Chapter 3). This means that an infrastructure funding gap exists and highlights the importance of partnership working and external funding sources in infrastructure delivery.

Structure of the Infrastructure Schedule

8.4 The Infrastructure Delivery Schedule is set out in the same order as the headings for each infrastructure theme within Chapter 7. It provides consistent information for each infrastructure scheme, across the following columns:

- **Reference** – For ease of reference, each scheme has been given a unique reference number.
- **Infrastructure type** – The infrastructure type under which the scheme sits. Some are cross- cutting across several different infrastructure types.
- **Scheme** – Summary details of the specific scheme; setting out its name, location and what it would achieve.
- **Prioritisation** – To support future investment and funding decisions, schemes have been assigned a recommended priority level based on our assessment of their relative significance (see paragraphs 8.5-8.6 below for further details). It should be noted that the infrastructure priority assigned to individual schemes may not necessarily reflect political and infrastructure provider views. Instead, these are intended to be a practical and pragmatic basis upon which the Council can make decisions when faced with the need to balance competing priorities. The prioritisation should not be interpreted as indicating that lower priority schemes are not necessary to make development acceptable in planning terms, and developers will still be expected to deliver all identified infrastructure needs as far as is viable (See Chapter 3 for more details).
- **Cost –** The current best estimate of cost for each scheme, based upon the most recent published costs provided by infrastructure providers. These are generally subject to indexation (to adjust for inflation and other influences) over time. Actual costs should therefore be treated as indicative, with more detailed re-calculation being necessary at the time development comes forward. For some schemes it is not currently possible to estimate a cost (with that being noted where relevant) – either due to a lack of detail about the scheme at this stage or because costs have not yet been formulated by the delivery body.
- **Confirmed Funding –** The amount and source of funding already confirmed as in place for schemes, where relevant. For schemes where this column is blank, the scheme would need to be funded in accordance with the principles set out in Chapter 3.
- **Delivery Body –** The infrastructure provider and/or public body with responsibility for the delivery of the scheme. Responsibility may be shared between several delivery bodies, with this indicated where appropriate.
- **Delivery phasing –** The broad timescales within the plan period where it is expected that the scheme will be delivered, based upon the time needed to fund and develop the scheme. Where relevant, this also reflects the pace of development in the vicinity which results in the need for the scheme.

- **District area –** The area of the city where the scheme will be located (see paragraph 8.8 below for further details)
- **Source –** The means by which the scheme and the need for it have been identified.

8.5 The three categories traditionally associated with an IDP are as follows:

- **Critical –** Infrastructure that must be provided for development to proceed. This generally includes connections to infrastructure networks and will often be triggered by the commencement of development.
- **Essential –** Infrastructure that will mitigate impacts arising from development. It often addresses demand generated by occupiers of new development (whether residential or commercial) and is usually triggered upon first occupation. Alternatively, essential schemes may be needed to address wider societal pressures, including the climate emergency.
- **Important** - Infrastructure that is required to achieve sustainable growth and deliver high-
quality places. It will generally improve operational infrastructure capacity, and/or deliver wider benefits to society.

8.6 A fourth category of infrastructure category has been introduced for this IDP:

- **Transformational** – Infrastructure that brings significant additional social, environmental or economic benefits in addition to the mitigation or wider benefits delivered by the traditional infrastructure categories.

8.7 For cross-boundary schemes, the prioritisation scoring set out in the schedule is Oxford- centric. Schemes such as T22 (provision of bus services into and through the Bayswater Brook site in South Oxfordshire District) would likely be considered critical in a South & Vale IDP but are only considered as important to Oxford.

8.8 This IDP also specifies the geographical part of the city, in which the scheme will be located. This is one of the following:

- One of the four "infrastructure areas" of the city considered in this IDP
- City-wide – applies to schemes which apply across the city, or which have no fixed location at the current time.
- Locations outside the city in cases where the scheme straddles the city boundary (e.g., for schemes that link with allocated housing sites in neighbouring districts).

9. Infrastructure Delivery Schedule 2045

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
Transport										
T1	Various minor works to the A34, including lay-by improvements, increased signage, improvements to the cycle track along the Western bypass and various other safety improvements	**Transport**	Highways	**Important**	Dependent on scope and scale		Highways England	2025-2035	Central and West Oxford	Stakeholder engagement with Highways England
T2	Zero Emission Zone (Phase II) - part of Oxfordshire County Counci's Oxford Transport "Core Schemes"	**Transport**	Highways	**Essential**	£5,759,000	£5,759,000	Oxfordshire County Council	2025-2035	Central and West Oxford	Central Oxfordshire Transport Strategy (COTS)
T3	Traffic Filters and Supporting Measures - part of Oxfordshire County Council's Oxford Transport "Core Schemes".	**Transport**	Highways	**Essential**	£6,500,000	£6,500,000	Oxfordshire County Council	2025-2035	City-Wide	Central Oxfordshire Transport Strategy (COTS)
T4	Workplace Parking Levy (WPL) to encourage sustainable transport use - part of Oxfordshire County Counci's Oxford Transport "Core Schemes".	**Transport**	Active Travel/ Bus	**Essential**	£3,359,000	Borrowing against future income from scheme	Oxfordshire County Council	2028-2038	City-Wide	Central Oxfordshire Transport Strategy (COTS)
T5	Oxford Rail Corridor Phase 2, including additional platform at Oxford Station (west side), secondary station	**Transport**	Rail	**Essential**	£169,000,000	£169,000,000	Network Rail	2025-2030	Central and West Oxford	Oxfordshire Connect, Stakeholder engagement with Oxfordshire County Council
T6	Oxford Station Masterplan and potential future Oxford Station Development Plan - the Station and the surrounding area including the Becket Street area	**Transport**	Rail/ Active Travel/ Highways/ Bus	**Transformational**	Detailed costs not publicly available		Network Rail/ Oxford City Council/ Oxfordshire County Council	2025-2040	Central and West Oxford	Various including Oxfordshire Connect, ORCS, OxRail 2040: A Plan For Rail
T7	Cowley Branch Line passenger reopening, including improvements to mainline track capacity south of Oxford Station, likely additional track around Hinksey and two new passenger stations.	**Transport**	Rail	**Transformational**	£155,000,000	£120,000,000	Network Rail	2030-2035	Central and West Oxford South Oxford	Oxfordshire Rail Corridor Study
T8	Cowley Branch Line: Public Realm and Connectivity Programme – supporting infrastructure including a pedestrian bridge and active travel improvements	**Transport**	Rail/ Active Travel	**Transformational**	£20,000,000		Network Rail	2030-2035	South Oxford	Stakeholder engagement with Oxford City Council
T9	East West Rail: Nationally important infrastructure project supporting growth across the Oxford – Cambridge Corridor	**Transport**	Rail	**Transformational**	TBC	Phased funding from central government	East West Rail Company	2025-2045	Central and West Oxford North Oxford	Stakeholder engagement with East West Rail Company

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
T10	Orbital bus route between Cowley and Hinksey to introduce bus lanes (in both directions) around the ring road between Cowley Interchange and Hinksey Hill.	**Transport**	Bus	**Essential**	£158,000,000		Oxfordshire County Council	2035-2040	South Oxford	Stakeholder engagement with Oxfordshire County Council
T11	City Centre Corridor Improvements: (West - Hythe Bridge St/ Oxpens Rd/ George St/ New Road), including active travel improvements, linked to LCWIP route CE2 proposal	**Transport**	Active Travel/ Bus	**Essential**	£20,000,000		Oxfordshire County Council	2030-2040	Central and West Oxford	Central Oxfordshire Movement and Place Framework / Oxford LCWIP
T12	City Centre Corridor Improvements: (North - St Giles/ Magdalen St/ Broad St), including active travel improvements linked to LCWIP route CN1	**Transport**	Active Travel/ Bus	**Essential**	£8,000,000	£870,000	Oxfordshire County Council	2030-2040	Central and West Oxford	Central Oxfordshire Movement and Place Framework / Oxford LCWIP
T13	City Centre Corridor Improvements (South & East - High St/ St Aldates), including active travel improvements linked to LCWIP Route CE1	**Transport**	Active Travel/ Bus	**Essential**	£8,000,000		Oxfordshire County Council	2030-2040	Central and West Oxford	Central Oxfordshire Movement and Place Framework / Oxford LCWIP
T14	Banbury Road Corridor Improvements between Cutteslowe and St Giles, including active travel improvements linked to LCWIP Route 4 proposal	**Transport**	Active Travel Bus Highway	**Essential**	£18,000,000	£875,000	Oxfordshire County Council	2035-2040	North Oxford	Central Oxfordshire Movement and Place Framework / Oxford LCWIP
T15	A4165 Corridor Improvements between Cutteslowe and Kidlington roundabout, linked to LCWIP Route 4 proposal	**Transport**	Active Travel Bus Highway	**Essential**	£10,000,000	(Partially funded by developer funding)	Oxfordshire County Council	2030-2040	North Oxford	Central Oxfordshire Movement and Place Framework / Oxford LCWIP
T16	Woodstock Road Corridor Improvements, including active travel improvements linked to LCWIP route 3 proposal.	**Transport**	Active Travel Bus Highway	**Essential**	£18,000,000	£3,200,000	Oxfordshire County Council	2030-2040	North Oxford	Central Oxfordshire Transport Strategy / Oxford LCWIP
T17	Northern Bypass corridor improvements (Cuttleslowe Roundabout to Headington Roundabout), including cycle path upgrade	**Transport**	Active Travel Bus Highway	**Essential**	£25,800,000	(Developer funded)	Oxfordshire County Council	2035-2040	North Oxford	Central Oxfordshire Transport Strategy / Oxford LCWIP
T18	Abingdon Road Corridor Improvements, from Folly Bridge to Kennington Roundabout	**Transport**	Active Travel Bus Highway	**Essential**	£17,606,000		Oxfordshire County Council	2035-2040	South Oxford	Oxford City Council identified scheme
T19	Cowley Road/ Garsington Road/ Watlington Road Corridor Improvements, from Magdalen Road to Grenoble Road, including improvements to Cowley interchange and active travel improvements linked with Route 14 of the LCWIP	**Transport**	Active Travel Bus Highways	**Essential**	£31,187,000	£550,000	Oxfordshire County Council/ Developer Contributions	2030-2040	South Oxford	Central Oxfordshire Transport Strategy/ Oxford LCWIP

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
T20	Iffley Road Corridor Improvements from The Plain to Littlemore roundabout, including active travel improvements linked with LCWIP route 17	**Transport**	Active Travel Bus Highways	**Essential**	£18,048,000	£800,000	Oxfordshire County Council/ Developer Contributions	2030-2041	South Oxford	Central Oxfordshire Transport Strategy/ Oxford LCWIP
T21	B4495 Corridor Improvements (Hollow Way/ Between Towns Road/ Donnington Bridge).	**Transport**	Active Travel Bus Highways	**Essential**	£3,046,000		Oxfordshire County Council/ Developer Contributions	2030-2035	South Oxford	Central Oxfordshire Transport Strategy/ Oxford LCWIP
T22	London Road Corridor Improvements, between St Clements and Green Road roundabout	**Transport**	Active Travel Bus Highways	**Essential**	£17,155,900	£2,225,000	Oxfordshire County Council	2035-2040	East Oxford	Central Oxfordshire Transport Strategy/ Oxford LCWIP
T23	Extension of existing bus routes (funding for additional vehicles) into Bayswater Brook site in SODC, linking to city centre and eastern arc	**Transport**	Bus	**Important**	Dependent on scope and scale		Oxfordshire County Council	2030-2040	East Oxford/ South Oxfordshire	Stakeholder engagement with Oxfordshire County Council
T24	Extension of existing bus routes (funding for additional vehicles) into Northfield site in SODC, linking to city centre and Science Vale	**Transport**	Bus	**Important**	Dependent on scope and scale		Oxfordshire County Council	2030-2040	East Oxford/ South Oxfordshire	Stakeholder engagement with Oxfordshire County Council
T25	Low Traffic Neighbourhoods (LTNs)	**Transport**	Active Travel Highways	**Essential**	£8,000,000	£8,000,000	Oxfordshire County Council	2030-2040	City-Wide	LCWIP and stakeholder engagement with Oxfordshire County Council
T26	Controlled Parking Zones	**Transport**	Highways	**Essential**	£1,000,000	£600,000	Oxfordshire County Council	2025-2035	City-Wide	OxIS (2017)
T27	Provision of additional coach parking within the city	**Transport**	Bus, Highways	**Essential**	TBC		Oxford City and Oxfordshire County Councils	2030-2035	City-Wide	OxIS (2017)
T28	Last mile freight pilot scheme	**Transport**	Bus, Highways	**Essential**	Dependent on scope and scale		Oxfordshire County Council	2030-2035	City-Wide	Zero Carbon Oxford Partnership (ZCOP)
T29	District Centre Improvements (All Centres)	**Transport**	Active Travel	**Important**	Dependent on scope and scale		Oxfordshire County Council	2030-2040	City-Wide	OxIS (2017)
T30	Provision of a pedestrian and cycle bridge from Oxpens to Osney Mead across the river, connecting development sites in these locations	**Transport**	Active Travel	**Transformational**	£14,000,000	£14,000,000	Oxford City Council	2025-2035	Central and West Oxford	Oxford City Council identified scheme/ LCWIP
T31	Horspath Road Junction Improvements	**Transport**	Highways	**Essential**	£4,100,000	£100,000	Oxfordshire County Council	2035-45	South Oxford	Oxfordshire County Council Bus Service Improvement Plan

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
T32	JR Hospital on-site bus interchange and priority measures, cycle parking	**Transport**	Bus Active Travel	**Essential**	£3,000,000	£400,000	Oxfordshire County Council	2030-2035	East Oxford	Oxfordshire County Council Bus Service Improvement Plan
T33	Churchill Hospital additional bus and cycle access, including cycle parking	**Transport**	Active Travel Bus	**Essential**	£2,000,000	£60,000	Oxfordshire County Council	2030-2035	East Oxford	Oxfordshire County Council Bus Service Improvement Plan
T34	Improvements to cycling provision along Botley Road, including active travel improvements linked to route 25 of the LCWIP	**Transport**	Active Travel	**Essential**	£19,590,000	TBC	Oxfordshire County Council	2025-2040	Central and West Oxford	Oxford City Council identified scheme/ Oxford LCWIP
T35	A40 cycle bridge schemes helping to link Bayswater and Barton Park developments to existing cycle network, as well as providing pedestrian access for residents	**Transport**	Active Travel	**Essential**	Dependent on scope and scale		Delivered through Bayswater Brook developers/ landowners	2025-2035	East Oxford/ South Oxfordshire	Oxford City Council identified scheme
T36	Connections to Oxford Parkway Railway Station with a route reserved through Peartree Farm	**Transport**	Active Travel Highways	**Essential**	Dependent on scope and scale		Oxfordshire County Council	2030-2040	North Oxford	Oxford City Council identified scheme
T37	Go Ultra Low Oxford Project Phase II (city-wide) - electric vehicle charging solutions for residents who do not have off-street parking	**Transport**	Highways	**Important**	Dependent on scope and scale		Oxford City Council/ Oxfordshire County Council	2035-2040	City-Wide	Oxford City Council identified scheme
T38	Improve pedestrianisation and cycle links to wider strategic routes into and out from Summertown district centre, including delivery of cycle stands for public cycle parking within Diamond Place redevelopment	**Transport**	Active Travel	**Essential**	Dependent on scope and scale		Delivered through development at Summertown district centre	2030-2040	North Oxford	Local Plan 2045 Policy
T39	Average Speed Cameras and 20mph extensions to ensure better speed control on the main road radials to manage traffic and create more attractive cycle routes	**Transport**	Active Travel Highways	**Essential**	Dependent on scope and scale		Oxfordshire County Council	2025-2040	City-Wide	Oxford LCWIP
T40	Potential bridge across the River Thames to link East Oxford via Jackdaw Lane, including widening and resurfacing of the cycle path and addition of solar lighting	**Transport**	Active Travel	**Important**	£8,000,000		Oxfordshire County Council	2030-2040	South Oxford	Oxford LCWIP
T41	A40 crossing at Collinwood Road	**Transport**	Active Travel	**Essential**	Dependent on scope and scale	To be funded via developer contributions	Oxfordshire County Council	2025-2035	East Oxford	Oxford LCWIP
T42	Improvements to North Oxford Cycle Route, to address pinchpoints and provide surfacing improvements. The majority of this route is along the highway network, but some sections are on third party land, including active	**Transport**	Active Travel	**Essential**	£3,000,000		Oxfordshire County Council	2030-2035	North Oxford	Oxford LCWIP

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
	travel improvements linking with LCWIP route 5									
T43	LCWIP Route 1: Canal Path, including the Canal Towpath Extension and Cycle bridge over the canal linking Nelson Street to the station	**Transport**	Active Travel	**Essential**	£2,500,000		Oxfordshire County Council	2030-2035	Central and West Oxford	Oxford LCWIP
T44	LCWIP Route 2: Walton Street calming and filtering interventions, and Walton Street Shopping QPC	**Transport**	Active Travel	**Essential**	£1,210,000	£356,000	Oxfordshire County Council	2030-2035	Central and West Oxford	Oxford LCWIP
T45	LCWIP Route 3: Wolvercote Roundabout Crossing	**Transport**	Active Travel	**Essential**	£1,825,000		Oxfordshire County Council	2025-2030	North Oxford	Oxford LCWIP
T46	LCWIP Route 6: Marston, including improvements to the lighting and upgrades to the bridge, as well as the Marston QPC	**Transport**	Active Travel	**Essential**	£850,000		Oxfordshire County Council	2025-2030	East Oxford	Oxford LCWIP
T47	LCWIP Route 7: Marston Road, including the crossing from Copse Lane to Marston Road	**Transport**	Active Travel	**Essential**	£200,000		Oxfordshire County Council	2025-2030	East Oxford	Oxford LCWIP
T48	LCWIP Route 8: Northway & Barton, including possible widening of the subway to Barton and a new link path	**Transport**	Active Travel	**Important**	£1,000,000		Oxfordshire County Council	2025-2030	East Oxford	Oxford LCWIP
T49	LCWIP Route 9: Headington Path, improvements to the street lighting and paths	**Transport**	Active Travel	**Important**	£600,000		Oxfordshire County Council	2025-2030	East Oxford	Oxford LCWIP
T50	LCWIP Route 11: Quarry and Risinghurst Route Improvements	**Transport**	Active Travel	**Essential**	£200,000		Oxfordshire County Council	2025-2030	East Oxford	Oxford LCWIP
T51	LCWIP Route 12: Old Road, including extension of the A2H scheme at Old Road. Improvements to Wheatley – Oxford section from Warneford Lane via Shotover remains	**Transport**	Active Travel	**Essential**	£7,035,000		Oxfordshire County Council	2025-2035	East Oxford/ South Oxfordshire District Council	Oxford LCWIP
T52	LCWIP Route 13: Barracks Lane and Horspath including surface improvements, widening and removal of barriers at Barracks Lane, a cycle link at Pony Road, and average speed cameras, as well as the Horspath QPC	**Transport**	Active Travel	**Essential**	£3,085,000		Oxfordshire County Council	2025-2035	South Oxford	Oxford LCWIP
T53	LCWIP Route 15: BBL, including a link road from Maidstone Road to Barns Road and various improvements to Barns Road as well as BBL shopping street re-design and the Barns Road QPC	**Transport**	Active Travel	**Essential**	£9,389,000		Oxfordshire County Council	2035-2045	South Oxford	Oxford LCWIP

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
T54	LCWIP Route 16: Littlemore, including route improvements and a cycle zebra crossing at Long Lane and the Iffley Road QPC	**Transport**	Active Travel	**Essential**	£1,525,000		Oxfordshire County Council	2035-2045	South Oxford	Oxford LCWIP
T55	LCWIP Route 18: Rose Hill, including route improvements and improvements to Cottesmore Bridge - Ringroad	**Transport**	Active Travel	**Essential**	£2,200,000		Oxfordshire County Council	2025-2030	South Oxford	Oxford LCWIP
T56	LCWIP Route 21: South Oxford Path, including surfacing improvements to the South Oxford cycle route	**Transport**	Active Travel	**Essential**	£6,800,000		Oxfordshire County Council	2025-2035	South Oxford	Oxford LCWIP
T57	LCWIP Route 22: South Hinksey Path. Full detail subject to final build-out of the OFAS	**Transport**	Active Travel	**Essential**	Dependent on scope and scale		Oxfordshire County Council	2030-2040	South Oxford	Oxford LCWIP
T58	LCWIP Route 24: West Oxford Path, including surfacing and widening improvements at Oatlands Park	**Transport**	Active Travel	**Essential**	£400,000		Oxfordshire County Council	2030-2035	Central and West Oxford	Oxford LCWIP
T59	LCWIP Route C: Oxford Ring Road, including the widening and resurfacing of Oxford Ring Road, and traffic calming measures in Wolvercote Village, as well as the Upper and Lower Wolvercote QPC	**Transport**	Active Travel	**Essential**	£13,160,000		Oxfordshire County Council	2030-2035	North Oxford	Oxford LCWIP
T60	LCWIP Route CC: City Centre Parking, through delivering the park that bike proposals	**Transport**	Transport	**Essential**	£150,000		Oxfordshire County Council	2025-2030	Central and West Oxford	Oxford LCWIP
T61	City Centre Cycle Hubs Parking	**Transport**	Transport	**Essential**	£3,000,000		Oxfordshire County Council	2035-2045	Central and West Oxford	Oxford LCWIP
T62	Improvements to various routes within West End as identified in the SPD	**Transport**	Active Travel/ Transport	**Important**	Dependent on scope and scale		Oxfordshire City Council/ Oxfordshire County Council/ site landowners	2030-2045	Central and West Oxford	West End SPD
T63	Headington Centre Improvements	**Transport**	Active Travel/ Highways/ Bus	**Important**	Dependant on scope and scale		Oxfordshire County Council	2030-2040	East Oxford	Headington Neighbourhood Forum/ Headington Action
T64	Oxford connecting routes improvements, including path widening and dedicated crossings of main roads	**Transport**	Active Travel	**Essential**	£5,000,000		Oxfordshire County Council	2030-2035	City-Wide	Oxford LCWIP
T65	Green Road Roundabout (A40) London Road - subways. Transform active travel connectivity to Barton and Risinghurst and route 10 to Wheatley and P&R by replacing/improving subways under roundabout.	**Transport**	Active Travel	**Essential**	£10,000,000		Oxfordshire County Council	2030-2040	East Oxford	Oxford LCWIP

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
T66	Improve access to green space and create surfaced circular routes in parks and recreation grounds for fun runs, small children learning to cycle, walks etc.	**Transport**	Active Travel	**Essential**	£5,000,000		Oxford City Council/ Oxfordshire County Council	2030-2040	City-Wide	Oxford LCWIP
Education										
E1	0.5FE expansion to Wolvercote Primary School (1.5-2.0FE), to cater for growth in North Oxford	**Education**	Education	**Essential**	£4,048,158		Oxfordshire County Council/ Academy Trust	2030-2035	North Oxford	Stakeholder Engagement with Oxfordshire County Council
E2	0.5FE expansion to Barton Park Primary School (1.5-2.0FE), to cater for growth in East Oxford	**Education**	Education	**Essential**	£2,710,440		Oxfordshire County Council	2030-2035	East Oxford	Stakeholder Engagement with Oxfordshire County Council
Health-care										
H1	New health centre in the preferred option of Summertown (Diamond Place), consolidating Banbury Road and Summertown surgeries. Potential to also include consolidation of Wolvercote surgery - primarily serving existing demand	**Healthcare**	Primary Healthcare	**Essential**	Dependent on scope and scale		BOB ICB	2030-2040	North Oxford	Stakeholder engagement with BOB ICB
Green Infrastructure										
G1	Oxford CIty Biodiversity Enhancements Programme	**Green Infrastructure**	Green Spaces	**Essential**	Dependent on scope and scale		Oxford City Council	2030-2045	City-wide	Oxford City Council identified scheme
G3	Improvements in accessibility and path network within Oxpens Meadow	**Green Infrastructure**	Green Spaces	**Important**	Dependent on scope and scale		Oxford City Council	2030-2035	Central and West Oxford	Oxford City Council identified scheme
G4	Enhancements in the public realm, including greening, along Oxpens Road to be delivered in tandem with the phases of development that address Oxpens Road to ensure a high quality environment and setting	**Green Infrastructure**	Green Spaces	**Essential**	Dependent on scope and scale		Oxford City Council	2030-2035	Central and West Oxford	Oxford City Council identified scheme
G5	Improvements and enhancements to Cuttleslowe Park through the Oxford North development. Potential to relocate football pitches and manage former area for biodiversity - depends on the outcome of the extension to Cutteslowe Park.	**Green Infrastructure**	Green Spaces	**Important**	Dependent on scope and scale		Oxford City Council	2030-2035	North Oxford	Oxford City Council identified scheme
G6	Integrated GI network required for the north of the city (linked to Cherwell Sites)	**Green Infrastructure**	Green Spaces	**Important**	Dependent on scope and scale		Oxford City Council	2030-2040	North Oxford Cherwell DC	Oxford City Council identified scheme

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
G7	New high-quality public open space to be provided on-site at Osney Mead, as identified in the Local Plan 2045 and the West End SPD	**Green Infrastructure**	Green Spaces	**Essential**	Dependent on scope and scale		Delivered through development at Osney Mead	2030-2045	Central and West Oxford	Various Local Plan 2045 Policies including West End and Botley Road Area of Focus
Community Facilities										
CF1	Provision of BBL Community Hub as part of wider regeneration efforts within the estate.	**Community Facilities**	Community Centres	**Important**	£550,000	Delivered by developer as part of wider planning application	Oxford City Council/ Developer Contributions	2030-2035	South Oxford	Stakeholder engagement with Oxford City Council/ Oxford City Community Centres Strategy
CF2	Investment into North Oxford Community Centre, to create hub with Ferry Leisure Centre	**Community Facilities**	Leisure Centres	**Important**	£800,000		Oxford City Council	2030-2035	North Oxford	Stakeholder Engagement with Oxford City Council
CF3	Refurbishment and extension of existing Ferry Leisure Centre	**Community Facilities**	Leisure Centres	**Essential**	£14,000,000		Oxford City Council	2030-2035	North Oxford	Stakeholder Engagement with Oxford City Council
CF4	Improvements to and extension of BBL Library to accommodate demand arising from growth in South Oxford Area and SODC - potentially to be amalgamated with BBL community centre project	**Community Facilities**	Libraries	**Important**	Dependent on scope and scale		Oxfordshire County Council	2030-2035	South Oxford	Stakeholder engagement with Oxfordshire County Council
CF5	Improvements to and expansion of the library offer in Headington and Barton to accommodate demand arising from growth in East Oxford	**Community Facilities**	Libraries	**Important**	Dependent on scope and scale		Oxfordshire County Council	2030-2035	East Oxford	Stakeholder engagement with Oxfordshire County Council
CF6	Provision of a community centre for Barton Park, alongside a new local centre	**Community Facilities**	Community Centres	**Essential**	Dependent on scope and scale		Oxford City Council/ Barton Park developers	2025-2035	East Oxford	Oxford City Council identified scheme
CF7	Capacity increases at existing cemeteries within Oxford, including Shotover Cemetery (cross-boundary with South Oxfordshire District Council)	**Community Facilities**	Cemeteries	**Essential**	£2,400,000	£2,400,000	Oxford City Council	2030-2035	City-wide	Oxford City Council identified scheme
Public Realm										
PR1	Public Realm and transport improvements around Botley Retail Park	Public Realm/ Transport	Public Realm/ Transport	**Important**	Dependent on scope and scale		Various	2025-2035	Central and West Oxford	West End and Botley Road Area of Focus (Oxford Local Plan 2045)
PR2	Public Realm improvements (including public spaces) in the West End	Public Realm	Public Realm	**Important**	Dependent on scope and scale		Various	2030-2045	Central and West Oxford	West End Spatial Framework/ SPD
PR3	Central Oxford Movement and Place Framework (COMPF) Projects	Public Realm	Public Realm	**Essential**	Dependent on scope and scale		Oxfordshire County Council	2030-2045	Central and West Oxford	Oxfordshire County Council
Utilities										

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
U1	Reinforcement (additional 132kV circuit from Cowley GSP) of Yarnton Bulk Supply Point (BSP) to accommodate additional demand from planned growth including Oxford	**Utilities**	Electricity Supply	**Critical**	Detailed costs not publicly available		SSE	2025-2030	North Oxford/ Cherwell/ Vale of White Horse	Stakeholder engagement with SSE
U2	Uprating of a section of the 132kV cable at Osney Lane Bulk Supply Point (BSP) to demand from development within the city	**Utilities**	Electricity Supply	**Critical**	Detailed costs not publicly available		SSE	2025-2030	Central and West Oxford	Cowley Grid Supply Point Strategic Development Plan (SSE)
U3	Reinforcement (additional 132/33kV transformer) of Cowley Local Main Bulk Supply Point (BSP) to accommodate additional demand from planned growth including Oxford	**Utilities**	Electricity Supply	**Critical**	Detailed costs not publicly available		SSE	2025-2030	South Oxford/ East Oxford/ South Oxfordshire	Cowley Grid Supply Point Strategic Development Plan (SSE)
U4	Reinforcement of the two 33/11kV transformers at Rose Hill Primary Substation and upgrade of 33kV circuit from Rose Hill Primary Substation to Cowley Local Main BSP	**Utilities**	Electricity Supply	**Critical**	Detailed costs not publicly available		SSE	2025-2030	South Oxford/ South Oxforshire	Cowley Grid Supply Point Strategic Development Plan (SSE)
U5	Reinforcement of Headington Bulk Supply Point Transformers	**Utilities**	Electricity Supply	**Critical**	Dependent on scope and scale		SSE	2025-2030	East Oxford	Cowley Grid Supply Point Strategic Development Plan (SSE)
U6	Union Street Primary Substation Transformers	**Utilities**	Electricity Supply	**Critical**	Dependent on scope and scale		SSE	2035-2040	South Oxford/ East Oxford	Cowley Grid Supply Point Strategic Development Plan (SSE)
U7	Cowley GSP to Headington BSP 132kV circuits	**Utilities**	Electricity Supply	**Critical**	Dependent on scope and scale		SSE	2040-2045	South Oxford/ East Oxford	Cowley Grid Supply Point Strategic Development Plan (SSE)
U8	St Ebbes Primary Substation Transformers	**Utilities**	Electricity Supply	**Critical**	Dependent on scope and scale		SSE	2040-2045	East Oxford	Cowley Grid Supply Point Strategic Development Plan (SSE)
U9	Delivery of a substation required to support the Diamond Place redevelopment	**Utilities**	Electricity Supply	**Critical**	Dependent on scope and scale		SSE	2030-2040	North Oxford	Oxford City Council identified scheme
U10	Oxford Wastewater Treatment Works (WWTW) phased upgrades (to support planned development to 2041)	**Utilities**	Sewerage	**Critical**	fully funded	fully funded	Thames Water	2030-2040	South Oxfordshire	Stakeholder engagement with Thames Water
U11	Oxford WWTW future upgrades (to support planned development post 2041)	**Utilities**	Sewerage	**Critical**	TBC	TBC	Thames Water	2040-2045	South Oxfordshire	Stakeholder engagement with Thames Water
U12	Oxford Flood Alleviation Scheme	**Utilities**	Flood Risk Defence	**Critical**	£260,000,000	TBC	Environment Agency	2035-2045	Central and West Oxford	Environment Agency/ Oxford City Council/ Oxfordshire County Council

Reference	Scheme	Infrastructure Category	Infrastructure Type	Priortisation	Cost	Confirmed Funding	Delivery Body	Delivery Phasing	District Area	Source
U13	Countywide roll out of fibre broadband in commercial buildings, extended where appropriate to surrounding residential buildings.	**Utilities**	Digital Infrastructure	**Important**	Dependent on scope and scale		Oxfordshire County Council/ Openreach	2025-2040	City-wide	Stakeholder engagement with Oxfordshire County Council
U14	Oxford City Mobile Phone Network Improvements	**Utilities**	Digital Infrastructure	**Important**	Dependent on scope and scale		Oxfordshire County Council/ Mobile Network Providers	2025-2035	City-wide	Stakeholder engagement with Oxfordshire County Council
U15	Undergrounding of Pylons at Osney Mead	**Utilities**	Electricity Supply	**Transformational**	Dependent on scope and scale		Various	2030-2045	Central and West Oxford	West End SPD

Appendix 1 – Further information

A.1 As part of their representation to the Reg. 18 Plan, Berkshire Oxfordshire and Buckinghamshire Integrated Care Board (BOB ICB) provided an update for the IDP. This section (and paragraph 7.27 which discusses Primary Healthcare) sets out some further information about BOB ICB specifically, provides some useful context about Oxford, and includes a discussion about the role of ICBs more widely.

- NHS Buckinghamshire, Oxfordshire, and Berkshire West Integrated Care Board (BOB ICB) is a statutory NHS organisation established in July 2022. BOB ICB has the delegated function of commissioning primary care, including GP services.

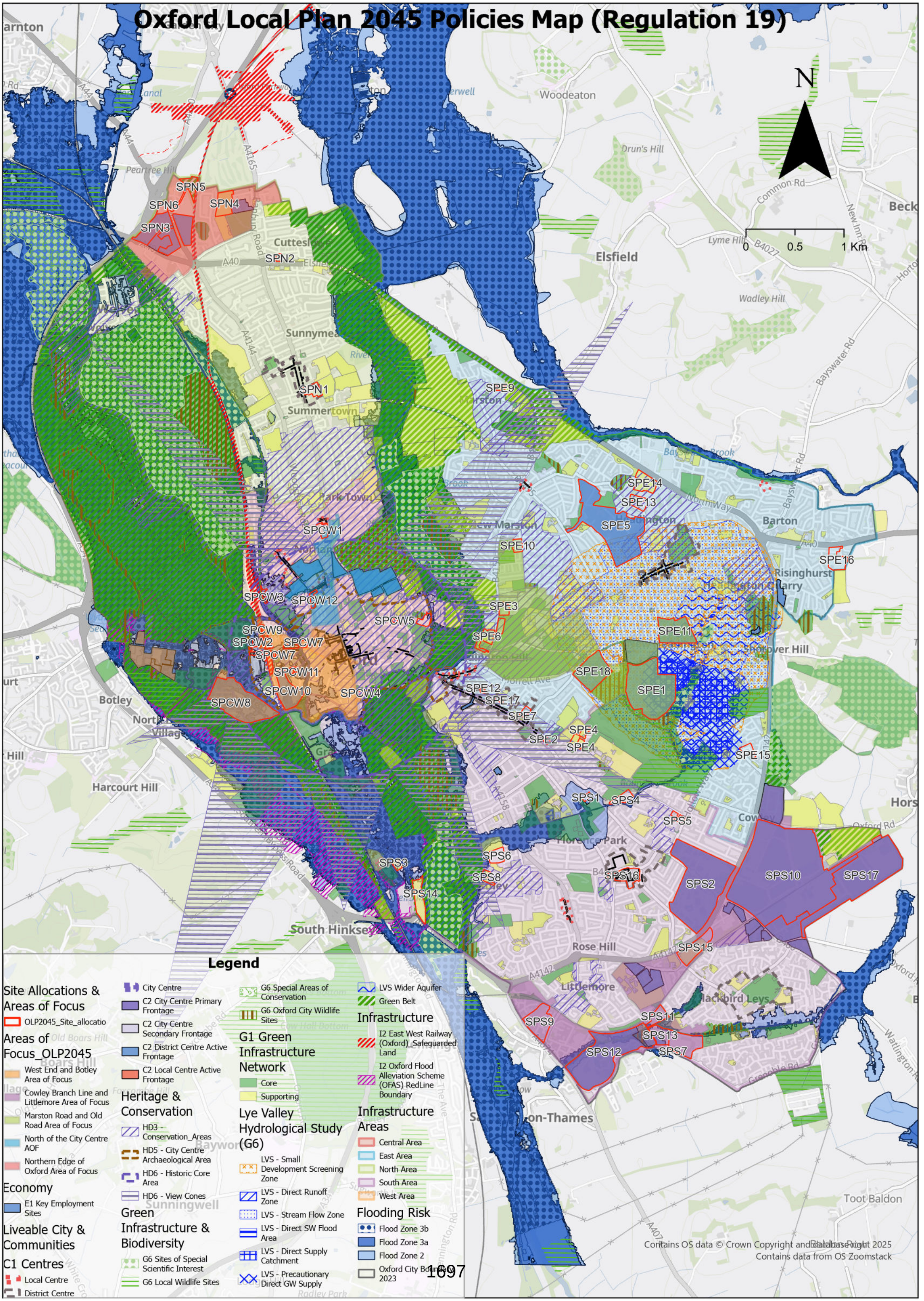
- GP practices collaborate with a range of other health-related organisations and services in their local areas in groups of practices known as primary care networks (PCNs). PCNs bring together a wider range of professionals to work collaboratively and provide high quality support to people when they need it.

- There are 6 Primary Care Networks (PCNs) in Oxford: City – East Oxford; City – OX3; Healthier Oxford City Network; Oxford Central; South East Oxford Health Alliance; and Spires. These PCNS include 26 GP practices, which serve a registered patient population of 240,400 (July 2025)

- Capital funding for improvement of GP premises comes from either NHS England (NHSE), or via the planning system through S106 contributions or CIL. While 100% NHS-funded premises improvement grants are allowed, the availability of funds for such *Improvement Grants* is very limited.

- The ICB needs to ensure that all primary care provisions are operationally and financially viable. The ICB funds Primary Care services via the reimbursement of rents (as approved by the District Valuer) and business rates (based on existing ONS population data). However, the ICB has no dedicated funding for any primary care estates development (including the commissioning of pre-project works or projects relating to new population growth and development).

Oxford Local Plan 2045 Policies Map (Regulation 19)



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Introduction

The Oxford Local Plan 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.

This Consultation Statement sets out how Oxford City Council undertook consultation on its Oxford Local Plan 2042 Preferred Options document between 27 June to 8 August 2025. This consultation stage was the Regulation 18 consultation and followed the requirements of Regulation 18 of the Town and County Planning (Local Planning) (England) Regulations 2012. The consultation was also carried out in accordance with the commitments in Oxford City Council's Statement of Community Involvement in Planning, which sets out how we will involve the community in the planning process.

This consultation statement covers:

(i) Which bodies and persons were invited to make representation under Regulation 18,
(ii) How those bodies and persons were invited to make such representations,
(iii) A summary of the main issues raised by those representations, and
(iv) How we intend to address the main issues in the Local Plan.

Following the Preferred Options consultation, the decision was made amend the plan period to 2025-2045, rather than 2022-2042, on a number of technical grounds. While the evidence base is being updated to align with this plan period, all representations and comments received to date remain valid and will be taken into consideration for the production of the final submission (Regulation 19 stage) draft.

One of the main principles of the planning system is that local communities and stakeholders should be involved from the outset in the preparation of planning policy documents.

This statement has demonstrated how Oxford City Council has prepared the proposed Oxford Local Plan 2045 in accordance with consultation regulations. Extensive community engagement and stakeholder consultation has been undertaken across each of the main stages of plan preparation including main issues and preferred options. Comments have been received on the proposed plan, Sustainability Appraisal and the plan's evidence base. These representations will be taken into careful consideration and will inform the submission draft of the plan, including amendments to the contents where appropriate.

Local Plan Timeline

Early Engagement Survey (March/April 2025)

The early engagement survey was designed to ask a series of questions to assess to what extent the public and businesses deem certain topics important for the Local Plan to influence and prioritise. This survey was designed to preview certain topics that are prevalent in Oxford City and that can be addressed within a Local Plan. The City Council was also keen to involve those who might not normally engage with planning.

This was a smaller scale exercise as it would build upon the findings and evidence established for the 2040 plan. The compressed timescale meant that a small-scale engagement process (relative to the previous Issues Stage of the Local Plan 2040) was put in place, as much of the findings and evidence base that the withdrawn plan was built upon was considered to still be valid. It would also help us in not losing the momentum generated by the work of the previous plan.

As with the Issues stage for previous plans, this early engagement exercise is not a statutory stage of consultation; it is in addition to the formal requirements (see below). This additional stage was incorporated into the project timetable because it was felt that early engagement, before any policy approaches are drafted, allows people the best opportunity to shape the plan as it develops.

There were seven main topics screened into the survey to gain a sense of how important these are to the respondents and what should be a main focus for the preferred options consultation stage of the Local Plan. The consultation survey was open for six weeks, running from 17 March to 28 April 2025. It was distributed via the Oxford City Council website, social media, press releases, the Oxford City Council newsletter, email lists, and posters in libraries and community centres.

Early Engagement Report Local Plan 2042

Preferred Options (Regulation 18) stage consultation (June/August 2025)

The main consultation document was the First Draft Oxford Local Plan 2042. The draft policies presented in the document are what we have identified as the preferred options, which is the approach that we consider will bring about the most beneficial outcome for a particular subject area when compared to the other possible alternatives. The alternative approaches considered were set out in our Background Papers.

The consultation document was approved by Cabinet on 18th June 2025. It had previously been considered at the Scrutiny Committee on 12th June. The consultation period, which ran from 27 June to 8 August 2025, was to specifically gain people's views on the policy options contained in the document as well as the background papers and other supporting evidence base. The outcomes from this stage of consultation, as summarised in this document, will help the City Council to prepare the Proposed Submission Draft Local Plan.

Proposed Submission Draft (Regulation 19) consultation (programmed for Spring 2026)

Following the analysis of comments on the First Draft Oxford Local Plan 2042 Consultation Document, we will draft a Proposed Submission Document and consult people for a further 6 weeks. Comments must be received in writing (or by email) as they will be submitted to the Secretary of State.

Examination (expected November 2026)

Following the Proposed Submission consultation, there is an opportunity to make minor changes to the Local Plan in response to the comments made, before the document, the supporting evidence base and comments received are submitted to the Secretary of State. An independent examination is then carried out. Those who have made comments to the Proposed Submission Document have the right to ask the Inspector to be heard in person at the examination. The Inspector will provide a Report concluding whether the plan is found sound. If the plan is found sound, any changes

recommended by the Inspector are made and the plan will be taken to Full Council to formally adopt it.

Preferred Options consultation process

Who was consulted?

The City Council conducted an extensive 6-week long consultation exercise between 27 June to 8 August 2025 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 directly involve residents, workers, employers, students and visitors to Oxford as well as statutory consultees, service providers and other stakeholders with an interest in Oxford.

Direct contact was made by email or post as follows:

- All residential addresses in the post code sectors covering Oxford (door-to-door delivery of questionnaires to approximately 46 000 households)
- Statutory consultees and Duty-to-Cooperate bodies (see **Appendix 1** for list of consultees)
- Additional local groups and organisations who were likely to be interested (see **Appendix 2** for list of consultees)
- Respondents from the Early Engagement Survey who wished to be kept informed of further stages in the Local Plan process (180 persons)
- All contacts on the Planning policy contact list, made up of persons and organisations signed up for updates on the Local Plan and related matters (400+ contacts);

Consultation methods

At this stage in the Local Plan project the material that was published was focussed on presenting the preferred policy options and the evidence base behind them. The consultation focussed on asking consultees whether they agreed with the Council's preferences for the policy options.

A leaflet questionnaire was distributed to all households and businesses through the city which could be returned using Freepost. In addition to being delivered to every household in the city, the leaflet was made available in the 7 local libraries and the central library.

Postal distribution problems unfortunately resulted in delayed leaflet deliveries for some parts of the city. We encouraged affected residents who made queries to return leaflets if they still wished to do so, and we continued to accept returned leaflets for several weeks after the formal closing date of the consultation.

The main element of the consultation was based online via the Council's online consultation portal. There were two questionnaire formats, the first was a 'short form' questionnaire that was based on the postal leaflets – aimed specifically at people who only wanted to provide high level comments or had limited time to respond. The second was an in-depth, or 'longer' questionnaire, through which it was possible to make representations on all the policy options and supporting documents that have been prepared for the plan, as well as general comments on the plan or the process. Representations were also accepted by direct email.

Consultation materials

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 a freepost reply with basic information, a simple 'Strongly Agree – Strongly Disagree' questionnaire and some space for additional written comments;
- Online questionnaire based on the 5 main topics contained in the leaflet survey.

For stakeholders and those with more time/interest:

- First Draft Oxford Local Plan 2042 Consultation Document
- Draft Sustainability Appraisal
- Background Papers
- Structured online questionnaire (on the Council's Consultation Portal) to comment on Preferred Options Consultation Document (in addition to the 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,
- As hard copies on request

Promotion of the consultation period/Publicity

The Preferred Options Consultation was publicised through the following channels:

- Publication of an updated Local Development Scheme (LDS) in January 2025;
- Direct notification of residents and stakeholders as described above;
- Publishing information on the City Council webpage, and dedicated page on the consultation portal;
- The City Council's social media channels. There were three paid adverts on Meta (Facebook and Instagram). An economy advert which had 733 link clicks, 19,629 reaches and 36, 478 impressions. A housing advert had 2,082 link clicks, 48,135 reaches, 89,658 impressions. And a biodiversity advert which had 873 link clicks, 14, 835 reaches and 38,864 impressions. There were also three videos on TikTok. A housing video with 55,585 impressions, 40,318 reaches and 375 clicks. An economy video with 26,423 impressions, 18,851 reaches and 148 clicks. A video about sustainability with 22,728 impressions, 16,950 reaches and 103 clicks.
- A press release;
- Posters distributed for display on all community noticeboards in the city; and
- Briefings to Local Councillors.

Consultation events and meetings

We organised a number of face-to-face sessions – including in person 'drop in' sessions at various locations across the city, attended by officers of the Planning Policy team, and a number of online sessions that were subject and topic based for which there was a sign up/booking process for members of the public. These were widely advertised through the posters displayed on all community notice boards, as well as on our website. The events were scheduled as follows:

Date	Time	Location
Saturday 5th July	12.00 - 15.00	The Leys Festival
Saturday 5th July	14.30 - 16.30	Afternoon tea at Littlemore Village Hall
Monday 7th July	16:30 - 18:00	**Online**
Tuesday 8th July	10.00 - 14.00	Barton Community Centre
Wednesday 16th July	11.00 - 13.00	North Oxford Association
Thursday 17th July	11:00 - 12:00	**Online**
Sunday 20th July	9.15 - 12.00	South Oxford Farmers' Market
Wednesday 23rd July	10.45 - 14.15	Town Hall, Long Room
Saturday 26th July	10.00 - 14.00	Wolvercote Mill Community Café
Tuesday 29th July	17:00 - 18:30	**Online**

Structure of this Report

The report provides a comprehensive summary and analysis of all responses received during the consultation period. As outlined above, responses were collected through a short questionnaire and long questionnaire, both of which featured open text boxes to encourage broader comments on the plan and draft policies. In addition, comments and representations were welcomed via email, with statutory bodies also able to submit their responses via email. Each response has been carefully summarised and analysed by chapter and by each draft policy. Findings have been presented in two formats: data drawn from the responses to the quantitative survey from the short and long questionnaires, followed by a table of the summarised public written comments alongside officer responses where appropriate. Summarised responses from statutory bodies are presented in a separate table.

Supplementary information is contained in the appendices, including the list of statutory bodies consulted, local community and amenity groups that were contacted directly, and the leaflet posted to all Oxford City residents.

Chapter 1 - Introduction and Strategy

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Headlines for Chapter 1:

- Strong public voice for provision of more housing which should have adequate infrastructure to support development
- Any developments should be designed to the highest quality and sensitive to the historic environment
- General concern that the amount of development will put a strain on infrastructure, services, and amenities; such as transport, water and sewage, GPs, schools, green spaces, shops etc
- Infrastructure improvements should come before development, not after
- Concern about more cars and pressures on the roads as it's too expensive for people to live so they commute
- Concern that developers can dodge provision of affordable housing too easily through claiming lack of viability
- Some preference for lifting vast majority of regulations on building to allow for more development

- Desire for the Plan to actively address inequalities through tools like citizens assembles, collaboration with community organisations, stronger mention of community-led and cooperative housing and neighbourhood plans
- Mansfield College, Worcester College and Lincoln College express support for the Chapter

All Public Responses – Draft Policy S1

Draft Policy	Topic	Summary	Response
S1	Support	We support policies S1-S3 and particularly welcome the commitments in policy S1 Spatial strategy to prevent new development in locations where it would have a negative impact on green infrastructure and take account of local historic context.	Support noted.
S1	What protection is there for green space outside f)	BBOWT supports S1 f) but asks what counts as "important". What protection is there for green spaces that are not deemed important nor are they public open space nor floodplain?	The detailed approach to protecting GI is set out in Policy G1.
S1	Support but policy should be split in two	We support the general approach to the spatial strategy of the local plan and the aim to ensure that development within the City is located in the right places. Support the City's ambition to address as much of its housing needs within the city boundary as possible, however, this should not come at the expense of the economic potential of development sites such as Oxford North. However, ONV remains of the opinion that the policy should be split into two, one setting out the spatial strategy and a second policy setting out the presumption in favour of sustainable development. Following withdrawal of the Oxford Local Plan 2040 there remains the need for co-operation between Oxford and the surrounding authorities to ensure that the approach to meeting the unmet housing need is agreed. While it is acknowledged that the consultation version of the plan does increase the amount of housing to be provided within the plan period there remains a level of housing still to be provided outside of the boundaries of the city.	The general support is welcomed. S1 as a whole deals with the spatial strategy, so there is no obvious advantage to splitting it. The Plan does not attempt to address housing need at the expense of existing employment sites, which it encourages intensification of.
S1	Templars Square	The redevelopment of Templars Square would make a significant contribution to meeting the aims of Policy S1/ the development proposals should be viewed as one of the most strategically opportunities for the city in terms of its ability to address and	Noted.

Draft Policy	Topic	Summary	Response
		positively contribute to the aims and objectives of the emerging Local Plan.	
S1	Change of use	We support this policy in principle. Whilst the general aims of sustainable development and growth in terms of the delivery of homes, jobs and services are positive, a strategic approach is needed to achieve these aims. This policy touches on a number of key themes without identifying opportunities for growth. We would like to see this policy set out the council's stance in favour of applications for the change of use from commercial to residential within city and district centres. Promoting development of this type would achieve a number of the aims set out in Draft Policy S1. We would also support a policy outlining sanctions against the keeping of vacant units, both residential and commercial, within city and district centres. The repopulation or urban centres will have a significant impact on housing need, preventing the further development of Oxford's green setting.	The support in principle is welcomed. The policy approach for employment sites is only to protect the very largest few in the city and district centres. Most employment sites in these locations are not protected. The Local Plan cannot set a policy with sanctions against vacant buildings.
S1 Spatial strategy		Capacity based approach must be flexible to a) Allow sites of all sizes that meet the presumption in favour of sustainable development to be allocated with the draft Plan; b) Allow sites of all sizes that are not allocated in the draft Plan, to come forward through the Development Management process (planning applications) where they meet the presumption in favour of sustainable development. It is also imperative that there are no restrictions on small sites coming forward through planning applications which support small and medium sized housebuilders. Those SME housebuilders will play a crucial role in delivering the new homes that the country is desperately in need of.	Not every site needs to be allocated. Small sites do not need an allocation policy as there is unlikely to be anything site-specific it would need to cover. However, small sites are not in any way prevented from coming forward, and they are factored into the assumed capacity of the city through application of a windfall forecast.
S1 Spatial strategy	Oxford unmet housing need	The policy outlines how Oxford's development needs will be met but doesn't address the role of neighbouring local authorities in	Policy H1 outlines the housing requirement and unmet housing

Draft Policy	Topic	Summary	Response
		this process. Since Oxford's city boundaries have limited capacity, a significant part of its future housing and employment demands must be met in adjoining areas. The existing plan acknowledges this but relies on a regional strategy that has not progressed. Therefore, a new, agreed-upon approach is needed to address Oxford's unmet housing needs collaboratively. The plan should be bold enough to state that if growth ambitions are to be met in full, cross boundary joint working will be necessary with neighbouring authorities to consider how additional unmet needs can be met.	need is referred to. A formal request has been made of our neighbouring authorities for helping meeting unmet need, and duty to cooperate engagement is ongoing.
S1	SA of spatial strategy	Hallam is concerned that the Spatial Strategy has not been presented as a preferred option alongside any alternatives in the consultation. We can only look to the Sustainability Appraisal in this regard and the growth strategy for the Local Plan where six alternatives have been presented upon which the preferred option is based - a balance between providing for housing and employment land needs whilst delivering on wider local plan objectives. The Spatial Strategy must also be able to express more spatially where growth can be focussed. To some degree the plan sets out Areas of Focus and this could be reflected in the Spatial Strategy.	The SA and six alternatives for the growth strategy show that various options were considered.
S1	Proposed amendment	Minor change proposed to better reflect the duty on decision makers set out under S38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) to have regard to the Development Plan as a whole… Proposed amendment: *"Planning permission will be granted where development proposals accord with the policies of the Plan <u>taken as a whole</u>."*	Amendment made.

Draft Policy	Topic	Summary	Response
S1	Proposed amendment/ modification	Move all text contained within Policy S1 to the supporting text. Policy is ***Ineffective*** as it is mostly aspirational. It allows any development anywhere providing it meets the criteria. It not a policy but a fluffy wish-list. ALL development will generally be a net negative for resident amenity even if it has positives such a housing provision.	Providing criteria to achieve is not considered to be merely aspirational.
S1	Comment – proposed amendment	This new policy should set out a Spatial Strategy for meeting the vision and objectives of the Plan referring to the need to maximise housing delivery in Oxford. The Spatial Strategy should also set out how the proposed development is to be delivered over the plan period and beyond. The Spatial Strategy should follow the approach in the extant Local Plan (i.e. maximising growth in the City and then adopt a hub and spokes approach, with the City being the focus for education, tourism and employment but having good infrastructure links into the surrounding Districts where housing is more readily deliverable). The wording of the Spatial Strategy should fulfil the role of the LP42 and respond to challenges which include "national and international pressures such as rising build costs for new development, a chronic undersupply of housing, climate change and energy insecurity". And to "build upon the positive aspects that make the city so special, whilst also seeking to address the challenges we face through positive planning policies to ensure the optimum outcomes for the environment and its residents, businesses, education, and health institutions". In terms of addressing the undersupply of housing, the wording of the new Spatial Strategy should be similar to the adopted Local Plan 2036 which acknowledged that "addressing the housing issue is a key priority…". The locational text in Chapter 8 of LP42 which is more	The spatial strategy does refer to sustainable locations. The described spatial strategy with spokes into the districts sounds like work that was done as part of the Oxfordshire Plan, which was never completed. It is beyond the scope of the Oxford Local Plan.

Draft Policy	Topic	Summary	Response
		akin to a spatial strategy should also be reflected in the Spatial Strategy, to focus delivery in sustainable locations. The Spatial Strategy should also respond to the importance of Oxford's location, "Oxford is also highly sustainable location for employment in Oxfordshire and the southeast. Enhancements could be made to the already sustainable transport system to take people to jobs here rather than if employment is scattered to less sustainable locations. A concentration of employment in a sustainable location is better than dispersed employment relying on the private car. In particular, the city's economy is shaped by the presence of its two successful universities". Without a clear spatial strategy the LP42 is unsound as it is not positively prepared, effective or justified.	
S1&S2		Cyclox support these policies	Support noted.

Statutory Consultee Responses – Draft Policy S1

Oxford County Council

Topic	Summary of comments	Response
Policy S1 needs to be sufficiently flexible to ensure appropriate developments, e.g., demolishing old buildings and replacing them with new housing, can be found to be compliant with policy, providing there is clear environmental justification as to why their reuse is not feasible/viable.	Policy S1 provides the plan's over-arching strategy. Other policies specifically deal with the reuse of buildings.	No action required. Resolved.
Oxfordshire County Council seeks that the effects of development are mitigated through appropriate conditions, works and contributions to infrastructure.	Noted.	No action required. Resolved.

Topic	Summary of comments	Response
We expect to agree S106 contributions and S278 works in respect of development envisaged in this Local Plan, as well as agreeing the use of Community Infrastructure Levy (CIL) receipts for some infrastructure needs.	Policy S3 sets out more information about S106, S278 and CIL.	No action required. Resolved.

All Public Responses – Draft Policy S2

Draft Policy	Topic	Summary	Outcome
S2	Clarification	We support the reference to the "..wider townscape and landscape" within this policy. We feel that the supporting text could include more detailed information on what this means, and could also include specific reference to the wider green setting of the city. It is also pleasing to see that the supporting guidance in Appendix 1.1 highlights the issue of important views across the city and how these can be both views from the outskirts in towards the historic centre, and those that are from the centre looking out towards the green hills which surround the city.	Support is welcomed. That part of the policy wording will be amended for clarity.
S2	Policy should mention high quality architecture	While we support the general aims of the policy, it does not mention any preference for high quality architecture within the city centre. In a city filled with rich examples of internationally significant architecture, we would like to see the council's stance in favour of supporting examples of high quality architecture within the city centre set out clearly in policy.	This is a strategic policy that addresses specifically the approach in the plan towards design guidance. The plan includes a policy that addresses high quality design (policy HD7), and other policies that affect placemaking such as green spaces (G1, G2, G3), historic environments (HD1, HD2).
S2	Weighting of local design	Draft Policy S2 (Design Code and Guidance) makes reference to development proposals referring to and aligning with the design principles set out in the Botley Road Retail Park Development Brief	Any design guidance will be produced to be in accordance with the policies of the plan. As

Draft Policy	Topic	Summary	Outcome
	codes and design briefs	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 draft Policy S2 for the avoidance of doubt.	they are not statutory documents they can be amended or updated as technical documents to be in line with the extant local plan policies. Their weighting will be set out in the policy supporting text.
S2	Strengthen design checklist	we consider that this policy and the design checklist at appendix 1.1 could be strengthened. A common complaint across communities is the banality of much new housing development, dissatisfaction with design quality, and frustration with design that is not in keeping with the existing built environment. It is our experience that communities wish to positively influence the design of new housing, ensure that heritage considerations are thoughtfully and pragmatically balanced with quality contemporary design, and achieve design that responds positively to the local context. These straightforward but positively impactful aspirations could be strengthened in Local Plan policy. Larger developments should include a requirement to establish a forum comprised of local organisations/ residents who can have proper input into the design of new developments on an equal footing with other statutory consultees. Such an approach has been shown to lead to developments being more integrated into the current local community and lead to better social and health outcomes for the new residents.	Developers are encouraged to engage with planning officers at the earliest possible stage so that any concerns are identified at the earliest opportunity, and engagement with the local community is also good practice particularly for major schemes. There is a basis for this in national policy and is set out in the City Council‘s Statement of Community Involvement.

Draft Policy	Topic	Summary	Outcome
S2	Local Heritage Assets Design Guidance 'Positive strategy' Modifications	• The following policy is muddled as statutory duties are as below anyway, and implies English Heritage listed assets will not be protected. Final paragraph of the policy states: *In recognition of the significance of Oxford's heritage, and as part of its positive approach to the historic environment, in addition to fulfilling its statutory duties, the Council will: a) identify, conserve and enhance local heritage assets* • Design guidance is not a material consideration unless backed up with an Article 4 restriction. • Bullet point d) of the final paragraph makes reference to a 'positive strategy' in the context of heritage assets at risk. The respondent asks "what is a positive strategy? It is simply waffle. • Whole policy needs to be moved to supporting text. • The word *should,* needs to be replaced with *must*, for the policy to be effective.	• This refers to heritage assets on the local list, which do not have statutory designation. • An Article 4 direction are not required for local design guidance to be a material consideration. • This refers to an approach of proactive engagement with landowners to support and encourage them to explore options for safeguarding the future of heritage assets at risk. Where relevant developers will also be encouraged to consider how their schemes may enhance the setting of such heritage assets or directly contribute to the safeguarding of their future.

Draft Policy	Topic	Summary	Outcome
S2	Support + clarification sought	The inclusion of a Design Checklist at Appendix 1.1 is supported. The reference in the Appendix to the Design Code document should be clarified in terms of whether reference is being made to the National Model Design Code.	Comment noted.

Statutory Consultee Responses – Draft Policy S2

Historic England

Draft Policy	Summary	Response	Outcome
S2	Current title does not reflect the content of the policy. Suggest review, and also consider what a strategic policy on the historic environment should contain and whether policy content needs further update. One topic that could usefully be integrated is promoting opportunities for heritage-led regeneration. Hope the supporting text on heritage at risk from LP2040 Statement of Common Ground (SoCG) can be integrated into the final supporting text.	We agree the title could be changed to be more reflective of the policy. We will also have a think about the additional point and are happy to discuss further through statement of common ground where necessary.	Policy title updated. Council will give further thought to other suggestion re: heritage-led regeneration

Oxfordshire County Council

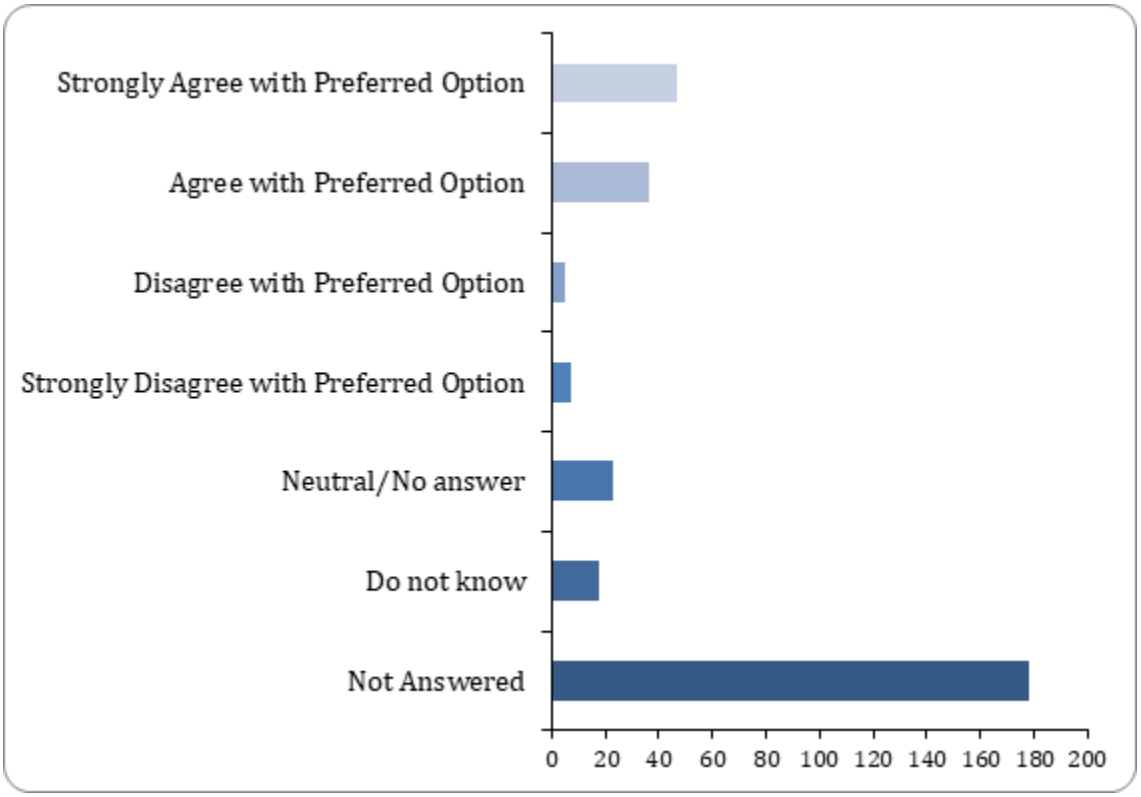
Topic	Summary of comments	Response
Landscape & Nature Recovery – Landscape		

Topic	Summary of comments	Response
Recommend that the policy and/ or design code includes reference to GI and the requirement to protect existing trees and hedgerows.	Design Checklist sections N1-N4 cover GI. Existing trees/ hedgerows are protected via other policies in the plan.	No action required.
Support design checklist at Appendix 1. It includes a lot of text making it not easy to use. Should consider if the checklist can be presented in more user-friendly way (e.g. more visualisation, interactive methods, etc.). It is not clear what applicants need to submit, or how compliance with the design code will be assessed.	Policy HD7 sets out that the design checklist could be included with a Design and Access Statement submitted alongside a planning application. No change proposed.	No action required.
Innovation Supporting text for Policy S2 should reference the Innovation Framework (available online as part of LTCP. The Innovation Framework requires an Innovation Plan to be produced. This is a mechanism for developers to comprehensively consider the need for innovation and futureproofing in the pre-planning stages of major new developments.	Having reviewed the Innovation Framework, it seems to apply more to infrastructure projects and is already supporting strategy for the LTCP.	No action required.
Urban Design (Placemaking) Require the inclusion of a reference "to carry out work with other local authorities and districts (where applicable) on producing and promoting use of other guidance – e.g., Oxfordshire Street Design Code (currently under development).	The Local Plan includes policy requirements to guide development in the city. As such, the inclusion of such a reference in the plan is not appropriate. We will continue to work with county colleagues to develop any relevant guidance.	No action required.

All Public Responses – Draft Policy S3

Please tell us what you think about policy options set 014a (draft Policy S3): Infrastructure Delivery in New Development .

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	47	14.97%
Agree with Preferred Option	36	11.46%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	23	7.32%
Do not know	18	5.73%
Not Answered	178	56.69%

Draft Policy	Topic	Summary	Response
S3	Strengthen social infrastructure element of policy	Community First considers that the themes of social infrastructure and community development could be significantly strengthened. To help achieve thriving, sustainable communities it is vital to set out expectations and enable locally-specific strategies to support long-term, on the ground community development support to support the process of new community formation, extend and deepen social and community infrastructure, and build bridges between existing and new residents. DRAFT POLICY S3: INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT sets out a range of expectations with regard to the provision of physical infrastructure. This policy would be strengthened by including an additional paragraph which considers social infrastructure, for example: *Where appropriate, in relation to the type, size, and scale of a development proposal, developers will be expected to engage early with the Council in order to identify and make to make sufficient provision to support site specific community development activity*.	This is an over-arching infrastructure policy which is supported by the Infrastructure Delivery Plan (IDP). While certain key physical infrastructure projects are referenced in the policy, the policy itself applies to all infrastructure – physical, social, green, etc. The IDP includes a schedule of projects to support planned growth over the plan period. Social infrastructure projects are included within the IDP. There is no need to explicitly reference social infrastructure in this policy as it is covered under the umbrella term of infrastructure.
S3	A more flexible approach suggested.	The infrastructure needs and delivery of an industrial site will differ from residential or mixed-use developments. A more flexible approach that allows for phased delivery would be welcomed.	Paragraph 3 of Policy S3 already includes some wording to ensure that infrastructure improvements are delivered “at a rate and scale to meet the needs that arise from that development or a phase of that development”

Draft Policy	Topic	Summary	Response
S3	More engagement with all stakeholders	Developers should engage with local active travel stakeholders (e.g. Coalition for Healthy Streets and Active Travel, Oxford Pedestrian Association). Oxford railway station should become a central transport hub, incorporating a nearby bus and coach station. Beckett Street car park is the preferred location for this hub due to its proximity and ownership. Urgent consideration needed before finalising housing/employment plans. Relocating the bus station from George Street is key to enabling a high-quality east-west cycle route through the city centre.	See response in box below See response in box below See response in box below Noted Noted
S3	Support for policy, with suggested amendments	Add: Engage with transport stakeholders to understand network opportunities pre-masterplan, to get the best results and avoid potential problems such as cutting off existing or future active travel routes. We specifically suggest that CoHSAT is engaged in any Major Development to identify opportunities or challenges. Change 'rail and bus' to 'rail, bus, active travel and links between these networks'.	The policy itself does not make reference to specific stakeholders as it is intended as an over-arching holistic policy which guides applicants to engage with appropriate/ relevant stakeholders. While active travel measures are supported through the IDP, these are usually delivered through developer contributions (e.g., S106/ S278 agreements. Whereas the policy states "Proposals to enhance the city's rail and bus network will be supported" relates to a much

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Draft Policy	Topic	Summary	Response
		The transformation of Oxford railway station should include a new fit-for purpose bus and coach station located close to the railway station, and a site should be allocated for this in the current Beckett Street car park.	broader suite of infrastructure, some which may require planning permission. The policy requirements for Oxford Railway Station/ Becket St car park will be set out in bespoke site allocation policy and any wider infrastructure requirements included within an Area of Focus Policy for the West End/ Botley Road. Neither of these policies include reference to a new bus/coach station. No changes are proposed.
S3	Infrastructure led regeneration	Network Rail welcome the preferred option for Policy S3 which outlines support for proposals that can enhance the city's rail and bus network, including Cowley Branch Line and Oxford Railway Station. However, redevelopment of Oxford Station is expected to act as a catalyst for economic regeneration, attracting investment and supporting new employment in and around the station area. The Local Plan should recognise the strategic importance of infrastructure-led regeneration in supporting the local economy.	Support noted. We can consider whether to incorporate these issues within Area of Focus/ Site allocation policies.
S3	CBL Buffer Zone	The inclusion of text relating to the proposed CBL buffer zone is not enforceable. 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	The CBL buffer zone area is the area where financial contributions from *new* trip generating development will be *expected. (emphasis added).*

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Draft Policy	Topic	Summary	Response
	Modification/ amendment	line) may benefit but so might others who use it as a transit point to go to Oxford Central. Remove the following text: *Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL [Cowley Branch Line] stations will be expected"* Unless there is a clear relationship between the proposed development. Contributions to CIL should be provided by city-wide CIL	Developer contributions are not sought from householder applications. CIL applies to minor and major developments in Oxford, while any financial contributions collected through this policy would be through the S106 process. The City Council already as a CIL charging authority already has a CIL tariff in place. The text also includes reference to the paragraph in the NPPF that sets out the tests for developer contributions (para 58 NPPF, Dec 2024). No changes are proposed.
S3	Infrastructure Delivery Plan	A clear, up-front rule that links schemes to an up-to-date Infrastructure Delivery Plan is preferable to ad-hoc negotiations: it gives landowners price certainty, speeds decisions and ensures that roads, bus priority, fibre and drainage scale in step with new homes and labs. The key, however, is to keep the IDP lean and regularly refreshed—no sprawling wish-list that becomes an open-ended tax. Contributions should default to a transparent, per-unit CIL/Section 106 tariff, with viability testing only for genuinely abnormal sites, and there must be scope to swap listed projects if evidence shows a higher-yield use of funds (e.g. bus lanes	The IDP is a 'live' document and is usually updated on an annual basis. Preferred Option Selected for reasons set out in Background Paper

Draft Policy	Topic	Summary	Response
		outranking public-art budgets). In short, the policy should secure essential enabling infrastructure without piling unpredictable, scheme-killing costs onto the very development Oxford needs to stay dynamic and affordable.	
S3	Timing of Infrastructure delivery	An emphasis on appropriate timing of infrastructure requirements would be useful- i.e., do not leave it till the end of the project.	Policy S3 recognises the importance of delivering infrastructure in a timely manner.
S3		I feel it is essential that new developments contribute to local infrastructure, but it would be good to see details of how this would be drawn up and enforced.	The IDP sets out the infrastructure required to support the delivery of the local plan. Policy S3 and the IDP provide the basis for developer contributions. Infrastructure is delivered through legal agreements/ conditions which are enforceable.
S3	Do not include policy	Four respondents considered that no policy on infrastructure delivery was required.	Preferred Option Selected for reasons set out in Background Paper
S3	Use evidence to support infrastructure delivery	It is important that the Council uses its evidence base (including the updated Playing Pitch Strategy) for sport and provides contributions to new sports facilities within the city.	The IDP sets out the infrastructure required to support the delivery of the local plan.
S3	Co-ordinated delivery of active travel routes	Prioritise a public health with a programme to join up and upgrade walking and cycling route into completed networks. Such a programme will pay for itself in health and productivity.	The IDP sets out the infrastructure required to support the delivery of the local plan.

Draft Policy	Topic	Summary	Response
S3	Shared service duct requirements for new development	With new developments, will services be required to be in shared service ducts and thus provide more space for trees especially street trees?	There is no requirement for services to share service ducts. Preferred Option Selected for reasons set out in Background Paper
S3	General comment	No idea what the text above is talking about.	Preferred Option Selected for reasons set out in Background Paper
S3	General comment	Additional infrastructure is needed for new people and developments.	Preferred Option Selected for reasons set out in Background Paper
S3	General comment	This should already be in place	Policy S3 recognises the importance of delivering infrastructure in a timely manner.
S3	Support	Support the policy subject to delivery on an appropriately phased timescale which will be development specific.	Support noted.
S3	Support	Support Preferred option which will ensure that development is more closely linked to infrastructure planning and should therefore encourage sustainable decision-making.	Support noted.
S3	Support	Having a policy seems a good thing to have.	Support noted.
S3 and S4	Support policies	Policy S3 and S4 are critical policies to ensure that policies contained within the Plan are deliverable and underpinned by sound evidence. Support inclusion of draft policy S4.	Support noted.

Statutory Consultee Responses – Draft Policy S3

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome
Draft Policy S3	Justification for the CBL 1,500m buffer for contributions is needed and confirmation of viability. S3 not fully deliverable as it extends beyond the city boundary. Not within 10mins walk.	Contributions have been viability tested. Policy S3 only applies to sites within city administrative boundary.	No further action.

National Highways

Draft Policy	Topic	Summary of comments	Response
S3	The Local Plan should provide a policy framework to ensure development cannot progress without the appropriate infrastructure being in place. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel, particularly on the SRN. Infrastructure improvements on the SRN should only be considered as a last resort.	Draft Policy S3 – Infrastructure Delivering in New Development advocates this approach. Infrastructure schemes covered in the IDP are included following discussions with key stakeholders.	At the meeting, the City Council and National Highways agreed that the issues raised within National Highways response to the Reg. 18 Plan consultation had been satisfactorily resolved.

Oxfordshire County Council

Draft Policy	Topic	Summary of comments	Response
S3	**Strategic Planning** Support the inclusion of strategic infrastructure projects (e.g., Oxford Station and Cowley Branch Line).	Noted.	No action required.
	Draft Policy S3 provides a defined buffer zone within which financial contributions will be sought. The County Council would prefer the policy to set out a more flexible approach. On this basis, the County is keen to continue working with the City on identifying suitable wording for this section of the policy between the Reg 18 and Reg 19 stages of the plan preparation.	Increasing the flexibility of the approach also reduces the certainty of receiving contributions as each development needs to be determined on a case-by-case basis. We will continue working with county colleagues as the plan production process moves forward.	Worked with the Counnty Council to agree an amendment to Policy S3 to address this issue.
	Place Planning and TDM (Central) Specific refence should be made to the city's Park & Ride (P&R) network alongside rail and bus. Emerging work to update the Oxford Park & Ride strategy suggests a need to provide more capacity serving the city within the plan period. This is linked to employment growth in the city, including redevelopment and intensification of existing and future employment sites as well as policy for more low car development. The County Council's core schemes (trial traffic filters, ZEZ expansion and workplace parking levy) will also increase demand for P&R.	We cannot include infrastructure requirements based on unpublished or emerging work. If the P&R strategy is published in a timely manner, then we can consider updating the IDP	Oxford City Action: Keep a "watching brief" for publication of emerging studies/ strategies

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Draft Policy	Topic	Summary of comments	Response
	Emerging work also identifies the need for more consistent and higher quality facilities at existing P&R sites and improved interchange with other modes. Further bus service enhancements are also required to ensure all areas of the city are adequately served by P&R, again, particularly the south-east of the city. **Innovation Hub** New infrastructure should be futureproofed and consider how needs will change over time as both society and technology changes, including the need to mitigate and adapt to climate change. It is important that the Local Plan sets out the need for new infrastructure and infrastructure improvements to consider these changes (e.g. changing grid demands with electrification of vehicles and heat, vehicle automation, greater digital connectivity, 5G/6G etc). **Environment and Circular Economy** The Household Waste Recycling Centre (HWRC) at Redbridge is a critical facility for householders to deliver their waste for reuse, recycling and composting for Oxford residents and beyond. It is anticipated that a HWRC in this location will continue for the foreseeable future.	with any identified P&R schemes that affect the city. See above. When the strategy is published and schemes/ infrastructure projects are identified we can consider their inclusion in the IDP. Draft Policy S3 already includes a reference to "futureproofing" infrastructure. The requirements of the policy are to ensure that new development mitigates any impact by supporting	Oxford City Action: Keep a "watching brief" for publication of emerging studies/ strategies

Draft Policy	Topic	Summary of comments	Response
		infrastructure delivery. It would be for 3rd party infrastructure providers to deliver (and futureproof) any required infrastructure. Thank you for the update. No changes proposed.	

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BOB ICB

Draft Policy	Summary	Response	Outcome
Policy S3	The ICB supports Policy S3 and welcomes the proposed engagement with developers to discuss the requirement of the infrastructure. The NHS body which is responsible for the commissioning neighbourhood health services or primary care services should be engaged in any pre-application engagements such as preapplication and planning performance	Noted. Noted.	No further action

Draft Policy	Summary	Response	Outcome
	agreement (PPA), including the delivery of neighbourhood health centres and other primary care health facilities in the city. The pre-application engagement will allow the ICB or as such appropriate body which is responsible for the commissioning neighbourhood health services or primary care services and the relevant PCNs to have further discussions with the Council and potential developers about the appropriate primary care mitigations as part of the wider housing developments. The ICB proposed the following wordings to the Draft Policy S3: “Development proposals to deliver a neighbourhood health centre and new primary care health facilities or improvement works to existing primary care health facilities will be	Noted.	

Draft Policy	Summary	Response	Outcome
	supported subject to the proposal complies with other policies set out in the Document. Developers must engage with the relevant neighbourhood provider, the Integrated Care Board or as such appropriate body which is responsible for the commissioning neighbourhood health services or primary care services to agree with the delivery and funding arrangement of the neighbourhood health centre or the primary care health facility."	Policy S3 is an overarching infrastructure policy which sets out that planning contributions will be sought from development to deliver required infrastructure to mitigate identified impacts from development. Draft Policy S3 sets out that "the standards of infrastructure delivery will be expected to comply with other policies set out in this Plan." Draft Policy S3 already includes an expectation for developers to engage with infrastructure service providers to discuss their requirements.	

Draft Policy	Summary	Response	Outcome
		Including bespoke healthcare requirements are not therefore required because the policy already sets out over-arching expectations relating to engagement and ensuring that infrastructure complies with the other policies in the Plan.	

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All Public Responses – Draft Policy S4

Draft Policy	Topic	Summary	Outcome
S4 Viability	Undertaking assessments to support applications	Any assessment of viability regarding affordable housing must be undertaken by a suitably qualified independent viability consultant and that consultant must be agreed by the applicant in advance of any appointment.	Amendment made to policy to clarify this.
S4	Viability Evidence / study	Further work is required to ensure the Plan's assumption (that all planning applications that comply with policies should generally be assumed to be viable) is indeed the case. Testing in respect of older persons housing requires some clarification in terms of the assumptions made and we would encourage the council to engage with providers of such typologies at an early stage.	The Viability assessment of the plan has tested a wide range of development typologies to represent the types of sites that are likely to be developed in Oxford during the plan period. The contributions and

Draft Policy	Topic	Summary	Outcome
			requirements set out in policies are set at a level that the majority of qualifying applications would be able to deliver viably. This includes C2 forms of residential development, which can include communal older persons accommodation, and C3 which would include self-contained older persons accommodation.
S4	Viability Evidence / study	The Council's website does not include any evidence studies relating to Viability. This is a notable omission given that the wording of draft Policy S4 states that "the policies in the Plan have been viability tested". Without the Viability Assessment, it is unclear whether draft policies have been subjected to a whole plan viability assessment, which will then define how easily or not the aspirations can be delivered. Such an assessment would also define the percentage of affordable housing and answer the question of whether a lower level of affordable housing should be considered in order to allow for the environmental improvements sought. It is difficult to comment on individual policies and wider implications (including in relation to future site allocations) without understanding how they impact on the need for housing and employment land and indeed viability overall. Viability evidence to support the plan not published as part of the Reg. 18 consultation. Without viability evidence, the cumulative cost impact of policy requirements (including increased CIL Rates,	The Viability assessment is an iterative process, to test emerging draft policies, inform refinements to policies, and test final policies. At the Regulation 18 consultation the assessment was not published because it was incomplete. Policies requirements are assessed individually and cumulatively as a whole plan, in order to test the full range of policy requirements which an application might be required to deliver.

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Draft Policy	Topic	Summary	Outcome
		S106 etc.), cannot be properly assessed. Viability evidence also needs to consider emerging WPL etc.	
S4	Viability Evidence / study	Given the number of emerging policies affecting R&D-led development, the viability evidence must use realistic inputs and test appropriate site typologies, including lab-enabled buildings with high servicing and sustainability requirements. Concerned that a generic, one-size-fits-all viability approach has been taken, which fails to reflect the distinctive operational, ownership and financial realities of specialist sectors such as life sciences. Macro-economic events and interest rate rises can have a significant and long-lasting impact on the property market. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this.	The Viability assessment of the plan has tested a wide range of development typologies to represent the types of sites that are likely to be developed in Oxford during the plan period. The contributions and requirements set out in policies are set at a level that the majority of qualifying applications would be able to deliver viably.
S4	Impact of policy requirements on viability (particularly employment uses)	The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability. Concerned about the cumulative impact of the cost of the proposed policies in the plan (particularly in relation to employment uses), which are in addition to the recent amendment to the CIL Charging Schedule. Those increased costs will ultimately be reflected in rents charged to occupiers. Rising occupier rents on top of tax rises including National Insurance and Business Rates, will reduce the funding available	The policies in the plan have been assessed in the viability modelling to help inform the level of contributions are set at an appropriate rate so as not to fetter development. This is in accordance with the NPPF which requires local plans to be deliverable, meaning that obligations and policy burdens should not make development unviable. The testing has taken into account the recently

Draft Policy	Topic	Summary	Outcome
		for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation. We request that the cost of proposed policy changes, are assessed and considered as part of any transparent decision-making process as part of the Plan progresses. Serious concerns about the viability and deliverability of development within the Local Plan. Paragraph 86(c) of the NPPF is clear that planning policies should facilitate modern economic development, including science and innovation. Introducing further financial burdens (on top of already high land values and infrastructure costs) risks deterring occupiers and investors. Concerned that additional planning costs will mean that key employment sites become undeliverable.	updated CIL rates for employment as well. In the event that it is not viable for a proposal to deliver the full policy contributions, then the Plan also builds in flexibility via the cascade policy in S4, so that proposals can be adjusted until they become viable.
S4	Viability cascade for Residential development	We note that this Policy recognises that imposing the 'low car requirement' in the parking policy (Policy C8) will be very unpopular with residents, will therefore reduce the selling price of properties, and will contribute to difficulty in achieving viability of developments needing other requirements such as having 40% affordable homes.	The viability assessment has tested the impact of Policy C8 and found that the majority of typologies can deliver this requirement along with other policy requirements. Furthermore a lot of proposals would be in locations where C8 policy did not apply.
S4	Viability cascade for Residential development	The overall goal must be to increase the number of houses, it is extraordinary that to maintain viability, car provision, and consequent loss of space for housing, is increased first and then affordable housing provision. It is clearly better to have 10 homes	Viability testing builds in an assumption for developer profit in accordance with the NPPF guidance for a developer profit margin of 15% to 20% of the

1732

Draft Policy	Topic	Summary	Outcome
		with two affordable, than 6 houses, 3 affordable, with space wasted for parking and car infrastructure. This is ineffective as there is no definition of viability, which would be considerably more than breakeven for a developer to proceed with the development.	Gross Development Value (GDV). Agreed that the number of homes is important but so is the affordability of homes, in the context of the affordability crisis in Oxford specifically.
S4	Viability - development costs	The science and innovation sector, like the wider UK development industry, is navigating significant challenges: rising construction costs, global competition, constrained funding conditions, and increasing regulatory obligations.	The viability assessment to inform the plan, takes into account recent, current and forecast future market trends.

Statutory Consultee Responses – Draft Policy S4

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
S4	**Strategic Planning** Do not support the viability cascade as it is not in line with the county's policies on low carbon or the LTCP objective to reduce car trips. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at	See below for rationale for inclusion of the viability cascade. Other policies in the plan already cover these specific issues. Policy C8 sets out motor vehicle parking design standards. For residential development, this includes setting criteria for low car schemes (0.2 spaces per 20 dwellings) and maximum parking standards that reflect the County Council's residential parking standards for Oxford city. For non-residential parking	This response was sent to the County Council for review. Following a review and further discussions between City and County officers, no further

Draft Policy	Summary	Response	Outcome
	good densities and not using land wastefully on car parking. Draft Policy S4 should be amended to remove a hierarchy that allows the removal/ minimisation of net zero buildings and that allows an increase of car parking contrary to the County Council standards to not be met before there is any consideration of reducing the affordable housing requirement. Instead, all the possible allowances to provide for viability should be considered in the round	developments, the starting point is no additional parking (except for blue badge/ servicing) and a reduction in spaces will be sought at highly accessible sites. Any additional car parking at non-residential developments should be kept to a minimum, with the need being demonstrated through submitted TA. Policy HD8: Making Efficient Use of Land sets out the expected densities for development (i.e., 100dph for the city/ district centres/ 80dph for gateway sites/ 60dph in most other locations. Policies R1-R3 provide the plan's requirements for delivering sustainable buildings. Policy R1 provides that offsetting may be accepted, as a last resort, to offset remaining energy demand that cannot be sourced on-renewably on- or off-site. The policy sets out that the City Council will accept payment into the Council's offsetting fund for this remaining energy demand (secured through an appropriate legal agreement/ S106). Policy C8 and Appendix 7.6 set include vehicle parking standards (both "low car", and the aligned city/ county residential parking standards for Oxford). The viability cascade does not suggest that parking standards would be allowed that was contrary to city/	specific action was identified.

Draft Policy	Summary	Response	Outcome
		county (Oxford) standards but rather that these are effectively the "fall-back" position. National Policy (paragraph 35, NPPF) sets out the plan should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan. Policy S4 provides a viability cascade which sets out the City Council's approach "if the applicant can demonstrate the development to be unviable". While the viability assessment for the plan provides the technical evidence to demonstrate that the policies in the plan (as a whole) should not undermine the deliverability of development, there are 'particular circumstances' (as set out in Paragraph 007 reference ID 10-007-20190509 of the PPG.	
	Place Planning & TDM (Central) This section of the Preferred Options document comes across as overly permissive. What the 'particular circumstances' are and what the relaxed standards would look like would be important. Such instances should be exceptions rather than the rule and any relaxation of standards should be kept to a minimum. In cases where there is no affordable housing requirement, we doubt that there is a need for any relaxation of standards. If allocating car parking spaces to units is considered necessary to make a development viable, a transport assessment may be required to demonstrate this is acceptable however we are concerned that any such policy contained in the Local Plan will		

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Draft Policy	Summary	Response	Outcome
	encourage developers to claim that car-free or low car parking requirements affects their viability and that would put the County Council's policies at risk. **Innovation Hub** Before any standards were to be relaxed, consideration of whether the developer has taken innovative solutions into account would be beneficial, i.e., relaxation of standards should be considered only after every alternative has been ruled out, especially in relation to sustainable development. **Climate Action** The County Council notes the preferred option could result in a key aspiration of the Local Plan, to reach net zero by 2040, to be lost if developments enter negotiations based on viability. This is concerning as the cost and emissions savings of implementing net zero standards at the build stage is significantly	Policy S4 sets out that it is the carbon offsetting payments that should be reduced incrementally until viability is achieved (rather than reducing the environmental quality of the development). The ordering in the cascade represents the city's priorities.	

1736

Draft Policy	Summary	Response	Outcome
	lower than achieving later through retrofit, and this additional cost will likely fall onto the occupant.		

All Public Responses to the Plan Process Overall

Topic	Summary of comments	Response
Consultation process- early engagement survey	The early engagement survey had 228 responses from a city of 165,000 residents but inclusive early engagement is critical and should use methods to capture input from many more, and particularly communities who are most difficult to reach. The results from this survey are not mentioned in the PO consultation.	Although the 2042 plan is a new plan, it can build on a lot of the work of the 2040 plan, which itself was informed by extensive consultation. Focus of the early engagement was in setting the scene that there are a few areas where the context has changed, but a lot of existing work to build on. The success of a consultation can't be measured only by the number of responses. The first statutory consultation at Regulation 18 had a much wider reach and bigger response rate. Nevertheless, statutory requirements are exceeded by an early engagement taking place.

Topic	Summary of comments	Response
Consultation questions – Q2: short survey	Wording of Q2 (short questionnaire) is misleading. Taking Care of Our Environment of the Planning Oxford's future: first draft Local Plan 2042 states: *We think it is important that Oxford is a green biodiverse city… We are protecting our important green spaces and features*. Instead, draft policy only protects sites which already have legal protection i.e. SSSIs and SACs. There is no protection for local wildlife sites. Yet many people will have voted in favour of this draft policy, under the misapprehension that it does indeed 'protect ALL our green spaces and features', not just the ones which the Council is legally obliged to protect. The misleading nature of this question invalidates not only the responses given but also invalidates the whole survey.	The plan includes a hierarchy of protection for ecological sites as well as protecting "Core Green and Blue spaces" - Policy G1. Policy G6 protects locally designated sites and sets out strict criteria which must be met, including "satisfactory mitigation and compensation".
Consultation process	Concerns over the complexity of the surveys, arguing this will exclude many from responding and responses will therefore not be representative of Oxford. Suggest introducing 1) Short video explanations for people who struggle with reading	This feedback has been noted and will be looked into for the Regulation 19 consultation and further consultation events.

Topic	Summary of comments	Response
	2.) Sending consultation out in sections (instead of whole plan) with deadline to return 3) have more localised consultation 4) have direct links to different sections on the online survey 5) have the option to save and return to the online survey. Questions are ambiguous and leading. Why is it not possible to vote on the alternative options if you are consulting on them anyway? All consultation material should meet professional standards for qualitative surveys. Furthermore, the list of site allocations should have been provided alongside the short surveys (not just the online surveys).	
Preferred options weighting	No information is given on what grounds preferred options are proposed/favoured and how that takes account of the evidence (e.g. the GI study report concludes Oxford's green spaces should be preserved and enhanced and new created, but only a tiny 'core' of these spaces are protected).	The background papers do set out a number of options in nearly all cases, and explain why the draft policy options were preferred. The background papers also link back

Topic	Summary of comments	Response
		to evidence and other relevant information to inform decisions.
Consultation process	Many planning authorities have a separate consultation on proposed site allocations after the Regulation 18 consultation, and we think that this would have been much fairer, especially as the next stage of consultation is supposed to concentrate on the plan's soundness only. This consultation also seems premature in relation to some of the proposed new site allocations as they are described as being still under investigation. In addition, we have had difficulty responding as there are errors and inconsistencies in the mapping and text, and the background information is incomplete. In our local area the interactive policy map shows more site allocations than are shown on the site allocation map in the online survey questionnaires. This seems likely to confuse or even invalidate some consultation responses. For at least one site (Warneford Hospital) the site assessment information is also missing. Approach to consultation engenders dis-engagement from democratic process. Site at	The proposed sites were included in the Regulation 18 consultation with proposed uses, just without detailed policies, But often there are no detailed policies on any topic at Regulation 18 anyway. The Regulation 18 consultation ran into the school summer holidays, but was largely outside of them.

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Topic	Summary of comments	Response
	Meadow Lane remains allocated despite 50 emails objecting to it. Timing of consultation inopportune – start of school holidays when many people in community organisations are on leave or have childcare responsibilities. Hinders community stakeholders being able to give a meaningful & genuine response. We would welcome further & deeper engagement with stakeholders/networks which represent communities in Oxford.	
Headington Neighbourhood Plan is a "material consideration"	The Headington Neighbourhood Plan, (valid until 2026) which went through multiple thorough consultations, generated lots of responses and was approved by the Council must be a Material Consideration. Yet its Green Spaces and Biodiversity policies have been completely ignored. They would be an excellent basis for the policies of the Draft Local Plan 2042. Relevant polices in the HNP are as follows; GSP1: CONSERVING AND ENHANCING PUBLIC ACCESS GREEN SPACE	The Local Plan does not seek to replicate existing policy already contained within the development plan for Oxford. The Local Plan provides an opportunity to set the local planning policy framework for the entire city. Where policies in the Headington Neighbourhood Plan remain up to date, these should be taken account of in the decision-making process.

Topic	Summary of comments	Response
	GSP2: PROVISION OF GREEN SPACE WITHIN DEVELOPMENTS GSP3: CONSERVING AND ENHANCING BIODIVERSITY	
Whole plan	**My objections to the Local Plan are**: 1. lack of transparency over the plan amounting to 'residents should not be allowed to comment or even know what is planned' 2. Where are the background papers for previous rounds of consultation feedback? 3. Why are Green Spaces not protected adequately – but seen as 'development sites' 4. The options on the consultation do not provide any evidence for the decision made 5. If there are background papers to support 'preferred options' – where are the background papers or the justification for these options, and where is the feedback from the alleged Early Engagement?	1. This engagement exercise was intended as a way of enabling residents to see what is planned and to comment. 2. The consultation report for the early public engagement survey was published ahead of the Regulation 18 consultation 3. The vast majority of green spaces are strongly protected 4. Attempts were made to explain why preferred options were put forward.

1742

Topic	Summary of comments	Response
	6. the survey report identified cross cutting themes: the protection of green spaces, sustainable infrastructure(especially sewage and flooding risks), the importance of aligning development with community health and wellbeing – however there is NO INFORMATION on how feedback on critical issues has informed the Preferred Option 7. Where are the background papers to prefer one green space Development site over another? 8. Where is the list of sites allocated for development - vital for residents to know what development is planned for their area and to ensure a strategic overview and not a blinkered generic response- is not provided in the short surveys (printed flyer and short online survey). Only the long online survey, that is least accessible to the majority of residents, gives the list of development sites and asks for feedback on whether these should be allocated 9. Wording is misleading, failing to define commonly used terms such as	5. The options were shown in the published background papers. 6. The explanations for the preferred options do refer to background information where relevant. 7. The Green Infrastructure Background Paper explains the approach 8. The sites were listed within the main document, but were not listed in the short questionnaire because that would have made the questionnaire not short or as accessible or possible to deliver door to door- but the questionnaire explained where ot find the information.

1743

Topic	Summary of comments	Response
	‘important green spaces’ and ‘affordable’ housing. In reality, the term ‘important’ green spaces is limited to ‘core’ green infrastructure with legal protection rather than spaces important to local communities, joined up biodiversity or climate adaptation; the term ‘affordable’ is unclear and undermined as unaffordable in the background documents with the introduction of a new term ‘truly affordable’ - a phrase that is not defined. **The Draft Local Plan will worsen Oxford’s current problems because:** • LP Preferred options 2042 consultation does not achieve a balance between the economic growth agenda and the societal and environmental needs of the city. • Policies promoting economic growth are prioritised and stated as requirements. • Policies around green infrastructure, heritage, place, culture and equality are worded as vague aspirations, merely ‘seeking to’ rather than requiring	9. Care will be taken to ensure important phrases are defined in the Glossary. The plan aims to balance competing needs and considerations. The policies follow standard wording. The majority of the green spaces are strongly protected. There has to be some flexibility to allow reprovision, but many green spaces are strongly protected in situ.

1744

Topic	Summary of comments	Response
	• The majority of the City's green spaces have no genuine protection **This consultation and plan should be rejected on the grounds that** • it hides the criteria/evidence on which the plans are being made • **economic growth appears to be the driver of this Local Plan and not plans which enhance Oxford for residents and which protect the local environment** • consultation with the public has not been in depth despite the claim on the City's website *'We can't get the Local Plan right without input from the community.'*	
Whole Plan	The entire plan is centred around the "ecocidal" model of growth economics. Wealth inequality is increasing. The earth cannot continue to sustain 8billion humans (the global economy and population size need to shrink by about 75%). Without healthy eco-systems and a	Comment noted. The Plan does attempt to balance need.

1745

Topic	Summary of comments	Response
	reliable climate we are going to be increasingly challenged to survive.	
Whole Plan	The plan seeks to introduce a raft of new requirements for development including building performance and ecology. While these are important matters for the local plan they need to be applied within the economic realities of development.	Comment noted- these measures are viability tested.
Policies Map	It is noted that the site is within one of the 'Areas of Greater Potential' identified within Figure 7 of the High Buildings TAN 2018 (area 5A – Cowley Residential Suburb). As described in the TAN, these areas are where proposals for new high buildings are more likely to be appropriate. The site is also within the 'Dynamic Area' 7 – Temple Cowley Centre. We request that these areas and heights are included on the Draft Policies Map, which is currently limited to certain layers. We would also request that the support for growth, regeneration and high buildings is clearly advocated and supported within the site allocation policy for Templars Square.	These areas are not considered appropriate for the policies map, and they provide background information but do not have a specifically applied policy approach.

Topic	Summary of comments	Response
Evidence base	We note that a number of Local Plan evidence base documents are not available at this Regulation 18 consultation stage. This includes an updated Housing and Economic Land Availability Assessment (HELAA). It is essential that these documents are published as soon as possible so that their contents can be used to inform the preparation of the draft Plan and for comments to be made upon them.	The full evidence base will be published at Regulation 19.
Plan Period	The proposed plan period is from 2022 to 2042, which reflects the 20-year plan period in the adopted Plan (2016-2036). There is an issue with the starting date for the period being 2022 given that it is 3 years before the submission of the plan and 4-5 years before its likely adoption date. In addition, whilst the 2042 end date would achieve the minimum 15 year plan period, this is based on the plan achieving the programme in the LDS with the emerging plan being adopted in 2027. Given that this allows no room for slippage, the Group proposes a later date for the end of the plan.	Since the Regulation 18 consultation, the Plan period has been adjusted to a 2025 start date, with a plan period now of 2025-2045. The LDS has been updated to reflect this.
Viability Evidence	The Group is concerned that the current consultation lacks detailed viability evidence to	The Viability assessment is an iterative process, to test emerging

Topic	Summary of comments	Response
	show the proposed policies are deliverable, particularly when combined with existing infrastructure costs like CIL. They stress that, according to planning guidance, viability evidence should be proportionate and part of an ongoing process. They request that such evidence be published for consultation to allow proper scrutiny of the potential impact on both commercial and residential development.	draft policies, inform refinements to policies, and test final policies. At the Regulation 18 consultation the assessment was not published because it was incomplete. Policies requirements are assessed individually and cumulatively as a whole plan, in order to test the full range of policy requirements which an application might be required to deliver.
Duty to cooperate	It is a serious and fundamental concern that whilst the Council have stated that the Plan will be based on a capacity led approach, that no Duty to Co-operate paper has been prepared to address the question of unmet needs. The Plan states only that "discussions will continue about the remaining unmet need to 2042." (paragraph 2.3 of the Reg 18 Local Plan"). Given the Council's approach in the local plan is capacity based, the issue of unmet needs (whatever the figure is – see below), needs to be addressed, given the acute need for housing in the City, and the	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.

1748

Topic	Summary of comments	Response
	importance of the provision of housing to economic growth not only in Oxford, but for the County of Oxfordshire and its contribution to the national economy in terms of significantly boosting the supply of housing.	
Duty to cooperate	To address the "acute housing pressures" in Oxford and the "urgent need for more housing", the Council is encouraged to maximise the provision of housing within the City and then liaise with its neighbouring authorities and other organisations to account for any unmet housing need. This should be done on a regular basis to address the recommendations made by the LP40 Examination Inspectors.	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.
Plan Period	The Council have set the plan period at 2022 – 2042. Using the Standard Method (SM) Oxford housing needs are 1,087 dwellings per annum, (this reflects the latest housing stock data). Over the proposed plan period, 2022 – 2042 this equates 21,740 dwellings, which on the basis of the Council's supply will result in a considerable level of unmet housing need that must be accommodated elsewhere.	The plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.

Topic	Summary of comments	Response
	The Council have chosen the start date of 2022 which is over four years prior to submission of the Plan in April 2026. The base date should be 2025 since the SM takes account of past supply through the affordability uplift to determine housing needs. As set out in the NPPF and PPG local plans are meant to look forward a minimum of 15 years (para 22), past delivery is taken into account through the use of the standard method. The PPG Housing and Economic Needs Assessment Paragraph: 004 Reference ID: 2a-004-20241212 explains how the Standard Method is calculated using the existing dwellings stock for the area and "the most recent data published at the time should be used." As set out in the PPG the Standard Method also requires the affordability adjustment to be based on the most recent data, in this case it is the median affordability ratio 2024 that was published in March 2025. This suggests that the starting point should be in the year to which the affordability ratio relates. Consequently, it follows that the plan period should commence in 2025/26.	

1750

Topic	Summary of comments	Response
	There have been recent examples (West Berkshire Local Plan, Isle of Wight, and North Norfolk Local Plan) where the Inspectors examining local plans have required the plan period to be extended to reflect paragraph 22 of the NPPF and for the starting point of the plan to be brought forward a year to reflect national policy in respect of the assessment of housing needs. The plan period should therefore be 2025 – 2042, resulting in a housing need of 1,087 x 17 = 18,479 homes.	
Plan Period	The Plan period runs from 2022 to 2042. If the Plan is adopted by March 2027, the strategic policies in the Plan will have a maximum lifespan of 15 years. This is supported by ChCh. If there is any slippage or delay in the timetable then the LP42's lifespan will be less than 15 years and will need extending. Should that situation occur then the LP42's housing need will also need to be increased accordingly.	The plan period has been adjusted to 2025 – 2045 and the housing need recalculated to reflect this. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
Structure of Local Plan Survey	Found the local plan survey difficult to understand due to complexity and time constraints; concerned that many residents will be excluded from the	As well as the long questionnaire, that necessarily covered all

Topic	Summary of comments	Response
	consultation. Urges clearer, more accessible communication to enable meaningful public input.	proposals, there was also a short questionnaire.
General Comments: Ineffective Language/ Objectives not set	A Plan should not be only aspirational but lay out concrete measures by which the stated objectives are to be realised, it is therefore ***ineffective*** where policies are ***fluffy***. Phrases such as "*should have regard for…"*, "*take opportunities taken…", "be informed by…", "into consideration…", "should*", etc. are not ***effective*** as clear goals are not set, and at most belong in the supporting text. The Council seems to impose solutions to issues, enforcing specific solutions on development, therefore this is not ***positively prepared***. Much of the content of policies should be in the supporting text. Frequently, "policies" consist of idle speculation, and vaguely articulated and formed ideas - these are marked as ***fluffy*** or ***waffle***. Verbose site description is	Draft Policies will alll be reviewed to ensure effective and appropriate policy wording.

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Topic	Summary of comments	Response
	waffle if not backed up with concrete policies detailing what is and not acceptable given the characteristics. "Reduce" is either meaningless as the baseline is not given, or not related to the application so ultra vires, as the condition must relate to the application. Many policies seem to assume that, if a report is written, the planning result will obtain, without providing any metrics as to what the goals or thresholds are to allow consent.	
General Comment: Repetition between site/ area policies and general policies	Many site-specific policies repeat endlessly concerns that should be, or are, general policies such as car parking, flooding etc, this is ineffective as it can lead to confusion or lack of consistency and is frequently simply wrong eg: *Policies G1 and G3 require protection of existing green infrastructure features and enhancement of*	The Reg. 18 consultation document (June 2025) did not contain any site-specific or area-based policies. The inclusion of specific references within site allocation policies can be useful, particularly when signposting how development at a

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Topic	Summary of comments	Response
	greening on site through the urban greening factor. Policy G5 requires onsite biodiversity enhancement, and Policy G2 requires new Green Infrastructure features and enhancement of existing features. It is expected that those requirements will be met in the following ways. 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. (JR, Churchill, NOC) Is not only needlessly repeated, but factually wrong – G6 and G7 are the relevant policies.	particular site or area can meet/ achieve wider policy aims.
Sites not up to date	A number of sites listed (e.g.: Marston Paddock) have already been developed but remain in the plan, these are ineffective as already developed.	We will review the list of sites to ensure that they are up-to-date for the next stage of consultation.
Plans Confused With Execution	The requirement to produce a plan (eg Traffic Assessment, SA etc) is confused with the actual goal, which is to achieve specific outcomes. A plan is not a goal, it is a means to a goal therefore these policies are ineffective.	Plans are underpinned by evidence, which inform their production. Certain policies include requirements for additional evidence to be submitted alongside planning applications. This is to assist the

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Topic	Summary of comments	Response
		decision-maker in coming to an informed decision.
Policy Map	It is not clear which Policy Map is the authoritative version, all are peppered with errors and omissions and not consistent with each other, rendering the OLP2042 ineffective and unsound. Green Spaces demarcation, possibly due to the illogical and wrong Green Space Survey 2020, is fundamentally incorrect. See Green Spaces (G1-G9)	The current extant policy map is for the adopted Local Plan 2036. A draft Policies Map was produced and consulted on as part of the Reg. 18 consultation (June-Aug 2025).
National DM Policies	The Levelling Up and Regeneration Act 2023 sets out provisions to introduce National DM Policies (NDMPs). NDMPs will implement a suite of national policy provisions for decision making with a view to streamlining Local Plans, enabling plan-makers to focus on matters that are genuinely local whilst also supporting consistent local decisions. Consultation on NDMPs is expected later in 2025 (prior to adoption/ possibly submission of Oxford's emerging Local Plan. Once adopted, Local Plans must not contradict or duplicate NDMPs – as per	Comment noted.

Topic	Summary of comments	Response
	Section 15C(7)(b) of the Planning and Compulsory Purchase Act 2004. ARC recommends the Council closely monitors NDMP developments and considers their implications carefully when drafting and reviewing development management policies.	

All Public Responses to the Whole of Chapter 1

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Support for heritage and biodiversity principles	Mansfield College supports the vision for the City to provide a healthy and inclusive City with equal opportunities which respects its identity, heritage and maximises the opportunities to enable business, knowledge and innovation to grow. The College also support the principle behind to support biodiversity and to protect the green infrastructure and resources of the City. The College is supportive of the objectives of the Local Plan which align with the College's aim to attract the best students to the City from all social backgrounds and ensuring an appropriate quality of accommodation for all who study in the City.	Support noted.

Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Maximising delivery of homes	All opportunities must be taken to deliver new homes on sites within the City's boundary that are suitable, available and deliverable and meet the requirements of national planning policy. Those opportunities can and must include the development of sites that are in the Green Belt	The Green Belt has been assessed for opportunities, although much of it is functional flood plain, of high importance for wildlife or well used parks, etc, and is not available or developable.
Vision & Objectives	Reducing inequalities	Would like stronger & explicit reference to the following principles for reducing inequalities: • agency & participation – many residents feel excluded from decision making & shaping policies, would also like more tangible opportunities for neighbourhood-level involvement in specific developments. Eg neighbourhood plans, especially in economically-marginalised areas; working with community anchor organisations; more transparency and community involvement in spend of CIL and S106 eg via community covenants; ensure that those who experience housing inequality are given opportunity to input to policies eg travelling communities; using tools like citizens assembles to strengthen participation in complex planning decisions.	The Plan has clear objectives to tackle inequalities and ensure strong communities. It can't, however, control who owns or manages developments.

Draft policy	Topic	Summary of comments	Response
		• Recognise role of Community ownership & stewardship in owning & managing spaces – housing, community buildings, shops, green spaces. Eg stronger mention of community-led and cooperative housing (see Collaborative Housing Hub report). • Strengthening Oxford's Social & Solidarity Economy (SSE) - recognise them as partners in delivering key elements including affordable housing, renewable energy and community facilities.	
Vision & objectives	Environment and landscape setting	The environment is identified as one of the six themes underpinning the Council's vision for Oxford in 2042. We agree that Oxford's environment, particularly its broader landscape setting, is a characteristic feature of the city. Oxford is situated at on the floor of a valley surrounded on all sides by undisrupted green hills, creating the effect of a 'green bowl' around the city. This 'green bowl' provides the backdrop to historically significant views out from the city and is the reason for the protection of Oxford's view cones within policy. Figure 1.2 sets out the underlying objectives associated with each of the six themes and there is no mention of Oxford's broader landscape setting. The protection of the characteristic landscape setting of the city essential to its semi-rural identity should feature more prominently within the objectives associated with Oxford's landscape.	The objectives do cover the need to respect heritage and the importance of green spaces.

Draft policy	Topic	Summary of comments	Response
		We recommend that these objectives are changed to highlight and reflect the significance of Oxford's wider landscape setting.	
Vision & objectives		Worcester College can confirm that it supports the wider visions and objectives set out in the draft Local Plan, with particular support for the acknowledgement of the need to support Oxford's reputation as an international destination for high quality education and learning.	Support noted.
Vision & objectives	Support	We consider that the policies contained within the plan are generally positive. We strongly agree with the plan objectives and the three overarching threads to reduce inequality, address climate change and enable a liveable city. However the proof will be in the delivery. The Plan's objectives and strategy (Figure 1.2, pp 13-14) should say more about supporting the use of public transport and sustainable modes of travel over the use of cars. In addition, in line with NPPF para 124, strategic policies should "set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land". We would like to see this principle explicitly recognised within the strategy.	The support is welcomed. The objectives are clear that protection and enhancement of important green infrastructure is a key aim, as is taking: *opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city*.

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Draft policy	Topic	Summary of comments	Response
Vision & Objectives	Not ambitious enough	The Plan does not meet its evidenced need – whether that is standard method derived or economic growth driven. Lack of affordability undermines economic growth and prosperity and works against the Vision objectives in respect to healthy and inclusive communities and equal opportunities for access to all basic needs to include homes, health, employment, nature and community infrastructure. 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. Hallam is not suggesting that the Council should water down its ambition. Indeed, the Vision should be appropriate to the City's prominence, influence and economic success; ensuring those qualities are strengthened and sustained and optimum outcomes for the economy, people and environment are achieved. The Plan must therefore provide a	An overarching thread of the plan is to reduce inequalities, and many policies are intended to work towards addressing this.

1760

Draft policy	Topic	Summary of comments	Response
		strategy to deliver that, with an appropriately planned level of growth.	
Vision & Objectives		Lincoln College support the Plan's overall spatial strategy.	Support is noted.
Vision	Proposed amendment	ChCh generally supports the Vision for Oxford but it does not address two key aspects: 1. the important role that the two Universities play in Oxford; and 2. the acute housing need in the City. The Universities and Colleges play a fundamental role in the social, educational, tourism, and local economy of Oxford, and indeed wider Oxfordshire,. In addition the Universities and Colleges require a functioning ecosystem. Good schools are part of this and access to schools for children of visiting academics is important. The LP42 must encourage and support schools expand and enhance facilities as needed. These points should be recognised in the Vision. Whilst the draft LP42 makes reference to there being a "chronic undersupply of housing", the Vision does not acknowledge this or set out any meaningful approach to addressing it. This should be a fundamental element of the LP42.	The Vision sets out where we think the city should be in 2045. It is not the primary means of setting out how we are going to get there. These points are well covered by other elements of the strategy, including the objective and the strategic policies, as well as by the plan generally.

1761

Draft policy	Topic	Summary of comments	Response
		In terms of the lifespan of the Vision, ChCh notes that the NPPF encourages Local Plans to have a Vision which looks over a longer term period (at least 30 years). In particular, where larger scale development is proposed and to take account of likely timescales for delivery. Whilst this is not a requirement for the LP42 given the lack of large scale development proposals, having a longer term Vision for Oxford (which envisages how Oxford's housing and employment needs will be delivered over the longer term) is important given its inability to meet its identified housing need. To respond to ChCh's comments, the following amendments are suggested to the Vision: "In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses, **the University of Oxford and Oxford Brookes University to prosper. The vision is one which addresses 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**; and supports research and	

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Draft policy	Topic	Summary of comments	Response
		development in the life sciences and health sectors which are and will provide solutions to global challenges. 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."	
Objectives and Strategy	Support	ChCh supports the objectives for the Plan, which are built off the six themes. In particular the recognition of the help that should be given to Oxford to continue in its role as a national and international destination and support the visitor economy.	Support noted.
Overarching Threads	Support but policies need to go further.	ChCh supports the Overarching Threads to reduce inequalities across the City, and to address climate change. However, the two elements that the Plan does not address in full (as 'overarching threads') are housing (see H1 response), and infrastructure/transport (partly because this is for the County Council). The policies need to include flexibility to provide an inclusive society.	Comments noted.

Chapter 2 – A Healthy Inclusive City to Live In

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Headlines for Chapter 2:

- General consensus that housing is needed in Oxford and general support for more affordable housing
- Confusion around the term 'affordable housing'
- General support for affordable housing contributions policies and some objections
- Majority of support towards the affordable housing threshold with some push to make the threshold higher
- Commentary about using empty homes and buildings for housing • Some respondents preferred proposed alternative policy options

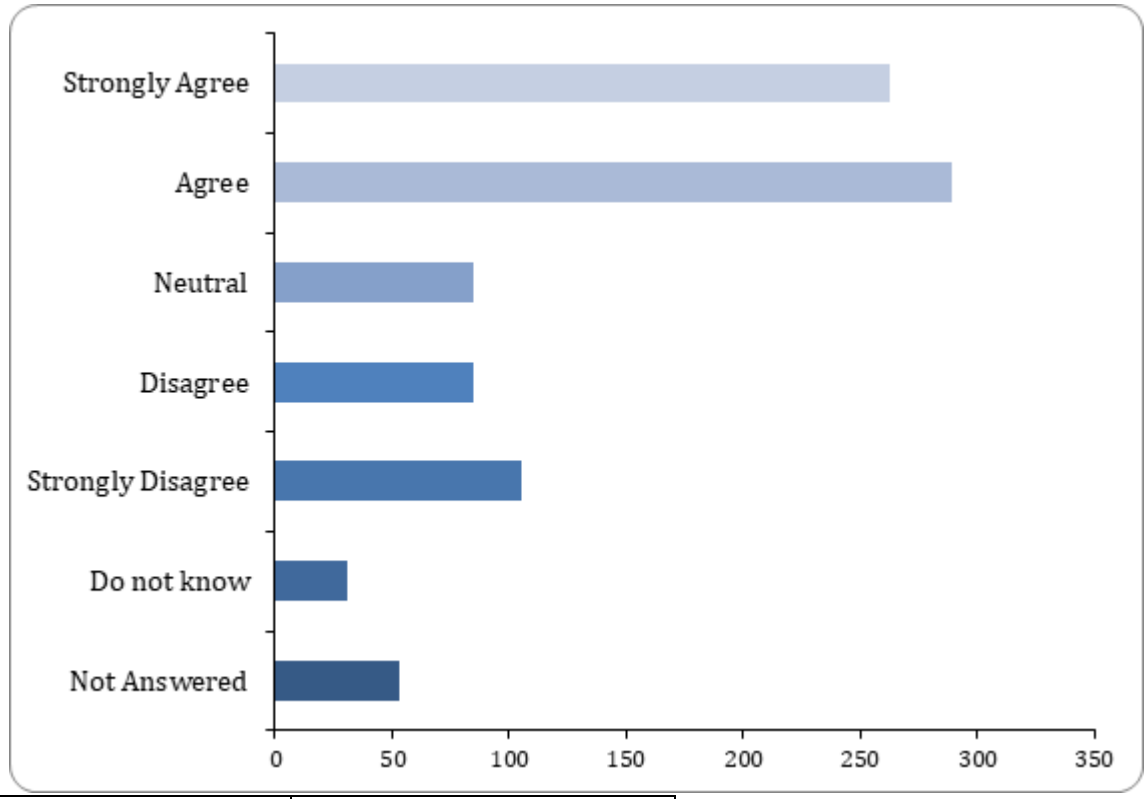
Short Questionnaire Responses

Affordable housing

We have used up-to-date evidence of costs and profits in new developments to set an affordable housing requirement- we are proposing that 40% of new developments with more than 10 homes should be affordable, and 80% of those affordable homes

should be social rented housing as this is the most affordable type to best meet needs. To what extent do you agree with this approach?

There were 858 responses to this part of the question.



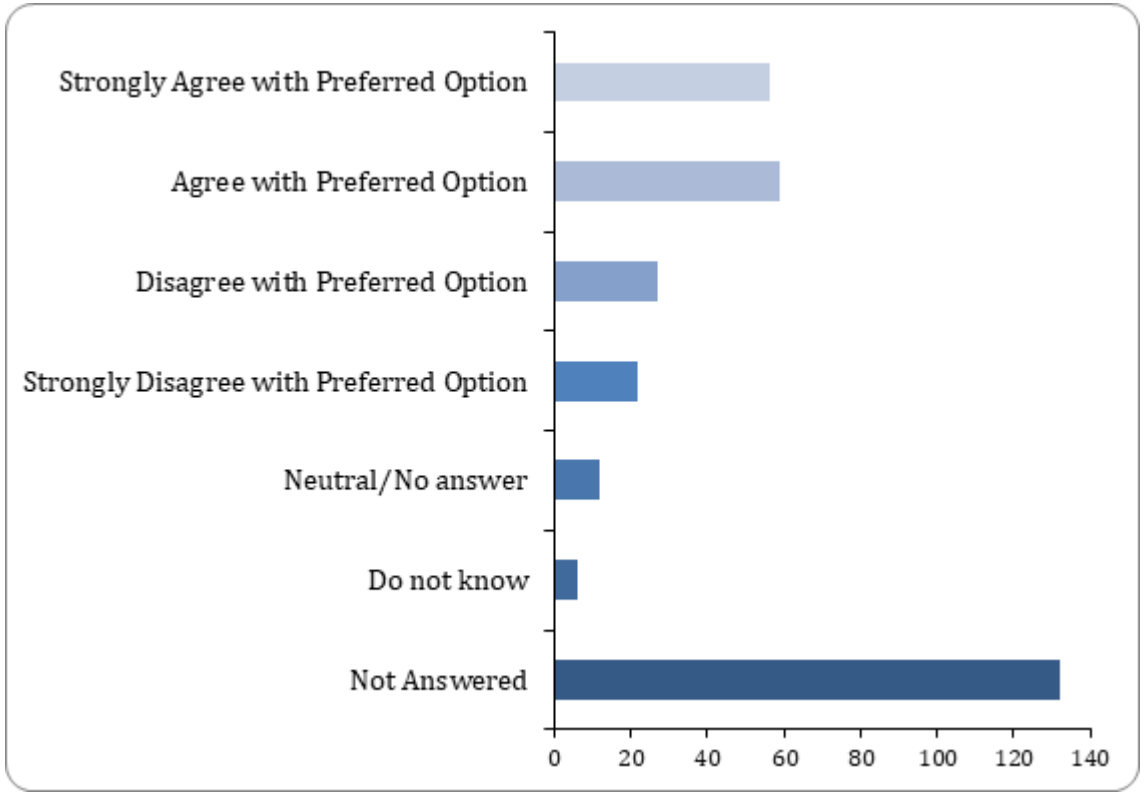
Option	Total	Percent
Strongly Agree	263	28.87%
Agree	289	31.72%
Neutral	85	9.33%
Disagree	85	9.33%

Strongly Disagree	105	11.53%
Do not know	31	3.40%
Not Answered	53	5.82%

All Public Responses – Draft Policy H1

Please tell us what you think about policy options set 001a (draft policy H1): Housing requirement for the plan period.

There were 182 responses to this part of the question.



Option	Total	Percent

Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	27	8.60%
Strongly Disagree with Preferred Option	22	7.01%
Neutral/No answer	12	3.82%
Do not know	6	1.91%
Not Answered	132	42.04%

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Draft policy	Topic	Summary of comments	Response
H1	Housing requirement - Exceeding the SM	Would support a housing requirement above the level calculated by the SM. The NPPF para 62 confirms this is possible and that it should not normally have to be thoroughly justified at examination. BP001 does not reference this change in approach. If the sub-region is to meet its economic potential and address the affordability challenge the housing requirement and level of unmet need must be increased. Calculate that from 2036 there is a deficit of 4,550 homes 2,376 homes 2036-2040 (1,087-493), plus 2,174 homes 2040-2042 (1087*2).	The level of unmet need needs to be calculated over the Plan period and discussions with neighbouring districts will take place about meeting that need over the Plan period. A higher than SM housing requirement in Oxford, given its limited capacity, would be essentially setting a requirement for outside the city and would need robust justification at examination, and is not considered to be a justifiable approach.
H1	Housing requirement – using Standard Method	Support the SM housing need figure of 1087dpa (21,740 over plan period) To unlock Oxford's economic potential, its full housing requirement must be met, as housing supports job creation and regional growth. This requires a coordinated cross-boundary strategy with neighbouring authorities, as confirmed by planning inspectors. The housing need should follow the standard method unless there are exceptional reasons to adjust it.	Policy H1 calculates housing need using the Standard Method, and latest government affordability data.

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H1	Housing need is higher than Standard Method	We acknowledge that efforts to secure higher growth in the Local Plan 2040 failed at examination. However, basing a housing requirement simply on a calculation of capacity, risks continuing to exacerbate a shortage in housing supply. Should first conclude duty to cooperate	Duty to cooperate discussions cannot be concluded before the capacity is confirmed through the examination process, but discussions are in train.

Draft policy	**Topic**	**Summary of comments**	**Response**

		discussions, before taking forward a strategy that knowingly supresses growth. A significant uplift in the delivery of housing will be essential for contributing to the growth ambitions, which we expect to be established by the Oxfordshire Growth Commission and for the Oxford-Cambridge Corridor. Only when these ambitions are fully understood can there be a full understanding of housing needs to assess against the Standard Method to establish a housing requirement that is able to take account of the exceptionally strong economic growth in Oxfordshire, which, if not supported by adequate provision of housing will continue to lead to problems of affordability, inaccessibility of housing and uncreased unsustainable commuting patterns. Whilst the previous Local Plan Inspectors did not conclude there was sufficient evidence to depart from standard method, that does not infer that the Council's should now settle for standard method as an indication of actual need. Need to undertake more work to understand and identify the actual growth requirements for the city and then work with neighbouring authorities to consider how the needs can best be met. Should reflect locally the Oxfordshire Leaders Joint Committee (OLJC) and the Vision for Oxfordshire. There is a strong case for a higher level of growth than is being provided for in the City Plan, whilst recognising that Oxford City has limited capacity (and this was the case when the adopted City	The Oxford Local Plan 2045 cannot consider the growth needs for all of Oxfordshire. Use of the Standard Method to assess housing need in Oxford is considered to be the most appropriate approach at the current time.

		Local Plan was prepared); it is considered that it is incumbent upon the	

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Draft policy	Topic	Summary of comments	Response
		authorities to work together to deliver the significant boost to the supply of homes (following on from the Growth Deal) in accordance with the NPPF and support both the local and national economic objectives some of which are outlined above. It is considered that provision should be made for a higher housing requirement than that based on the Standard Method (this level of growth should not be dismissed purely on the basis that there is insufficient capacity) and we would therefore urge the Council to urgently examine what is needed to support economic growth of Oxford and its hinterland and recognise that the housing needs of Oxford may well be higher than those proposed by the standard method and in doing so explore this strategic issue with neighbouring authorities through the duty to co-operate.	

	Capacity calculation and plan period	The supply would also need to be adjusted; it is noted in Background Paper 001 that the capacity work carried out for the preparation of the Oxford Local Plan 2040 showed a supply/capacity of 9,851 dwellings for the period 2020-2040 i.e. an average of 453 dwellings per annum. (it is noted that this work is being updated) however, the plan period is inconsistent with national policy so delivery from the three years preceding the assessment of housing need will need to be removed from the total housing supply expected in Oxford City. Agree that: "Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply." Recognise that Oxford City is a constrained area for development: There is the Green Belt, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council will	The capacity has been updated and recalculated to reflect the 2025-2045 plan period.

Draft policy	Topic	Summary of comments	Response
		need to work with landowners, and its local authority neighbours to explore all options for delivering new homes (including Green Belt review), ensuring that every potential avenue for housing is explored before a 'capacity cap' is identified.	

H1	Plan period start date	HBF does not agree with the Council's decision to use a plan period that starts in 2022, over three years prior to the local plan's expected submission. Such an approach fundamentally misunderstands the standard method which takes account of past supply through the affordability uplift to determine housing needs moving forward. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. This is clear from paragraph 2a-004 in Planning Practice Guidance (PPG), which notes that when setting the baseline for the standard method the most recent assessment dwelling stock is used.	Since the Regulation 18 consultation, the Plan period has been adjusted to a 2025 start date, with a plan period now of 2025-2045.
H1	Sources of sites and prioritising brownfield first	While it is right for the Local Plan to maximise delivery on previously developed land (PDL); where housing and employment needs cannot be met on such sites, Greenfield sites will be required not only for the overall quantum of development but also to create a rolling supply of housing land (five-year land supply). Capacity should include the Allotments as a housing development site. No stone should be left unturned. Many of the proposed new site allocations for housing are on greenfield land. These should only be approved once all opportunities to use brownfield land have been exhausted. Some of the proposed building sites seem to conflict with many of the advertised priorities	Greenfield sites and allotment sites are both included in the Strategic Housing Land Availability Assessment (SHLAA). The only types of sites not included are those with national designations which preclude development, such as SSSI and Flood Zone 3b (greenfield). National policy establishes that development on brownfield should be prioritised, but not enough sites can be identified on

Draft policy	Topic	Summary of comments	Response

		of the Local Plan, including retaining green infrastructure and respecting heritage sites.	brownfield alone to meet Oxford's housing need so some greenfield sites are also needed, whilst also balancing other priorities and objectives of the Plan.
H1	Should encourage conversion of employment to residential	Plan should encourage the conversion of vacant employment uses (offices, retail) into residential use. The delivery of residential units within the city centre and district centres would bring great benefits. More life would be breathed into city streets, such as Cornmarket Street, if there was a mix of residents, workers and tourists. The preference for mixed use developments should also be mentioned within this policy. While the provision of dwellings is important, to do this successfully within urban centres the activation of ground floor units must be retained. This will help to protect the existing public realm. There is a chronic lack of affordable housing in Oxford. It is such an expensive city in which to buy or rent a house in that essential workers struggle to find a home here and instead travel in from outside the city, contributing to the appalling gridlock on our roads with which all residents are all too familiar. The Plan should seize the opportunity to convert existing brownfield sites into affordable housing rather than turning them over to new work sites (maximizing employment) that will only add to the number of commuters. Empty retail and office space should be actively targeted to create affordable housing.	The plan supports the conversion of employment sites to residential in Policy E1 where the landowner is interested in doing so. Many employment sites in Oxford also qualify for permitted development rights for conversion of office to residential. A particular challenge in recent years is that retaining employment uses often provides a higher return to the landowner.

H1	Process for addressing	there is still uncertainty as to what Oxford's unmet housing needs are without an up to date housing land availability assessment but on the basis of those plans being progressed elsewhere in Oxford it would	Duty to Cooperate work with neighbouring district councils is

Draft policy	**Topic**	**Summary of comments**	**Response**

	unmet housing need	appear that there will still be some unmet housing needs. It will therefore be necessary for OC to work with its neighbours to identify additional supply to meet these needs as part of their duty to cooperate. Agreements must be reached that unmet needs will be met in full and that when new plans are prepared, they will maintain commitment to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. Without such agreements there can be no certainty that Oxford's need in their latest plan will be met in full. Para 2.3 explains no process for how the umet need figure to 2042 will be accommodated, this must be fully resolved before Reg 19. Recent updates to national planning guidance have increased the calculated housing need for Oxford and surrounding areas. Given government ambitions and the work of the Oxford Growth Commission, further analysis is needed to potentially raise housing targets, considering economic growth and housing affordability challenges. After this, the emerging plan should identify how much housing can be accommodated within Oxford itself, with the remaining unmet need addressed through agreements with neighbouring authorities. The previously agreed unmet housing figure (14,300 dwellings) from 2016 now needs updating and reconsideration for the new plan period based on current evidence and collaboration	ongoing to address Oxford's unmet housing need.

1779

Draft policy	Topic	Summary of comments	Response
		Unmet need of 11,889 will have to be agreed with the neighbouring Oxfordshire authorities. It is considered that in order to meet the unmet needs is falls to Oxford City to work with its neighbouring authorities to identify additional supply to meet these needs as part of their duty to cooperate. It is considered that agreements must be reached so that unmet needs will be met in full and to ensure that when new plans are prepared, they will maintain commitments to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. Without such agreements there can be no certainty that Oxford's need in their latest plan will be met in full.	
H1	Sites in adjoining districts for Oxford unmet need	It is suggested that the remaining unallocated land and Dalton Barracks and Abingdon Airfield is best placed to assist in providing some of the unmet need through the expansion of Dalton Barracks Garden Village site allocation that could provide an additional 2,500 new homes over the current allocation.	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.

1780

H1	Build to Rent and co-living provision	Consider that the Plan (at Policy H1) should also give positive encouragement to the development of BTR schemes as these are ideally suited to smaller brownfield sites located within city centres that can be constructed at high densities. BTR schemes can also make significant reductions to local housing supply figures as a high number of units can be constructed within a short space of time. The draft Local Plan fails to consider in any detail more modern housing tenures such as build to rent or co-living. Such tenures are actively promoted in the latest iterations of both the National Planning Policy Framework (NPPF) and the National Planning	Whilst the NPPF allows for BTR tenure, these types of developments are unlikely to meet affordable housing needs in the Oxford context because they are still not affordable to many people on Oxford salaries.

1781

Draft policy	Topic	Summary of comments	Response

		Practice Guidance (NPPG). The NPPG within the 'Build to Rent' (BTR) chapter (Paragraph: 001 Reference ID: 60-001-20180913) states "as part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent". Co-living, a form of build to rent, is a relatively new concept of housing which aims to provide a housing option for single person households, who cannot or chose not to live in self-contained homes or Houses in Multiple Occupation (HMOs). In planning terms this housing type is sui generis non-self-contained market housing and is not considered conventional residential, which would fall under Use Class C3. This type of housing is not restricted to particular groups by occupation or specific needs. In addition, communal amenity space is provided in lieu of private floorspace to create a sense of community and encourage social interaction and engagement between its residents. The private units are appropriately sized to be comfortable and functional for tenant's needs and generally include en-suite bathrooms and limited cooking facilities (e.g. a kitchenette), but with access to larger kitchen facilities elsewhere in the development. It is important to note that the National Housing Space Standards do not apply to this type of accommodation due to its key attribute as a 'cost-effective' alternative form of housing, which would be proven negligible should unit sizes be increased. It is not clear as to whether any assessment has been undertaken into the potential requirement for build to rent homes.	

1782

Draft policy	Topic	Summary of comments	Response
		A plan-led solution to supply will help to ensure that housing is delivered in the most sustainable locations, and that it meets the needs of groups with specific housing requirements, as set out in the NPPF at Section 5. The Draft Plan's Paragraph 2.38 notes this also. Therefore, there is an overriding principle to facilitate the supply of housing to meet specific needs in the city, this should include housing targeted at single households, including co-living. Co-living housing is for single households and in planning terms, falls under sui generis non-self-contained market housing. Therefore, requirements applicable to conventional residential development (Use Class C3) are not applicable to this housing type, and therefore any new policy (or alternatively an extension to Policy 14) should address: • Room space standards – minimum 18 sqm typically. • Internal and external amenity space requirements. • Affordable housing approach – assume PIL typically (see Para 2.9, forth bullet). • Management expectations. • Preferred locations – assume central and accessible typically such as City and District Centers.	
H1	Should go further to find sites for housing	Where major developers are being permitted to use part of their employment sites for other uses, affordable/employee housing should be the first consideration. Specific, proactive allocations should be made for housing, for example on empty retail and office space.	Allocations can't be made for sites where no landowner interest is present. However, where it is, then sites are allocated where appropriate.

H1	Housing Requirement	CPRE support the revised methodology used to ascertain a lower housing need from that identified in the previous Local Plan. We seek	Clarity on unmet need is given in the Draft Submission Local Plan.

Draft policy	Topic	Summary of comments	Response
		an emphasis on all housing need to be provided within the City boundaries, making best use of existing allocated sites, and particularly support the emphasis and policy on existing allocated employment sites reverting to housing. We seek clarity on the unmet housing numbers (if any) which the city council will be seeking to be met by its neighbouring districts and understand that work in being undertaken in this area. We seek all efforts to be made that any such unmet need can be accommodated on existing allocated sites, using higher densities and good design. We will strongly oppose any proposal for unmet housing need to be met in the Oxford Green Belt or in the open countryside generally. CPRE Oxford City seek further interim consultation when detailed housing numbers are available . It is not possible to comment constructively without sight of the overall and detailed site specific housing numbers. It is vital that a further interim stage of consultation is undertaken when housing numbers become available in order that the City meets its duty to cooperate with neighbouring districts and democratic consultation can be incorporated. It is not acceptable that there will be no sight of the detailed housing numbers until the Reg 19 stage, when comment can only be given on legal and compliance grounds.	All attempts have been made to find capacity for housing.

		Therefore, an interim consultation on housing numbers must be undertaken prior to Reg 19.	
H1	Delivery through small sites	It is … unclear as to whether the Council will, as required by paragraph 73 of the NPPF, be delivering 10% of its housing requirement on sites of one hectare or less. Whilst the HBF recognises that Oxford is constrained it should still seek to identify and allocate as many	Sites with a capacity of more than 10 are allocated, and these really are quite small sites, which Oxford does heavily rely on.

1785

		small sites as possible through this local plan rather than rely on windfall	Indeed there are few large sites in Oxford at all.

Draft policy	Topic	Summary of comments	Response
		from such sites. Recent research by the HBF has found that there are 85% fewer small house builders today than there were 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up their residential activities in the next three years. Whilst this decline is due to a range of factors, more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.	Sites smaller than 20 do not need a site allocation as there will not be anything site- specific that needs to be said in a site allocation policy, but the generic policies of the plan are adequate.

1786

H1	Evidence underpinning housing need Exclusion of sites under 10 homes (HENA) Modification/ amendment	The HENA used for the calculation is based on a set of mainly generic metrics and calculations ignoring most of the special factors in Oxford. The representation then goes on to critique the HENA. The Government Planning Practice Guidance suggests sites of 5 units or more should be included in Housing and Economic Land Availability Assessments, but Oxford City Council has excluded all sites from a Site Assessment under 10. Important sites listed below (eg: Policy XXX etc) are in their relevant sections are NOT included in the Plan which therefore is unsound as consultation and assessments of sites with important constraints have not been assessed and the community has not been given a chance to give input. Three modifications are suggested, 1. A rerun of the HENA Calculating the actual housing need	HENA evidence not relied upon. It was the supporting evidence for the LP2040 (withdrawn). This Emerging Local Plan relies on Government's Standard Method for its assessment of housing need.

Draft policy	Topic	Summary of comments	Response

1787

		2. Inclusion of all Sites with less than 10 houses (Listed in each Area section) 3. A report detailing how HENA representations were taken into account (which they were not)	HENA evidence not relied upon. It was the supporting evidence for the LP2040 (withdrawn). This Emerging Local Plan relies on Government's Standard Method for its assessment of housing need.
H1	Student accommodation ratio	A significant proportion of the housing supply is a result of student accommodation. This is accounted for in the supply with a 2.5 student bed spaces considered the equivalent to one dwelling. This is 2.5:1 ratio is taken from the Housing Delivery Test which is based on national data as to students per dwelling. However, given the significant amount of student accommodation being built in Oxford the HBF would suggest that a local assessment is required to see whether this is accurate for Oxford and the contribution of student accommodation to overall housing supply is not being overestimated.	The HDT ratio of 2.4 will be applied when measuring Oxford against the HDT, so applying a different ratio would not be appropriate.

1788

H1	General comment	Planning for the right number of new homes is vital to the (OUH) Trust. This is to meet the needs of staff (and affiliated students), and also the continued sustainability of the wider community of Oxford. While the Council will need to maximise delivery on available sites; the Local Plan will inevitably set a "capacity constrained" housing requirement. The Trusts agrees that: "Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply." The Trust recognises that Oxford City is a constrained area for development: There is the Green Belt, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council will need to work with landowners, and its local authority neighbours to explore all options for delivering new homes (including Green Belt review), ensuring that every	Comments noted.

1789

Draft policy	Topic	Summary of comments	Response
		potential avenue for housing is explored before a 'capacity cap' is identified. The Trust welcomes the flexible approach that is being taken to the proposed development allocations on its land, which includes the potential for employer linked housing where appropriate, which could contribute to meeting the overall need for new homes in Oxford.	
H1	Heights	When there is such a great need for housing, confusion around only 57 stories	There is no 5-7 storey limit in the plan.

H1	Support for more flats	Build more flats to meet need	The minimum housing numbers assumed will sometimes mean flats are likely to be the solution, particularly in the city centre and district centre, but there are considerations, including viability.
H1	Capacity/constraint based housing requirement	While we broadly agree with the preferred option, which would provide a capacity/constraint-based housing requirement based off what is deliverable within Oxford City Council's boundaries, we consider the policy should include a fall-back allowing for higher density development in the case neighbouring authorities are unable to meet the shortfall in identified housing need. We consider this caveat to be pertinent given the recent breakdown in negotiations for the Oxfordshire Plan 2050.	The densities applied are already in the spirit of maximising capacity.
H1	Disagree with Standard Method Approach	Oxford should start with the full Standard-Method figure as a minimum and treat capacity as elastic: permit gentle densification of suburbs, up-zone transit corridors and retail parks for mid-rise mixeduse blocks, scrap parking minimums, and allow residential on employment land unless a net jobs loss is proven. A rules-based, form-led code would let bottom-up market forces deliver homes swiftly while keeping the city compact, liveable and globally competitive.	These measures are part of the plan, but assumptions of capacity are based on evidence of what may come forward, and can't simply be aspirational numbers based on assuming something will happen that there is no suggestion will practically be able to happen
Draft policy	**Topic**	**Summary of comments**	**Response**
			(e.g. densification across whole estates).

1790

H1	Prioritise housing over employment	More employment might be driving up house prices, meaning people have to commute which isn't sensible in light of the Climate Emergency doesn't make sense. The population needs a good cross section of people to thrive.	Comment noted.
H1	Ambiguity around unmet need	Agreement with standard method but unclear where unmet need figure has come from and why the plan period runs to 2042.	The plan period now runs until 2045. The unmet need is the difference between the calculated capacity and the housing need (as calculated by the standard method).
N/A	Identifying housing sites	All sites earmarked for development over 3 units should be shown as Preferred Options – not merely those over 10 units. This conceals the true impacts of development on city's green spaces.	Sites with development potential are identified within the Strategic Housing Land Availability Assessment (SHLAA). Sites which are unlikely to deliver 10+ dwellings net gain are not included as site allocations.

1791

Statutory Consultee Responses – Draft Policy H1

Cherwell District Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

H1	Note that the Government's standard method is to be used and this is welcomed. The Local	Dialogue is ongoing with the other Oxfordshire districts about our	Dialogue to be ongoing.
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**
	Plan 2036 contained a level of unmet housing need for which the other Oxfordshire districts made provision for. Cherwell committed to delivering 4,400 homes in 6 partial review sites. No request has been made yet by Oxford City Council for help accommodating any additional unmet need. Any additional unmet housing need must be rigorously examined and Cherwell DC would want to explore through Duty to Cooperate process whether the city can accommodate any additional unmet need within its own boundaries.	capacity assessment and likely request for unmet need. The agreed unmet need links to the 2036 Plan. That leaves 6 years of unmet need ot the end of the 2042 Plan. The need might not be greater in numbers, but will be extended in years, and an acknowledgement of this from our neighbours would be helpful. We understand that we must attempts to find housing capacity where we can, but a lack of acceptance of whether or not we have cannot mean that discussions of the unmet need in the plan period to 2042 cannot take place.	All methodology and details behind capacity calculations to be shared. Formal request for unmet need to be made.

1792

Draft Policy	Summary	Response	Outcome
Draft Policy H1	Support the use of SM to inform Oxford's housing needs. We welcome the fact that with the capacity-	The SM is the basis for the calculation of the housing need.	Engagement on capacity calculations has been ongoing.
Draft Policy	**Summary**	**Response**	**Outcome**
	based housing target and unmet need of 14,300 already taken by surrounding district there is more than enough to cater for the amount of unmet need this plan generates. Request, as has been committed to, engagement on capacity calculations prior to Reg 19.	At the Regulation 18 stage it was not clear whether the unmet need would be above or below the 14,300 previously agreed for the previous round of local plans. The SHLAA to support the Regulation 19 consultation finds a capacity of 9,267 over the Plan period, which gives an unmet need of 12,473.	

1793

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H1 Housing Requirement	**Strategic Planning** Using a capacity-based requirement will not meet the housing need identified through the Standard Method (Dec, 2024) and will generate an element of unmet housing need. The exact amount of unmet housing need was not set out in the PO document.	Noted.	No Action Required

Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

1794

	The County Council will review any updated work on capacity when it is available. The Reg. 18 document only discusses the housing requirement in Oxford and does not discuss how the arising unmet need will be addressed.	Noted.	No Action Required
	The County is keen to understand the implications of any additional unmet housing need arising as new strategic housing allocations are likely to have infrastructure requirements (e.g., transport/ education), and other issues relevant to the County's statutory functions.	Noted.	No Action Required
	Concerned about trip generating growth contrary to LTCP targets and whether the cost of infrastructure can be met.		
	The County Council wishes to be involved in future discussions about housing need numbers and can act to support the Districts and City in highlighting issues where there are differences in approach and offering	Noted.	No Action Required

1795

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	a way forward for example in relation to infrastructure needs. The County Council's position has been, and continues to be, that any site allocations should be well located in relation to the people they are intended to accommodate. Therefore, Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking, cycling and public transport links or the ability to provide such links funded from development. The number of homes to be delivered in the 2022-42 plan period (9,851) is less than the number of homes to be delivered in the 2016-36 plan period (10,880). The Reg.19 consultation should set out the numbers and detail the reasons such as whether landowners are now not seeking to redevelop their sites and why as there could be scope for further increasing the housing requirement.	We look forward to continued discussions with district and county colleagues as we seek to resolve issues of unmet housing need and associated infrastructure implications. Noted.	Continue relevant discussions through DTC Forum/ etc. No Action Required

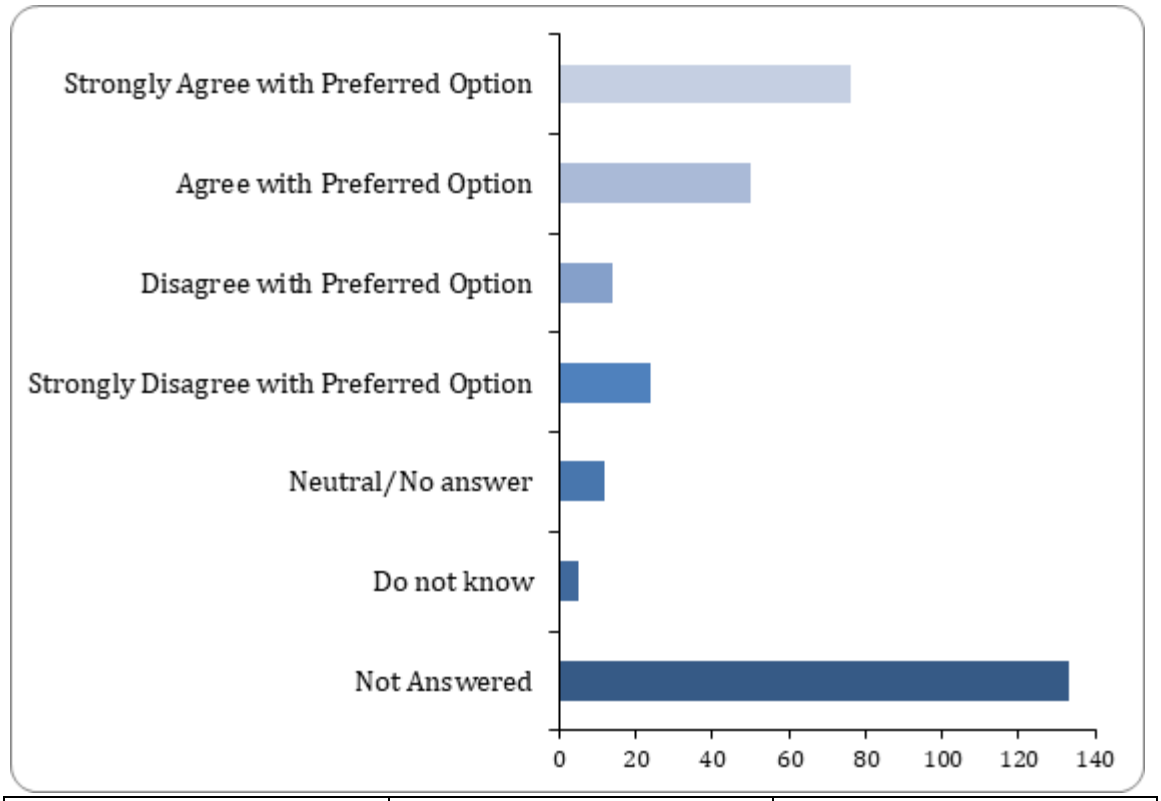
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
		The Reg. 19 Plan and supporting evidence will include SHLAA (Strategic Housing Land Availability Assessment), which includes details of landowner ambitions for sites in the city.	No Action Required

1797

All Public Responses – Draft Policy H2

Please tell us what you think about policy options set 002a (draft policy H2): Affordable housing contributions.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	76	24.20%
Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	24	7.64%
Neutral/No answer	12	3.82%
Do not know	5	1.59%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H2	Prioritising Social Housing	Social rent should be prioritised as past policies in Oxford have not made homes genuinely affordable. Policy needed on limiting the number of unoccupied houses e.g. planning restrictions on short-term lets.	Social rent is prioritised.
H2	Objection to reducing affordable housing target	Object to reducing affordable housing from previous target of 50% to 40%. Government policy now requires social rent, so this is a missed opportunity.	The Viability evidence indicated that it was not feasible to continue the 50% affordable housing target for this plan period. Whilst some developments would be able to deliver this rate of contribution, a significant proportion would not.
H2	Amend policy to remove viability provision	Whilst supporting the intent of Policy H2, the wording must be altered and strengthened to ensure it delivers results. Developers often cite viability to replace social rent homes with other "affordable" options, and this must be prevented. It is CPRE Oxfordshire's view that sites which are not viable for social housing for rent should not be considered.	The NPPF requires that developer contributions should not make sites unviable

1800

H2	Viability - justification needed for affordable housing contribution above national 20%	National policy requires a 20% affordable housing discount (Paragraph: 002 Reference ID: 60-002-20180913) so any diversion from this must consider the current viability and deliverability challenges facing the residential sector. Request that regards be given to development viability on a site-by-site basis.	The 20% minimum rent discount set out in national guidance is specific to the category of affordable private rent homes. It is not a general principle for all affordable housing types.

Draft policy	**Topic**	**Summary of comments**	**Response**
H2	Application of policy to BTR	More clarity needed on affordable housing requirements for build-torent developments. National policy states that '20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme' (Paragraph: 002 Reference ID: 60-00220180913).	Whilst the NPPF allows for BTR tenure, these types of developments are unlikely to meet affordable housing needs in the Oxford context because they are still not affordable to many people on Oxford salaries.

1801

H2	Viability study – testing of typologies	In the plan wide viability assessment (BNP Paribas 2023) it is unclear how sheltered or extra care typologies have been tested. Typology 19 is described as 'C2 care scheme - flats' extending to 60 flats with an average GIA of 4,376 m2. It is unclear how non saleable floorspace has been factored in. Unless further testing has been undertaken specifically examining a full range of older person housing typologies, it appears that there is insufficient evidence regarding the viability of this typology. The typology tested appears to be a hybrid typology incorporating various elements of extra care and 'a care scheme'. Some clarity is required on the assumptions made to ensure that all appropriate costs are included and realistic so that a judgement can be made in respect of traditional sheltered and extra care typologies.	The requirement for affordable housing contributions from older persons accommodation applies only to selfcontained units, and therefore excludes most typologies.
H2	Exemption of older persons and specialist housing from affordable housing requirement.	Various examples of LPs where affordable is concluded as not viable for older persons and specialist housing, so those developments are exempt from affordable housing contributions. Eg Fareham policy HP5, Swale LP, and Birmingham & Charnwood LP. Oxford should examine a similar exemption. By not adopting a different policy in respect of housing for older people, the policy is adding uncertainty and an unnecessary layer of cost and delay to such proposals.	The Plan Viability Assessment indicates that in the context of Oxford, a significant proportion of these development typologies would be able to deliver affordable

Draft policy	**Topic**	**Summary of comments**	**Response**

		See the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note'). The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. We are also aware that the RHG Briefing Note is being updated and indeed we are informing that process. Sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling. Sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales/occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling and amended accordingly. These longer sales periods should therefore be incorporated into the Viability Assessment, especially for sheltered housing. It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost - to cover Council Tax liability on unsold units and service	housing contributions as part of a viable proposal.

		charges (which will be applicable to the whole building from day first resident moves in). This	

1804

Draft policy	Topic	Summary of comments	Response
		increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff, and services and reflecting a slower sales rate than Retirement Living. PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers.' However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people.	
H2	Support for policy	We support this policy and believe that new affordable homes should be at genuinely and permanently affordable social rents.	Support is welcomed

1805

Draft policy	Topic	Summary of comments	Response
			for Build to Rent developments.
H2	Appendix 2.1 - Method for calculating affordable housing contributions	'D' is not described sufficiently clearly and should be clarified.	Noted, will review definitions in Appendix.
H2	Glossary Definition of affordable housing	Refers to glossary definition of affordable housing (page 184 of draft document). It is unclear whether the phrase Affordable Private Rent used in a iii) and Affordable Rent used in a i) are intended to be the same.	Affordable rent is defined as at least 20% below market rents, and Affordable *Private* rent would also be at least 20% below market rents but is a class of affordable housing specifically defined by national policy

Statutory Consultee Responses – Draft Policy H2

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome

Draft Policy H2	The preferred tenure split of 80% social rented does not align with the Specialist Housing Needs Assessment, which gives a 65:35 split.	The tenure split is aimed at prioritising and maximising social rented housing because it meets the needs of those in greatest housing need.	No further action.

Oxfordshire County Council

Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

1807

Policy H2 Delivering Affordable Homes	**Strategic Planning and Infrastructure teams** It is disappointing that the AH requirement is being reduced from 50% to 40%. We understand that the 40% requirement is based on viability.	The Local Plan viability study provides evidence for affordable housing and other proposed policy requirements	No Action Required
	It is not clear why delivery of the government mandated proportion of 'First Homes' is not expected.	Footnote 31 to paragraph 66 of the December 2024 NPPF sets out that First Homes are no longer mandatory but instead can be delivered where local planning authorities judge they meet local need.	No Action Required
	In relation to 'unmet need' housing sites, would the emerging Oxford Local Plan's 40% requirement undermine the currently adopted 50% requirements in neighbouring district's local plans. We have also raised a similar query in our comments on the recent Cherwell Local Plan Regulation 18 consultation where 30% affordable housing is proposed to apply to new	Sites allocated in neighbouring authorities' local plans to meet Oxford's unmet housing need are outside the jurisdiction of the city. It is for each individual authority to set policies for planned development in their areas.	No Action Required

1808

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

1809

	sites, but 50% affordable housing requirements apply to some existing allocated sites. The County Council has a particular interest in affordable housing given its social care role. We want to see provision being made for affordable forms of housing catering for those who are older or who have specialist needs, particularly in the form of affordable extra care housing which is set in our Market Position Statements on this topic. In the Districts, we are asking for a requirement in those Local Plans to provide an affordable extra care housing development of at least 60 units as part of the affordable housing component of very large sites. We do not think there are any proposed allocations in Oxford City where such a requirement would be suitable, as sites are smaller. Even Oxpens is expected to be an unsuitable site for such a requirement. We anticipate some extra care housing being delivered at a small number of sites in adjacent Districts to meet the City's need e.g. at Bayswater Brook. We would be	Noted (see box H4 below). Noted.	No Action Required No Action Required

1810

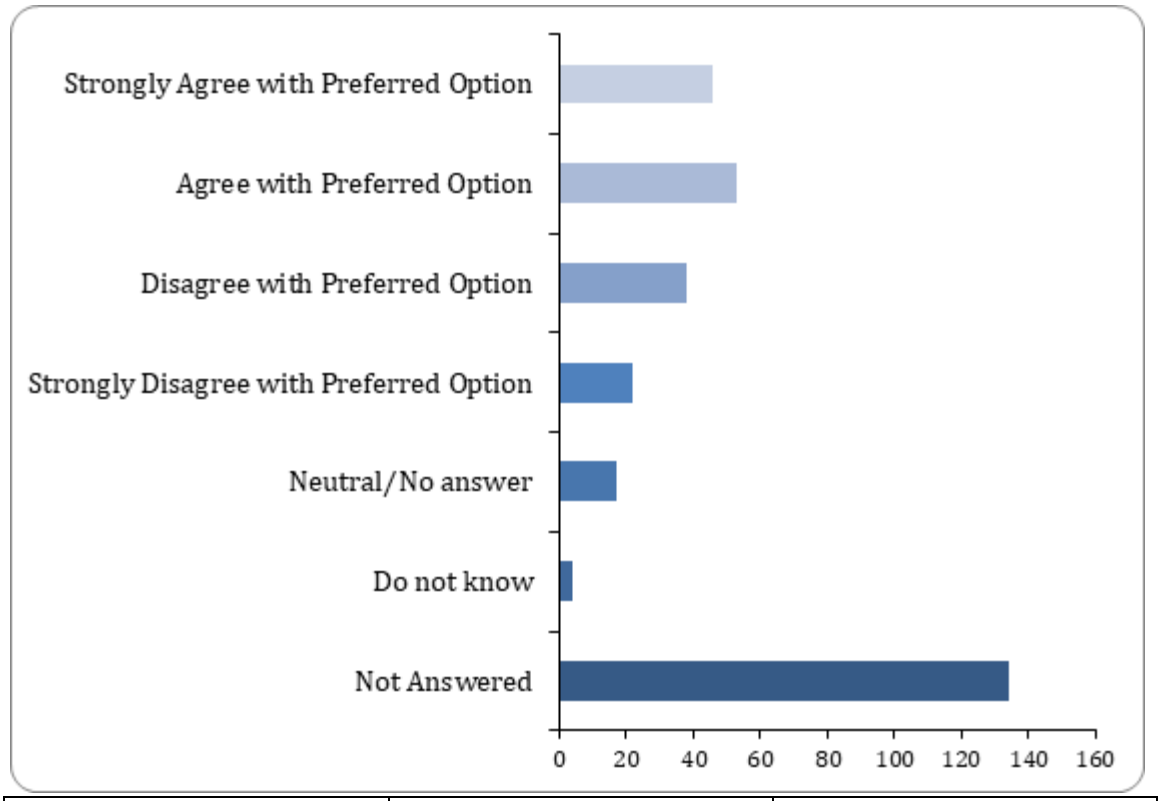
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	concerned if a reduced affordable housing threshold makes it more difficult to get affordable specialist housing provided on sites.		

1811

All Public Responses – Draft Policy H3

Please tell us what you think about policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	38	12.10%
Strongly Disagree with Preferred Option	22	7.01%
Neutral/No answer	17	5.41%
Do not know	4	1.27%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H3	Support for policy	The approach to the supply of conventional affordable housing, as a financial payment which is subject to viability (as set out in Policy H3) is broadly supported. Support the caveat which does not require affordable housing contributions from student accommodation which is on sites which are within an existing or proposed University or College Campus site. With regards to PBSA development that falls outside of these categories, we recognise the PBSA to conventional housing ratio is 2.5:1, we therefore consider this policy to be appropriate. The University should be providing a lot more houses. The City is turning into a student campus. Developments are for students at the expensive of residents who actually pay council tax. The Universities should be made to contribute more to the City and residents.	Support is noted. The emerging policy seeks financial contributions towards the delivery of affordable housing from PBSA developments of 24 or more student units, reflecting the 2.4 ratio set out in the Housing Delivery Test measurement rulebook.
H3	Objection to policy	It is not clear from the Council's evidence base that there is any justification to support this policy, without rendering development for student accommodation unviable.	Viability testing for LP2045 indicates contributions from PBSA are viable.

1814

H3	Objection - Unjustified	In line with previous comments to the withdrawn Local Plan, the Universities do not support this option given that student accommodation is already an affordable form of housing that relieves pressure on the University of Oxford and Oxford Brookes University wider housing market. The controls over location of student accommodation mean that there is limited competition with mainstream housing, which means this policy is unlikely to be justified.	Noted.
H3	Support for alternative option	A number of people said they preferred alternative option 1 rather than the Preferred Option. Comments in support of this include:	The reasons for the preferred option are set out in background paper 002.

Draft policy	**Topic**	**Summary of comments**	**Response**

1815

		• the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students. • Education establishments MUST make a greater contribution to Oxford than is presently the case. • All new developments of this kind should have a duty to contribute towards affordable housing given the need in Oxford, no matter the size of the development. • We recognise that students do not pay council tax, and in many cases there is also no CIL payable if the institution has charitable status exemption. We therefore believe that all purpose built student accommodation should make a financial contribution to housing by way of compensation. • All initiatives to fund further affordable housing should be pursued. • The draft plan itself states that many sites for student accommodation could equally be suitable for non-student homes. The plan also makes it clear that contributions will not be required from either proposals within existing or proposed university or college campus sites OR renovations of existing sites. i.e. they will only be required from units creating a net gain. Although the plan voices a concern in that "any contributions should not disadvantage the delivery of sites," the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students.	

1816

Draft policy	Topic	Summary of comments	Response
H3	Support for alternative option	Prefer alternative option 3 because this might reduce the creation of social housing ghettos, by distributing social housing more evenly across neighbourhoods, and not creating "estates" with concentrations of social housing in only some neighbourhoods where more social housing concentration is accompanied by anti-social behaviour, drug dealing, fly-tipping, unkept rubbish strewn bins and gardens etc. It is better that student areas take some of the social housing load, as do all other areas, including affluent areas etc.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternative option	The Plan itself concedes that “any contributions should not disadvantage the delivery of sites,” and notes that on-site affordable units are seldom practical in PBSA. A more supply-led, proportionate approach would either (i) apply the contribution only to **larger schemes—say 50 rooms or more—**or (ii) forgo it altogether where the development demonstrably substitutes for private HMOs. By keeping the pipeline of student accommodation flowing, Oxford maximises both housing choice and affordability without relying on complex transfer payments that can inadvertently choke off the very supply the city needs.	The reasons for the preferred option are set out in background paper 002.

1817

H3	Policy/ glossary wording misalignment	Exemption from contributions towards affordable housing provision welcomed for new student accommodation that is within an existing or proposed university or college campus site. This exemption must include the Centre for Islamic Studies sites on Marston Road (i.e., Government Buildings and Harcourt House) as development of student accommodation is integral to the development of academic and institutional facilities. Currently the glossary definition does not reflect the draft policy requirements. The draft policy suggests that existing and proposed	The sites referred to are in use as a car park and a small business estate/ cadet accommodation. If these sites come forward for development that meets the definition of 'campus development' that matches what they are allocated or proposed for, then they will be exempt from the policy. For clarity, the Glossary has been amended to say:

1818

Draft policy	Topic	Summary of comments	Response
		campuses should be exempt from the requirement for financial contributions, while the glossary definition only includes existing campuses. The glossary should be updated to include proposed campuses, including the Centre's allocated sites, to properly reflect policy H3 and avoid future confusion.	Campus: Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special facilities) and/or administrative uses (offices and administrative functions).

H3	Applicant specific text Modification/ amendment	At each and every Local Plan, Oxford City Council has tried, under pressure, to give existing Universities preferential treatment, each and every time the Inspector throws it out as a policy cannot be dependent on applicant identity. Remove applicant specific text, make effective	Draft Policy H3 only contains "applicant specific text" in relation to the locations/ circumstances where affordable housing contributions will not be sought from purpose-built student accommodation.
H3	Seeking exemption from contributions towards affordable housing	Lincoln College is promoting an existing College site for graduate accommodation - the site would not be suitable for market housing. Seeking confirmation (via pre-app advice) that contributions would not be required for affordable housing.	The glossary definition of 'campus' is: Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special

1819

Draft policy	**Topic**	**Summary of comments**	**Response**

			facilities) and/or administrative uses (offices and administrative functions). The site being promoted is currently in use as sports provision, there is no existing accommodation and therefore contributions are likely to be required for affordable housing.
H3	General comment	As well as the locations listed in the policy, we support student accommodation being provided on arterial roads. These locations 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, as demonstrated by Iffley and Cowley Roads in East Oxford.	Draft Policy H10: Location of new student accommodation sets out where planning permission would be granted for student accommodation. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. Allowing student accommodation along arterial routes has the potential to significantly change their character which could have a negative impact on the local community.

1820

H3	General comments	This is an unwarranted tax on landlords and students. This is totally mixing up objectives and unnecessarily skewing aims and outcomes.	Securing contributions towards affordable housing from new purpose build student housing can contribute towards the supply of

Draft policy	**Topic**	**Summary of comments**	**Response**

1821

		I assume the contribution is from the developer, not the students. I think the financial burden will fall ultimately on students. If you are proposing to do this then you are probably considering to provide too much affordable housing. Please don't do this! Just get on with building housing and don't slow things down with restrictions!! The need to take pressure off the ladder is the main thing. Fine tune in later years! Housing is a crisis the important thing is to make rapid progress! You should force the university/colleges to provide one accessible dwelling for every student accommodation room it builds. I think there is a balance that needs to be struck between student housing and other housing, both affordable and general housing requirement. This city, especially some parts of it, is in danger of being swamped with student housing, either new built or in existing stock (i.e. HMOs) The policy is unjustified as the economic gain or loss will be the same for existing or new campuses or institutions, further, provision of student housing of itself removes students from the housing market. Ineffective as student accommodation can be provided by nonuniversity institutions (Boarding schools, Language schools)	affordable homes as many sites for student accommodation could equally be suitable for non- student homes, from which a percentage of affordable housing would have been sought. The preferred option seeks to strike a balance between the accommodation needs of students and other types of housing. Payment liability would fall on the applicant/ developer.

1822

Draft policy	Topic	Summary of comments	Response
		All of these screams are pushing prices up for the consumer, in this case the students, which already have difficulties paying back their loans. This is a problem created by a University that follows a blind 'growth is good' mantra, at whatever costs to the city. Student accommodation makes this place more soulless and is expensive, meaning that this further contributes to making oxford the most unfair place to live - is your future for oxford a place for the born wealthy, foreign investors and every street looking the same?	

1823

H3	Higher thresholds required.	The current thresholds is insufficient, it should be less than the 10 unit or 25 room threshold as this creates a loop-hole for developers to build smaller developments on the remaining sites - which are by definition going to be small. The financial rate per room should be higher. We should not unfairly impose additional costs on developers building larger developments while not imposing them on smaller developments. Every new purpose-built student room pulls a student out of the private rental market, easing pressure on family homes and reducing overall rents. Policy H3's low threshold—financial contributions from schemes as small as 25 beds or ten self-contained units—risks slowing delivery of this dedicated stock, because the levy is set on a	The threshold is as same as that for residential developments.

1824

Draft policy	Topic	Summary of comments	Response
		comparable basis to residential development and calculated against land value.	

H3	General Comment	Student developments should make contributions to local leisure and entertainment hubs. One problem with the city is there are only a couple of social focal points (Cowley road/Jerico). This is part of the traffic and transport problems, everyone is trying to get to the same place. New Student developments should create/seed those sort of hubs in new places.	The policy seeks contributions towards affordable housing as this can help contribute towards the supply of affordable homes in Oxford.
H3	General Comment	The student housing sector should play a stronger role in supporting affordable housing in the wider community.	Noted.
H3	Viability	In a city where suitable sites are scarce and landowners already face a menu of Section 106 and CIL costs, even a modest per-bed charge can tip marginal schemes into non-viability.	Viability testing for LP2045 indicates contributions from PBSA are viable.
H3	General Comment	The present situation has led to student accommodation being developed on a commercial basis because it is more profitable than other housing. 25 student rooms are enough to cause a significant impact on a neighbourhood and it is important that developments of this size are sensitively done and with proper management organised and not just put up wherever a developer can find a space. NB This policy should apply to university and college developments and not just commercial ones.	The policy 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 because development on those sites would not displace mainstream residential development or reduce opportunities for the provision of affordable housing.
Draft policy	**Topic**	**Summary of comments**	**Response**

1825

H3	Support for alternate option	Why should student housing developments contribute to 'affordable housing'. Building student accommodation takes students out of other housing stock releasing it for general use. The whole concept of subsidised housing is unfair. If the city needs and the market can support student housing, let it built and do not tax it differently.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternate option	Students are on the lowest incomes in the city, requiring additional contributions to push up their rent is wrong. I favour option e.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternate option	Decent student accommodation is key to the city and should not be discouraged.	The reasons for the preferred option are set out in background paper 002.
H3	General comment	Prefer to seek a financial contribution from all student accommodation developments, but towards social rent housing rather than "affordable".	The reasons for the preferred option are set out in background paper 002.

Statutory Consultee Responses – Draft Policy H3

Oxfordshire County Council

Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**
Policy H3 AH financial	**Strategic Planning**	Noted.	No Action Required

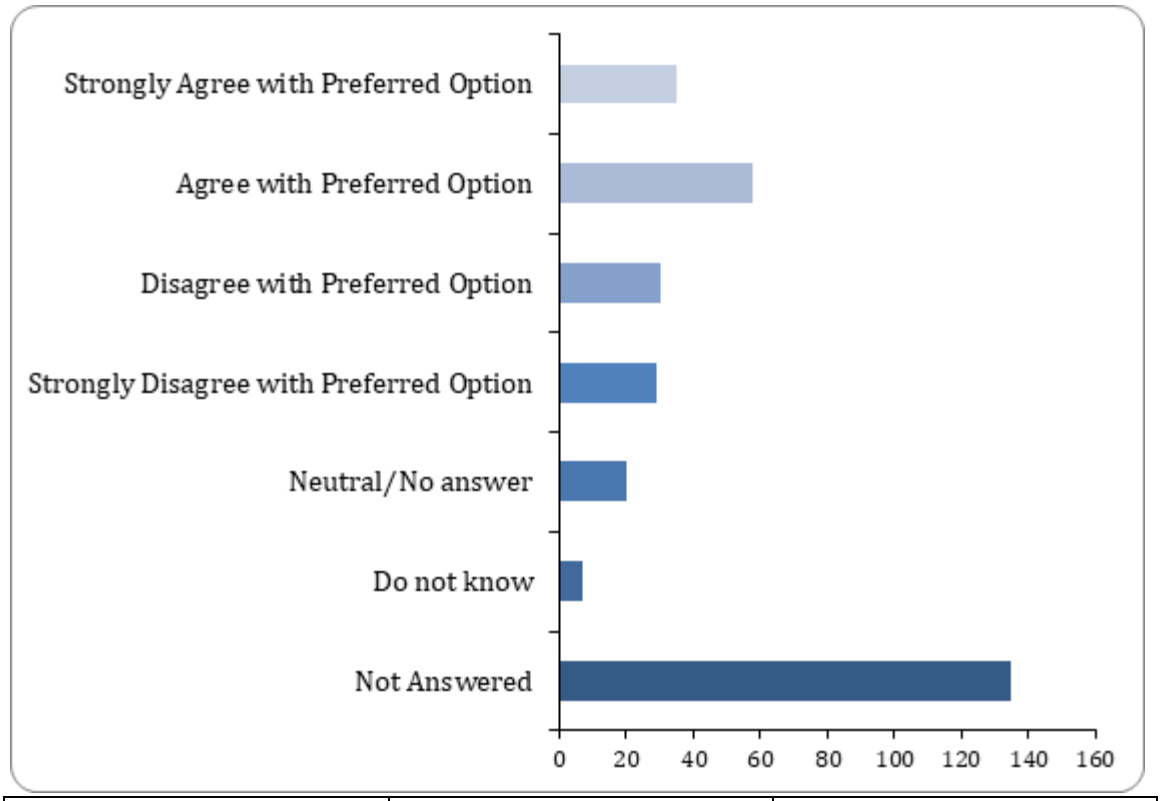
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
contributions – student acc.	This is a matter for the City Council. We agree with the preferred option to seek funding for affordable housing to be delivered on other sites.		

1827

All Public Responses – Draft Policy H4

Please tell us what you think about policy options set 002c (draft policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	35	11.15%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	30	9.55%
Strongly Disagree with Preferred Option	29	9.24%
Neutral/No answer	20	6.37%
Do not know	7	2.23%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H4	Comments in support of policy	As most older-person accommodation development is going to be increasingly by commercial entities they too must contribute more to Oxford. Ambivalent between preferred option and alternative 1.	Support noted.

1830

H4	Alternative options	Several comments support alternative option 1 – i.e.: • housing developments for old people shouldn't be approved with free rein for profit only- they must contribute to society. The only exception to this should be if the development is converting disused or derelict buildings or brownfield sites, • Having a threshold of more than 10 self-contained units creates a loop-hole for developers to build smaller developments on the remaining sites - which are by definition going to be small, All new developments of this kind should have a duty to contribute towards affordable housing given the need in Oxford, no matter the size of the development. • Agree with Option 1 or a lower limit for the preferred option, the same as for student housing. • We should not unfairly impose additional costs on developers building larger developments while not imposing them on smaller developments. • All affordable and all financially contributing Some comments were in support of alternative option 2 – i.e. • Every new unit of specialist older-persons housing allows a household to "right-size", releasing larger dwellings back to the general market and easing city-wide affordability	The reasons for the preferred option are set out in background paper 002. The policy seeks to strike the right balance.

1831

Draft policy	Topic	Summary of comments	Response

		pressures. Oxford faces a need for roughly 1,100 extra-care and supported units by 2042, yet suitable sites are scarce and typically small. Imposing an affordable-housing levy on schemes of just 10 self-contained units—the draft H4 threshold —risks deterring precisely the modest, infill developments that can be delivered quickly within the city boundary. • The Plan acknowledges that on-site provision is usually inappropriate for retirement complexes and that viability testing must not "disadvantage the delivery of sites". In a highcost land market, even a well-intentioned payment-in-lieu can erode residual land value to the point where owners hold rather than redevelop. The result would be fewer specialist units, slower turnover of under-occupied family homes, and greater pressure on adult-social-care budgets. A calibrated, supply-led policy would therefore: Apply the contribution only to larger schemes (≥ 20 units) where economies of scale exist, or waive it where a proposal demonstrably frees generalmarket housing. • By raising the threshold, Oxford would secure more specialist accommodation and, indirectly, more family housing— advancing both affordability and welfare without constraining vital supply (only levy contributions on schemes of 20 + units) Comments in support of alternative option 3: • This option might reduce the creation of social housing ghettos, by distributing social housing more evenly across neighbourhoods, and not creating "estates" with	

1832

		concentrations of social housing in only some neighbourhoods.	

1833

Draft policy	Topic	Summary of comments	Response
		• It is better that older person areas take some of the social housing load, as do all other areas, including affluent areas etc. Others preferred alternative option 4 commenting as follows: • Don't discourage accommodation for the elderly from being built. • Bespoke accommodation for the elderly makes it easier for people to downsize, freeing up houses elsewhere. • There should be no requirement for contributions from older persons accommodation. Such accommodation at reasonable cost would encourage older people to downsize and so release family sized housing which is badly needed. At present there is very little housing for older people in Oxford suitable for people who do not need or wish to move into a care home. • This type of development needs to be encouraged and could free up housing stock.	

1834

H4	General Comments	Self-contained older-persons accommodation will increasingly be necessary - this isn't a money-making enterprise (unlike student accommodation) - and the low-paid people who work at them will need to live somewhere close too. Affordable housing should accompany self-contained older-persons accommodation, but not to the point at which no developers can afford to build self-contained older-persons accommodation. I would prefer specifying seeking contributions from private and forprofit older-persons developments.	The policy allows for a pro rata approach to determine the level of contributions for mixed use developments. Contributions are not being sought for developments of less than 10 self contained units.

Draft policy	**Topic**	**Summary of comments**	**Response**

1835

		This is totally mixing up objectives and unnecessarily skewing aims and outcomes. Keep the formula transparent and subject to viability review, avoiding ad-hoc negotiations that add delay. Prioritise rapid delivery of age-appropriate homes—through gentle density and mid-rise formats—as the most effective, market-driven path to affordability city-wide. Let the market decide the cost of housing and what should be built, not interventionist policies to benefit preferred groups. If the city needs units for the elderly then let it get built without extra penalty. Old people on pensions are often on fixed incomes. Rental prices are already so expensive in oxford. Affordable housing needs a rethink before you start claiming money from everyone for it. Again a hidden tax on people who want to retire. Another unwarranted tax.	
H4	General Comment	The preferred option appears to penalise older retired people rather than the developers - the main one being the University - who are pushing for constant growth and profit at whatever costs to residents. Their fixation on growing the University and providing profitable	Payment liability would fall on the applicant/ developer.

1836

Draft policy	Topic	Summary of comments	Response
		accommodation for students is why there is pressure on housing/places for older people.	
H4	General comment	Prefer to seek a financial contribution from all self-contained older persons accommodation developments, but towards social rent housing rather than "affordable".	The reasons for the preferred option are set out in background paper 002. The policy seeks to strike the right balance.

Statutory Consultee Responses – Draft Policy H4

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H4 AH contributions from selfcontained older persons acc.	**Strategic Planning and Infrastructure teams** In order to deliver affordable extra care housing units, generally a minimum of 60 units are needed for a scheme to be viable. Therefore, if the requirement for affordable housing is 40%, we would agree that unless a total of 150 units are proposed, it may be difficult to separate off an affordable element of extra care housing.	Noted.	No Action Required
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

1838

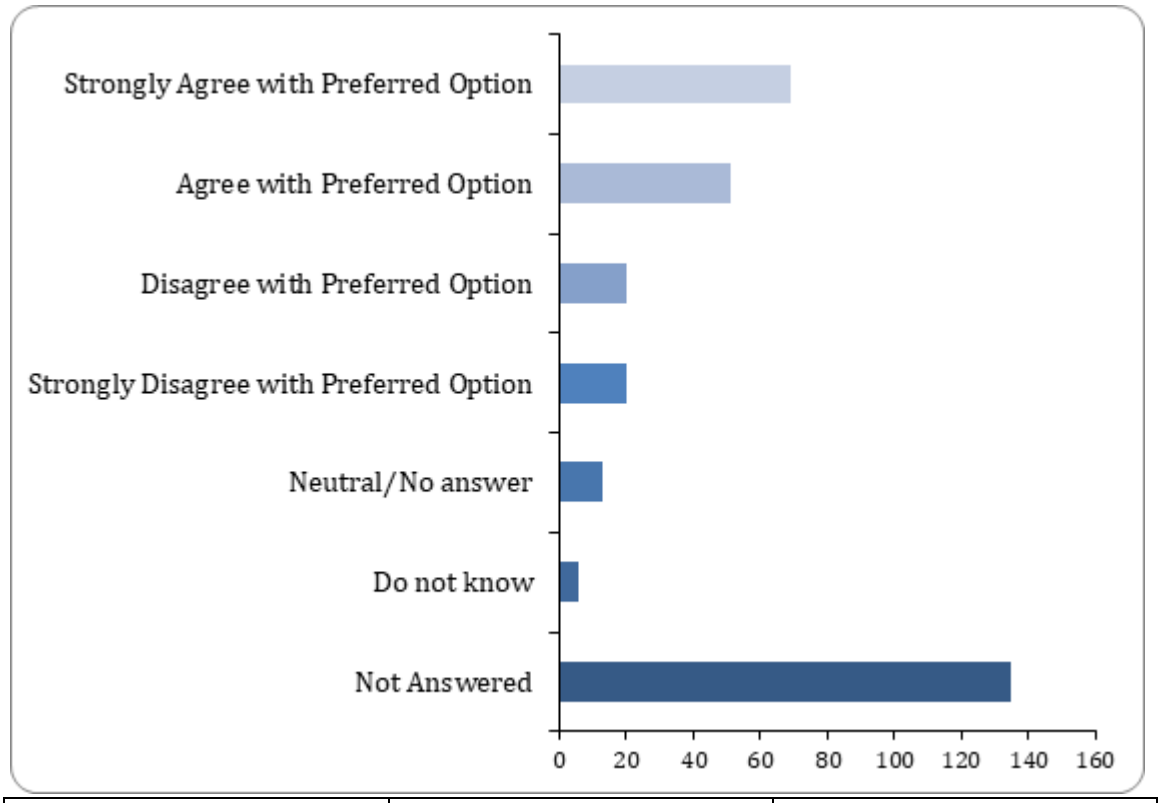
	Nothing in text that specifically ring-fences contributions from older persons housing to deliver affordable extra care accommodation. It appears that the contributions gained from affordable housing on self-contained older persons housing will, like other contributions, go into a pot for affordable housing generally. The County Council would like to see some provision being made within the affordable housing pot for extra care housing for older people and specialist needs. This may not need to be addressed by any change of policy in the Local Plan, but instead by a working arrangement, perhaps addressed through a memorandum of understanding. The contributions could be pooled into a pot for future supported housing projects.	That is correct. There is no specific ring-fencing of contributions for affordable extra care housing. We will continue a dialogue with the County Council on this issue, which could be addressed outside of the plan-making process.	No Action Required No immediate action required related to the plan-production process however further discussions with county colleagues may be required in the future.

1839

All Public Responses – Draft Policy H5

Please tell us what you think about policy options set 002d (draft policy H5): Affordable housing: financial contributions from new commercial development.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	69	21.97%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	13	4.14%
Do not know	6	1.91%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H5	Lack of evidence base	No clear evidence has been provided showing a causal link between commercial floorspace and additional affordable housing need. No analysis has been undertaken that relates to job creation by use class, the share of workers needing housing locally, or the portion of need attributable to individual schemes. The policy also lacks clarity on key matters, such as the calculation methodology.	The calculation is set out in the Draft Submission Oxford Local Plan. Employees are people and people need to live in homes, and there is a significant need for affordable housing in Oxford, so the policy approach is considered justified.

H5	Support option c	Multiple responses from developers support option c. Requiring contributions would harm commercial investment in Oxford. A similar policy to option a) was tested and found unviable between 20012016. It is unhelpful that there is no up-to-date viability assessment in support the proposed policy. Seeking a contribution would not meet all three tests for planning obligations set out under Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. The current market cannot absorb the additional costs, especially after a recent large increase in commercial property charges (CIL) ie. a 400% increase in the levy charges for Class E, B2 and B8 uses. Regarding option a), major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line. Regarding option a) and b), OCC have not undertaken and/or published a viability assessment at this stage. OCC should ensure that the viability assessment contains careful analysis on development at Botley Road	The viability assessment shows this approach is viable. The 2036 Plan did not include this approach as it was no longer viable. The viability profile has changed considerably. The Draft Policy is very clear that this requirement applies only to new developments.

1843

Draft policy	**Topic**	**Summary of comments**	**Response**

		Retail Park, Osney Mead and other commercial developments coming forward. In the absence of additional supporting text and draft policy wording for option b, there are also concerns over contributions being applied more than once to the same site and development. Should such a policy be adopted (either in the case of Option A or Option B), safeguards would need to be put in place in the policy and supporting text, limiting its application to new developments only. The policy should be clear in stating that it is not applicable to: (i) any subsequent changes of use applications between the employment land use classes; or in relation to (ii) any applications relating to alterations or extensions to the new buildings. Without these safeguards in place, the viability of maintaining and improving existing employment buildings for future use will be called into question, particularly during downturns in the economy.	
H5	Support option c- reduced chance social housing ghettos	Anti-social behaviour problems partially caused by an overconcentration of social housing would be reduced- better that commercial areas take some of the social housing load.	Comment noted.
H5	Small sites too	Unfair to impose additional costs on developers buildings larger developments, but not smaller ones.	The threshold is consistent with national guidance on when these contributions are required.
H5	Support option b, expressing concern about option a	Multiple responses support option b but emphasise that this is without seeing a viability assessment. Carefully consider the impact on local and national economy, particularly key employment and revenue generating sectors such as life sciences, research and innovation. These sectors are critical to the city's long	The viability assessment fully reflects other needs and requirements such as contributions to the Cowley Branchline and the update CIL Charging Schedule. The

		term economic resilience and global competitiveness. For instance, the risk of making	
Draft policy	**Topic**	**Summary of comments**	**Response**
		investment in the Oxford Knowledge Cluster unattractive compared to other locations where such levies are not in force. Impact on OUH. The commercial success of these sectors is steadfastly in the national interest and central to government policy as set out within the Government's 'Plan for Change' and incorporated in to key national policy within the 'Modern Industrial Strategy' (June 2025) and 'National Planning Policy Framework' (December 2024). Closer to home, undermining the commercial viability of development risks the delivery of the significant infrastructure needs, such as the Cowley Branch Line. Brining housing to employment sites brings activity at otherwise quiet times.	contributions are set at a level that is well within what is assessed to be viable, keeping in mind all costs and other requirements.
H5	Support for option a (preferred option)	All employment sites require workers, and a proportion of them will require affordable housing. These sites generate significant profits and drive up lad values, reducing available space for the community, so they should contribute to addressing the housing crisis by contributing to the cost of providing affordable housing.	Support welcomed.

1845

Statutory Consultee Responses – Draft Policy H5

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H5	**Strategic Planning**	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

1846

AH: financial contributions from new commercial development	This is a matter for the City Council. We agree with the preferred option to seek financial contributions from new commercial development subject to further viability studies which could assist meeting the need for affordable housing. It is understood (and important) that this affordable housing contribution will be in addition to s106, CIL and Cowley Branch Line contributions (as needed). The County Council would like to highlight the importance that this requirement does not jeopardise the delivery of sites which can contribute to necessary infrastructure, in particular related to the Cowley Branch Line. **Minerals and Waste Policy and Strategy** Commercial developments to which the policy applies should be defined in the glossary.	The viability testing makes assumptions for S106, CBL contributions (as needed) and CIL. The viability testing makes assumptions for CBL contributions. The policy will need to set out which developments it applies.	No Action Required No Action Required Oxford City Action: set out development
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

1847

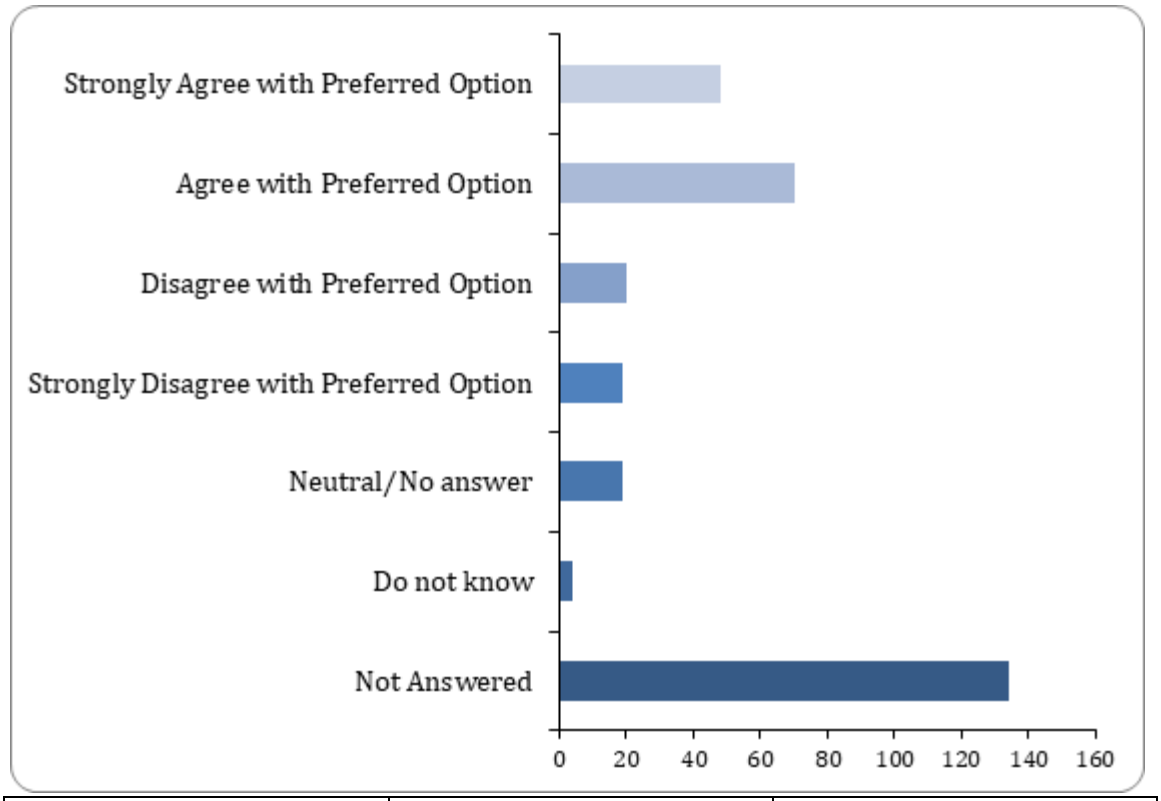
			types to which the policy applies

1848

All Public Responses – Draft Policy H6

Please tell us what you think about policy options set 002e (draft policy H6): Employer-linked affordable housing.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	48	15.29%
Agree with Preferred Option	70	22.29%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	19	6.05%
Neutral/No answer	19	6.05%
Do not know	4	1.27%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H6	Support for policy	Multiple comments express support for the policy as it aligns with the definition of Affordable Housing in the NPPF that identifies that homes "for essential local workers" can be considered as part of any requirement.	Support welcomed.
H6	Add site 024 into policy (Government Buildings and Harcourt House)	Consider that specific reference should be made to site 024 (Government Buildings and Harcourt House) within policy H6. Rationale is set out below: The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration or other essential, on-site support services. The city's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best, without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.	Policy H4 in the draft Regulation 19 Plan indicates that the sites identified as appropriate for employer-linked affordable housing includes "Campus sites of the colleges of the University of Oxford and of Oxford Brookes University. These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employerlinked housing".

H6	The main employer in the city should deliver new homes for their staff or provide significant contributions to	Ever increasing expansion of the main employers – Oxford University, OUHT and Brookes, BMW, are the root cause of housing need in the city. The Headington hospitals (e.g., JR, Churchill and NOC) have capacity for 1000s of homes in highly sustainable locations, by developing existing car parks for new homes would reduce the need to travel and save the surrounding countryside and the few remaining green spaces in the city. Either employers in the city should provide	Policy H3 in the Draft Submission Oxford Local Plan is aimed at helping address the housing need created from new employment. Policy H4 enables employers, in certain circumstances, to provide for their own staff.

Draft policy	Topic	Summary of comments	Response
	housing delivery in the city Proposed Modification	housing or pay significant contributions towards new homes based on their increasing staff numbers. They cannot simply create housing need, traffic problems and dump the consequences onto the taxpayer and ordinary citizen. The policy is too complex and restrictive. Better solutions such as allowing market housing or straight sale of land would provide more homes. Mandatory contributions to housing with discounts where on-site housing is provided, and further discounts where destination parking space is used. Allow market component as incentive to delivery. General housing should be allowed. A contribution to housing stock is valuable however it is delivered and should be determined by the landowner. Sites should not be listed as this is not effective as the list given is not the same as the Site Policies, Headington Hall and Ruskin are both absent.	

1852

H6	No justification for policy	We are concerned that Criterion (f) requires an unspecified and potentially unjustified level of control and approval over the employer's affordable housing approach. We accept that the controls identified in criteria a) to e) should be controlled through a legal agreement, however we consider that criteria f i) to f iii) exert an unacceptable and unworkable degree of control over assets which are not in the control of the City Council. We therefore request that the policy is modified to read as follows: " f) A legal agreement will be required to secure the benefits of this policy. ~~In addition, the legal agreement will be used to: i) agree the allocations policy; ii) agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months; iii) agree that if the employer decides they no longer have a~~	The legal agreement to secure the affordable housing policy as negotiated with the applicant is considered a reasonable approach, necessary to ensure the benefits are realised.
Draft policy	**Topic**	**Summary of comments**	**Response**
		~~need for the housing, then the affordable housing requirements detailed under Policy H2 will be applied.~~ "	

Statutory Consultee Responses – Draft Policy H6

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H6 Employer-linked AH	**Strategic Planning and Infrastructure team** The County Council has published a draft Adult Social Care Workforce Strategy, which outlines higher than national average housing costs within Oxfordshire as an obstacle to the recruitment and retention of social care professionals. We welcome the recognition in Policy H6 and some site policies of the need for employer-linked affordable housing to provide homes for key workers. We can provide further advice if needed about the ongoing need for key workers undertaking multiple social care roles.	Noted. Noted.	No action required. No action required

1854

Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

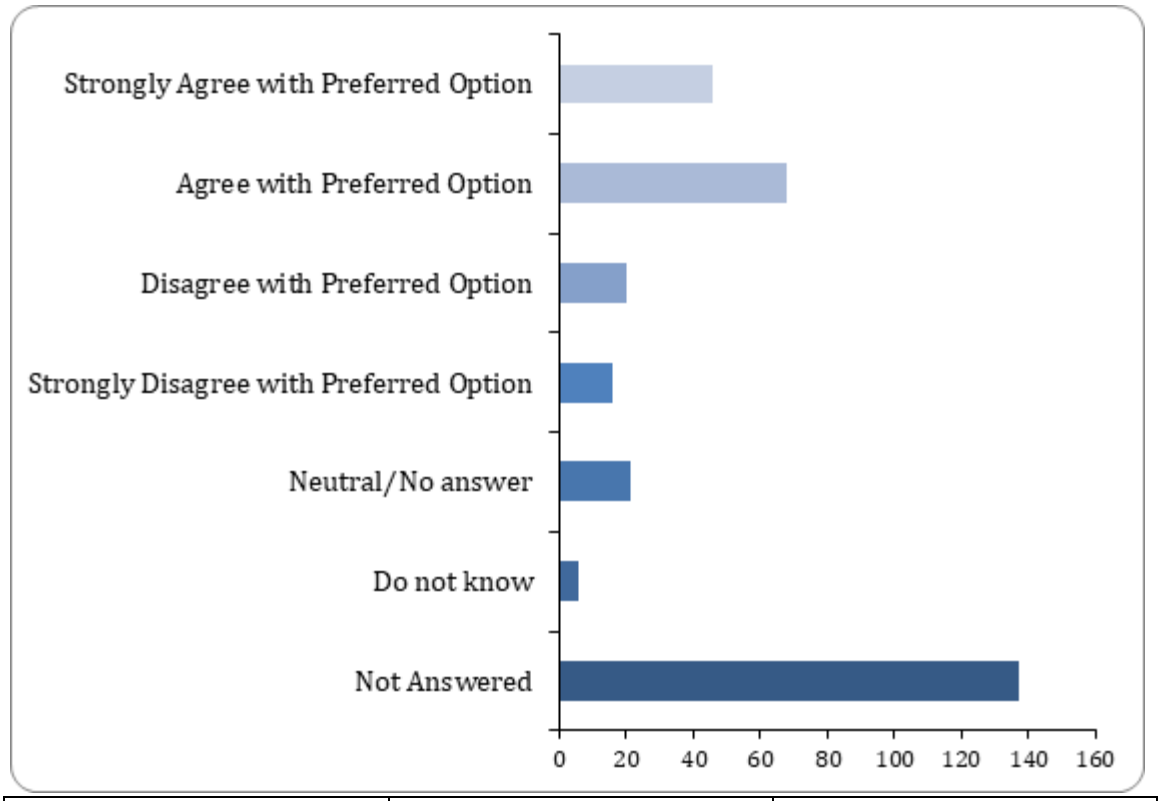
	It is noted that the third paragraph of this policy reads: “Where this policy is applied, the standard affordable housing requirements of Policy H2 will not apply, except to any market housing element on the site, or under those circumstances identified under criterion h).” however there is no criterion h) either under Policy H2 of H6.	We will review the policy and make sure that internal references are correct.	Oxford City Action: Ensure that policy criteria are correct and correctly referenced

1855

All Public Responses – Draft Policy H7

Please tell us what you think about policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms).

There were 177 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	68	21.66%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	21	6.69%
Do not know	6	1.91%
Not Answered	137	43.63%

Draft policy	Topic	Summary of comments	Response
H7	Application to BTR	The Council could usefully clarify whether the Mix of Dwelling Sizes (Policy H7) applies to Build to Rent (BTR). It is very uncommon for BTR to accommodate 4-bedroom units as the Council's evidence base recognises.	H7 allows flexibility for proposals to respond to site context and local needs, as well as market demand and design considerations. The prescribed housing mix only applies to the affordable element, and there is flexibility in the policy if it can be shown as not feasible on a specific site.
H7	Policy should specify space standards as well as housing mix	CPRE are supportive of the mix of dwellings but are concerned that on recent housing developments the social rent / affordable element is mostly made up of one or two bedroomed flats often located in blocks adjacent to main roads. Since the lack of housing for those in need is one of the main drivers for allowing development in the first place a minimum floor area should be set for the social/ affordable element as a condition for planning permission rather than only the number of units.	We will continue to apply the Nationally Described Space Standards to new residential development, including for the affordable element. This policy outlines minimum floor areas for different dwelling types and occupancies.

H7	All staff housing schemes should be exempt	The preferred option for Policy H7 sets out a prescribed housing mix, which proposals for 25+ homes, or sites of 0.5ha+ are expected to comply with, unless it can be shown not to be feasible. Employerlinked affordable housing is exempt from this requirement; however, it is considered that all staff housing schemes should also be exempt on the basis that they are likely to have their own bespoke housing requirements. Contrary to wider ambitions within the plan for making efficient use of land, requiring all schemes to comply with the prescribed housing mix may also preclude higher density developments, in locations where they may otherwise be appropriate.	H7 allows flexibility for proposals to respond to site context and local needs, as well as market demand and design considerations. The prescribed housing mix only applies to the affordable element, and there is flexibility in the policy if it can be shown as not feasible on a specific site.

1859

Draft policy	**Topic**	**Summary of comments**	**Response**
H7	New policy: extensions	Many houses in Oxford are getting extensions, suggesting that houses are too small in general. Houses should be built to easily have one or two bedrooms added in a logical place. This would keep the initial price down and allow affordable extensions in the future.	National policy/permitted development rights already allow for modest household extensions without planning permission.
H7	Fuelling overpopulation (climate considerations)	The rationale behind offering 5-bedroom affordable homes should be clarified due to overpopulation and climate mitigation.	The housing mix is informed by the assessment of housing need in Oxford.

H7	Questioning the 10 units threshold	10 units is too small (they support a more flexible policy). Another comment wants it to be lowered to 5 units because most developments in their neighbourhood (Summertown) are less than 10 which they don't want to encourage.	10 units was chosen because that is the definition of major development. A higher threshold for example with a 25-unit threshold, would be more likely to fail to meet identified needs and could lead to an imbalance in housing mix. Alternatively, a lower threshold would be too small to get a mix onsite.
H7	Lack of clarity	Several comments say policy wording could be clearer e.g. it is unclear if a one-bedroom apartment would be a "home" or not. One person says confusing wording has stopped them from giving input.	Any self-contained residential dwelling is classed as a home. Noted, further explanation is provided in the supporting text and background papers.
H7	Support for preferred option	Several people support the policy, saying that diversity is needed in developments e.g. to avoid areas where no one with small children can move in which could be detrimental for local schools. Some support with no stated reason.	Noted and appreciated.

Draft policy	**Topic**	**Summary of comments**	**Response**

1860

H7	Alternative options	Several comments support option b, i.e. including a mix for both market and affordable homes, with no stated reason. Many comments support option c, i.e. not specifying a mix for any type of development but requiring 2-3 types of unit size in larger developments. They argue this would allow developers to better respond to market signals. Several comments against any policy relating to housing mix, either with no stated reason, or for reasons such thinking we should not interfere with the housing market as it will disincentivise developers.	Including both market and affordable homes would not allow for a flexible response to the market. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example. Not specifying a mix is more likely to fail to meet identified needs and lead to an imbalance in sizes of new units of both market and affordable housing. The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. For example, one-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.
H7	Only prescribe a mix for affordable homes	Newmark consider the current policy contradicts itself as it starts by only relating to AH, but it later implies a mix would be set for both AH and market homes.	The respondent has misinterpreted the draft policy which does in fact only apply to

Draft policy	Topic	Summary of comments	Response
		We consider a unit mix should only be prescribed for the AH.	affordable housing (not market housing). The first part applies to affordable housing (for rent or ownership), and the second part only applies to affordable ownership.
H7	More council housing and housing cooperatives	One person does not support any of the policy options as they argue that there is an overreliance on market housing: there should be more council homes and housing cooperatives instead.	There are other policies in the Local Plan which seek to deliver social rent housing and community-led development (H2 and H13).

1862

Statutory Consultee Responses – Draft Policy H7

Oxfordshire County Council

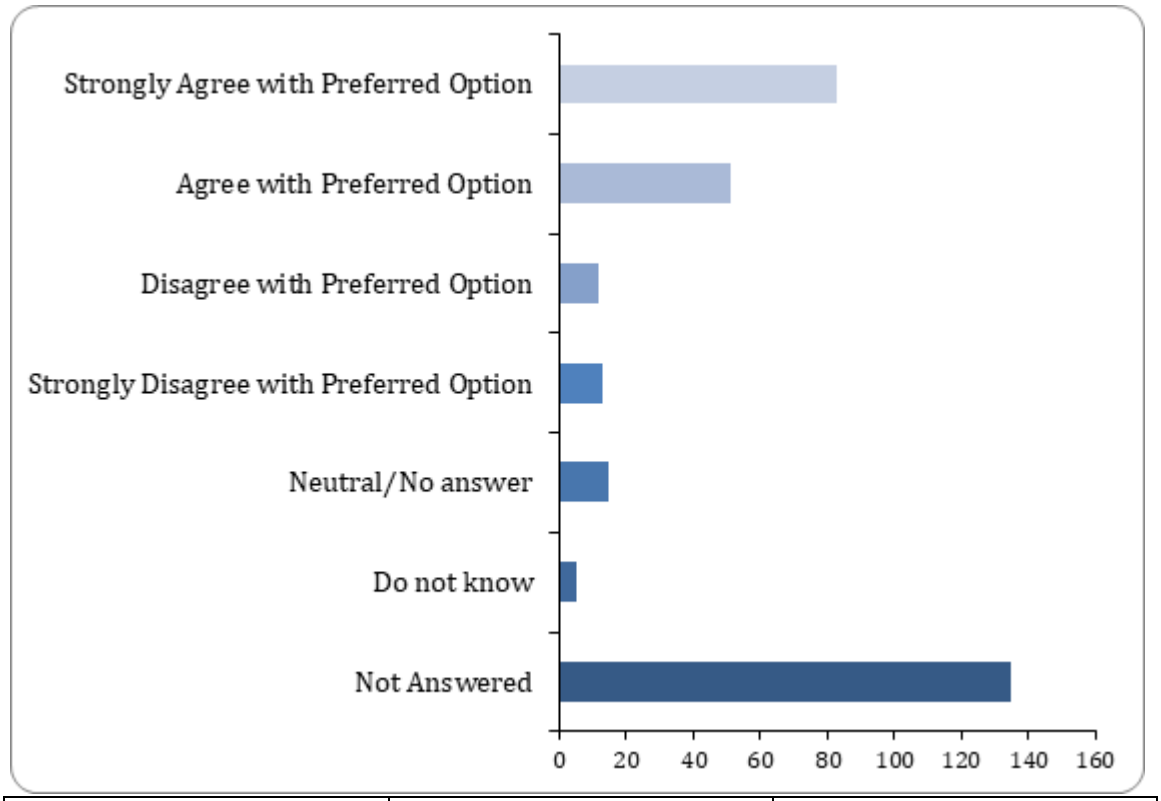
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H7 Mix of Dwellings	**Strategic Planning** This is a matter for the City Council. The City's choice between the options on mix of housing sizes should be based on the evidence and monitoring of current policy.	Noted.	No action required.
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**
	Housing Services This policy sets out the number of bedrooms, but this may not be sufficient to ensure an appropriate mix of dwellings to create mixed and balanced communities. Given that extra care housing developments within Oxford City are unlikely, we consider there is a need for provision within the policy that refers to the possibility of providing affordable specialist supported housing.	This comment is contrary to the above. We are not considering introducing a provision relating to affordable specialist supported housing for this policy.	No action required. May be discussion outside plan-making are needed.

All Public Responses – Draft Policy H8

Please tell us what you think about policy options set 001c (draft policy H8): Loss of dwellings.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	83	26.43%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	12	3.82%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	15	4.78%
Do not know	5	1.59%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H8	Short lets	As worded this does not explicitly cover the loss of a permanent home to a short term let or holiday home. This should be clarified in the policy, or put in a separate policy. Policy should also include permanent residency requirements on all new housing granted planning permission and restrict the number of short-term lets.	It's beyond the scope of the plan to restrict lets.
H8	Support	Support this policy and the contribution it will make towards retaining the existing housing stock.	The support is welcomed
H8	Subdivision is positive	Subdivision increases housing options, so this policy makes no sense. Can create flats for young, who need them. The policy should not include the blanket presumption against subdivision of existing family houses. There is an over-whelming need for single person housing and some family accommodation converted to this is beneficial.	The policy does not prevent subdivision at all, as long as the dwellings created meet space and other amenity standards.
H8	Subdivision should be restricted	This is a quick earner for a developer cashing in on short supply of first time housing and just generates problems for families trying to find a bigger place.	The mix of dwellings policy for new developments, as well as the market and practicalities will work together to ensure family units are still available.
H8	Object in principle	There should be no restrictions on the loss of dwellings. Let free market dynamics prevail.	Given the strong need for new housing, allowing loss would not be a good response.

H8	Strength of exceptions	Will these be strong enough? Will they be worked around by powerful vested interests?	The criteria set out only a few exceptions, which are considered sensible exceptions that will not be easily worked around.
H8	Include CLTs	This policy should include the encouragement of community land trusts.	This isn't something prevented by the policy.
H8	No mention of vacant properties	This policy is ineffective as it does not cover abandoned or vacant properties. (or a policy is missing)	Separate workstreams look at this issue, but it is not something that
Draft policy	**Topic**	**Summary of comments**	**Response**
			can be addressed by the planning system.

1867

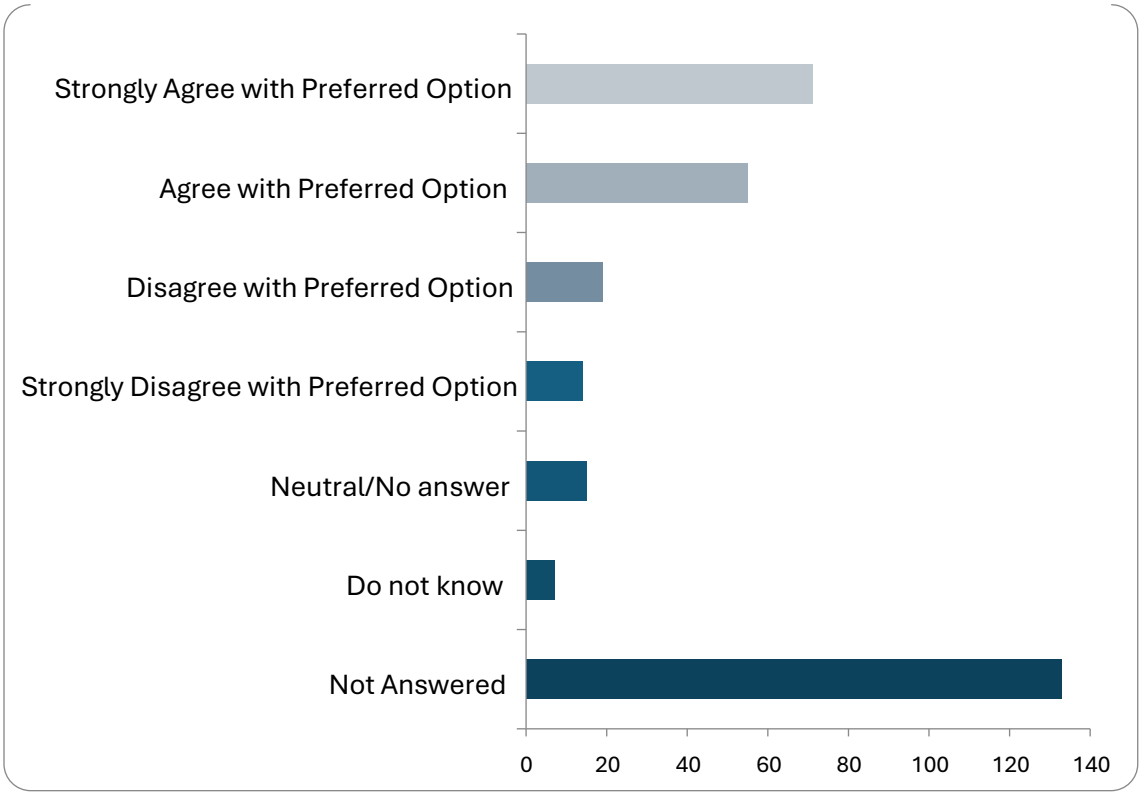
Statutory Consultee Responses – Draft Policy H8

There were no statutory consultee responses to draft policy H8.

All Public Responses – Draft Policy H9

Please tell us what you think about policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO).

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	71	22.61%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	19	6.05%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H9	Request for added flexibility	We consider HMOs offer an affordable solution for some individuals as opposed to renting individually or buying a property. We do however recognise that high concentrations of HMOs can result in changes to the character of the local area and can contribute to amenity issues and parking issues. However, we consider criterion a) (relating to the proportion of HMOs in a 100-metre street length) should not apply to the [Oxford Health NHS Foundation] Trust's sites. The Trust requires complete flexibility to provide staff accommodation on its sites and its considered that criterion a) as currently drafted could unacceptably limit the supply of new HMO accommodation on the Trust's sites. We therefore request that an exclusion is incorporated to Criterion a) to clarify that it applies to public streets rather than those within a privately owned estate, such as those owned by the Trust.	Comments acknowledged. An addition has been made to Appendix 2.2 (point vi) to make it clear that criterion a does not apply to roads within private nonresidential sites.

1870

H9	Objection to policy	We understand the Council's definition 'new purpose-built HMO' means the same thing as 'co-living' accommodation or 'purpose-built shared living' accommodation. We do not agree that prohibiting this type of development is the right approach. The provision of purpose-built co-living allows for existing family homes, which have been poorly converted and are being used as HMOs (whether by students or house-sharing young professionals), to be freed up. Furthermore, the planning system can ensure that newly built co-living accommodation can be controlled and managed properly, which is not always the case with HMOs owned by individual landlords, and often managed poorly.	New purpose-built HMO could potentially have negative impacts leading to additional harm to local amenity, the character of a neighbourhood or additional demand on local services. They could also be put forward with the intention that they will house students and act like student accommodation to circumvent draft policy H8 which seeks to ensure student accommodation is delivered only in the most suitable areas. The preferred option is

1871

Draft policy	**Topic**	**Summary of comments**	**Response**
			therefore to not permit this type of development.

H9	Limit for proportion of HMOs too high	We believe the proposed limit of 20% on the proportion of HMOs among dwellings within 100 metres of a new HMO is too high, and should be reduced to 10%.	Whilst reducing the threshold could lead to a reduction of HMOs in certain areas it is recognised that HMO offer the only available and affordable solution to many. Existing Local Plan Policy H6 includes a 20% threshold, and it is considered appropriate for this to be taken forward in the new local plan.
H9	"Unrelated individuals' not defined	The phrase "Unrelated individuals" is not explained or defined. 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.	An owner occupier can have up to 2 lodgers living in the property, for the purposes of the Housing Act 2004, the property would not be considered an HMO. Owner occupier includes the registered owner and any member of their household. Any subletting in a rented family home where there are 3 or more people from 2 or more households would likely result in an HMO being formed.

Draft policy	**Topic**	**Summary of comments**	**Response**

			In most cases, summer school students who are hosted by a family are unlikely to be deemed as occupying the property as their main or only home, they are essentially guests. Further guidance is provided in Appendix 2.2 of the draft plan which states that buildings NOT counted as HMO include a homeowner together with up to two lodgers.
H9	General comment	How is "area" to be defined? is radius the distance from an existing HMO?	Appendix 2.2 illustrates how the policy will be applied.
H9	Support for alternate options	A number of people said they preferred alternative options. Comments include: • why is the threshold currently 20%? What are the considerations? • Oxford HMOs are already restrictive, we should not restrict them further. • HMOs fill an important gap in Oxford's rental market, offering lower entry rents when studio flats are beyond reach. The policy as drafted would cap HMOs at 20% of properties within 100m and rule out any new purpose-built schemes. Such tight micro-thresholds dampen supply, push sharing households into adjoining districts and risk an unlicensed "shadow" HMO	The reasons for choosing the preferred option are set out in BGP 003: Specialist housing. The 20% threshold is in the existing adopted policy and is effective.

Draft policy	Topic	Summary of comments	Response
		market—outcomes that neither improve neighbourhood character nor housing affordability. •	
H9	General comment	Will anything be done where HMO are already over the 20%?	How the policy will be applied is set out in Appendix 2.2.
H9	General comment	Call a halt to planning permission being given in advance or retrospectively for HMOs. There are too many, and the residential character of areas with them - eg the Lye Valley estate - is being undermined.	Applications are determined in accordance with existing Local Plan policy H6.
H9	General comment	There should be no increase in the current percentage limit on HMOs as this is important in limiting the creation of new HMOs in areas that already exceed the limit. Consideration should also be given to reducing the proportion of HMOs in areas where limits are already exceeded and tackling associated legacy issues such as parking pressures. Conversion to short term lets, which aggravates local housing shortages, should be prevented.	There is currently no planning law to allow councils to restrict numbers and location of short term lets.

H9	General comment	There should be a better register of HMO (for some fly very much under the radar), and if planning permission was given for two family dwellings which turned out to be built as HMOs (or used as AirBandB rental) these should be retrospectively have their permission withdrawn.	Oxford City Council is required under the Housing Act 2004 to maintain a register of current HMO licences, temporary exemptions from HMO licensing and interim management orders. The Regulations only permit publication of licences that are in force and so prohibit publication of pending or expired licences.

1875

Draft policy	**Topic**	**Summary of comments**	**Response**
H9	General Comment	HMOs can blight an area as there may be poor management leading to nuisance of all type for the neighbours. They also cause a loss of community cohesion when a family home becomes an HMO. This is one reason why the concentration of HMOs should be resisted. HMOs run by colleges and universities should be included in the policy. Although they may (but are not always) be better managed than commercial HMOs their effect on the local community will be equally damaging.	The policy seeks to strike a balance, it does not include HMO run by universities and colleges as policy H8 seeks to ensure that student accommodation is delivered only in the most suitable areas.
H9	General comment	I have spent half my life in Oxford in HMOs, it's an essential to the city and allowing early careers people to move here. Me feeling is the quantity and quality is controlled by supply and demand.	Noted.

H9	Lack of clarity	Consideration should be given to the increase in very large HMOs or clustering of several HMOs in a single building. It is not clear that the preferred option would deal with additional problems which they cause and the policy needs adjusting to ensure that it will do so.	The policy includes a requirement for applications for HMO to comply with good practice guidance on HMO amenities and facilities. Further adjustments are not considered necessary.
H9	General comment	You need a mixture of owner-occupied, private rental and HMO rental in an area or it'll just look shabby and feel dangerous. Take Ridgefield Road and Cricket Road, for example - the houses on these roads should be as desirable as any other 30s-built houses in Cowley but I wouldn't walk down either of these roads after dark (put it that way). Any harsh restrictions on HMOs just lead to unauthorised HMOs and bad conditions/poverty/crime etc.	The policy seeks to strike a balance between restricting the location of HMOs and allowing them to be part of a mixed and balanced community.

1876

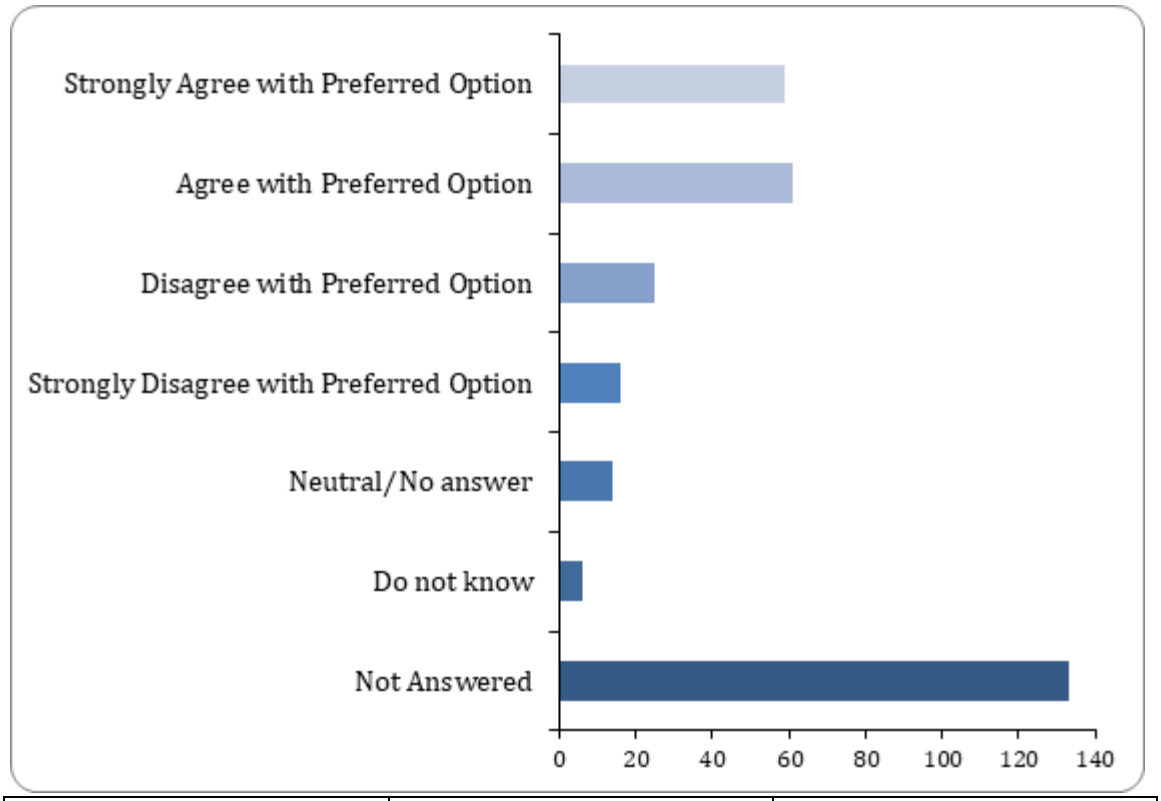
Statutory Consultee Responses – Draft Policy H9

There were no statutory responses to draft policy H9.

All Public Responses – Draft Policy H10

Please tell us what you think about policy options set 003b (draft policy H10): Location of new student accommodation.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	25	7.96%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	14	4.46%
Do not know	6	1.91%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H10	Clarification of policy clauses	Confirm how clause a) is operated / monitored over time, and further guidance required for clause b), regarding the expected indoor amenity space ratio to bedspaces.	Criterion a) is likely to be secured through planning condition. There are no set size or other requirements for indoor amenity space, the requirement is simply that there is some.
H10	Support policy flexibility outside term time	Support the continued allowance of other occupants outside of term times, where a management plan is in place. This supports not only the local economy but the College, through the use of space for conferences and/ or additional tourist accommodation. It would be helpful if the policy elaborated on the types of other occupants, for example, by saying it can be visitors paying per night and who might not be in education. This should not constitute a material change of use given the use would be restricted to students in full time education during term time, which is most of the time.	Support welcomed.
H10	Locational aspect – general support	Support but suggest that wording be adjusted to confirm that if the criteria are unable to be met, then there is a requirement to demonstrate that there are no reasonable alternatives available.	The policy sets out what are considered to be suitable locations, of which there are sufficient to meet the requirements of what is Policy H10 in the Draft Submission Oxford Local Plan.

H10	Additional restrictions to arterial roads	Policy should be amended to include an additional restriction to principal/arterial roads. This is to exclude student accommodation on side roads leading from district centres so as to prevent further issues	Restricting even further to arterial roads only within the centres is considered to be too restrictive

Draft policy	**Topic**	**Summary of comments**	**Response**
		of student noise etc. Support very strong restrictions on parking associated with student accommodation.	and could rule out too many sites that are suitable.

1880

H10	Locational aspect is too restrictive - list of suitable locations should be expanded	Suitable locations should also include along arterial routes and those sites within a 15-minute walking distance of a campus/college. It is considered that the arterial routes in/out of Oxford present a logical and suitable option for locating new student accommodation given the frequency of public transport services along these routes and ease of access to/from both educational and social facilities and the reduced sensitivity of the residential environment. There are other policies in the Plan which address concerns relating to unacceptable changes in character to residential streets and ensuring that new development does not lead to adverse amenity impacts. The appropriateness of the location should be judged on a case-bycase basis. There might be a location that is outside of a centre / existing campus, and which has good public transport links to a university, and which has characteristics that make it unsuitable for conventional residential housing. The policy would be restrictive to both universities and the delivery of student accommodation by third party providers, given its interaction with Policy H11. Without the allocation of new sites, there needs to be greater flexibility on windfall locations to help both Universities meet the requirements of the threshold in Policy H11.	Sites within a 15-minute walking distance of a campus may well be wholly unsuitable sites.
H10	Objection – should include all universities and	The Policy is dependent on the identity of the applicant, which favours existing institutions and is an attempt to limit competition. There are not two but three universities in Oxford, as University of	The policy is not dependent on the identity of the applicant.

1881

Draft policy	Topic	Summary of comments	Response
	boarding/ language schools	West London owns Ruskin Campus. The policy should also apply to boarding/ language schools and other institutions which don't have a campus.	
H10	Increase provision of purpose-built student accommodation	Recognise that provision of student accommodation can impact upon the availability of private market dwellings due to potential occupancy by students. Increased provision of student accommodation can therefore release these dwellings back into the marketplace. Provision of purpose-built-student accommodation positively impacts on the wider housing availability in the City by providing more accommodation at a higher density, thereby releasing housing stock back to the community.	Provision of student accommodation can free up market housing, but it can also compete for sites with market housing that delivers on-site affordable housing. The policy approach is about managing the impacts of student accommodation by ensuring it is in suitable locations.

1882

H10	Amount of new student accommodation required should be justified	Student accommodation is already extensively used by non-students, including UNITE students accommodation, but especially in Oxford University Colleges where the university term lasts for less than half the year. Rooms are let out even in term time on a bed and breakfast basis and before they are allowed any more student accommodation, colleges should be required to demonstrate the use of their existing rooms and why they are not all used for students. Due to colleges' charitable status, the colleges renting out their facilities provides unfair competition to anyone trying to run a hotel or B and B in Oxford.	The policy does restrict occupation to those on longer courses. It does also allow use of the accommodation outside of term-time, which makes efficient use of the site and can help meet the needs of other types of students such as language students visiting Oxford outside of term times.
H10	Support	Support preferred option.	The support is welcomed.
Draft policy	**Topic**	**Summary of comments**	**Response**
H10	Support Alternative Option 3	New student accommodation should only be built on existing campus or student accommodation sites. Developing sites in other locations has led to a continued loss of family homes and areas which could have been developed for private residential use to meet the housing need have been replaced with development by educational establishments.	The Local Plan is required to understand and attempt to meet all types of housing need. There are sufficient sites in the outlined locations, but further restriction would not be justified.
H10	General comment	There should be restrictions on students generally bringing cars to Oxford in this policy, not just to only campus and accommodation sites. Student parking is already a problem in private HMOs.	Policies are restricted to what can reasonably be achieved through the planning system.

H10	General comment	This policy should expressly reference the need for student accommodation, and it should expressly support new accommodation that meets this need, not restrict it. Additionally, management restrictions should not be placed on new student accommodation.	The Local Plan is required to understand and attempt to meet all types of housing need, including for students. Without proper management of student accommodation, all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

1884

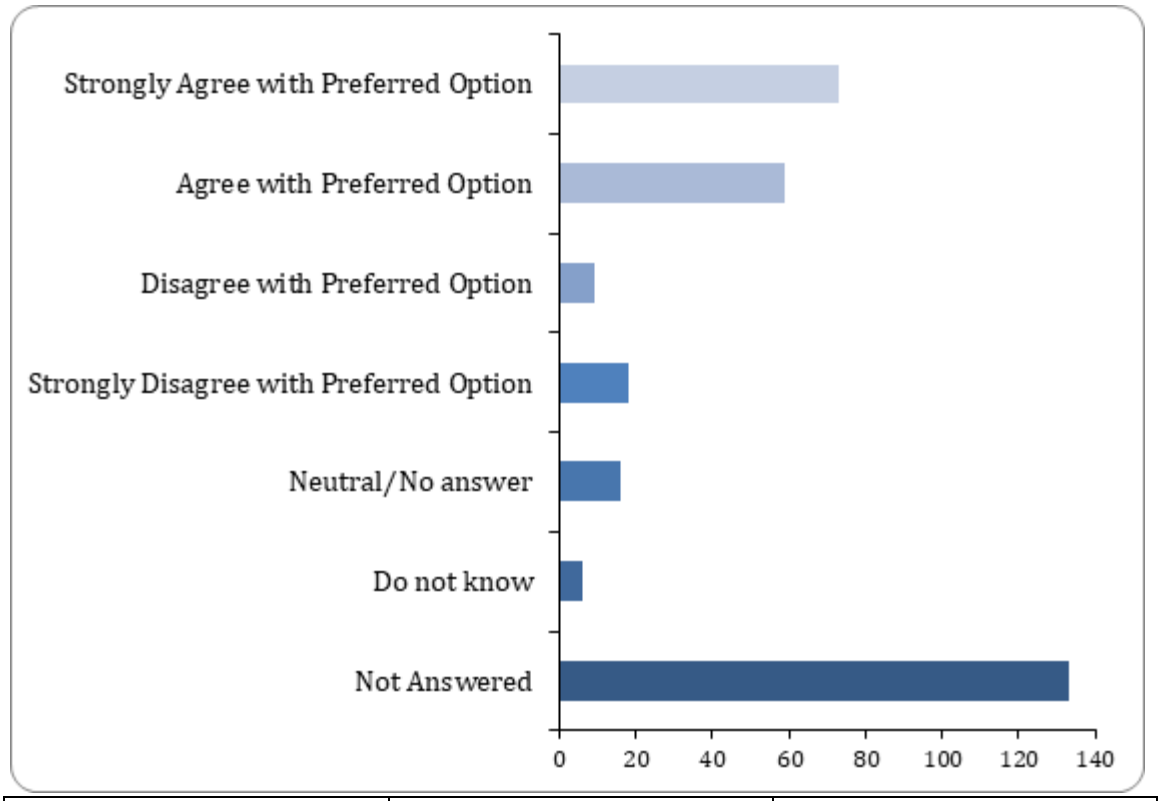
Statutory Consultee Responses – Draft Policy H10

There were not statutory responses to draft policy H10.

All Public Responses – Draft Policy H11

Please tell us what you think about policy options set 003c (draft policy H11):Ensuring there is enough student accommodation to meet needs.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	73	23.25%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	18	5.73%
Neutral/No answer	16	5.10%
Do not know	6	1.91%
Not Answered	133	42.36%

Draft policy	Topic	Summary of comments	Response
H11	Objection – don't link new academic floorspace with need for additional student accommodation	Too restrictive and will not allow leading institutions like the University of Oxford to expand and grow as it needs to, especially at a time when the UK is in desperate need for economic growth and innovation. Growth should be enabled, not held hostage, if the city wants both affordable housing and a thriving research ecosystem. Do not cap the number of students who live in the private market, they should be able to choose whey they wish to live.	The thresholds are set above current levels and within what is achievable by the end of the threshold period, even with the forecast growth in student numbers requiring accommodation. It is a way of managing the potential negative impacts of student accommodation, without being overly restrictive.
H11	Objection – thresholds set too low	The data in the most recent Specialist Housing Needs Evidence by Iceni indicates that Policy H11 does not seek to support new accommodation to meet the universities' need. This is because it restricts any development that would expand University of Oxford and Oxford Brookes by more than 2,500 and 5,750 students respectively, however, these caps are around the same numbers as the new student accommodation beds needed. Therefore, the need will be present with or without the expansion restriction as proposed. The policy should be supporting development to meet this need, rather than restricting universities from expanding beyond the bed need.	The policy only applies to certain students - those in the defined list of students requiring accommodation. It is carefully calculated to be achievable, based on the expected growth in numbers of students requiring accommodation, and forecast increases in student rooms.

1887

H11	General comment	Policy H11 makes development of new and improved university facilities reliant upon development of additional student accommodation. Consequently, policies which influence the development of student accommodation are integral to the achievability of the Local Plan's objectives. Policies which prevent the	The requirement for contributions to affordable housing from student accommodation is considered justified, and has been viability tested. It is not
Draft policy	**Topic**	**Summary of comments**	**Response**
		delivery of student accommodation, particularly on strategic sites, would undermine the delivery of the Local Plan as a whole and render it unsound. This is considered particularly relevant on the issue of affordable housing contributions from student accommodation discussed under policy H3.	considered to hinder development of additional student accommodation.
H11	University of Oxford Colleges should each be considered separately	Although Worcester College is a constituent college of the University of Oxford, it is a separate legal entity to the University. On this basis, it would not be reasonable for the College to have facility restrictions placed upon them whilst they cannot fully control other institutions. The College would seek additional wording such as; "Unless demonstrated that facilities associated with constituent colleges will have no impact on existing accommodation requirements for the relevant college".	This approach has applied to the university as a whole for decades and the University is able to supply necessary monitoring each year across the colleges. The needs as a whole, and the expected growth in student numbers of the university, have been considered when setting the policy.

1888

H11	Clarity over review period	Agreeable to the proposed thresholds for the maximum number of students living in non-university owned accommodation. However, there is ambiguity of what the required information or process would be after 2033, or the terms of this review. This does not enable the Universities to undertake strategic planning with any certainty and would be grateful for further discussions on this element of the Policy.	Text has been added to clarify this.
H11	General support for policy	Several Colleges and others generally support the objective of Draft Policy H11.	Support noted.

1889

Draft policy	Topic	Summary of comments	Response
H11	Support Alternative Option 1	Favour a free market approach - the private rental market will invest in student accommodation if the demand is there. Have students in private rental accommodation city wide to avoid overconcentration in certain neighbourhoods.	A free market approach could not at the same time ensure students were spread across the city.
H11	General comment	'Students' must include both undergraduates and graduates. Increase in numbers of postgraduate students must be closely monitored as the numbers continue to increase as fast as the Universities build new accommodation. Also set long term targets to ensure year on year reductions in student numbers living in non-student dedicated accommodation. The intention is to reclaim housing for council housing or for keyworker part rent/part buy.	The definition in the plan of students requiring accommodation does not exclude all postgraduates.

1890

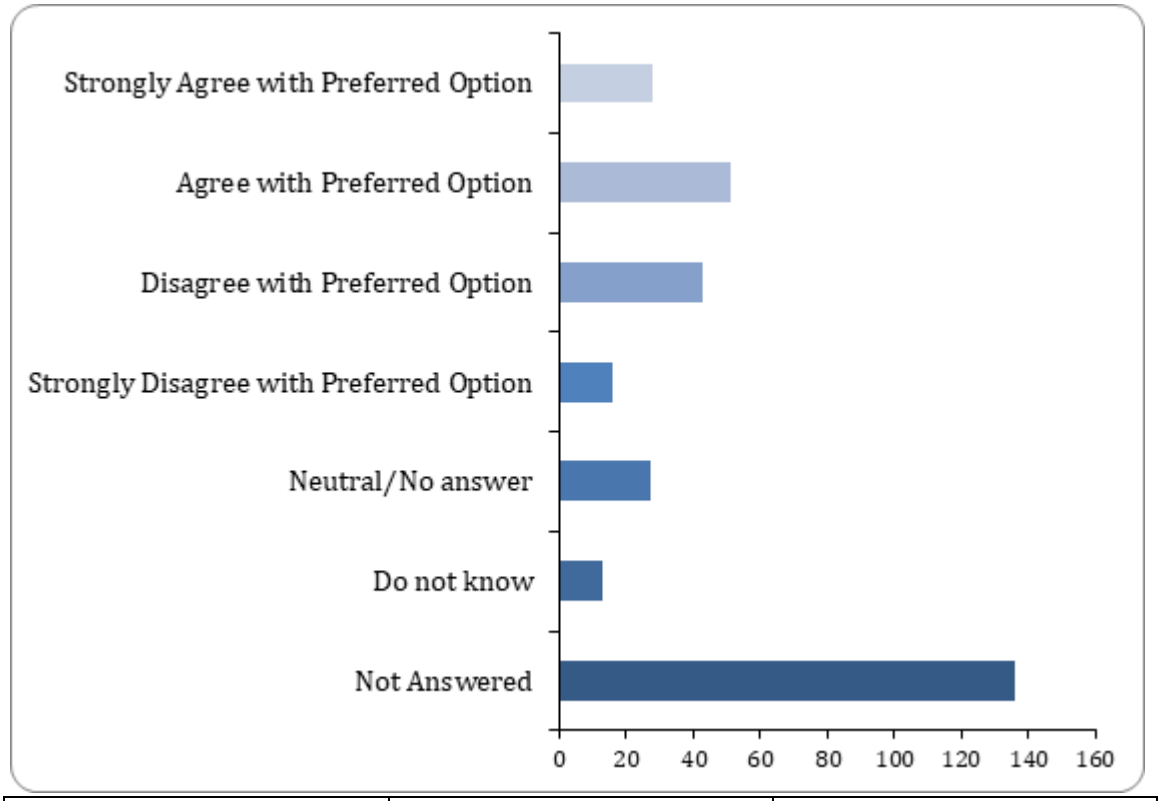
Statutory Consultee Responses – Draft Policy H11

There were no statutory responses to draft policy H11.

All Public Responses Draft Policy H12

Please tell us what you think about policy options set 003d (draft policy H12): Homes for Travelling Communities.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	28	8.92%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	43	13.69%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	27	8.60%
Do not know	13	4.14%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H12	Preferred Option	Who would determine the criteria referred to in the preferred option? They may be impossible to meet.	The criteria in the preferred option have been informed by the latest Gypsy and Traveller Assessment (2024), as well as ensuring that the context is relative to Oxford's constrained area.
H12	Support Alternative Option 1	Sites should be allocated to meet the identified need - travelling communities have as much right as anyone else to live in Oxford. Also provides clarity to all about where the sites will be located. If the expected assessment of need for this type of site demonstrates that a site in Oxford is needed, we would encourage the council to find space for this within the city's boundaries. It is better to have a well-managed facility which can be cleaned and have the necessary provisions such as water, power, lighting and refuse collection, rather than to react on a case-by-case basis.	The latest evidence indicates that Oxford City does not have a need, therefore there is no justification to allocate sites. Should any proposals be submitted, the criteria as set out in the draft policy would ensure that these provisions would need to be met on site.

H12	Support Alternative Option 2	Default to national policy Traveller communities are a big nuisance in terms of causing antisocial behaviour and environmental problems for the surrounding communities. They should not be encouraged or allocated sites.	There would not be any policy to help in the assessment of the impact, should a site come forward if only national policy was relied on. The December 2024 update to the Planning policy for traveller sites made clear that the Government's
Draft policy	**Topic**	**Summary of comments**	**Response**
			overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community.

1894

H12	Designate stopping sites	Through freedom of information requests, Friends, Families and Travellers found in 2024 that there is a lack of transit site provision across the UK, despite repeated recommendations from national and international bodies. The Council should search for sites that can deliver temporary stopping places for Travellers. Oxfordshire County Council's 2024 needs assessment highlighted that there are currently no transit pitches available in Oxford City, yet across Oxfordshire there were 22 reported encampments between May 2022 to October 2023. Even if sites are not designated, the council should identify areas that could potentially be used by travellers "on hand" so that they may be efficiently allocated space rather than being caught up in an endless waiting process.	Noted. The latest Gypsy and Traveller Assessment recognises that all Oxfordshire authorities should work together to address the lack of stopping sites in the County.
H12	General comment	Any proposals for traveller sites should be carefully scrutinised to ensure they do not negatively impact local neighbourhoods.	The draft policy makes it clear that all criteria in the policy would have to be met for a proposal to be acceptable.
H12	General comment	This will only work if engaging with the travelling community.	The travelling community have been involved and were a key part of informing the data in the latest

Draft policy	Topic	Summary of comments	Response
			Gypsy and Traveller Assessment (2024).

Statutory Consultee Responses – Draft Policy H12

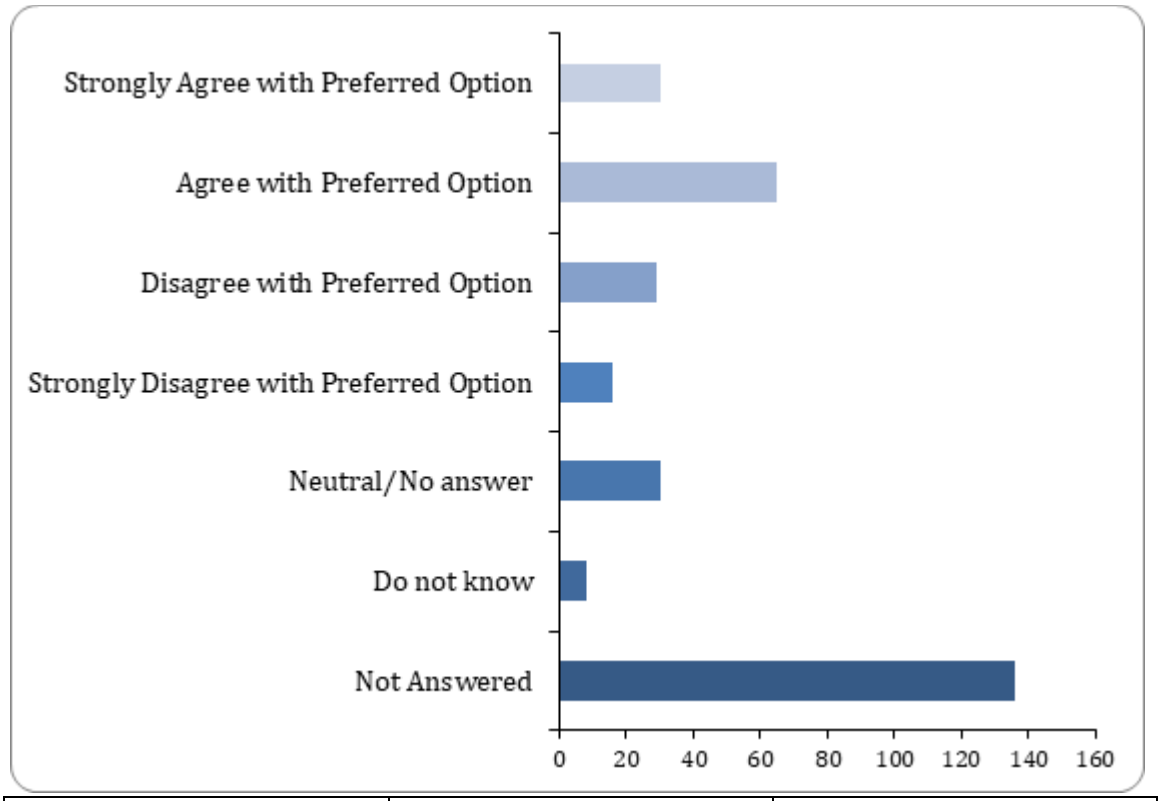
There were no statutory consultee responses to draft policy H12.

1896

All Public Responses – Draft Policy H13

Please tell us what you think about policy options set 003e (draft policy H13): Homes for Boat Dwellers.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	30	9.55%
Agree with Preferred Option	65	20.70%
Disagree with Preferred Option	29	9.24%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	30	9.55%
Do not know	8	2.55%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H13	Support Alternative Option 1	Search for sites to allocate new moorings. The 2024 assessment concedes that despite a need being identified in Oxford, there is limited potential. Allocating even a small, well-screened strip – perhaps by repurposing disused wharfage or incorporating moorings into a wider regeneration scheme—would give boat dwellers a legitimate, serviced option and ease pressure on land-based housing. This is a more pro-active approach where moorings can be prepared with sanitation, water and power facilities, and be considerate of other waterway traffic and users. Reacting case by case is inefficient.	This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.
H13	Support Alternative Option 2	Do not allocate sites or set out policy criteria	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.
H13	Provides a more affordable way of living	Boat dwellings are one of the few remaining unique and affordable ways for people from a diversity of socio-economic backgrounds to live and work in Oxford - it's essential that mooring spaces be increased gradually over time in line with other increases in dwelling spaces.	They can provide a more affordable way of living, although this isn't always the case due to cost of boat maintenance etc.
H13	Object to all proposed options	Disagree with all options. A new policy shared with neighbouring local authorities should be created which allocate sites for new permanent moorings based upon a realistic, independent assessment of demand.	This will not necessarily result in delivery of sites if there is no landowner interest.

H13	General comment	There seems to be no oversight and management of these boat sites. Many boats are either half-sunk or in disrepair and are an eye-sore. Need stricter controls and monitoring over exteriors areas to manage this.	Noted. In Oxford, the control of residential moorings falls under the Environment Agency for the
Draft policy	**Topic**	**Summary of comments**	**Response**
			River Thames and the Canal and River Trust for the Oxford Canal.
H13	General comment	Hopefully you are engaging with relevant local communities to find out if they are happy with this.	The boat dwellers community have been involved and were a key part of informing the data in the latest Boat Dwellers Assessment (2024).

1900

Statutory Consultee Responses – Draft Policy H13

South Oxfordshire District Council and Vale of White Horse District Council

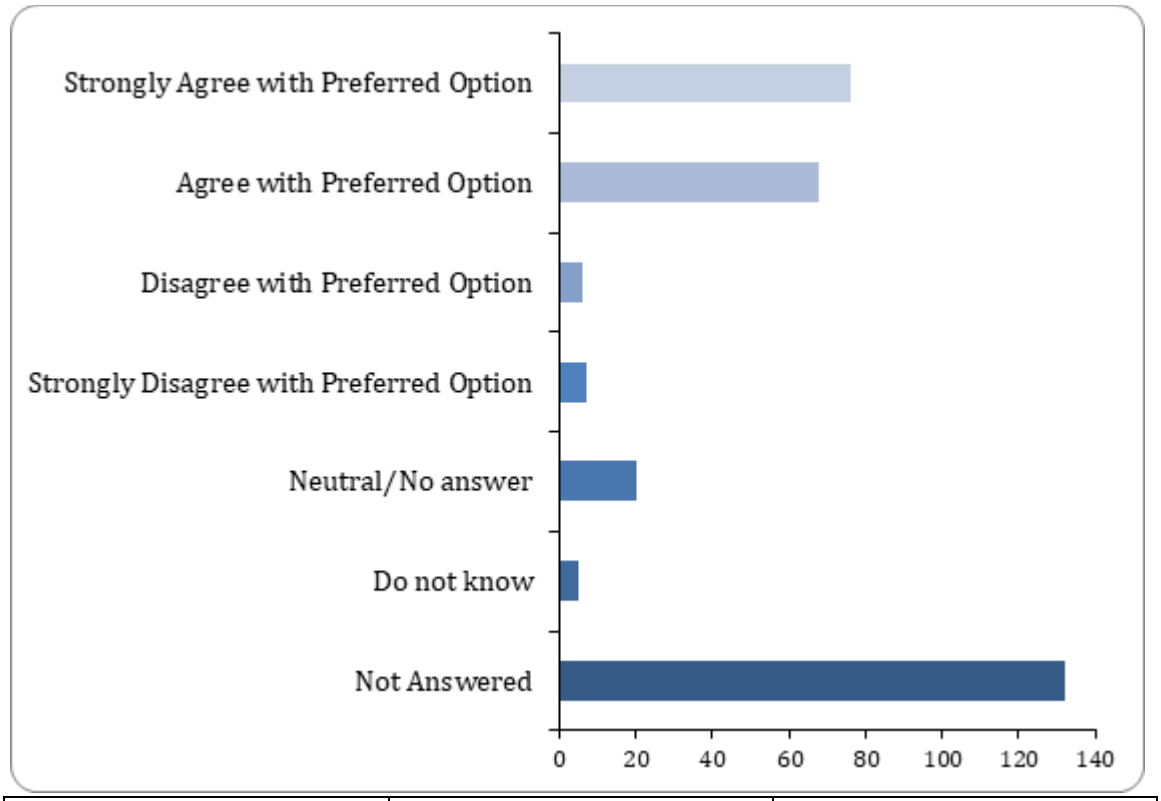
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy H13 Homes for boat dwellers	References to need in Oxford and Oxfordshire aren't precisely aligned to the joint evidence in the GTAA at para. 9.30, and this should reflect the evidence.	Paragraph 2.49 of the Reg 18 document does reference the need expressed in paragraph 9.30 of the joint Oxfordshire Boat Dwellers Assessment. The associated Background Paper for Specialist Housing already explains the justification for using a criteriabased policy approach.	No action required.

All Public Responses – Draft Policy H14

Please tell us what you think about policy options set 003f (draft policy H14): Older Persons and Other Specialist Accommodation.

There were 182 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	76	24.20%
Agree with Preferred Option	68	21.66%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	20	6.37%
Do not know	5	1.59%
Not Answered	132	42.04%

Draft policy	Topic	Summary of comments	Response
H14	Support	Support for preferred option	Support welcomed.
H14	Policy should go further	The housing needs data referenced within the supporting text has been superseded by the June 2025 study which demonstrates a significantly larger requirement for older persons housing of all types. The policy should recognise the benefits to the wider housing stock (releasing underoccupied homes) as well as the many savings and health benefits associated with the provision of such housing. As drafted, the policy is negative ("will only be granted where…"). We recommend that this draft policy is rewritten and suggest the following by way of example. *Proposals for specialist and supported housing will be strongly supported where applicants provide evidence of appropriate existing transport and other services within the vicinity of the proposal site. Over the plan period, targets will reflect the latest evidence of housing need (at the time of writing being the June 2025 Housing Needs evidence base).*	The Specialist Housing Needs Assessment has been updated in November 2025. The policy wording is consistent with other policies in the plan.
H14	Sufficient exterior space	There must be enough green space, easy access for visitors, parking spaces, etc.	Agreed- the intention is that the criteria ensure this.
H14	No policy	There should be no policy interfering in this or relating to elderly persons or supported accommodation in any way.	It is considered important to ensure a good quality living environment for everyone.

H14	Ensure no 'ghetto'	It is important there are no areas with homogenous demographics- it must be mixed. Preferred option fine as long as that's avoided.	In Oxford any delivery of this kind of housing will be limited in size and part of a mixed-use area because of the nature of development opportunities.
H14	Does not need to be in the city/no requirement in	There may be more space and less pressure on local infrastructure outside the city. Many elderly people do not work and this may help reduce housing costs in the city for working residents. There is not an	The policy approach is to ensure what does come forward is suitable, but not to make it a
Draft policy	**Topic**	**Summary of comments**	**Response**
	city/prefer option 4	over-whelming housing need for older persons accommodation. There are, however, hundreds of single homeless people in desperate need. Therefore, the priority is elsewhere.	requirement that would then be competing with other needs.
H14	Quality of care homes	What can be done to encourage better access to affordable, publiclyowned or communal-ownership structures for care homes that have a high quality of care?	Many solutions will be outside the planning system.
H14	Balance requirements against delivery	This type of accommodation can help free up family homes, so it's important it's not restrictive, but it's also important that it is good quality.	Agreed, and the criteria will attempt to strike the right balance.
H14	Prefer option 2	Prefer option 2 or wonder if it cannot be incorporated into option 1 as it sounds like a good idea to ensure a mix of housing and types of residents.	Option 2 is not mutually exclusive to the preferred option, but it is not favoured for the reasons set out in Background Paper 003

Statutory Consultee Responses – Draft Policy H14

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H14 Older Persons and other	**Strategic Planning and Housing teams** The County Council's evidence of need for affordable extra care housing is set out in the existing market position statement supplement. As the County Council's interest is predominantly in respect of affordable	The County's specialist and supported housing needs assessment sets out that c.145 affordable extra care housing units	ACTION: Potential meeting/ discussion with Strategic

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

specialist housing	housing, rather than market provision of housing for older people, our comments on this issue are covered earlier in this response in respect of Policies H2, H4 and H7. However, we support the part of this policy which indicates that planning permission will not be granted for the loss of existing specialist care accommodation unless replaced or there is evidence of no need for the facility. **Public Health** This policy is supported, and we would like to see additional wording which elaborates on the term 'gardens' in the draft wording, with emphasis on dementia-friendly design. Studies have shown that the design of outdoor spaces (such as the choice of sensory planting and wayfinding) and indoor spaces (level accesses) can significantly	are required by 2044. The City's specialist housing needs assessment (published to support the Reg.18 consultation) shows a similar amount of need for the planperiod. Noted. We will consider whether we can incorporate the phrase 'dementiafriendly design' as relating to gardens. Noted.	Planning and Housing Teams No action required. Oxford City Action: Consider incorporating some text around 'dementia-friendly garden design'

1907

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	improve the quality of life of those living with dementia and enable them to stay living in their homes for longer: https://www.kirklees.gov.uk/beta/health-and-wellbeing/pdf/kirklees-dementia-design-guide.pdf		

BOB ICB

Draft Policy	Summary	Response	Outcome

1908

Policy H14 Older Persons and Supported accommodation	The ICB published its Primary Care Strategy in 2024, and it sets out that the population of BOB will increase over the next 10 years in particular the older population who make the greatest use of healthcare services. GP appointments would need to increase by 55% and this would represent an unsustainable level of growth in terms of available funding and workforce if there is no change to the existing care model.	Noted. Noted.	No further action

1909

Draft Policy	**Summary**	**Response**	**Outcome**

	Considering the scale of this type of development in the City will be limited, the ICB considers that robust evidence should be requested to identify appropriate primary care mitigation measures to accommodate this extra demand.	Appropriate primary care infrastructure required to mitigate the level of development proposed in the Local Plan should be identified and projects/ schemes set out in the IDP. It is not the role of the City Council to identify healthcare infrastructure, nor is it the role of developers.	
	The ICB notes that the Council has published a technical advisory note related to Health Impact Assessment (HIA). The ICB considers that the submission of a HIA would be appropriate evidence to demonstrate the provision for older persons and other specialist accommodation would not exacerbate the capacity of the nearby existing primary healthcare provisions. The ICB should also be consulted in this type of planning application.	Noted.	

1910

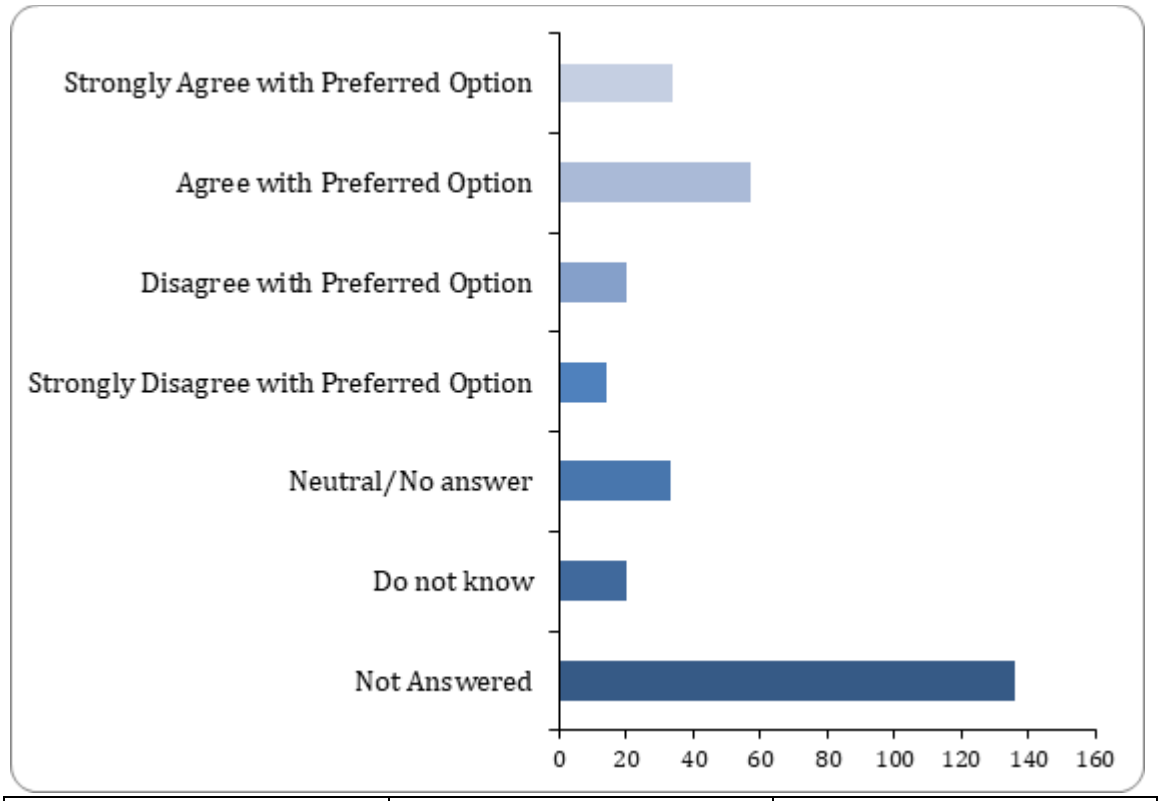
Draft Policy	Summary	Response	Outcome
	BOB ICB propose the following amendment to Policy H14: Planning permission for accommodation for older people and supported and specialist care will only be granted where it: a) Is located with good access to local facilities and services including public transport, shops, and healthcare facilities; and ~~b) Includes the submission of a Health Impact Assessment (HIA) is to provide an assessment of the impacts of the proposals in healthcare provision and any mitigation measures are identified~~ in the scheme; and b) c) Is located close to or as part of a mixed community and will contribute positively to the creation and/or maintenance of mixed and balanced communities; and c) d) Is appropriate for the neighbourhood in terms of form, scale, and design…	The Plan already contains a policy (HD10) which sets out when an HIA would be required. As the threshold is for "major development" (i.e., 10 or more homes or 1,000sqm or more of employment floorspace), this would mean that development proposals for accommodation for older people would already produce an HIA for such proposals. Inclusion of a requirement in this policy is therefore not required as it is already covered in the HIA policy.	

1911

All Public Responses – Draft Policy H15

Please tell us what you think about policy options set 003g (draft policy H15): Self-build and custom house building.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	34	10.83%
Agree with Preferred Option	57	18.15%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	33	10.51%
Do not know	20	6.37%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H15		ONV notes that policy H14 is not effective when applied to higher density housing schemes that the plan is aiming for to make efficient use of land. In particular, schemes that include apartments or flats. In such developments it is not practical to have self-build properties. It may be possible to allow people to fit out an apartment, but this could be difficult in terms of noise and disturbance for adjacent occupiers and location of services etc. A suitable caveat should be added to the list in the policy as currently it only excludes flatted development on brownfield land. The concerns noted above would arise on brownfield or greenfield sites.	On greenfield sites there is far more option to deliver a variety of housing types.
H15	Policy should be more ambitious	Community-led housing is supported via DRAFT POLICY H15: SELFBUILD & CUSTOM HOUSEBUILDING. However, this policy offers much less CLH ambition than in the emerging South and Vale, Cherwell and West Oxfordshire Local Plans. These have drafted more detailed policies in support of community-led housing, in line with the requirements of the new NPPF. The Oxford Plan could very usefully and straightforwardly include a policy for community led housing such as that included in the South Oxfordshire District Council and Vale of White Horse and Vale of White Horse joint submitted Local Plan *(JLP policy copied in text).* Such a policy would also recognise and much better reflect the pioneering role that the City Council has historically taken (and continues to do so) with regard to the promotion and advocacy of community-led housing.	The needs in Oxford are very different to those in the more rural areas surrounding it. The NPPF says that planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing. The local plan policy is generally supportive, but it is not considered it needs to go further.

			In Oxford, mall sites are the norm, and all that is available to meet most needs.
H15	Feasibility	On complex and constrained brownfield sites such as Templars Square, where comprehensive, higher density mixed use development is required and design and active frontages are a key element of the	The policy acknowledges that there are sites where the policy may not be appropriate, such as

Draft policy	**Topic**	**Summary of comments**	**Response**

1915

		masterplan, this policy creates challenges in terms of feasibility, construction programme/phasing/management, and limits the ability to optimise the housing delivery on-site. We therefore request that the policy includes wording to prioritise comprehensive development and site optimisation, over rigid application of the 5%. We also request that it is acknowledged that this percentage target may be challenging to achieve on constrained and complex urban sites and is not required to be met at the Templars Square site.	brownfield sites with flatted developments.
H15	Site threshold	challenge the increased threshold for the provision of land for selfbuild from 5% on sites of 50 units or more to 100 units or more, making it more difficult for community-led housing groups to acquire land for self-build affordable housing projects.	The threshold is set for self-build at a level sufficient to meet forecast needs over the Plan period, whilst also ensuring a large enough group of plots come forward to be feasible to deliver.
H15	Support for preferred option	We seek assurance that such self-build and custom housing is bound by the same policies as other development and specific mention that Policy G1 and G4 apply.	Developments which come forward under H15 would also be subject to the other relevant policies in the plan, the same as any other development propopsal.
H15	Support for option 2	Support of more freedom and pushing the policy	Support is welcomed.
H15	Support the policy but encourage more environmental initiatives	Provide incentives for ecological net-positives of the buildings to look at environmental and social benefits	Environmental and social measures to be delivered through any development would be addressed through other policies in the plan.

H15	Support to try and help affordability issues	A few comments all agreeing this is a good policy and should be pushed forward by the council to address affordability and pushing social cohesion	Support is welcomed.

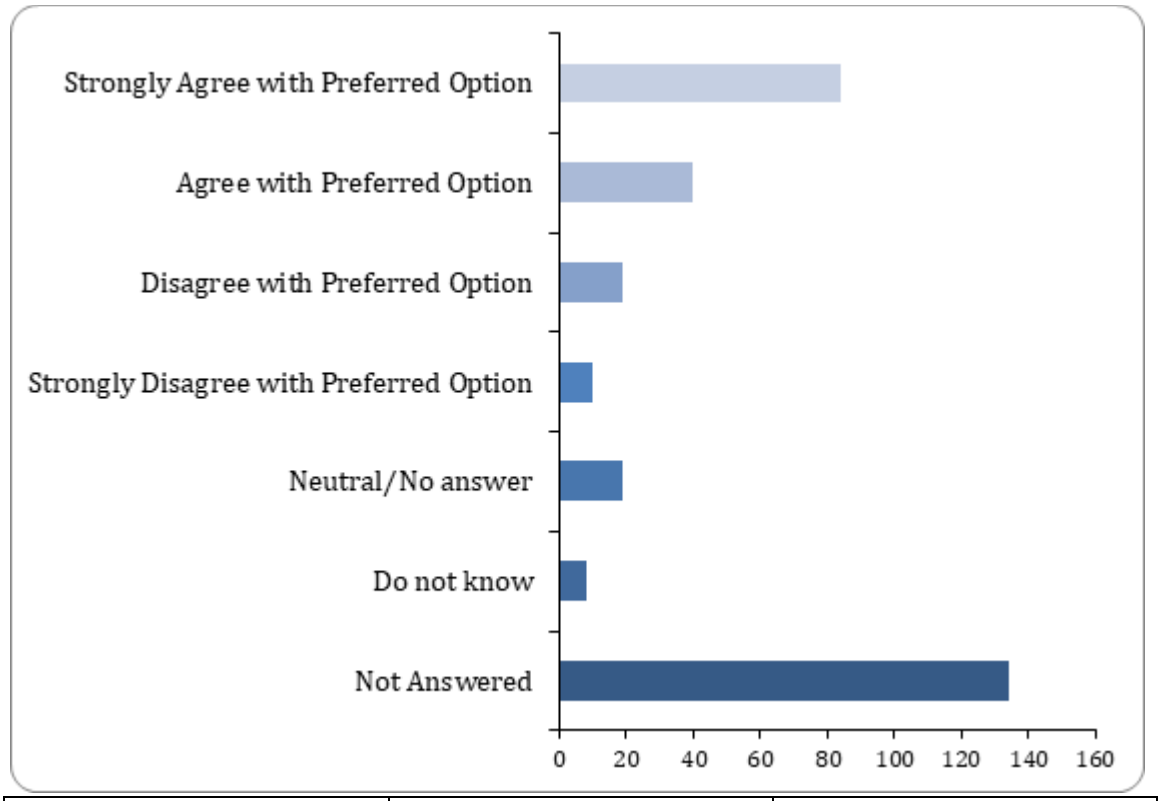
Statutory Consultee Responses – Draft Policy H15

There were no statutory consultee responses to draft policy H15.

All Public Responses – Draft Policy H16

Please tell us what you think about policy options set 003i (draft policy H16): Boarding School Accommodation.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	84	26.75%
Agree with Preferred Option	40	12.74%
Disagree with Preferred Option	19	6.05%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	19	6.05%
Do not know	8	2.55%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H16	Objection	Policy is unjustified. What is the justification for the accommodation being adjacent to the teaching campus?	The location of the new boarding development may affect the safety and amenity of students and local residents and neighbouring residential properties.
H16	No want for policy	Support of no policy	Noted
H16	Support of policy	Support of complete policy	Support is welcomed
H16	Support	ChCh supports this policy in the context of its own School requirements. Policy should acknowledge that new boarding accommodation can be provided either as a new building or conversion of an existing building, which may be in an alternative use.	The policy wording covers new or extended boarding accomodation. Conversions would be covered within this.

Statutory Consultee Responses – Draft Policy H16

There were no statutory consultee responses to draft policy H16.

All Public Responses to the Whole of Chapter 2

Draft policy	Topic	Summary of comments	Response

Chapter 2	Bring vacant homes back into use	Would welcome a policy around using CPO to bring empty homes back into use, along with retrofitting, to provide more affordable housing and an environmentally responsible approach to the housing crisis.	Although Oxford has a severe housing shortage, bringing empty properties back into use is not a statutory function. Oxford City Council encourages owners to bring empty homes back into use
Draft policy	**Topic**	**Summary of comments**	**Response**
			through support, advice, and by imposing significant council tax premiums on long-term empty properties. The Plan supports retrofitting in Policy R3, which supports retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate.

1922

1923

Chapter 3 - A Prosperous City with a Globally Important Role in Learning

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Headlines for Chapter 3:

- ELNA – general support for policy
- Employment land should not be competing with land needed for housing
- Employment land should be competing with existing infrastructure
- General support for housing on employment sites
- General support for Community Employment Procurement Plans (CEPP)
- Clarification around what affordable workspaces means
- Numerous commentaries around developing derelict buildings and old office space
- Minor commentary disagreeing with proposed policies

1925

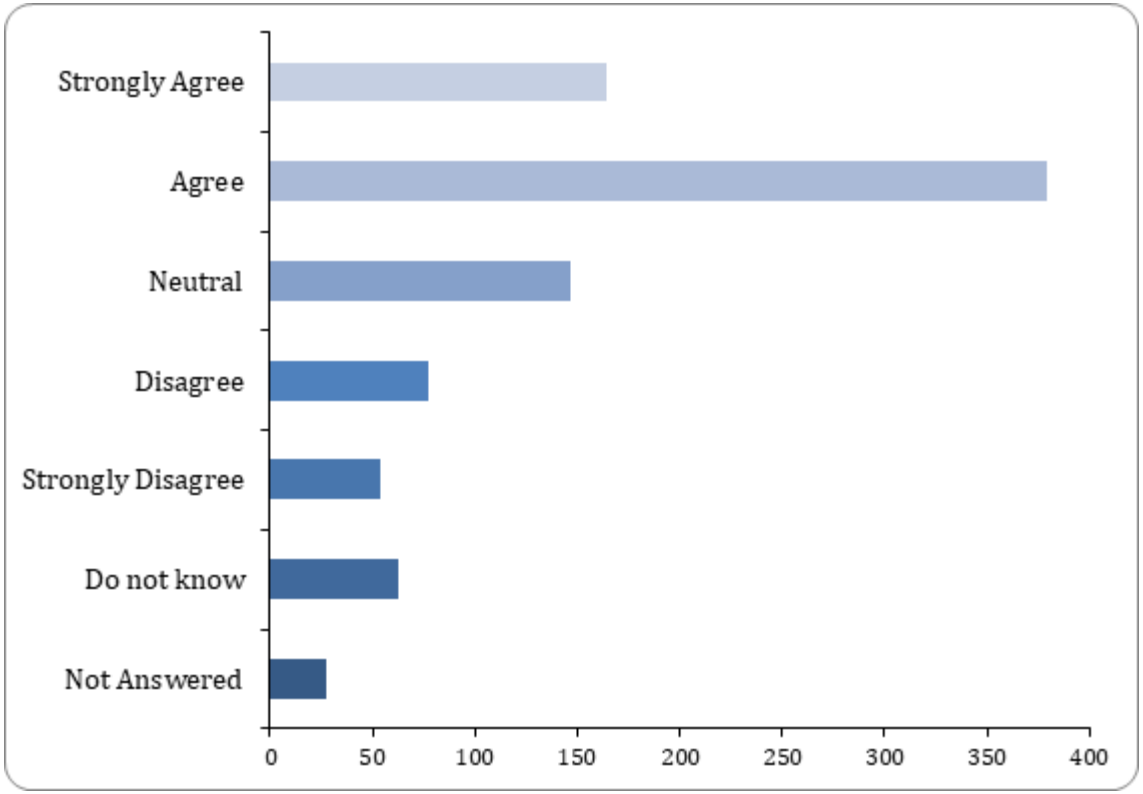
Short questionnaire responses

Employment Sites

We have identified what we think are key employment sites in the city that we should protect. These are sites that support Oxford's internationally important role in education, research and health, and also those that support a diverse and strong economy. We are not protecting any employment sites in the city centre or district centres, to give full flexibility in those areas, for example to allow for offices to change use to housing. To what extent do you agree with this approach?

There were 884 responses to this part of the question.

1926

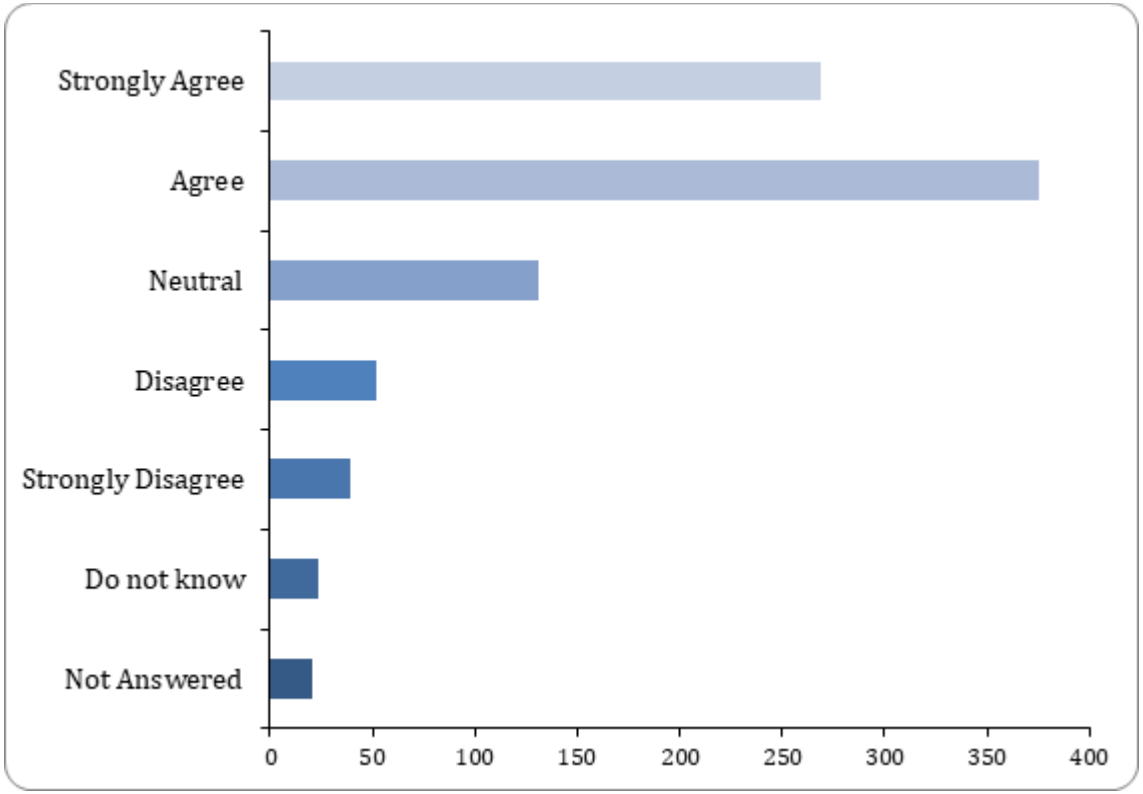


Option	Total	Percent
Strongly Agree	164	18.00%
Agree	379	41.60%
Neutral	147	16.14%
Disagree	77	8.45%
Strongly Disagree	54	5.93%
Do not know	63	6.92%
Not Answered	27	2.96%

CEPPS

We propose requiring community employment plans so that work and training opportunities are given to local people. To what extent do you agree with this approach?

There were 890 responses to this part of the question.



Option	Total	Percent
Strongly Agree	269	29.53%
Agree	375	41.16%
Neutral	131	14.38%

Disagree	52	5.71%
Strongly Disagree	39	4.28%
Do not know	24	2.63%
Not Answered	21	2.31%

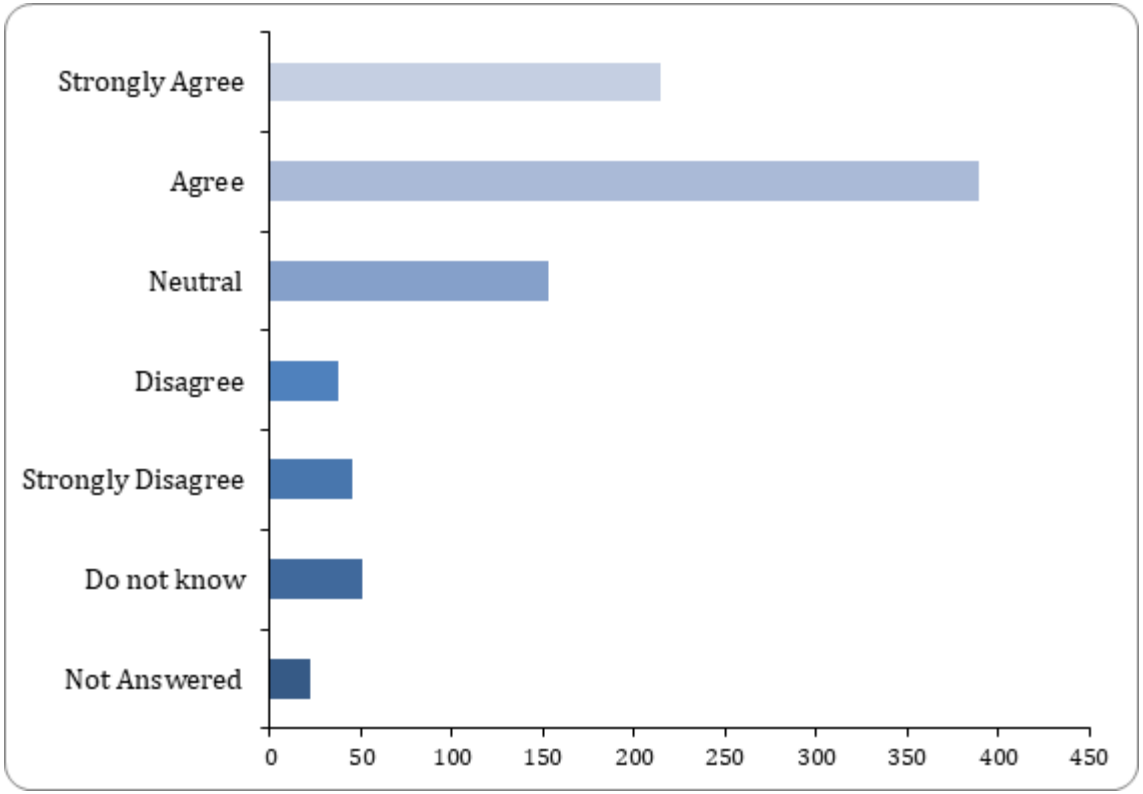
Affordable workspaces

Affordable workspace is proposed as a new policy approach- the largest key employment sites will be expected to deliver an affordable workspace strategy, to ensure a range of employment types and businesses.
To what extent to you agree with this approach?

There were 889 responses to this part of the question.

1928

1929

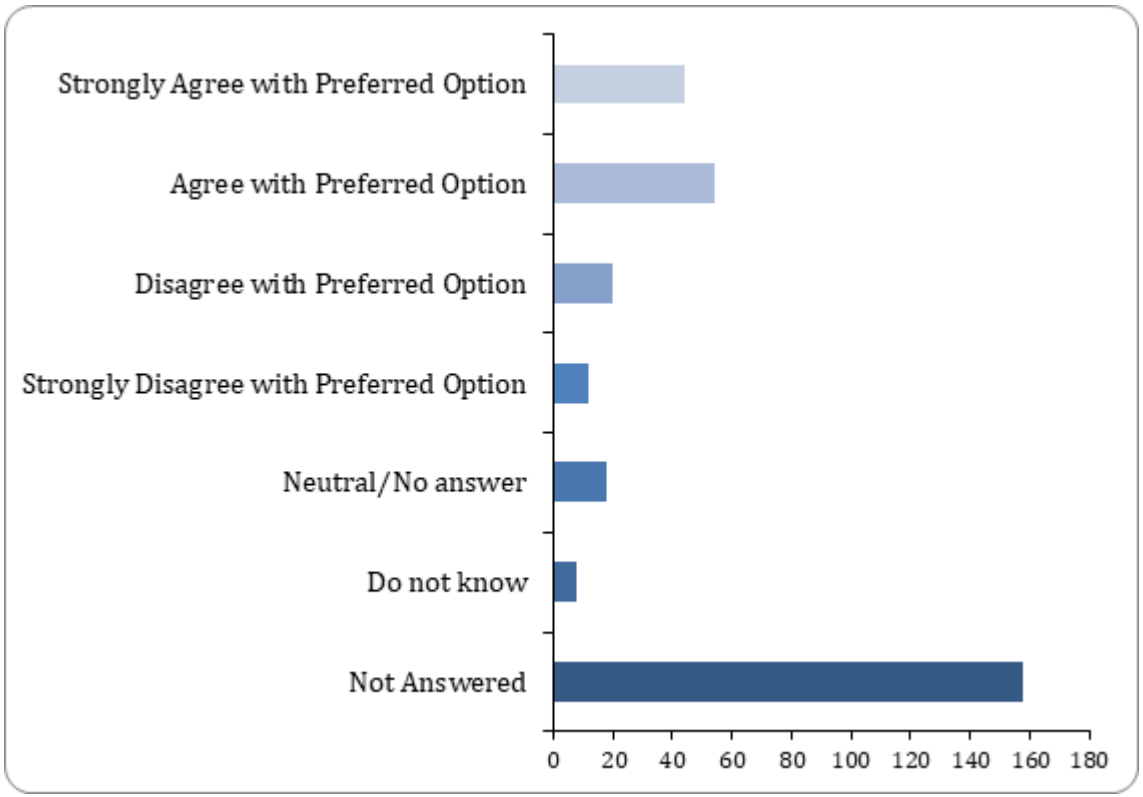


Option	Total	Percent
Strongly Agree	214	23.49%
Agree	389	42.70%
Neutral	153	16.79%
Disagree	37	4.06%
Strongly Disagree	45	4.94%
Do not know	51	5.60%
Not Answered	22	2.41%

All Public Responses - Draft Policy E1

Please tell us what you think about policy options set 004a-1 (draft policy E1): Addressing Employment Land Needs. If you have any additional comments please put them in the comment box below.

There were 156 responses to this part of the question.



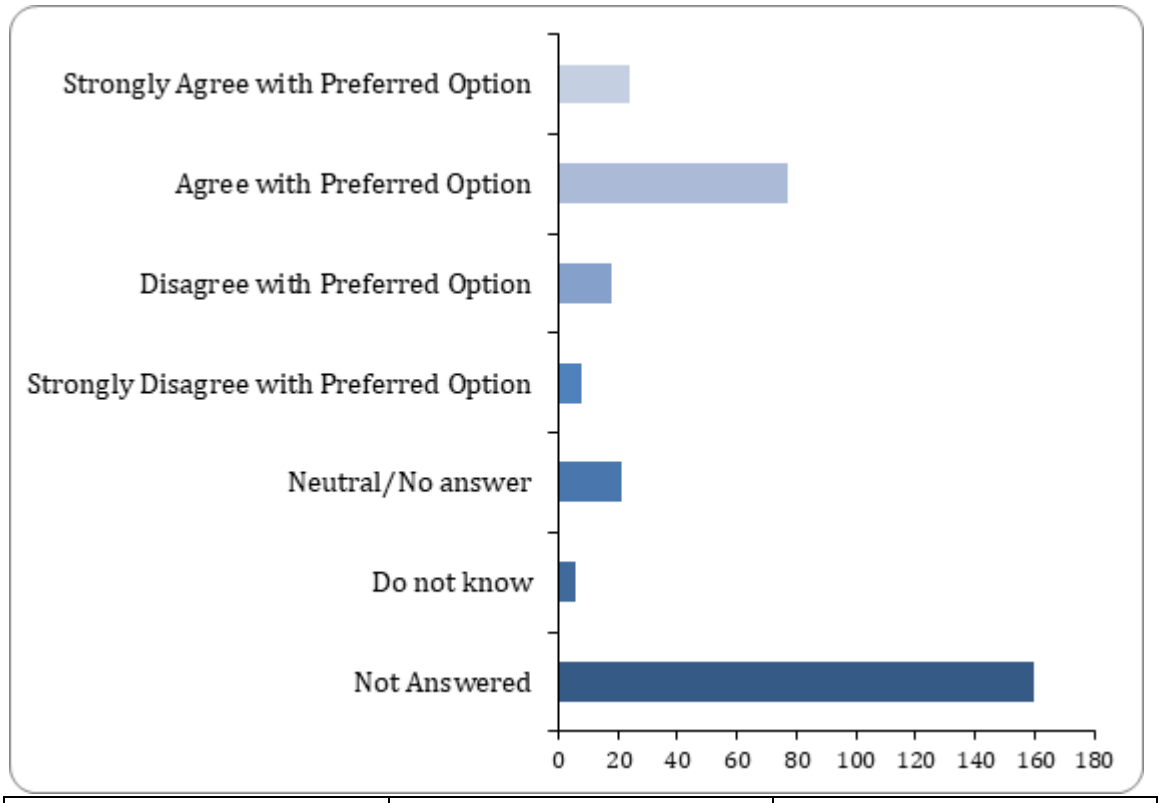
Option	Total	Percent

Strongly Agree with Preferred Option	44	14.01%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	12	3.82%
Neutral/No answer	18	5.73%
Do not know	8	2.55%
Not Answered	158	50.32%

1931

Please tell us what you think about policy options set 004a-2 (draft policy E1): Making the best use of employment sites. If you have any additional comments please put them in the comment box below.

There were 154 responses to this part of the question.

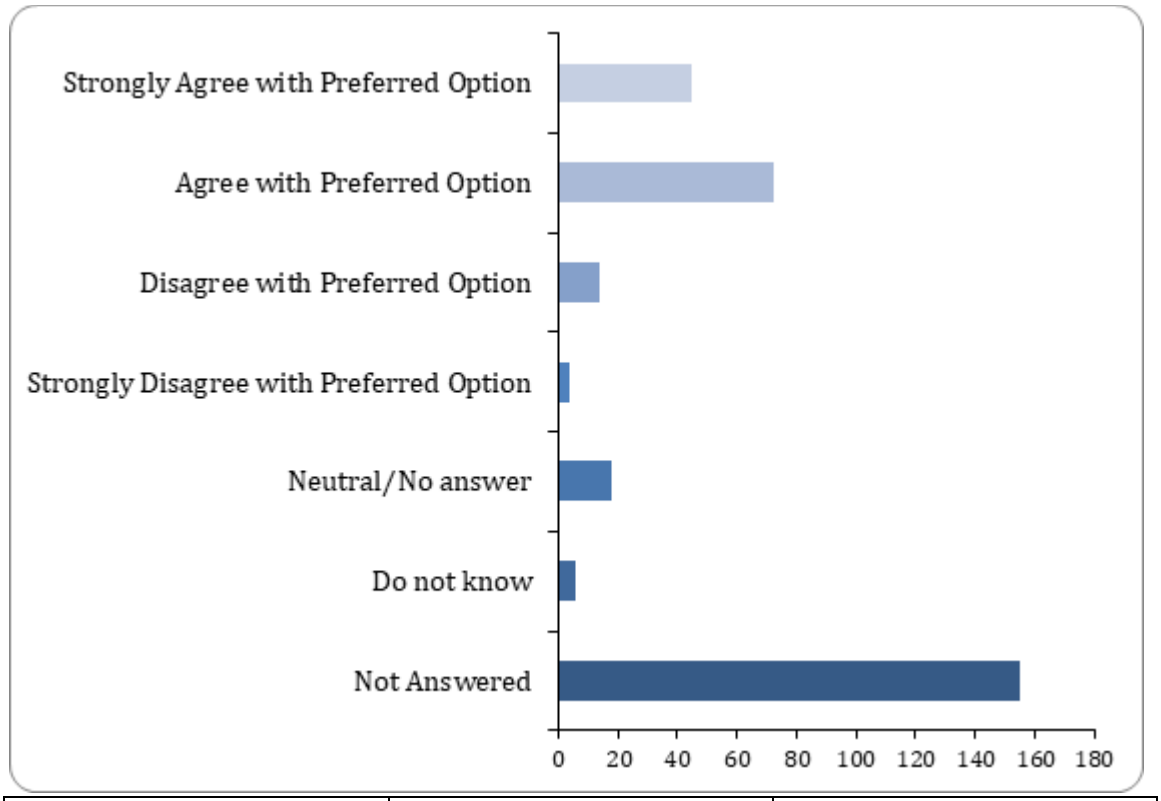


Option	Total	Percent
Strongly Agree with Preferred Option	24	7.64%
Agree with Preferred Option	77	24.52%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	21	6.69%
Do not know	6	1.91%
Not Answered	160	50.96%

Please tell us what you think about policy options set 004a-

3 (draft policy E1): Housing on Employment Sites. If you have any additional comments please put them in the comment box below.

There were 159 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	72	22.93%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	18	5.73%

Please tell us what you think about policy options set 004a-

Do not know	6	1.91%
Not Answered	155	49.36%

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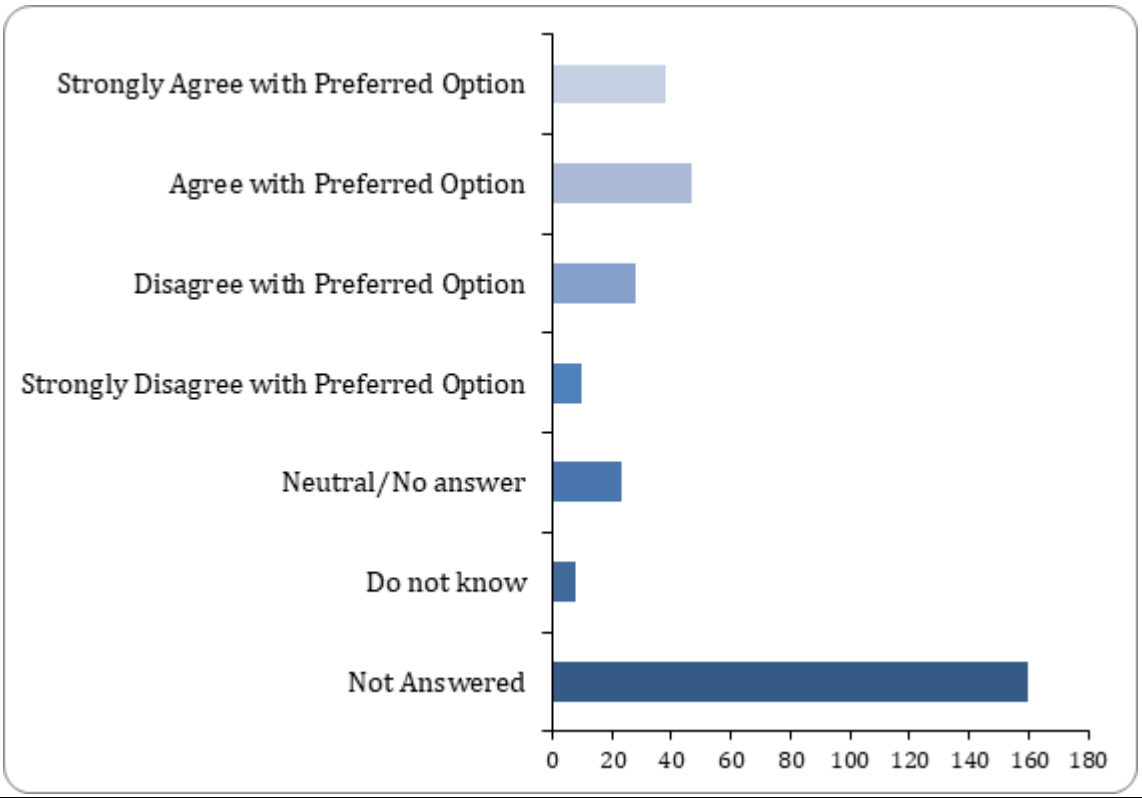
4 (draft policy E1): Location of New Employment Uses. If you have any additional comments please put them in the comment box below.

There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	38	12.10%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	28	8.92%

Please tell us what you think about policy options set 004a-

Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	23	7.32%
Do not know	8	2.55%
Not Answered	160	50.96%

Draft policy	Topic	Summary of comments	Response
E1	Support	We support the preferred option to attempt to meet employment needs, while balancing other uses, in particular housing. We consider that designated employment sites, such as Oxford North, are the best locations for intensification of employment uses to meet employment needs. ONV support the preferred option of seeking to maximise existing employment sites to ensure that best use is made of those allocated, to meet employment needs. Supporting the intensification of the city's existing key employment sites will enable employment land needs to be met on existing sites where successful clusters can be established. ONV notes the proposed provision of housing on non-designated employment sites. This is recognised as being a potential source of housing numbers supporting the Council's ability to meet housing need. Oxford North is a mixeduse site and the land uses identified include residential development and commercial/ employment development. The site allocation policy for Northern Gateway/	Support noted. Support noted. Support noted.

		Oxford North has not yet been released however, this should allow for flexibility over the location of the uses	

1937

Draft policy	Topic	Summary of comments	Response
		within the allocation to ensure that development can respond to market demand. We strongly support the preferred option of supporting new employment uses through intensification at existing employment sites and sites specifically allocated for employment uses in the plan. This option would not allow any new employment-generating uses outside of these locations and we support employment needs being directed to existing employment sites.	Support noted.

1938

E1	Support – ARC Oxford	We support the preferred option to attempt to meet employment needs, while balancing other uses, in particular housing. We consider that designated employment sites, such as ARC, are the best locations to support intensification of employment uses to meet employment needs. We support the preferred option of seeking to meet employment land needs through appropriate modernisation and intensification of the city's existing employment site network, which would include ARC. Supporting modernisation and intensification of the city's key employment sites will enable employment land needs to be met on existing	Support noted. Support noted. Support noted.

1939

Draft policy	**Topic**	**Summary of comments**	**Response**

		sites through a mixture of refurbishment of existing buildings and new build development. RLMIS has no plans at this time to deliver housing on its site at ARC, but recognises housing is a key locational consideration for companies. There could be scope for allowing some housing on employment sites provided it supports their economic function. Where there is scope to deliver housing on other key employment sites in the City, we support the preferred option to allow an element of housing delivery on existing employment sites (subject to other policy requirements being met). We strongly support the preferred option of supporting new employment uses (through modernisation and intensification) at existing employment sites and sites specifically allocated for employment uses in the plan only. This option would not allow any new employmentgenerating uses outside of these locations and therefore support employment needs being directed to existing employment sites, such as ARC Oxford.	Conditional support noted. Support noted.
E1	Support for policy	The [OUH] Trust supports Policy E1, and the continued identification of its hospital sites as 'Key Employment Sites' at Appendix 3.1.	Support noted.

1940

Draft policy	Topic	Summary of comments	Response
		The aspiration to protect and make the best use of existing employment sites is a particular positive for the Trust given the importance of the three hospital sites to the city in terms of the number of people employed and the services provided.	Support noted.
E1	Support – Suggested wording	It is supported that emerging policy E1 considers new employment generating uses within the city centre as an acceptable location for delivering new, modernised and intensified employment floorspace. It is suggested with respect to the initial paragraph of the draft policy that it is updated to 'All new development for employment purposes…' as opposed to 'All new development on employment sites'. It is understood that the sentiment of the first paragraph is applicable to employment development more broadly rather than only being applicable to allocated/existing employment sites. This clarification and amendment would ensure the policy is effective.	Support noted. The city's employment sites include hospitals, teaching and research campuses, and sites allocated for a range of employment generating uses. It is important that the key principles outlined in the first paragraph of Policy E1 are applied uniformly across the city's diverse network of employment sites rather than restricting their application to development for "employment purposes" (an undefined term).

E1		The Group supports the flexibility in the draft policy, which protects the most important 'key' employment sites, whilst also allowing for their intensification including complementary housing to create mixed use sites.	Support noted.

Draft policy	Topic	Summary of comments	Response
		Given the scale of the City's housing requirement, it is right that all options should be considered, including employment sites. However, in those circumstances where employment sites (either in whole or part) are given over to other uses, it is essential that there remains sufficient employment land for the economic potential of Oxford to be fully realised.	The policy includes criteria to ensure that, even where a loss of employment floorspace is proposed at Key Employment Sites, the employment use can be retained and the number of jobs in employment generating uses are retained.

E1	Greater flexibility needed to align with NPPF	The Universities welcome the latest evidence presented in the 'Oxford City – Employment Land Needs Assessment Interim Report' (June 2025), which is generally more aligned to the data submitted within the Universities' representations during the last round of planmaking. However, the Universities consider that greater flexibility is needed on the list of permissible locations for new employment uses and clarification is needed on what defines an 'employment site'. Currently, the preferred options for Policies S1 and E1 collectively seek to direct new employment land to existing employment sites whilst prioritising housing elsewhere. However, in the absence of a definition of 'employment site', the policy poses a potential	Noted. Given the city's well-publicised inability to meet housing need (standard method, NPPF, Dec 2024) and widely acknowledge barrier to economic growth that this brings, coupled with the very healthy "demand-led"

1943

Draft policy	Topic	Summary of comments	Response

		barrier to the development of employment uses on certain redundant brownfield sites which may lend themselves to employment-generating uses. Furthermore, the Universities consider that in their current guise, Policies E1 and S1 risk conflict with the overarching vision of the Local Plan to support Oxford's international standing for research and development. Reflecting Paragraph 68 of the NPPF ("the Framework"), which required policies to be "be flexible enough to accommodate needs not anticipated in the plan", it is suggested that a sequential approach could be added to the policy, to enable new employment generating uses where they would not undermine other priorities of the plan.	employment land supply position puts the city in a strong position to meet all identified employment land needs in the plan-period. The plan's strategy to support new sites for housing is therefore critical to the further economic success of the city. The Reg. 19 plan will provide clear definitions of employment sites and appropriately sub-categorise them. While supporting Oxford's key economic strengths forms part of the overarching vision for the plan, delivering new homes in the city is a key priority as well. Given the brownfield and strategic greenfield opportunities that remain undeveloped across the city's network of Key Employment sites, we consider there is sufficient flexibility to accommodate any employment needs not anticipated by the plan. However, as stated previously, as Oxford is unable to meet currently identified housing need, the plan's overarching strategy (S1) and employment strategy (E1) provide clear support for economic growth by seeking to reduce its barriers, which include housing affordability issues. Noted – see above.

Draft policy	Topic	Summary of comments	Response
		Whilst this option is not considered within Background Paper 004, such an approach would achieve an appropriate balance between land use pressures, ensuring the Plan conforms to the Framework.	
E1	Support draft policy preferred option over alternatives.	The policy is supported. Although the policy appears to be supportive of a range of employment land uses, it doesn't reference the nature/type of acceptable uses and should ensure that it is responsive to market demands to allow for the delivery of employment types in accordance with the needs of the local market.	The policy supports "employment generating uses" defined in the appendix. A specific policy is included for B8 uses as these often have bespoke requirements/ needs etc.

1945

E1	Clarification suggested	Policy E1 seeks to support and protect employment uses. However, it supports the loss of employment uses on sites that are not designated for employment uses, and where housing is proposed. It also supports the provision of housing on designated sites, taking a balanced judgement approach where the employment function of the designated site is not harmed. In both these circumstances it would be helpful if the policy said that student or co-living types of housing are supported. Both types meet housing needs (in terms of the NPPF and NPPG), and it might be that such housing types are	Noted. Noted. Policy E1 does not specify the type of residential development that should be come forward. As the acceptable locations for student housing are covered elsewhere in the plan, it would not be appropriate to support them at all employment sites. The policy therefore provides a general support for residential development and does not specify precise types.

1946

Draft policy	Topic	Summary of comments	Response
		more appropriate alongside employment uses than conventional housing.	

E1	Policy should go further	We welcome the proposed more flexible approach to the use of employment sites for housing, but as indicated above in relation to policy H1, we think this could go further. The policy should explicitly recognise that creating new employment opportunities also creates additional housing need that cannot be accommodated within the city, adding to congestion and carbon emissions. The city already has significantly more jobs than residents of working age so the provision of new homes should be prioritised over employment.	Support noted. This Local Plan uses the Government's Standard Method (NPPF, Dec 2024) to calculate housing need. The plan does not allocate any additional sites for employment purposes. The plan's strategy seeks to promote housing and limits new employment generating uses to existing employment sites, the city and district centres and sites in lawful use for the proposed employment use class.
E1	Objection	The policy is unjustified as there is no provision for extra employment to provide extra housing, only permission to do so. The relentless expansion of the OUHT, the Universities and associated research centres is the primary driver of housing need in the city, but E1 permits expansion with no contribution to housing. If a business wants to downsize and allocate space for housing, this is specifically prohibited, which is unjustified.	The policy sets out a permissive approach to housing delivery across the city's employment site network. Where relevant, site allocation policies provide minimum housing numbers. Policy E1 allows the loss of "existing employment sites not designated as Key Employment sites" to other uses, while actively supporting their loss to housing. Preferred Option selected for reasons set out in Background Paper

1947

Draft policy	Topic	Summary of comments	Response
		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.	While it is noted that working from home can reduce premises needs for certain sectors, other sectors (e.g., manufacturing/ research & development often cannot operate successfully without the workforce being present on site.
E1	Policy as written not effective	Hallam does not support the proposed employment strategy due to its failure to identify clear requirements for employment land and how or where needs will be met. The preferred option is based on a criteria-based approach that seeks to focus and intensify development at existing employment sites and city and district centre locations whilst resisting development resulting in the loss of floorspace at key employment sites. A more effective employment land strategy is required. It should quantify employment land and floorspace requirements, express the spatial priorities where provision can be made and ensure flexibility for the market and growth in current and emerging sectors.	Employment land needs evidence will be consulted on at the next statutory consultation stage (Reg.19). Noted. The City Council is confident that the employment land strategy, which supports the modernisation and intensification of existing employment sites will be sufficient to meet identified land needs and ensure flexibility for market growth in current and emerging sectors, while addressing key barriers to economic growth, i.e., lack of housing and infrastructure.

1948

E1	Suggested amendment	CPRE have repeatedly called for some development on various sites listed as Key Employment Sites many of which have sat empty for decades.	Noted.

Draft policy	**Topic**	**Summary of comments**	**Response**

1949

		The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others. For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively Brownfield sites. If there is no real expectation that these sites will be actively developed, then protecting them as Employment sites makes no sense. The City Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full. ignoring Osney Mead and the many other vacant sites in Oxford. In CPRE's view the draft Policy should state that: *"if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller*	Neither Osney Mead Industrial Estate nor the "Unipart" site, are completely vacant. Both are long-standing site allocations and are actively in use for a range of employment purposes. There is 3ha of vacant land at ARC Oxford (without planning consent). Discussions with all landowners suggest that they are keen to bring forward development at their sites within the plan period. We do not accept this modification. Storage and distribution uses are a recognised employmentgenerating use under the Use Classes Order. The plan provides a permissive approach to housing on employment sites. Preferred Option selected for reasons set out in Background Paper.

1950

Draft policy	Topic	Summary of comments	Response
		developments (formerly Category 3 sites) the suggested proposals should not apply." Further owners should pay enhanced business rates if they fail to redevelop vacant sites.	

1951

E1	Clarification sought.	Draft policy allows for housing to be supported on employment sites where the objectives of the policy are met. Policy E1 differs from that in the adopted local plan (and previous 2040 plan) it that it only proposes two categories of employment site – Key Employment Sites and non-designated employment sites. However, there appears to be no mechanism in the LP42 to change category outside of a review of the Local Plan. It is therefore suggested that a mechanism is provided in the LP42 to review the categorisation of employment sites on an annual basis and update the list within Appendix 3.1 of the Plan. Conflict between the wording in the policy - states that "planning permission will be granted for the loss of any non-designated employment sites to other uses, proposals for housing will be supported" and the section relating to housing which sets out a number of criteria to meet where housing is proposed, including –	Noted. That is correct. As part of the plan-making process, existing employment sites (over 0.25ha) were assessed against specific criteria. We do not propose to undertake this assessment annually. We do not consider that this is a conflict. The policy is clear that for existing employment sites not designated as Key Employment Sites, that housing, in principle will be supported, however, the objectives set out parts c)h) of the policy need to be assessed by the decisionmaker.

Draft policy	**Topic**	**Summary of comments**	**Response**

		"avoiding the loss of or significant harm to, the continued operation or integrity of successful and/or locally useful, business and employment sites". Who determines the above is also a concern, as all employment sites are locally useful? These conflicts should be clarified.	Preferred Option selected for reasons set out in Background Paper.
E1	Support	Support identification of ARC Oxford as a 'Key Employment Site' (Appendix 3.1)	Support noted.
E1	Wider contextual comment	Oxford remains the most sustainable location for employment in the county. The continued intensification, regeneration and modernisation of ARC Oxford can meet that demand and support local, regional and national economic growth.	Support noted.
E1	Housing on Employment sites	ARC does not object to the newly introduced principle that housing (in the future, where justified) could be realised on the site.	Lack of objection noted.
E1	Other uses	In addition, ARC would support hotel or aparthotel uses.	Site allocation policies will set out appropriate uses for each site.
E1	Employment land needs	Get out of the property market.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Within the preferred option, require a clause to re-categorise existing commercial land to housing land or mixed use	Policy E1 enables housing to come forward at existing employment sites. Preferred Option selected for reasons set out in Background Paper

E1	Employment Land Needs	Alternative Option 1 preferred Reasons include:	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		- Employment drives prosperity which in turn will support housing and taxation - The market should have more flexibility in determining the most appropriate uses that meet market dynamics at the time of development - being over prescriptive may impact the delivery of any type of development.	

1954

E1	Employment Land Needs	Request Alternative Option 1 is progressed to ensure employment needs are fully met within Oxford. Alternative Option 1, focusing on meeting all identified employment land needs within Oxford's boundary, is essential to sustaining the city's economic vitality and supporting its key sectors, particularly research and development, life sciences, and advanced manufacturing. The preferred option, which prioritises other uses such as housing even where employment needs cannot be fully met, risks undermining Oxford's long-term economic resilience. While we recognise the acute need for housing, this should not come at the expense of employment land that is critical to the city's innovation ecosystem and broader regional economy.	The lack of housing (and infrastructure) has often been cited as a barrier to economic growth in Oxford. The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Preferred Option selected for reasons set out in Background Paper

Draft policy	**Topic**	**Summary of comments**	**Response**

		Alternative Option 1 offers a more balanced and proactive strategy. By actively investigating ways to meet employment land needs within the city, including the identification of new, appropriately located sites, it ensures that Oxford can continue to support high-value job creation, attract investment, and retain its competitive edge.	
E1	Employment Land Needs/ Best use of Employment sites	Alternative option 1 seems to provide some solutions. Given that working from home is so common nowadays, it is hard to understand the employment land needs in Oxford. Plus, lots of shops move to online, the council may consider how to maximise the use of unoccupied office sites. to balance such needs.	Preferred Option selected for reasons set out in Background Paper. While working from home has become more common for certain sectors (e.g. traditional office workers), the type of employment land coming forward in Oxford (e.g., R&D), often requires the workforce to come into the workplace on a regular basis.
E1	Employment Land Needs	Support Alternative Option 2: (10) Reasons include: - It is more likely to succeed in the long term. - Councils have a poor record of decisionmaking in this area. - Stop intervening, let the market find the right balance. - Let the market decide the most appropriate employment land - Don't over-manage, let a thousand flowers bloom.	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		- Option two based on the existing framework is sufficient - Long live the market!	
E1	Employment Land Needs	At present housing is the important thing but there should be no strict rule here. Helping the economy expand is important as well.	The policy supports the economy by not allocating new additional sites in employment-generating uses and allows employment sites to modernise and intensify to support the expansion of floorspace, without impacting further on Oxford's limited land availability.
E1	Employment Land Needs	I don't like the increase in business and science parks around the edge of the city. They should be better integrated with some kind of local infrastructure, including housing.	Re: infrastructure - The plan supports the re-opening of the Cowley Branch Line to passenger services, which has recently (October 2025) been provided with £120m of Government funding to support it. New homes are proposed as part of strategic site allocations in neighbouring authorities to meet previously agreed unmet housing need.
E1	Employment Land Needs	I don't really know what this means. We should be encouraging employers to locate in oxford, especially small business, entrepreneurs, and transforming the city centre from the tourist shop and takeaway desert it is now to a mosaic of independent shops.	The Reg.18 Plan included draft Policy E4 which is designed to support affordable workspaces for certain sectors. While Policy E1 itself supports a range of uses within the city and district centres.

1957

E1	Employment Land Needs	I think a joint up approach is needed. We need jobs to contribute to public finances as well as good and safe housing.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Prioritising housing on employment sites will slow and complicate decision making around the evolution of employment in the city; which is tending towards densification, higher value uses,	The plan's strategy does not seek to prioritise housing on employment sites but rather to prioritise any new site allocations to support housing delivery. The Employment Strategy supports the modernisation and

Draft policy	**Topic**	**Summary of comments**	**Response**

1958

		and R&D, often in uniquely suitable locations for this sort of economic growth. Adding the need to consider housing into decision making on the future needs of employers is unnecessary. In the past the City has co-operated with Cherwell on unmet housing needs. This will hopefully continue, but there is also an opportunity to co-operate on employment needs. For example, the Science North area, stretching from Oxford North and Oxford Parkway, through the University of Oxford's Begbroke Science Park, Oxford Technology Park and London Oxford Airport, is emerging as a strong rival to Science Vale in the south and as a further link along the Knowledge Spine stretching from Didcot to Bicester. There is, moreover, 4,400 homes for Oxford's unmet need committed in this location. In our Opinion, the spatial strategies in the Oxford Local Plan need to connect with and plan for Science North. This will provide for the housing and employment needs of the City, set a plan for the related infrastructure, all in a highly sustainable and market-aligned way. For example, Bloombridge is planning to submit the application for Phase 2 of Oxford	intensification of the city's larger "Key Employment Sites". Where losses of employment floorspace are proposed on "Key Employment Sites" certain criteria need to be met, while the loss of non-designated employment sites to other uses is allowed, Policy E1 supports housing at these sites. The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Economic Evidence will be published at next consultation stage (Reg. 19) to confirm. Re: "Science North" - this is outside the city boundary and should be supported by appropriate infrastructure. The County Council is currently responsible for developing active and sustainable travel schemes and they should be involved with regards to any infrastructure linkages.

1959

		Technology Park within the next 6 months - comprising	

1960

Draft policy	Topic	Summary of comments	Response
		approximately 90,000 sq m of technology, quantum and life sciences space, linked to the City via the excellent public and accessible transport infrastructure in this area.	
E1	Employment Land Needs	Employment and housing should be equally prioritised as they go hand in hand Surely employment and housing provision are two sides of the same coin? Situations where mixed use if the appropriate solution?	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Mixed-use sites will be appropriate in certain locations (e.g., city and district centres) Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	The University assumes that more is better, but in fact standards are slipping in some areas in the face of an obsession with growth.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Agree that priority should be given to the communal and social needs first, such as good housing and access to green spaces and community spaces.	Support Noted.
E1	Employment Land Needs	There's no point creating more employment if so many employees have to live outside Oxford.	Preferred Option selected for reasons set out in Background Paper

E1	Employment Land Needs	Revise ideas for the Oxpens site in order to conform to this draft policy. Eg priority throughout this area for council/keyworker/self-	Having regard to national policy, the city and district centres are suitable for a wide range of uses including employment, retail, hotels and residential uses.

Draft policy	**Topic**	**Summary of comments**	**Response**
		build homes from existing empty built environment including above commercial units.	Preferred Option selected for reasons set out in Background Paper

1962

E1	Employment Land Needs	Oxford's global research clusters depend on a steady pipeline of modern labs, offices and lightindustrial floorspace. Consciously favouring housing over employment whenever a trade-off arises would push high-value firms further from the city, lengthen commuting and erode the very wage growth that underwrites local prosperity. The draft Plan itself notes that demand for R&D space is "being delivered at pace" and already commands premium rents city-wide; constraining supply will only magnify that pressure. The evidence base also recognises that existing employment sites can be "intensified significantly" and that brownfield retail parks such as Botley Road are naturally converting to laboratories under the new Class E rules. Rather than ration floorspace, the pragmatic course is to keep policy flexible: encourage vertical extension, allow mixed-use redevelopment of low-density plots, and let new sites come forward wherever they satisfy environmental and transport criteria.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment needs). Preferred Option selected for reasons set out in Background Paper

Draft policy	**Topic**	**Summary of comments**	**Response**

		Alternative 2 does exactly that. By relying on clear, city-wide design standards and the normal NPPF tests, while lifting blanket locational bans, the Council can accommodate both jobs and homes, letting price signals direct land to its highest-value use. In a space-constrained city, the surest route to inclusive growth is to remove bottlenecks, not choose winners.	
E1	Employment Land Needs	I am not sure of the merits or otherwise of prioritising housing over employment needs. I would have thought it was important for employment to be available for people who live in the city but am not sure how these priorities interact.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	I don't think we need more employment at all. Oxford does NOT need growth, but it does need accommodation for those who are already here.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	This seems rather vague. Employment has been prioritised over housing over recent decades leading to significant proportion of workers commuting from well beyond Oxford boundaries.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment needs). Preferred Option selected for reasons set out in Background Paper

1964

E1	Employment Land Needs	Note explicitly the need for the provision of housing to outpace the growth in housing	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		demand stimulated by new or densified commercial development.	
E1	Employment Land Needs	Put employment elsewhere where it is needed	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	We support the preferred option. We were pleased to see that this policy reflects the need for housing in Oxford to catch up with job provision.	Support noted.

1965

E1	Employment Land Needs	Increasing housing stock must be prioritised above developing new employment sites. Otherwise, planning policy will exacerbate the number of workers forced to live outside the city due to unaffordable housing. Although we welcome a more flexible approach to using employment sites to help deliver new housing, the provisions in Policy E1 and Appendix 3 remain overly restrictive. They offer only limited flexibility and continue to place excessive emphasis on maintaining high levels of employment. We encourage the council to monitor the job-tobed ratio in the city and set out a plan and policies aimed at narrowing this gap.	Policy E1 does not allocate new employment sites and supports the modernisation and intensification of existing employment sites. It is important to protect Key Employment sites as they include a range of sites that support both the local and national economy. A monitoring framework will be produced to support the plan.
E1	Employment Land Needs	There is no employment crisis in Oxford. Please take great care to prioritise housing where sustainable sites for increasing employment are proposed, instead of job-creation: 55,000 new	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas able to meet employment needs).

1966

Draft policy	**Topic**	**Summary of comments**	**Response**

		workers can never be housed in the City and will simply make any lack of housing worse. I am opposed to calling on surrounding councils and green belt to take on construction projects to accommodate something that Oxford should not entertain.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs/ Best use of employment land	Expansion of or acquisition of sites for conversion to education purposes should be expressly considered as employment uses	Local Plan already contains separate policies relating to academic institutions. Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	There is no point building more and more dwellings if there's nowhere for more and more people to work.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Allowing 'brownfield sites' for housing is eminently sensible.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Support Preferred Option Reasons provided include: - To ensure a higher level of protection to employment sites, unless these sites are demonstrably poorly performing. - Yes, modernisation and retrofitting of existing spaces, and not using more land for employment purposes. - Oxford should concentrate protection on the core campuses and business parks that anchor its life-science and	Preferred Option selected for reasons set out in Background Paper

1967

		advanced-manufacturing clusters, while	

Draft policy	Topic	Summary of comments	Response

1968

		allowing tired, low-density sites in secondary locations to switch to highervalue uses; doing so unlocks land for much-needed homes, channels investment into modern multi-storey labs on the key sites, and prevents an inefficient blanket freeze that would trap obsolete sheds and offices in perpetuity—thereby maximising both job creation and housing delivery within the city's tight boundary. - I think important employment sites should be protected. - Support preferred option which focuses on increasing employment locations only through intensification and modernisation of existing sites. - I agree with allowing/ changing the loss of poorly performing sites to other priority uses e.g., housing. For example, the much-missed Co-operative Bank has been an eye-sore since before the pandemic.	
E1	Best use of employment sites	Support rely solely on national planning policy.	Preferred Option selected for reasons set out in Background Paper

1969

E1	Best use of employment sites	I disagree with all the options. More employment and growth is not going to benefit the life of those already in the city.	Preferred Option selected for reasons set out in Background Paper

Draft policy	**Topic**	**Summary of comments**	**Response**
E1	Best use of employment sites	Be flexible. Employment matters too	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	There is very little unemployment in Oxford.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	We note our concern that even intensification could lead to increases in housing need and thus add further pressure to the city's housing provision.	Housing need calculations are based on the Government's Standard Method (NPPF, Dec 2024). Preferred Option selected for reasons set out in Background Paper

E1	Best use of employment sites	Draft Policy E1 sets out clear support for the intensification and modernisation of both Key Employment Sites and any other employment sites where the site is located within a district or city centre. It is recommended that a higher level of protection be afforded to existing employment sites to prevent change of use unless there is robust evidence provided to demonstrate that it is poorly performing in employment use. Wording should also be included which allows for the redevelopment of employment sites for suitable employment uses.	Noted. All employment sites over 0.25ha were assessed and the Key Employment Sites were selected where they scored well against the assessment criteria. Policy E1 already sets out a higher level of protection for Key Employment Sites. Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	The city should divest its property holdings.	Preferred Option selected for reasons set out in Background Paper

Draft policy	**Topic**	**Summary of comments**	**Response**
E1	Best use of employment sites	Agree, take initiative to protect employment, do not rely on national initiatives alone.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Any opportunity to change to housing from commercial use should be taken.	Preferred Option selected for reasons set out in Background Paper

E1	Best use of employment sites	I think changing employment sites to housing is fine if the market supports that	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Always consider impact on existing communities.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Encourage working from home where possible to make room for housing	The type of employment floorspace coming forward (i.e., R&D), often requires the workforce to come into the workplace rather than being able to work from home. Also, Different organisations have different work from home policies. Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	What grieves me are the number of exceedingly ugly building such as the large structures in Speedwell Street or the intrusive Oxfordshire County Council offices which do not reflect the character of the city.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	The currently adopted Local Plan classifies the MINI Plant as a Category 1 site, and it is noted that the 2042 Preferred Options consultation	Preferred Option selected for reasons set out in Background Paper

Draft policy	**Topic**	**Summary of comments**	**Response**

		document has maintained and streamlined this classification of the MINI Plant into simply a “Key Employment Site”. It is essential that manufacturing uses at the MINI Plant continue to receive this highest level of policy protection to enable the company’s operations to expand and modernise within a stable policy environment.	
E1	Housing on Employment sites	Support Option 1	
E1	Housing on Employment sites	Support Alternative Option 1 Reasons provided include: - Housing is a crisis at present - If there is a greater need for housing, then let it be built on employment sites. There’s no point in maintaining places of employment if people don’t have places to live. - it will help preserve existing employment sites. - Housing would not be an appropriate use at the MINI Plant given its manufacturing use. - We support principle of allowing housing delivery on employment sites provided that other policy	Preferred Option selected for reasons set out in Background Paper

1973

		considerations are met. We would go further to say that this	

1974

Draft policy	Topic	Summary of comments	Response
		should be encouraged to ensure a mixed use of sites.	
E1	Housing on Employment sites	Housing should be secondary to employment. Housing can be anywhere, does not need to be ring-fenced where employment is.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	The city shouldn't be able to allow as it shouldn't be in the property market.	Preferred Option selected for reasons set out in Background Paper

E1	Housing on Employment sites	Bring it on!	General comment/ statement. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Yes...appropriate mixed use	Preferred Option selected for reasons set out in Background Paper
E1	Housing on employment sites	Does not specifically allow an element of housing delivery on existing employment sites	Preferred Option selected for reasons set out in Background Paper
E1	Housing on employment sites	It depends a bit how close any potential residential units will be to suitable infrastructure (shops, public services, transport etc.).	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Evaluate each employment site to determine if it is beneficial to local people. Cultural centres should not be focused as an easy route to housing just before their income is not as excessive	Employment sites over 0.25ha were all assessed against set criteria including specific local objectives. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	I think this [*housing*] should be required not just allowed.	Preferred Option selected for reasons set out in Background Paper

Draft policy	**Topic**	**Summary of comments**	**Response**
E1	Housing on Employment sites	Densification for housing seems to be a solution where 4 or 5 story flats that don't interrupt the skyline can be built in areas of	Policies that set out appropriate residential densities are included elsewhere in the plan. Preferred Option selected for reasons set out in Background Paper

1975

		existing employment sites - and in city centre sites.	
E1	Housing on Employment sites	It is recommended that all Key Employment Sites are protected from policy driven inclusion of residential development, unless it can be demonstrated that this residential development does not impact the role and function of the key employment site. The priority should remain modernising and intensifying in line with the existing employment use.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Some sites which are currently in commercial use e.g. the retail parks off the Botley Road, and the Osney Mead industrial state, should be allocated by the council entirely for housing, ideally affordable housing. Developers (including the university and colleges) should NOT be allowed to build yet more labs on these sites. Such commercial developments potentially provide more jobs (for the university) but do not address the problem of where those workers are to live. Most people (particularly young people) can't afford to live in Oxford, so they are forced to live outside and to commute in, adding to traffic problems in and around the city.	Preferred Option selected for reasons set out in Background Paper Permitted development rights already exist to support the conversion of these spaces to residential.

		Additionally, there should be an active policy to turn currently empty spaces above shops in the	

1977

Draft policy	Topic	Summary of comments	Response
		city centre into affordable living accommodation for citizens (not university students).	

E1	Housing on employment sites/ Location of new employment uses	Protection of mixed-use sites (e.g. Retail, restauration) as well as residential sites from conversion to hotels Expansion of or acquisition of sites for conversion to education purposes should be expressly considered as employment uses and should not be permitted if it results in loss of residential dwellings of any size.	Policy E5 deals with hotel and short stay accommodation. Local Plan already contains separate policies relating to academic institutions and includes a policy to prevent the loss of dwellings. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	If employment land is able to accommodate labs and other employees with regular use within flood risk areas, want to see this land available for allocation to housing as well.	Plan includes separate policies to govern appropriate development in flood risk areas, supported by national policy. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Please reject construction on Oxford's flood plain.	Plan includes separate policies to govern appropriate development in flood risk areas, supported by national policy. Preferred Option selected for reasons set out in Background Paper
E1	Location of New Employment	Reasons provided include: - may attract new SMEs and the creative economy.	Preferred Option selected for reasons set out in Background Paper
E1	Location of New Employment	Support Alternative option Reasons provided include: - Less rigid - allows for a plan-led, limited, and strategic release of new employment	Preferred Option selected for reasons set out in Background Paper

1978

Draft policy	Topic	Summary of comments	Response
		sites without compromising the protection of existing housing land. This strikes a more effective balance between competing land-use pressures. - The market should have more flexibility in determining the most appropriate uses that meet market dynamics at the time of development - being over prescriptive may impact the delivery of any type of development. - It is important not to hamper Oxford's thriving economy by making employment creation difficult. - seems okay too but am not an expert on employment sites.	
E1	Location of New Employment	Rely solely on national policy Reasons provided include: - Simpler - Let housing and employment coexist /exist freely, as needed, wherever needed. - Don't interfere or intervene. Let the market decide. - We shouldn’t be adding more restrictions	Preferred Option selected for reasons set out in Background Paper

E1	Location of New Employment	If the preferred option went ahead, provisions for transport links to these sites might need to be considered.	Preferred Option selected for reasons set out in Background Paper.

Draft policy	**Topic**	**Summary of comments**	**Response**
E1	Location of New Employment	Judge each case on its merits. Generally, the principle is ok - but not to be followed slavishly.	Preferred Option selected for reasons set out in Background Paper

1980

E1	Location of New Employment	Oxford's economy is dynamic and rapidly evolving, particularly in sectors such as life sciences, research, technology, and advanced manufacturing. A more flexible policy that enables some employment development outside of currently designated sites will allow the city to respond to emerging opportunities and market demands, especially where existing sites may be constrained or nearing capacity. Permitting new employment uses adjacent to existing employment sites allows for logical and coordinated expansion of successful clusters (e.g. near hospitals, science parks, or research campuses), where businesses benefit from agglomeration, infrastructure, and workforce proximity. Allowing new employment sites to come forward as part of mixed-use developments, including residential, is consistent with national planning principles and Oxford's broader sustainability objectives. This supports walkable communities, reduces commuting distances, and makes more efficient use of land.	Policy E1 supports the expansion of successful clusters through modernisation and intensification of employment-generating uses at existing sites, supported by any necessary infrastructure. Preferred Option selected for reasons set out in Background Paper.
Draft policy	**Topic**	**Summary of comments**	**Response**

E1	General comments	A flourishing oxford economy needs to allow new businesses and employers find new sites for competition. I do not support new employment sites before housing, and I do not support ANY new employment sites in the city centre. No loss of housing to accommodate commercial use should be allowed - even in the centre. The MINI Plant is suitable for new employment uses that supports its primary manufacturing use. Don't build in Green Belt	Preferred Option selected for reasons set out in Background Paper
E1	Criteria based approach to employment	A blanket rule that confines all fresh employment floorspace to current sites and city/district centres "planning permission will not be granted … outside of these locations" ignores Oxford's acute shortage of modern lab and office space, already driving premium rents in every quarter of the city. Allowing wellconnected plots immediately adjacent to key campuses to come forward (and, where viable, pairing them with housing) would expand capacity, shorten commutes and curb price inflation without sacrificing existing dwellings. A criteria-based green light at the margin is far more pro-growth than a hard red line.	A significant pipeline of Research and Development (R&D) space is coming being delivered in the city. Significant floorspace already has permission/ is under construction. This is all on existing sites/ within the city and district centres and through lawful changes of use within Use Class E. Preferred Option selected for reasons set out in Background Paper

Statutory Consultee Responses – Draft Policy E1

Cherwell District Council

Draft Policy	Summary of comment	Response	Outcome
E1	The policy says new employment generating uses will be acceptable only on exiting employment sites and the city and district centres, but says that outside of these locations non-designated sites can only be regenerate for employment purposes if certain criteria are met. B8 uses are not always regarded as the most appropriate use within the city. The approach set out should be reviewed so that the policy can reflect the emerging and future assessment of need for such uses, rather than to try and impose this restrictive approach.	This is not the intention of the wording, which will be reviewed. We are not quite sure what is being asked for in terms of B8 uses. Our evidence base demonstrates that there is limited demand for these uses in the city because there are not suitable sites- they are generally too high in value and they are not on the strategic road network and they are too small. A policy approach that requires sites to remain in this use or new sites to come forward for this use as opposed to other uses such as housing does not seem a sensible approach and we're not entirely sure what is intended with this suggestion.	Tweaks have been made to the policy wordin to add clarity.

1983

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome
Draft Policy E1	Concerned that the ELNA shows that draft policies will result in wider economic impacts on the Oxfordshire economy. It is not clear how key employment sites were identified. More information, including criteria, is needed in the background paper.	ELNA looks at Oxford's city's land needs only, which creates the conditions to meet Oxford's identified land needs within the city. The employment sites were assessed using specific criteria.	We will be publishing the methodology for identifying Key Employment Sites in a Background Paper at Reg. 19 stage.

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

1984

E1 1985	**Strategic Planning** Re: loss of non-designated employment sites to housing: Policy E1 is not clear in that the approach should be for housing first and other non-employment uses second. Although housing in sustainable locations must be the focus, the policy as worded could result in land-use conflicts and loss of employment, which is still important for the City. Therefore careful consideration must be given to this policy. In addition, infrastructure demands from new housing on these formerly employment locations need to be taken into account and mitigated by these new housing developments, where the County Council's expectations are that these become highly	It will be for landowners to decide whether further employment uses, or an alternative use is proposed at a nondesignated employment site. The plan sets out that housing would be supported at non-designated employment sites (subject to the policy criteria). Noted.	Overall, editorial changes to Policy E1 aid its legibility and clarity. These changes have regard all comments made by the County Council, in particular, those from the County

Draft Policy	Summary of comment	Response	Outcome

1986	sustainable, net zero ready and adequately serviced housing developments. We welcome future conversations with the City Council to assist in the drafting of the wording for this policy as the current criteria include matters of particular interest to the County Council such as being well connected to public transport and active travel opportunities. **Place Planning and TDM (Central)** Linked to comment at draft policy S3 - new employmentgenerating uses and intensification of existing sites, coupled with low car parking, will increase demand for P&R, as well as bus and rail. **County Council Property and Estates Team** Oxfordshire County Council Property and Estates Team notes that this draft policy currently categorises employment sites into three categories: 1) Key Employment Sites; 2) Employment sites located within a city or a district centre; and	We will maintain a dialogue with the county on relevant matters. Noted. The City Council considers that two categories of employment sites exist. Designated sites and nondesignated sites. Sites located in the city and district centres are generally non-	Property and Estates Team.

Draft Policy	Summary of comment	Response	Outcome

1987

1988	3) Non-designated employment sites	designated employment sites and do not need their own specific designation.	
	Oxfordshire County Council Property and Estates Team supports the objectives of this draft policy as a whole, although it is considered that it is restrictive and lacks the inclusion of a proportionate element that is required to enable sustainable development.	Noted.	
	The second paragraph of this draft policy states: *"The only locations that are suitable for new employment-generating uses are existing employment sites and the city and district centres. Planning permission will not be granted for proposals for employment-generating uses outside of these locations."*	Noted.	
	First, this paragraph introduces a new category of employment sites other than those listed above, which are the "existing employment sites". Oxfordshire County Council Property and Estates Team considers that for the sake of improving clarity, this should be replaced with either "Key Employment Sites" or specified that this part of the draft policy refers to existing employment sites within the city and district centres.	As the plan introduces no new employment site allocations, all employment sites (both "key" and "nondesignated" are existing employment sites.	

Draft Policy	Summary of comment	Response	Outcome
1989	Second, the second part of this draft policy is considered to be quite restrictive and onerous, as it fails to take into account the proportionate element of a development proposal. Paragraph 86 (e) of the NPPF highlights that planning policies should be flexible enough to accommodate needs not anticipated in the plan in response to changes in economic circumstances. It is the view of Oxfordshire County Council Property and Estates Team that this part of the policy should be revised to state that: ***"Planning permission will not be granted for <u>Development</u> proposals for employment-generating uses outside of these locations will not be supported, <u>unless they are in accordance</u> with the development plan as a whole and it can be***	The city and district centres are appropriate locations for new employment-generating uses. As such, we do not wish to restrict new employment-generating uses to existing employment sites within these accessible locations. Policy E1 is aligned with the plan's overarching strategy which supports housing delivery. Emerging evidence shows that the city's employment land needs can be met wholly on existing	

	demonstrated that…" (include criteria mentioned in fourth paragraph of this draft policy text) Equally, the first part of the fourth paragraph states: *"Planning permission will only be granted for the intensification and modernisation of all other employment sites where that site is located within the city or a district centre."*	employment sites. As such no new site allocations are needed. New employment-generating uses can therefore come forward at existing sites or on sites within the city and district centres.	

Draft Policy	**Summary of comment**	**Response**	**Outcome**

1990

1991	Oxfordshire County Council Property and Estates Team considers that planning permission should not automatically be granted for employment development within these locations, as they could conflict with other policies of the development plan. Accordingly, Oxfordshire County Council Property and Estates Team considers that the wording should change to demonstrate that these types of proposals will be supported. Paragraph 6 explains that development proposals seeking the net loss of employment floorspace on Key Employment Sites will not be granted planning permission, unless the number of jobs in employment-generating uses is retained and the employment use can be maintained. Oxfordshire County Council Property and Estates Team considers that this part of the draft policy, as it is currently drafted, lacks the appropriate clarity that would enable development proposals to achieve sustainable development. Oxfordshire County Council Property and Estates Team is concerned is that using the number of jobs that will be retained to assess development proposals is not appropriate, as different economic circumstances apply to small, medium	The proposed amendment weakens this position and potentially undermines the city's ability to deliver homes. This paragraph does not automatically grant planning permission, instead it sets out that the principle of intensification and modernisation is acceptable in this location. Other policies in the plan specifically deal with other requirements (e.g., net zero, urban design, heritage etc.). These all need to be taken into account when coming to a decision. Noted. As Key Employment Sites are larger sites (over 0.25ha), this policy would	

1992		ensure that any loss of employment floorspace	

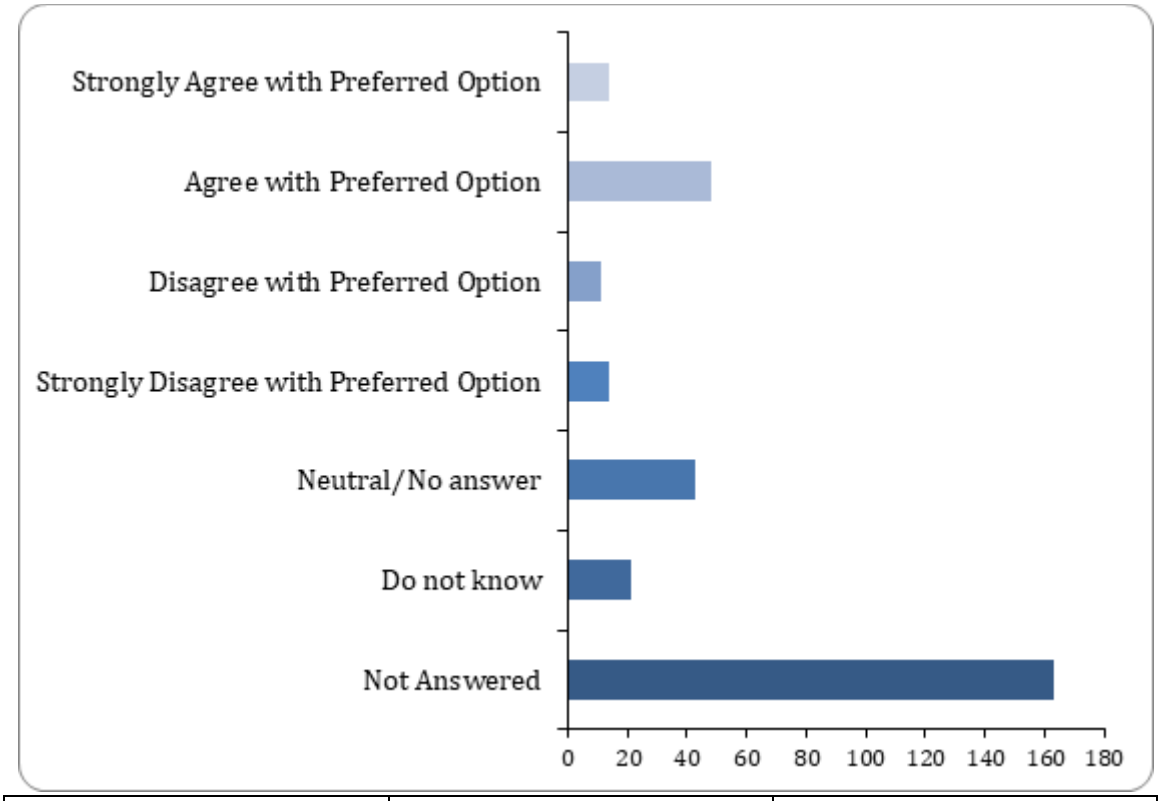
Draft Policy	Summary of comment	Response	Outcome
1993	and large businesses. Therefore, it is considered that this part of the draft policy should be reconsidered to include a proportionate element in order to ensure that sustainable development can be achieved. The last paragraph of this draft policy states that development proposals for residential development on all employment sites will be assessed by a "balanced judgement" which will take into consideration a number of "objectives". Oxfordshire County Council Property and Estates Team considers this part of the draft policy to be confusing, as it is unclear as to the purpose and weight this "balanced judgement" would attract in decision making. It is also unclear as to whether this would fall within the assessment carried out by a decision maker when conducting the planning balance or it would consist of a separate process. Last, it is unclear as to the weight each of the six proposed objectives should attract in decision making. It is therefore difficult to ascertain whether it would be expected of a decision maker to attach equal weight to all of them, when carrying out their assessment.	at these larger sites would not result in a loss of jobs. While it is clear that there are concerns about using the number of jobs as a metric to assess floorspace losses at Key Employment sites, no other specific metric is proposed or suggested. No change proposed. The phrase 'a balanced judgement' was an amendment made by a Planning Inspector. These are the issues that the case officer needs to consider when determining such an application. There is not a separate process. The weight needs to be applied through a "balanced judgement" which considers all aspects. We will discuss with our DM colleagues to ensure that they can follow the policy.	

1994

All Public Responses – Draft Policy E2

Please tell us what you think about policy options set 004b (draft policy E2): Warehousing and Storage Uses. If you have any additional comments please put them in the comment box below.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	14	4.46%
Agree with Preferred Option	48	15.29%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	43	13.69%
Do not know	21	6.69%
Not Answered	163	51.91%

Topic	Summary of comments	Response
Support with suggested amendments	Policy E2: Should go beyond 'promote the use of freight consolidation centres where possible' and aim to proactively identify potential sites for consolidation centre(s) for more efficient distribution into the city.	Preferred Option selected for reasons set out in Background Paper
Support in principle	ONV supports the principles behind this policy, however, considers that the flexibility of the policy should depend upon the appropriateness of the location rather than whether there is a demonstrable need for the use on the site. Oxford North, for example, has very good access to the strategic highway network and could be considered an appropriate location for some warehouse and storage use.	We will consider this issue when drafting the Reg. 19 policy. Noted.

1996

Support freight consolidation and local B8 uses. Object to B8 uses supporting national economy.	CPRE support an exemption for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road. We support for loss of B8 uses, but the word "generally" must be deleted in order to make this policy possible to apply in practise.	Support Noted. The word "generally" in this context is not contained in the policy. It is in the supporting text and refers to some of the characteristics of new large-scale B8 uses. We consider it is

Topic	Summary of comments	Response
	Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification we support, but declaring support for B8 sites that support the national economy once again removes clarity and undermines the aim to intensify employment sites and decrease the total number of B8 sites in Oxford.	appropriate, given the context in which it is used. Support for local B8 uses noted as is objection to policy support for B8 uses supporting the national economy. Preferred option selected for reasons set out in Background Paper.

1997

Policy is overly restrictive and inappropriate.	Whilst it is acknowledged that larger Clas B8 facilities can consume a lot of land, they are essential in a local economy and they don't always need to consume large areas of land. They provide diversity and opportunities to local residents and support other uses. Such uses around Oxford should be viewed in a positive light. The Mini Plant Oxford (BMW) and Unipart sites are the only significant key employment sites conducive to the delivery or a diverse range of employment uses including B8 (by virtue of their size and location). Draft Policy E2 appears to aim to allow such a use, but the requirement to demonstrate that the use is essential to support the operational requirements of that key employment site is inappropriate and overly restrictive. It's worded so it has to be	Noted. Noted. We will consider these comments when drafting this policy for the next stage of consultation (i.e., Reg. 19).

1998

Topic	**Summary of comments**	**Response**
	essential to support other development on the same key employment site, which is nonsensical.	
General principle supported	ARC supports the general principle of Draft Policy E2. Supports the flexibility of E2 in that the policy supports new B8 uses, while also allowing their loss within key employment sites.	Support noted.

Policy tests	ARC questions whether the policy tests relating to whether its provision/loss is 'essential' to the Key Employment Site is required. This should be determined by market conditions.	We will consider these comments when drafting this policy for the next stage of consultation (i.e., Reg. 19).
Support existing approach	Reasons provided include: • Restrict B8 uses to nationally important sites only.	Preferred Option selected for reasons set out in Background Paper
Support Preferred Option	Support preferred option	Preferred Option selected for reasons set out in Background Paper
Support Freight consolidation pilot	Reasons provided include: • Strong support for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road. • would be valuable to enable LGV/ HGV freight to be moved to electric delivery vehicles.	Preferred Option selected for reasons set out in Background Paper
Object to Freight consolidation pilot	Reasons provided include:	Preferred Option selected for reasons set out in Background Paper

Topic	**Summary of comments**	**Response**

1999

	• reject idea of freight consolidation centre in any single location. • Council should prioritise increasing freight transfers from HGV and other goods vehicles to cargo/e-cargo bike enterprises at a wide variety of lay by sites or comparable to help reduce large vehicles entering Oxford on as many routes as possible. • Also, cooperation with other local authorities to make this a common policy to assist in traffic reduction should be pursued and implemented. • The specific exemption to enable a 'pilot' of a suitably located freight consolidation centre is highly problematic. Too many so-called 'pilots' do not have clearly defined objectives, are not adequately monitored and evaluated, allowing them to proceed. They should be fully transparent and re-designated as phase 1 projects if that is the intention.	
Support further restrictions	Reasons provided include: • If an employment site requires a massive warehouse to be viable then it shouldn't be built in an area with such restricted space. Build a different type of employment site	Preferred Option selected for reasons set out in Background Paper

2000

Topic	Summary of comments	Response
	that makes better use of both the location and where the warehouse would have to be. • Land within the city is too scarce for this use.	
Rely solely on National Policy	Reasons provided include: • More bureaucracy • Don't create an interventionist policy • Let the free market decide	Preferred Option selected for reasons set out in Background Paper
No warehousing on new sites.	Warehousing etc should not be allowed on new sites at all. It is an ineffective use of scare space and provides little employment. It is not Oxford City's role to support the national economy.	Preferred Option selected for reasons set out in Background Paper
No B8 on green belt	No new warehouses should be built on green belt sites	Preferred Option selected for reasons set out in Background Paper
Support loss of B8 uses	Support for loss of B8 uses, but the use of the word "generally" would make this policy impossible to apply in practise.	The word "generally" appears in the supporting text rather than the policy in relation to a description of "large scale B8 uses". It is appropriate given its descriptive context.

2001

Support local B8 uses but not national	Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification but declaring support for B8 sites that support the national economy once again removes clarity and undermines the aim to intensify	Preferred Option selected for reasons set out in Background Paper
Topic	**Summary of comments**	**Response**
	employment sites and decrease the total number of B8 sites in Oxford.	
Land values enough to deter inefficient uses	I would expect the high cost of land in the city to mostly suffice to deter inefficient uses.	Preferred Option selected for reasons set out in Background Paper
Unlikely to be needed	Major storage sites rarely need to be located within the city.	Preferred Option selected for reasons set out in Background Paper
MINI Plant Oxford	The MINI Plant is suitable for new B8 employment uses that support its primary manufacturing use	Preferred Option selected for reasons set out in Background Paper
General comment	Do not understand the question	Preferred Option selected for reasons set out in Background Paper
Too much jargon	I don't really understand this - e.g. sizing of these warehouses etc. Would need de-jargonising and more detail to be able to take a view.	Preferred Option selected for reasons set out in Background Paper

Statutory Consultees – Draft Policy E2

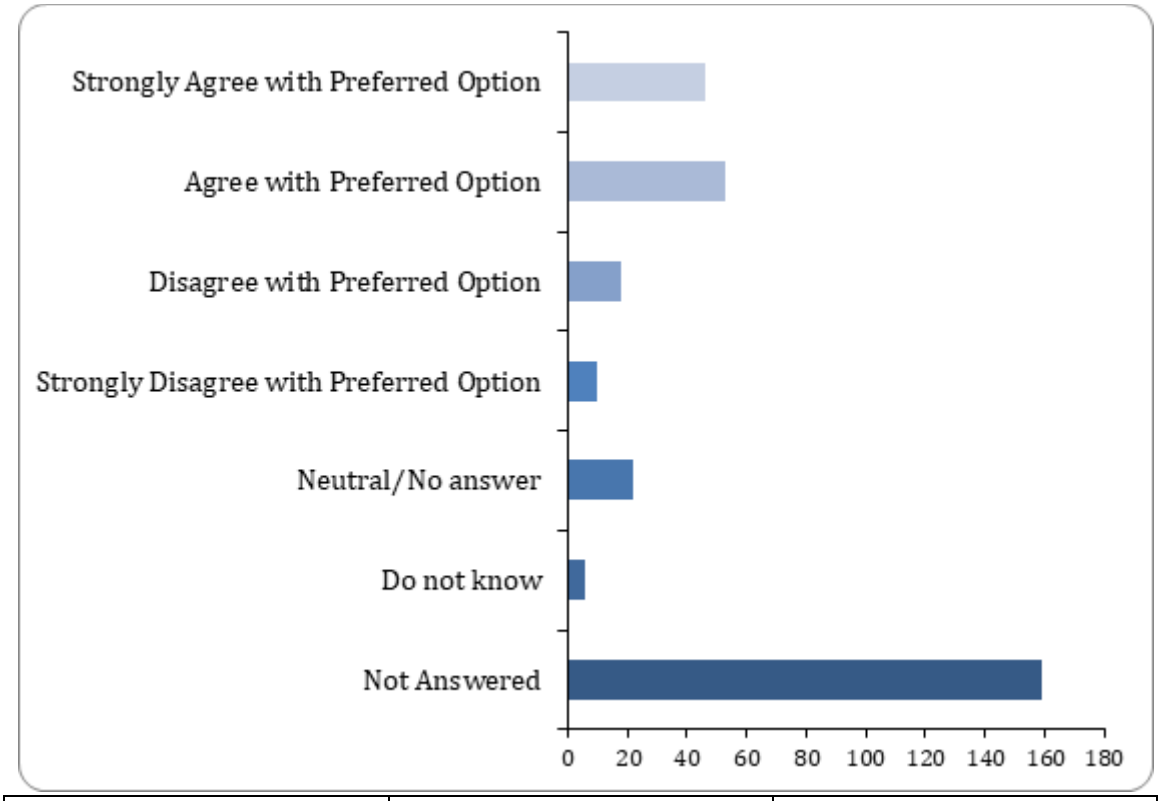
No statutory consultee comments on draft policy E2.

2003

All Public Responses – Policy E3

Please tell us what you think about policy options set 004c (draft policy E3): Community Employment and Procurement Plans. If you have any additional comments please put them in the comment box below.

There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	22	7.01%
Do not know	6	1.91%
Not Answered	159	50.64%

Topic	Summary of comments	Response
General Comment	CEPP submissions should be supported by compelling evidence.	Noted.
support	Support as genuine mechanism for supporting community wealth building. Should be strengthened to reference “community & solidarity economy” businesses within the local economy and recognise the role that these “social trading” businesses play in inclusive development.	Support noted.
CEPPs may not be practical.	For many small occupiers a CEPP requirement may not be practical or reflect their realities. The draft policy should recognise that a CEPP must be proportionate with the type of development and employment. It is recommended that the policy is an encouragement, not mandatory requirement to provide flexibility. Alternative Option 1 is supported.	CEPP requirement only applies to qualifying developments as set out in policy. Preferred Option selected for reasons set out in Background Paper
Clarity in relation to student accommodation	Policy E3 relates to the provision of Community Employment and Procurement Plans where developments are proposed which include the provision of 50 or more dwellings or where they propose 1,000 Square metres of non-residential employment space. The policy is unclear on how this would relate to uses such as student accommodation and clarity is required on that. This matter was raised as part of the previous 2040 local	The equivalent number of dwellings that relate to student accommodation is usually calculated using the most recent ratios set by the

		Government. We will consider how to address this issue more widely as it

Topic	Summary of comments	Response
	plan submission and has not been addressed as part of this latest consultation.	likely impacts more than this policy in isolation.
Objection	Policy promotes too much government interference in the operation of business.	Noted.
Support	The approach to Community Employment and Procurement Plans is supported.	Noted.

2006

Object to mandatory CEPPs	CEPPs should not be mandatory for all commercial schemes. This adds to viability concerns. The mandatory expectation that all developments of a certain threshold "must" address "all" of the listed interventions risks imposing rigid and overly burdensome obligations on proposals. The cumulative cost and complexity of implementing all the listed criteria may not be possible. Many of the listed criteria (e.g., use of local labour or enforcing Oxford Living Wage policies on contractors and occupiers) may not be deliverable or enforceable across all schemes.	CEPP requirement only applies to qualifying developments as set out in policy. A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. The Reg. 18 policy did not impose a mandatory requirement but rather that "CEPPS will be expected to consider all the following criteria". We will review wording, taking this point into consideration when drafting the Reg. 19 version of this policy.

2007

Topic	**Summary of comments**	**Response**

Amendment	ARC therefore recommend that Policy E3 be amended to remove the rigid "only be granted" condition, instead framing CEPPs as a potential tool of securing social value in proposals. The listed interventions (a-i) should form a flexible menu that can be tailored by development scale and context.	The intention of the policy is that the list (a-j) forms a flexible menu. The Reg. 18 document set out that CEPPS will be expected to consider all criteria a)-j). We will review wording, taking this point into consideration when drafting the Reg. 19 version of this policy.
	ARC notes the Council states a TAN will be needed to expand on various aspects of the policy – it considers this TAN should be published before or alongside Regulation 19 to provide much-needed clarity to the policy.	Noted.
	ARC recommends removing the requirement for schemes below the threshold to submit written statements. The administrative and resource burden of preparing bespoke employment-related statements for minor planning applications will likely be disproportionate to the scale and impact (and potential value) of such developments. Furthermore, the practical ability of monitoring or securing any proposed outcomes does not exist – resulting in this being a box-ticking exercise adding unnecessary cost to developers whilst delivering little measurable value.	We consider that the production of a written statement for development below the threshold is proportionate. If developers view this process as a "box-ticking exercise" that is a shame as when done well, CEPPs can provide valuable opportunities both for local people and businesses.

2008

Topic	Summary of comments	Response
Require CEPPs	Reasons include: • Procurement plans for major developments should be required to demonstrate a particularly high standard of ethical and sustainability criteria.	Preferred Option selected for reasons set out in Background Paper

2009

Encourage CEPPs	Reasons include: • Not all applications need to prepare a Community Employment and Procurement Plan. Currently Oxford secures this through a S106 agreement which is the most appropriate way forward as it can be assessed on a site-by-site basis. • BMW support alternative option 1, to recognise those occasions where a Community Employment and Procurement Plan would not be appropriate or feasible (e.g. specialist materials or construction methods). • It is important not to discourage businesses from setting up in Oxford. • Every additional compulsory document increases the cost and risk of bringing forward major schemes, particularly for smaller developers who are crucial to Oxford's infill housing and lab refurb pipeline. • Training and local hiring targets are laudable, yet they can be secured through voluntary agreements, sector charters or postconsent s106 negotiations without turning the planning gateway	Preferred Option selected for reasons set out in Background Paper

Topic	**Summary of comments**	**Response**

	into another compliance hurdle that slows delivery of homes and workspaces the city urgently needs. • Plans are likely to be totally ineffective in delivering training and education and will merely be an extra cost for applicants.	
Rely solely on National Policy	Reasons include: • Don't impose requirements on builders, let them build. • It isn't the responsibility of the city planners to mandate that employers plan to continue employing labour.	Preferred Option selected for reasons set out in Background Paper
General comment	Avoid complications at this stage that might deter house builders.	Preferred Option selected for reasons set out in Background Paper
Objection	This is virtue signalling and will result in no benefit except to consultants who will create meaningless unenforceable plans and strategies	Preferred Option selected for reasons set out in Background Paper
General comment	A good policy but doesn't it create more red tape for developers and cost for Council?	Preferred Option selected for reasons set out in Background Paper
General comment	But it would be better still to consider whether endless growth and development is what is needed.	Preferred Option selected for reasons set out in Background Paper
Support local opportunities	• Strongly agree that local jobseekers and local suppliers should have first right of refusal to opportunities created in Oxford. • To promote employment opportunities for local people.	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	• Local businesses, designers, contractors and employees should be prioritised strongly • It sounds like a good idea to source labour and materials locally to provide local employment and reduce the environmental impact of the supply chain. • Local businesses, designers, contractors and employees should be prioritised strongly. • Clause to ensure that these plans are locally led and have clear evidence of local inputs and stakeholder engagement.	
Support Oxford Living Wage	We would strongly support an additional policy that requires employers to pay employees and indirectly employed workers (such as contractors) the Oxford Living Wage.	The Oxford Living Wage is already included as a potential “criterion” for consideration under the CEPPs Policy.

2012

In principle support (with suggested amendments)	Support inclusion of policy requiring CEPPs however a stronger focus on local procurement is needed to properly align with national policy. The failure to use local businesses in the procurement of major projects in Oxford needs to be corrected. If the policy focuses on the engagement of local businesses rather than individuals, this will have a much greater and longer-lasting beneficial	Support noted.

Topic	**Summary of comments**	**Response**

2013

	effect on the local economy and the environment. The distances travelled will be far less, the numbers of people engaged will be far more, and the businesses will keep them employed after the project has concluded. If the policy covers not just construction jobs but also the design jobs and supply jobs which are all part of the procurement process, then that will have a wider positive impact too. Suggest this wording for the policy E3: *Planning permission will only be granted for proposals……where they are supported by a site-specific Community Engagement and Procurement Plan (CEPP). The CEPP must identify how the procurement process has already and will ahead:* A. *optimise the potential for local businesses to undertake as much as possible of the work in the design, supply and construction processes, for instance by the tendering of discrete work packages rather than combining them into larger contracts and by setting eligibility criteria which are viable for smaller businesses,* B. *use a method of assessment of tenders and bids which gives appropriate weight to:* • *lower carbon footprint through travel and other measures,* • *levels of local employment,* • *commitment to the Oxford Living Wage,*	The policy already includes "criteria" e) and h) which expect applicants to consider: e) Procuring a proportion of on-going supply chain needs locally; h) Procuring a proportion of construction materials locally. The introduction of local planning policy requirements (in the manner suggested here) to govern the specific tendering processes of individual businesses and organisations would fall outside of the remit of local planning policy. Preferred option selected for reasons set out in Background Paper.

2014

Topic	Summary of comments	Response
	• *training programmes,* • *and community engagement.* *The CEPP will set a target for the percentage of the total expenditure on the project that is to be delivered through local businesses and will record the actual percentage upon completion. This data will be available upon demand by OCC and then to the public.* *The City Council will use a condition to ensure the CEPP is adopted and followed by the applicant.*	

2015

Statutory Consultees – Draft Policy E3

Oxfordshire County Council

Summary of comment	Response	Outcome

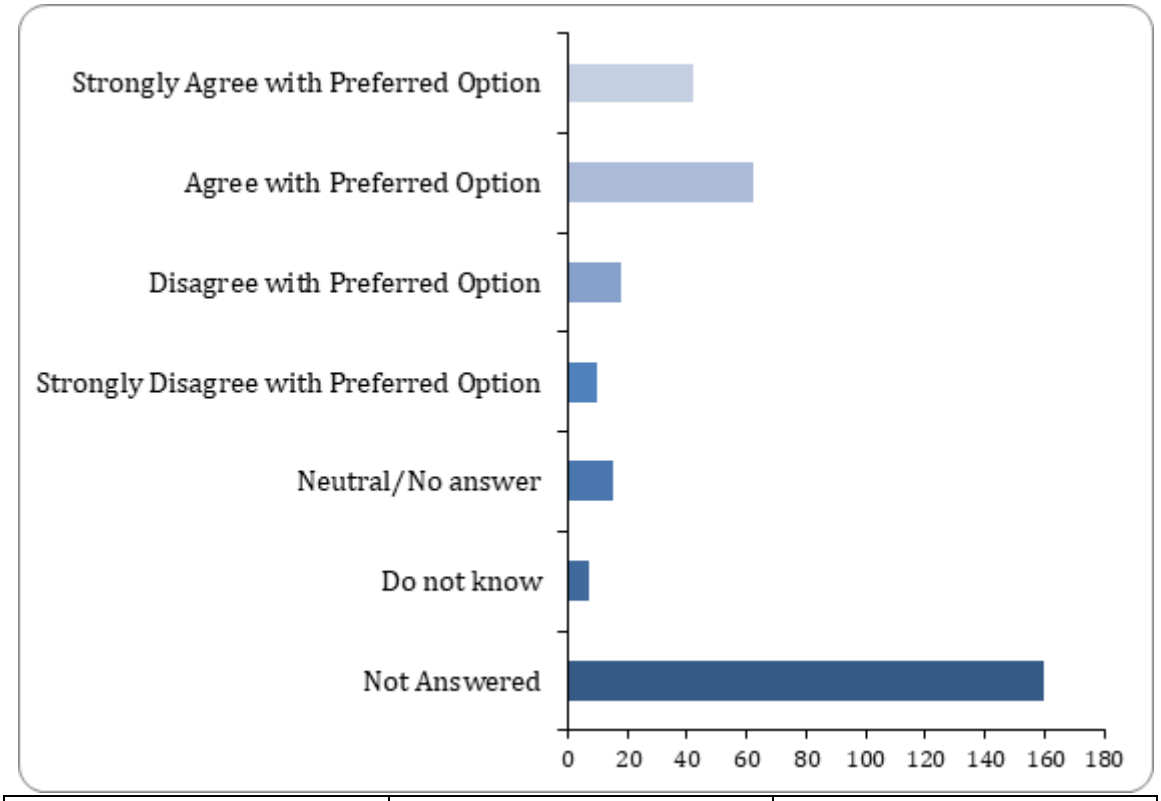
Strategic Planning Enterprise Oxfordshire (formerly OxLEP) promotes policies requiring Community Employment Plans. The hospitality and care sectors suffer acute labour shortages within Oxfordshire and employment plans can support these sectors to develop a local skilled workforce where new	Noted.	No action required.
Summary of comment	**Response**	**Outcome**
development proposals are coming through the planning system. In conjunction with Enterprise Oxfordshire (formerly OxLEP) we therefore support this proposed policy. In addition, we would like to highlight that clarity regarding what is understood as 'the inclusive economy' on the first paragraph of the policy would be welcomed, as it would better direct developers on this matter.	The city's economic strategy sets out what is meant by the 'inclusive economy'. It is also included in the glossary of the plan.	No action required.

2016

All Public Responses – Policy E4

Please tell us what you think about policy options set 004d (draft policy E4): Affordable Workspaces.

There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	42	13.38%
Agree with Preferred Option	62	19.75%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	160	50.96%

Topic	Summary of comments	Response
Viability	It is noted that Nuffield Sites are expected to deliver affordable workspace as part of their Masterplan and that details of the size, marketing, servicing and the management of these spaces should be set out in an affordable workspace strategy. We note that the definition of affordable workspace states that such spaces is to be available for rent set at an agreed rate below the commercial rent. It is understood, based on the current drafting of the Local Plan that the percentage reduction below the commercial rent is not defined and is to be agreed with OCC as part of the planning process. Our understanding is that any commercial rent reduction will need to be based on the ability of any scheme, i.e., in this case Nuffield Sites, to present a proposal that is capable of being financially deliverable and therefore able to absorb such costs as part of any viable scheme. Affordable workspace has a significant impact on viability and is a core and fundamental consideration in terms of development feasibility and deliverability.	Noted. The Local Plan Viability Study is to be published at the next consultation stage (i.e., Reg. 19).
Concerns about practicalities of implementation.	Operational requirements of major manufacturing/research units and logistical units may make it challenging to integrate smaller workspaces unlike with typical offices). The expectation to deliver as part of a phased development is also problematic because a critical mass will be needed to make it viable.	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
Would Support Encouragement of Affordable Workspaces subject to clarifications.	The provision of an affordable workspace strategy as part of masterplans should not prejudice owners of plots who are not party to masterplans which may or may not be prepared by third parties. In addition, it is unclear which companies would qualify for affordable workspace, particularly at SME level, and what percentage of floorspace would be expected to be delivered as affordable. Clarification on these matters is critical to understand how the policy will operate in practice and the cost of the policy on future developments. Any provision of affordable workspace should be subject to viability assessment to ensure that it does not prevent appropriate development coming forward. Therefore, in order to protect sites which may be caught by this policy it is suggested that amendments to the wording is included to ensure that viability of plots is not adversely affected. Alternative Option 1 which seeks to introduce text in the local plan encouraging employers to deliver affordable workspace in the city may be more appropriate, subject to clarification on the matters set out above.	Noted. The definition of "affordable workspaces" provides a selection of key sectors. No specific percentage is set – it is for the developer-led affordable workspaces strategy to determine. A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. Preferred Option selected for reasons set out in Background Paper.

2019

Object – Counterproductive to employment delivery	Requiring affordable workspace to be delivered in developments could be counter-productive to the delivery of employment developments. Provision of affordable workspaces will impact the overall scheme viability (particularly combined with increased CIL and potential affordable housing	Noted.

Topic	**Summary of comments**	**Response**

	contributions etc). Rental levels in the City are increasing due to demand for space and Oxford's appeal as a hub for research and development. This demand is out stripping supply, especially for laboratory space and any requirements that potentially decrease delivery would exacerbate the supply vs demand imbalance and hence push up rents. Furthermore, seeking to convert Category 3 employment sites to housing runs counter to the approach set out in policy E4 to provide more affordable workspace. In other areas, principally London Boroughs, new affordable workspace has been delivered most effectively via low-cost reuse and/or refurbishment of existing buildings to produce workspace at lower rents. This is especially relevant to Category 2 and 3 sites. However, ONV does support the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. It is delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas. However, the general approach should be reconsidered in terms of affordable workspaces.	A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. While the plan does support the loss of existing employment sites not designated as key employment sites to housing (subject to certain criteria) it also enables their regeneration for employment purposes. Support for a range and sizes of workspaces (but not specifically affordable workspaces) is noted.
Provision inappropriate in some circumstances	Whilst the difficulties experienced by SME's and Social Enterprises in finding affordable workspace is understood, this must be considered on a case-bycase basis. In some circumstances it would be inappropriate for this to be provided, particularly where development is for a specific end user rather than speculative development. In terms of Oxford Science Park, it is understood	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	that the intention for Oxford Science Park was to incentivise the best R&D businesses from around the world to lead and progress AI and science-based projects, to rival and compete against Cambridge and other locations globally. Placing restrictions on its use will compromise the ability for this to be achieved. Furthermore, it is noted that the Council now requests considerably higher rates of CIL for Class E Offices and R&D floorspace. There is concern that this would place a significant burden on affordable units. It is therefore requested that this policy is removed or, alternatively, the Oxford Science Park is removed from the list of sites where affordable workspace must be delivered.	A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.
Objection to preferred option	Policy not supported by robust or quantified evidence and the rationale that large floorplates exclude SMEs is inaccurate. ARC delivers large floorplates specifically designed to be subdivided or flexibly let. Many SMEs at ARC occupy these formats. There is no clear assessment of unmet demand, market failure, or how mandatory provision would resolve this. Overall, as drafted, the burden of demonstrating market failure falls on the applicant, which is contrary to the Local Plan's role to assess and address such issues.	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	Singling out certain sites while exempting others raises fairness and effectiveness concerns.	
AW requirements	Any requirement for AW must be narrowly defined, supported by clear evidence by use class and typology, and viability tested. A requirement should differentiate between different site types and ownership/funding structures (e.g. lab campuses, logistics parks, mixed-use areas) – lab-enabled buildings, in particular, involve much higher build and operational costs.	Glossary provides a definition of affordable workspaces. Preferred Option selected for reasons set out in Background Paper
Details left to a TAN	The Council notes further details would be deferred to a future TAN, this is unacceptable and introduces uncertainty and risks reliance on guidance rather than policy.	TANs are often used to provide Technical Advice for applicants/ decision-makers. Preferred Option selected for reasons set out in Background Paper.
Support flexibility of policy	Osney Mead is included within the policy as a site expected to deliver a strategy for affordable workspace. The rationale for the policy (i.e., to facilitate a broader range of businesses within the City), is appreciated by OUD.	Support noted.

Topic	Summary of comments	Response
	Policy does not include a specific percentage requirement. This approach is supported by OUD as it allows flexibility for the provision of affordable workspace to be subject to development viability.	
Require affordable workspaces in line with Draft Policy E4	Reasons include: • Strongly Support E4 Preferred Option which sets out the principle that larger workspace developments need to include an affordability strategy as a part of their masterplan. This is intended to ensure that where there is employment space this is accessible for smaller business and social enterprises. • The preferred option would add a full policy and is therefore the strongest stance. We would also be interested in seeing if this could be applied to retail units in order to provide affordable premises for local independent retailers.	Support noted.

Encourage affordable workspaces	Reasons include: • While the principle of providing AW is accepted is often something developers would like to provide, this is highly dependent on scheme viability, and in a market where many commercial developments are already facing financial strain, requiring developers to provide this would likely stifle otherwise viable projects. • Do not consider it is appropriate to require developers to provide both AW as well as a contribution towards affordable housing (as currently required by H5) - this creates an unfair burden on the developer and	A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage. Viability assessment considers cumulative financial implications of policies in the plan.

2025

Topic	**Summary of comments**	**Response**
	creates significant additional costs over and above a reasonable and appropriate level. • We consider this policy would adversely impact Class E focussed development in Oxford. • Policy approach is unsound without more evidence on proportional justification and viability. The Council could instead encourage affordable workspace delivery.	Preferred Option selected for reasons set out in Background Paper.

Rely Solely on National Policy	Reasons include: • Avoid complicated restrictions. Not necessary. • Do not incorporate the concept of affordable workspace in the Local Plan • A free-market solution seems sufficient here. If high-value workplaces outcompete others, good, they're higher value. • 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. • Such policies are unlikely to be enforceable.	Preferred Option selected for reasons set out in Background Paper.
Support principle subject to viability and flexible	Do not object in principle to inclusion of a policy requiring the provision of affordable workspaces. Supporting access to workspace for a diverse range of businesses and organisations is important for maintaining Oxford's economic diversity and resilience.	Policy E4 does not set out a requirement to deliver a specific amount of affordable workspace but instead requires an affordable

Topic	**Summary of comments**	**Response**

application of policy.	However, any requirement for affordable workspace must be reasonable and proportionate to the scale and nature of the proposed development. It is essential that such obligations are clearly defined, commercially viable in their own right, and do not unduly impact the deliverability of scheme, particularly where developments are already contributing to other planning priorities such as affordable housing or sustainability measures. We encourage the Council to ensure that the policy includes flexibility in its application, with consideration given to site-specific circumstances, market conditions, and the overall viability of development proposals.	workspace strategy (AWS) to be produced to support development proposals on the specific list of sites. Preferred Option selected for reasons set out in Background Paper.
Policy compliance monitoring needed	Also needs careful monitoring of compliance and sanctions for noncompliance, if you are to send a supportive signal to those who would benefit for more affordable workspaces.	We will consider issue of monitoring/ compliance/ delivery/ implementation as we draft the Reg. 19 policy E4.
Encourage discounted workspaces through TAN guidance, grants or on council-owned sites.	Requiring every big R&D or office project to carve out subsidised space risks repeating Oxford's housing mistake: load viability costs onto new supply and you simply get less of it. The Plan itself recognises that premium rents stem from a shortage of modern floorspace, not from developer indifference, and that any affordable-workspace offer must clear a "minimum size" and be underpinned by a detailed management plan and legal agreement. Those layers add delay and cost, deterring precisely the investment that would expand capacity and cool prices for all tenants, SMEs included. A stronger economy-of-scale solution is to encourage discounted studios and labs (via TAN guidance, targeted grants or city-owned sites) while letting high-value	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	schemes proceed quickly, thereby increasing total stock, fostering competition and giving small enterprises a wider choice of locations without mandating cross-subsidies that may never stack up.	
General comments	Workplaces that can't sustain themselves aren't long term viable. Commercial development should be minimal Care needed to avoid making development requirements too onerous Subject to demand. There are empty workspaces around the place...question of scale?	Preferred Option selected for reasons set out in Background Paper.

2028

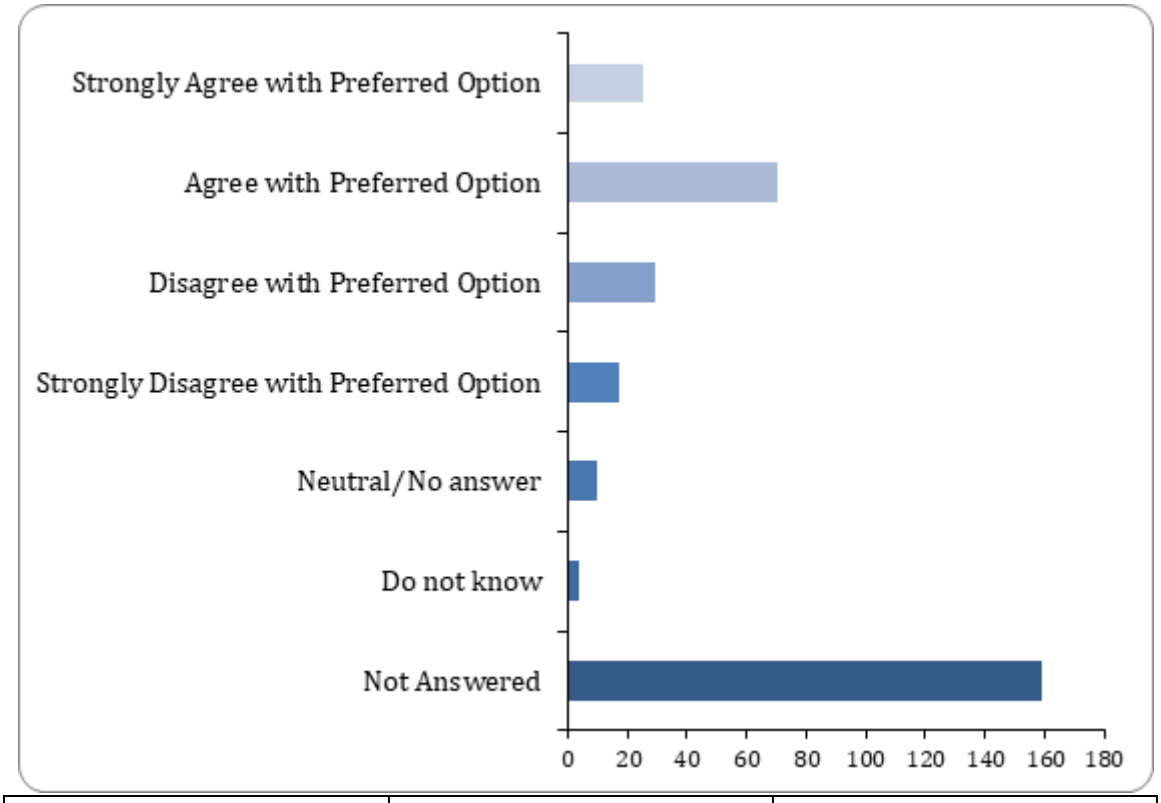
Statutory Consultees - Draft Policy E4

No statutory consultee comments.

All Public Responses – Draft Policy E5

Please tell us what you think about policy options set 004e-1 (draft policy E5): New Tourism and Short Stay Accommodation.

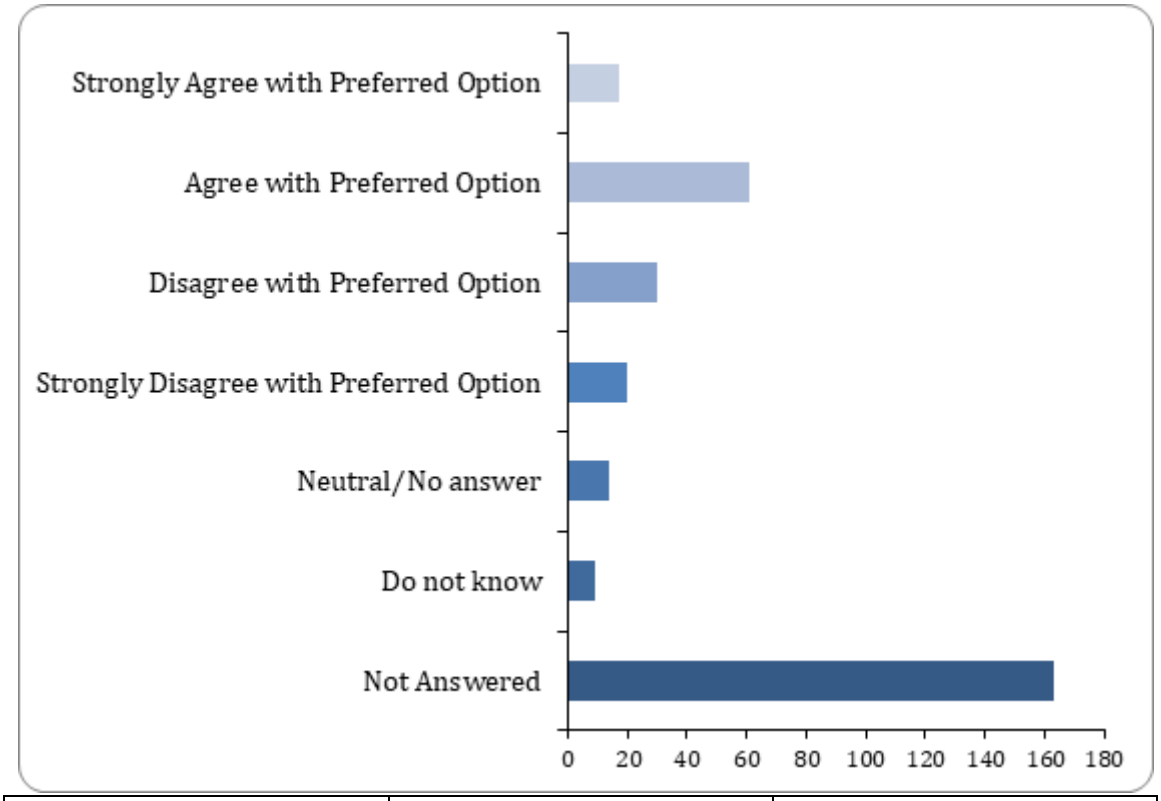
There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	25	7.96%
Agree with Preferred Option	70	22.29%
Disagree with Preferred Option	29	9.24%
Strongly Disagree with Preferred Option	17	5.41%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	159	50.64%

Please tell us what you think about policy options set 004e-2 (draft policy E5): Existing Tourism and Short Stay Accommodation.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	17	5.41%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	30	9.55%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	14	4.46%
Do not know	9	2.87%
Not Answered	163	51.91%

Topic	Summary of comments	Response
Consider additional reference to level of need within policy/ supporting text.	We agree with Policy E5 in that it supports hotels in the city and district centres, allocated sites, and on Oxford's main arterial roads where there is frequent and direct public transport to the city centre. The policy could be further improved if it made reference to the number of hotel beds needed. The Council's evidence-based document regarding hotels is the Hotel & Short Stay Accommodation Study for Oxford (March 2023), by Bridget Baker Consulting Ltd. It sets out that by 2040, there will be a need for 2,475 new hotel beds. We think that this number is significant and should be referenced in the policy.	Support noted. We will consider making a reference to the overall need for bedspaces in the Reg. 19 Plan.

2032

Consider whether suggested additional issues should be covered by this policy/ policies in the Local Plan	Tourism is a significant sector of Oxford's economy and with it brings its own pressures and problems. It is disappointing to see that there is only one policy within the Local Plan which addresses this issue. Whilst we welcome a policy which seeks to restrict and manage short stay accommodation across the city, there are many other impacts of tourism that need to be managed. Other issues that the policy (or other standalone policies) should cover include impact of tourism on the city's historic core, how the public realm could be improved to accommodate large groups, how tourists arrive and depart from the city and how and where coach parking could be provided.	Support for policy noted. Preferred Option selected for reasons set out in Background Paper. These issues seem to extend beyond the remit of local planning policies. The County Council are in the process of producing a movement and place framework (COMPF). How best to address wider issues including tourist coach parking is also being looked

Topic	**Summary of comments**	**Response**
		at outside of the Local Plan process.

Increased flexibility for loss of hotel/ short stay accommodation where sites allocated for comprehensive mixed-use development.	It should be made evidence 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. It is suggested that supporting text is incorporated which supports a flexible approach toward loss of short stay accommodation where site allocations are supported for comprehensive mixed used redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of short stay accommodation is supported. This additional bullet point could be incorporated/read as follows: • Or forms part of comprehensive, mixed used development scheme.	Preferred Option selected for reasons set out in Background Paper. Policy already includes appropriate criteria to support loss of hotel/ short stay accommodation.
Policy should state that new homes are always the priority.	Whilst CPRE support the intent of this policy the provision of homes should always be prioritised over short stay accommodation, such as hotels, and this should be stated in policy. Need tighter wording in the policy from 'must' to 'would'.	The policy supports new hotel and short stay accommodation in line with national policy (i.e., within the city and district centres. It also provides support for new hotel and short stay accommodation on arterial roads for the reasons set out in the Policy/ Background Paper. Outside of these locations, housing is prioritised.

Topic	**Summary of comments**	**Response**

2034

Prioritise housing	Reasons include: • The city should prioritise meeting the needs of its residents and those who contribute to the local community first, before expanding space for tourism. • Tourism often drives up the cost of living, making it increasingly difficult for local people—especially workers and families—to afford a decent quality of life. • Ensuring affordable housing, services, and amenities for residents must come before catering to tourists, so that the community can thrive sustainably and inclusively. • Short stay accom unless in hotels should not be priority. Local housing should. More Short term rentals, Airbnb etc should be discouraged.	Preferred Option selected for reasons set out in Background Paper.
Role of student accommodation (outside term-time) to support visitor economy.	The policy identifies that tourism is an important contributor to the local economy and identifies that the locations in which tourist accommodation will be supported. Elsewhere in the Local Plan it is recognised that the use of student accommodation outside of term time is supported therefore, there is the potential to provide support in this policy for the use of student accommodation outside of term time for short stay accommodation which would support the local economy through the provision of tourist accommodation.	Noted. The Plan already recognises the secondary role that student accommodation can play (outside of term-time) in supporting the visitor economy. As such, there is

2035

Topic	Summary of comments	Response
		no need to duplicate that reference in this policy.
Support and suggested amendment to include specific reference to changes of use.	Ch Ch supports this policy - Tourism is important to the economy of Oxford, in particular the City Centre. Christ Church is a major tourist destination and as such it is important that tourist and short stay accommodation is provided to support this and maximise the length of time visitors stay in Oxford. The policy should include 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.	Support noted. Reg. 18 Plan draft policy E5 includes the phrase "new sites". We will consider whether this phrase suitably covers changes of use when drafting the Reg. 19 version of the policy and supporting text.
(New acc.) Support preferred policy approach	Support preferred option	Support noted.

Support new hotel/ short stay acc. in city and district centres / allocated sites only	Reasons include: • accommodation for tourists is vital for the local economy, but it also exerts pressure on housing for residents. Hence, I feel sites on the main arterial roads would be better used for long-term accommodation	Preferred Option selected for reasons set out in Background Paper.

Topic	**Summary of comments**	**Response**
	• I am strongly in favour of restricting new short stay accommodation and am supportive of the idea to restrict this in residential areas. I am not sure about the inclusion of entire arterial routes.	
Support new hotel/ short stay acc. anywhere in Oxford.	Reasons include: • Draft Policy E5 artificially throttles supply just when the Plan itself recognises "strong demand" and the economic value of longer visitor stays. • A broader criteria-based policy would allow under-used brownfield land or mixed-use schemes anywhere in Oxford to add rooms, easing pressure on both residential rents and weekend traffic without sacrificing quality, because applications would still need to satisfy access, noise and H8 "no loss of dwellings" safeguards. • In a land-constrained city, expanding capacity, rather than rationing locations, is the surer route to a vibrant visitor economy and a healthier housing market.	Preferred Option selected for reasons set out in Background Paper.

Outside city and district centres, resist new short stay acc. anywhere in the city	Reasons include: • Hotels and proper B and Bs should be encouraged in non-residential areas, but other short stay accommodation restricted as much as governments rules allow. Air Band B and similar businesses cause the loss of homes and often result in nuisance for neighbours. In addition, they lack proper controls on fire and other risks.	Preferred Option selected for reasons set out in Background Paper.

Topic	**Summary of comments**	**Response**
Rely solely on National Policy	Reasons include: • Try to be as un-prescriptive as possible, let the market, supply and demand, define what is provided/invested in. • The Council should not be meddling in area. They will just make everything more expensive. • Should encourage more 3 and 4 star hotel capacity • Council policies ought to focus on reducing this growth and prioritise residential housing.	Preferred Option selected for reasons set out in Background Paper.

Further restrict new hotels/ short-term lets.	Responses include: • We need to keep Oxford a place where people can live. no more short stay accommodation, hotels etc. I am not sure which one of the options to choose but you need to really stop Airbnb and chains. its destroying oxford • No need for additional short stay accommodation in the City centre. • Where a short-stay accommodation is proposed in the centre, it should be either long-term accommodation or a service, like a convenience store, an event's venue, anything for the community. • Many other cities have, for example, restricted Airbnb's. • Tourism has a disproportionate impact and can price out residents from their own cities. Tourists, unlike students, do not live in Oxford,	The Government is in the process of introducing specific legislation to address short lets (including Airbnb). However, permitted development rights exist for temporary changes of use. Preferred Option selected for reasons set out in Background Paper.

Topic	**Summary of comments**	**Response**

2039

	they are not residents, they do not vote for you. You represent the residents. • Do not allow more Airbnb type accommodation • Why is there no Option 2: resist expansion of short-stay accommodation! And do not protect existing short-stay accommodation! • We do not need more short-stay accommodation. We need residential communities. • You can create a different economy instead. Use buildings for long term housing and for shops and service for residents, or as highlighted in another section, for other businesses offering employment.	
Do more with student acc. to support tourism	More use should be made of university accommodation to house tourists within the city rather than using our existing space to accommodate people who don't live & work here.	Preferred option selected for reasons set out in Background Paper.
Evidence/ audit of existing hotels needed	Oxford City Council's Planning Department has been suffering from 'hotel fever' for some time. The provision of short-term accommodation when many tourists are coach visitors and will not stay in Oxford means that an independent assessment is needed to judge whether current short stay accommodation is sufficient to meet actual demand at present, and projected demand based on post-Covid trends.	A Hotel and short stay accommodation study forms part of the evidence base. Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
Are more hotels needed?	Does Oxford need more accommodation for tourism? The City is overrun with coaches and large groups in the centre overwhelming local people on the pavements. Of course, Oxford is a heritage site, but surely there must be limits or people will be put of visiting as it becomes so unpleasant.	Preferred Option selected for reasons set out in Background Paper.
Don't lose housing to Airbnb/ short lets	Really important that we don't lose too much housing to Airbnb or short lets.	The Government is in the process of introducing specific legislation to address short lets (including Airbnb). However, permitted development rights exist for temporary changes of use. Other policies in the plan protect against the loss of dwellings.
Already a lot of hotels in Oxford.	There also seem to be a great many hotels in Oxford. Oxford is diminishing with too much tourism - how much do tourists actually spend, for example? The streets and experience of the city is much less than it was 20 years ago...we don't want to be the next Venice or Barcelona!	Preferred Option selected for reasons set out in Background Paper.

New hotels/ short stay acc. Should not impact residential dwellings	Given the number of hotels/amounts of short-stay accommodation currently in the pipe-line, I think that OCC need to draw a line. I think that new accommodation should only be agreed with the proviso as stated in the draft	Preferred Option selected for reasons set out in Background Paper.

Topic	**Summary of comments**	**Response**
	plan that it does not result in the loss of a residential dwelling OR the site is not suitable for provision of residential dwellings.	

2042

General comments	Tourist accommodation should not be a priority when there is a housing crisis for local people. Should consider a tourist tax to stay Tourist taxes and other measures to restrict tourism will lead to worse finances for Oxford. Most tourists are day trippers. Do we really need more accommodation? Please consider existing communities before allowing permission for new developments. Tourist should rely on hotels or similar Too many hotels and student blocks already- to the detriment of affordable housing Restricting to arterial roads only is unhelpfully strict. More and more people are using Airbnb. This policy doesn't seem to have a huge impact. If tourist accommodation is lost to housing, then that is a good thing! This policy is weak around supporting a fair use of short stary accommodation in the centre that would not protect against loss of accommodation for workers and student	Local Plan seeks to balance competing needs including for new tourist accommodation and new homes. Preferred Option selected for reasons set out in Background Paper.

Topic	**Summary of comments**	**Response**

2043

(Existing Tourism etc) support expansion in city and district centres and at arterial routes.	Support preferred option.	Support noted.
(Existing Tourism etc) do not include a policy	Reasons include: • Try to be as unprescriptive as possible, let the market, supply and demand, define what is provided/invested in. • Stop meddling! • Why would you protect it? If there is demand let it expand if not let it be removed. • The Council is busy creating more and more policies and restrictions which just add cost to developers and to Council officers.	Preferred Option selected for reasons set out in Background Paper.
Do not support expansion of existing short stay acc.	Reasons include: • Allowing the expansion of existing short-stay accommodation risks further increasing housing costs and reducing availability for local residents. Protecting these accommodations without strong restrictions may encourage more properties to be converted from long-term homes to tourist rentals, worsening the housing crisis. I believe stricter controls or limitations are needed to prioritise	Preferred option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	affordable housing for the community over tourism-related short stays. • No, as above, be very cautious about expansion of short stay accommodation - the criteria would need to be very tight! • The expansion of short-stay accommodation should be resisted. We need long-term homes for ordinary people, not yet more tourist accommodation.	
Temporary changes of use	Consideration given for alternative use even for a period of time. Could mean classification/license not loss but paused? could be very helpful with temp accommodation pressures.	Permitted development rights allow temporary changes of use already without the need for planning permission.
(Existing) - what are criteria?	Thought would have to be given to the criteria, and I am very concerned about the number of properties being illegally used for short lets (i.e., they are not properly registered).	The criteria were listed in the main policy document. Preferred Option selected for reasons set out in Background Paper.

General comment	Locking every hotel or guesthouse into perpetual tourist use would hamper the city's ability to repurpose sites for higher-value needs—especially housing—when market signals change; Oxford's land base is tight, and flexibility is paramount.	Preferred Option selected for reasons set out in Background Paper.
Topic	**Summary of comments**	**Response**
	By simply allowing expansion where viable and applying the usual design, transport and amenity criteria to any proposed loss, the Council can safeguard visitor beds when demand is strong while still freeing under-performing premises to become homes, labs or mixed-use schemes when that better serves residents and the wider economy. A light, criteria-based approach keeps supply responsive instead of ossified, advancing both tourism and housing objectives without unnecessary regulation.	
General comment/ clarity issues	Not clear what short stay means, is this hotels? Probably don't need more hotels in Oxford. Don't allow Air B&B and second homes for tourism rents.	Preferred Option selected for reasons set out in Background Paper.
General comment	Seems that this needs more work, guiding/regulation any short stay accommodation is important.	Preferred Option selected for reasons set out in Background Paper.

Statutory Consultee - Draft Policy E5

No statutory consultee comments.

All Public Responses to the Whole of Chapter 3

Draft policy	Topic	Summary of comments	Response

Chapter 3	Economic Strategy	As expressed in previous consultation responses, we have a fundamental concern about the very significant imbalance between the high number of jobs in the city and the much lower number of economically active residents, which has led to many problems including high levels of commuting into the city, traffic congestion, a shortage of housing and very high housing costs. We would like to see more being done to ensure that people can live in Oxford closer to their jobs.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). The plan's employment strategy seeks to limit new employment generating uses to existing employment sites, the city and district centres and sites in lawful use for the proposed employment use class and introduces a generally permissive approach in relation to housing delivery across the existing employment site network.

2048

Draft policy	**Topic**	**Summary of comments**	**Response**

Chapter 3	Support commitment to inclusive growth	Support commitment to inclusive growth, where wealth is distributed and all citizens can share the benefits of growth. Would like to see this commitment more strongly and explicitly in the plan.	Support noted. Policies E3 and E4 provide policy support for inclusive growth in the plan.
Chapter 3	Supportive	Cyclox support all policies in this chapter	Support noted.

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

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Headlines for Chapter 4:

- Consensus regarding the importance of Oxford's network of green spaces to the character and setting of the city as well as the well-being of its inhabitants and for climate resilience
- Green spaces are a finite resource, not easily re-created when lost or damaged
- It should be explicit that greenfield will only be developed if no brownfield sites are available or meet needs
- Lots of support for initiatives and policies that protect the environment and creation of additional green spaces
- Push to work with local wildlife groups to maintain and enhance and educate people about local wildlife
- New developments must be constructed to latest green and sustainability standards and flooding
- Mitigating flooding and sewage issues should be prioritised

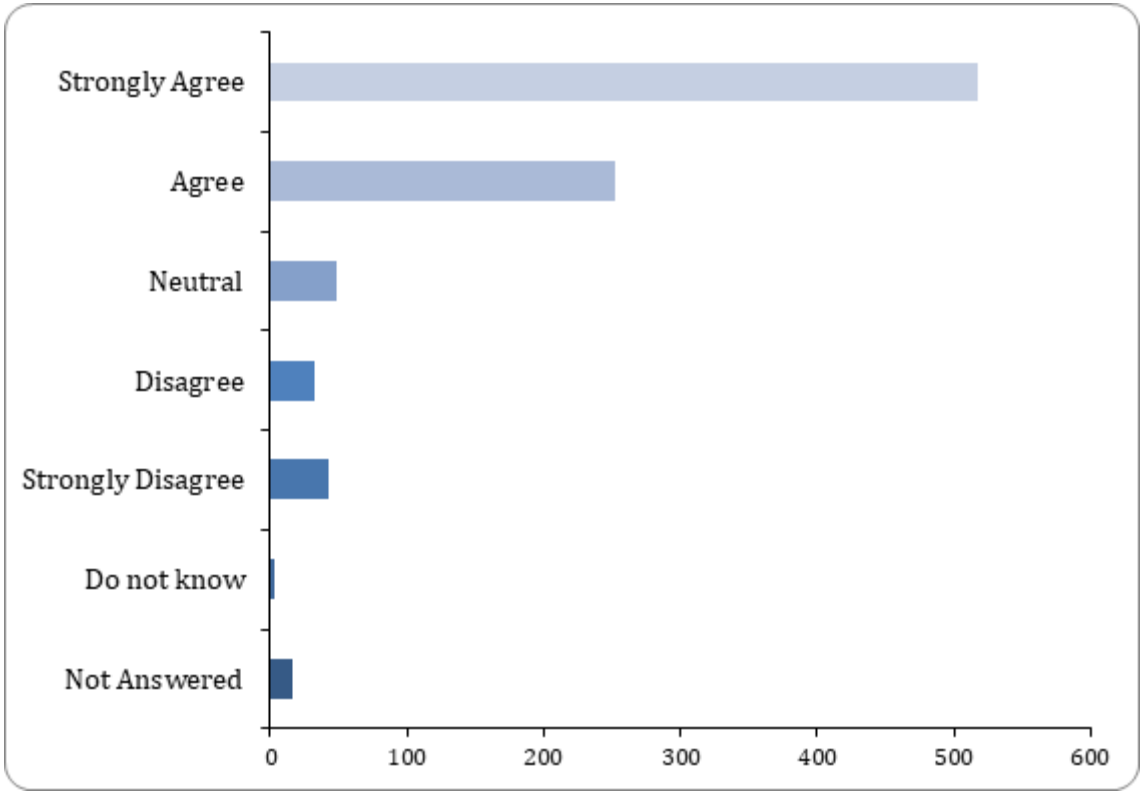
Short Questionnaire Responses

Green Spaces

We are protecting our important green spaces and features. We are also requiring biodiversity enhancements and new green features on sites. To what extent do you agree with this approach?

There were 894 responses to this part of the question.

2053

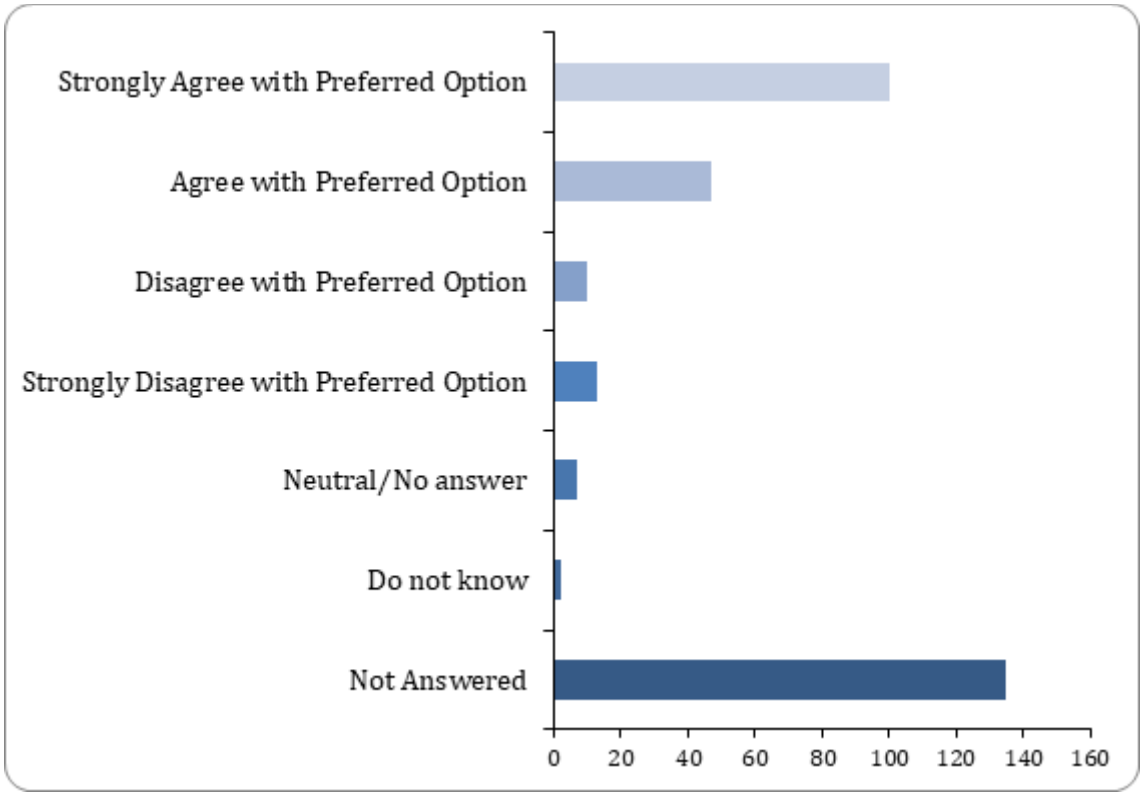


Option	Total	Percent
Strongly Agree	517	56.75%
Agree	252	27.66%
Neutral	48	5.27%
Disagree	32	3.51%
Strongly Disagree	42	4.61%
Do not know	3	0.33%
Not Answered	17	1.87%

All Public Responses – Draft Policy G1

Please tell us what you think about the policy options set 005a (draft policy G1): Green Infrastructure Network and Features.

There were 179 responses to this part of the question.



Option	Total	Percent

2054

Strongly Agree with Preferred Option	100	31.85%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	7	2.23%
Do not know	2	0.64%
Not Answered	135	42.99%

2055

Draft policy	Topic	Summary of comments	Response
G1	Ambiguity in policy wording	As drafted, the policy suggests that parts of the hospital sites may constitute land in category G1C: All other Green and Blue Spaces. These areas form undeveloped land within a 'Key Employment Site'. These areas could be critical to securing employment floorspace, or other important hospital requirements. It is therefore unreasonable to ascribe a level of protection that would prevent development delivery. The Trust therefore suggests that Key Employment Sites are given additional consideration or dispensation in the proposed policy. Draft Policy G1 also introduces extended criteria for tree loss, now requiring evidence of tested alternative layouts to preserve trees (apparently regardless of quality), as well as general evidence that these have been minimised in accordance with BS 5837:2012. The Trust considers the current drafting of this provision in Policy G7 of the adopted Local Plan remains sufficient. Requiring extensive evidence for all trees as proposed – regardless of quality – adds disproportionate burden. BS.5837:2012 already embeds a structured, evidence-led approach which must be taken into account in planning	The categorisation does not preclude development proposals coming forward, and it will be made clear in the policy/supporting text that reprovision can be made on a qualitative as well as quantitative basis, which allows consideration for improved or more functional green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.), which will also be outlined in the final policy wording/supporting text. The policy criteria with respect to tree loss follows the current adopted policy approach and also takes into consideration the Urban Tree Canopy

2056

		applications and design of development that does not need to be repeated in local policy.	standard contained in the Natural England GI framework.

2057

Draft policy	Topic	Summary of comments	Response

G1	Unjustified as surplus requirements not considered	In the case of Core Green and Blue Spaces, the proposed policy does not allow the loss to be balanced against the public benefits of the proposal, thereby setting a higher test than national policy. Moreover, the policy does not enable surplus requirements to be taken into account, thereby preventing the redevelopment of any underutilised greenspaces e.g. sports facilities in the future. In comparison, the NPPF (Paragraph 104) sets out protection for greenspaces unless they are surplus or can be reprovided. In the case of Supporting Green and Blue spaces, harm can only be mitigated by ensuring reprovision either to the same standard or higher. Again, this fails to take into account surplus requirements, or any other public benefits which may outweigh the harm caused. In addition to the concern that the reason for designation is not evidenced or necessary, institutions should be given a freer hand to plan their estates having regard to broader planning objectives when applying for planning permission.	Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the designated spaces. In a situation where facilities such as sports pitches (typically categorised as 'Supporting' GI) are within a Core designated space, it is likely because such a space also performs a core function in the GI network, such as active flood storage, or forms part of the setting of a designated heritage asset. Categorisation as a Supporting GI space does not preclude development proposals coming forward, and it will be made clear in the policy that reprovision can be made on a qualitative as well as

2058

Draft policy	Topic	Summary of comments	Response
			quantitative basis (see policy G3) - the requirement for 'like for like' reprovision will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.). The determination of what facilities may be deemed as surplus will be made on the basis of assessments by relevant departments in the council.

2059

G1	Supporting green spaces should have more protection	Supporting Green spaces that are within the inner parts of the city should be protected from development to avoid a future in which the impact of the urban heat island effect gets ever worse. For example, the green spaces to the north of Cowley Road that are currently sports fields have been included as proposed site allocations, even though they play a vital role in all of the above aspects, and are adjacent to one of the least green parts of the City, East Oxford, which already suffers very high summer temperatures during heatwaves. If despite our concerns such sites are taken forward as site allocations, or have planning applications for development on them, we consider that it is essential that there is policy in place that means that there must be a minimum of 50% green space (in addition to gardens within the urban development), including a variety of habitats	Green spaces categorised as supporting spaces will only be considered where any harm or loss is mitigated by replacement to the same standard or higher. Additional evidence will be required from applicants that broader considerations are taken into account specifically for sports facilities and amenity spaces – including a demonstration that spaces can be reprovided in such a way that there are no deficits against demand, opportunities are taken for suitable alternative provision where that is appropriate, or that

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Draft policy	**Topic**	**Summary of comments**	**Response**

2061

		including trees, and wetlands, which will benefit both wildlife and people. Whilst some areas of the green space could be accessible, a significant proportion (except on the very smallest of sites) should be set aside as a nature reserve with high quality natural habitats and an in-perpetuity management plan, managed through a CIC, Trust or similar. The nature reserve part of the green space should be screened to reduce disturbance to wildlife but could be enjoyed by people through viewing areas and depending on their scale, footpath networks. BBOWT greatly welcome the preferred option, particularly the text: "All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of a network means that it would be challenging for them to be replaced elsewhere)."	consideration has been taken of any specific local needs, or particular deficiencies in a type of space. Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.
G1	Disagree with supporting green space classification	Disagree with Headington Quarry Park, Barton Road Park, Ruskin Fields among others being downgraded from 'Core' to 'supporting' green spaces, giving them little protection. Emphasise the benefits to public wellbeing, especially for local young people.	Core spaces are designated as such because of fundamental characteristics that make their reprovision impossible or impractical, which in practice often applies to designated ecological sites (e.g. SACs, SSSIs etc), flood storage, designated heritage sites etc.

			While supporting spaces may not have

Draft policy	Topic	Summary of comments	Response
			statutory designations, they still play important roles for public amenity and wellbeing, as well as environmental functions. Core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces').

2062

G1	Objection to tiered GI	The proposed wording is a deviation from Policy G1 of the adopted Local Plan, which does not rank Green Infrastructure and confirms that planning permission will not be granted for development that would result in harm to the Green and Blue Infrastructure network, except where it is in accords with relevant mitigation or exceptions identified in supplementary policies. Based on the above, this policy wording and allocation methodology is objected to for a number of reasons: 1. The allocation for Core and Supporting arbitrarily draws a line between one and the other, without any reasonable balance being provided to a sliding scale of quality both internally within individual Green Infrastructure, or when comparing the lowest quality Core against the highest quality Supporting.	The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate land with the least environmental and amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The proposed hierarchy in the policy is consistent with the approach required by national policy and has a framework for how it applies to the Oxford context. Core spaces are designated as such because of fundamental characteristics that make their

2063

Draft policy	**Topic**	**Summary of comments**	**Response**

		2. The assumption that Core 'spaces cannot be moved/re-provided sufficiently without compromising the overall character and function' is subject to each site's individual merits and proposals. For example, Core areas may have lower quality sub-areas within them. This conclusion should not be drawn at this stage and result in a blanket in-principle ban on development within designated areas. 3. The proposed wording conflicts with the aim of the policy as outlined at Paragraph 4.6 as outlined above, which seeks to protect Green Infrastructure from 'inappropriate development', requiring mitigation where development comes forward. 4. The Core policy wording has no flexibility for the scale of green or blue infrastructure, scale of existing and proposed development, exceptional circumstances, or the possible wider reprovision or enhancement of the infrastructure. The following updates are requested: 1. The principle of 'Core' and 'Supporting' be removed, in line with Option A of the Background Paper, as well as the approach currently within the adopted Local Plan. The overarching policy wording should seek protection, but acknowledge that the loss may be justified	reprovision impossible or impractical, or their loss will have a significant adverse impact to the character or GI network of the city. In practice the designation will apply to designated sites (e.g. SACs, SSSIs) or sites of heritage significance or scheduled sites. Other national policy considerations will also apply to such sites. There are no situations envisaged whereby planning permission that results in loss or harm to such spaces would be acceptable. Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the

2064

		subject to adequate re-provision or enhancements, and / or sufficient	

2065

Draft policy	Topic	Summary of comments	Response
		justified evidence of the need for the development in the context of wider site function and use. OR 2. Alternative policy wording for Core sites, with the allowance for development in 'exceptional circumstances', as recommended by Option B of the background paper.	designated spaces. Formulating 'exceptional circumstances' will be a subjective exercise and run risk of depriotising spaces that may still bring about benefits

2066

G1	Justification unclear	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 reprovision', 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	The categorisation of a green space or feature as G1B (supporting) can depend not only on specific functions but other considerations such as user amenity, relationship to and impact on the setting of other buildings etc. The categorisation does not preclude development proposals coming forward, and it will be made clear in the policy that reprovision can be made on a qualitative as well as quantitative basis, which allows consideration for improved green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.), which will

Draft policy	**Topic**	**Summary of comments**	**Response**

2067

		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.	also be outlined in the final policy wording/supporting text.
G1		Ok. But exercise judgement. There are too many college sports grounds only used a little. If one were to become a car park that would be a good thing. Never say never.	Comment noted.
G1	Objection to approach	This consultation fails to identify or map a network of Oxford's green blue infrastructure. This is a significant omission which affects the validity of the consultation and which cannot be justified given the existence of the longstanding Green Infrastructure Report (2022) and the availability of the results of the Local Nature Recovery Strategy consultation responses report (January 2025) and liaison with the LNRN. An interim consultation which maps Oxford Green Blue Infrastructure and includes findings from the LNRS must be undertaken prior to any Reg 19 consultation. Oxford's green space network should encompass and connect all of the existing green - blue infrastructure in the city and identify sites where	An interactive policies map including layers showing the GI network was published by the launch of the Reg 18 consultation, and links to it were provided on the council webpages and consultation materials which all remain active. Improvements to the public interface will be made in response to user feedback on a continuous basis. The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate

2068

		new genuine brownfield development can connect	land with the least environmental and

2069

Draft policy	Topic	Summary of comments	Response

		with this network. In addition, Oxford's nature network should connect with green infrastructure beyond the city boundaries. This policy should include the Oxford Earth Academy work on the Oxford Education Nature Park. There should be a presumption against any loss of trees, hedgerows and woodland. No losses should only occur except in truly exceptional circumstances e.g.: safety. All Green space should be protected; there should be no hierarchy. The preferred option requires identification/designation of green and blue infrastructure sites for protection. You suggest a hierarchy of protection for spaces within the Green Infrastructure network of green spaces, in which ecological function takes priority over recreational/health functions. In the last GI study, Bertie Park was cited as an example of a small, but multi-functional site. In spite of the fact that it is a highly valued community space, it would be at the bottom of the hierarchy. You state that planning permission will only be granted for proposals relating to sites at the bottom of the hierarchy "where any impacts are	amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The NPPF also sets out the strict conditions for when loss of open space, sports land/buildings and pitches can be lost (para 107). The proposed hierarchy in the policy is consistent with the approach required by national policy and has a framework for how it applies to the Oxford context. The hierarchy consists of three levels of protection. The core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). The conditions for approving development affecting supporting spaces (G1B), such as Bertie Park, will

2070

		mitigated by ensuring sufficient reprovision, ideally onsite, and to the	be required to sufficiently reprovide affected

Draft policy	Topic	Summary of comments	Response
		same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements." There is no detail on how you determine whether a site is "surplus to requirements". Draft policy "would seek to protect all public and private green infrastructure in the city from inappropriate development and ensure that, where it comes forward, development mitigates any potential impacts." "Seek" means that you are not necessarily going to protect GI, and if it comes forward for development, instead of replacing recreation spaces with equivalent or better, you make clear your intent to "mitigate any potential impacts." The following statement is even worse: "the draft policy also sets out conditions by which certain types of green space may be lost to other forms of development, however, there may also be additional considerations which would apply to applications that affect certain types of spaces including how these might need to be reprovided." You claim to clarify this in section 4.2 where you actually make clear your intention to depart from national guidance with reference to Parks and gardens, accessible greenspace	spaces to the same standard or higher and the approach aligns with national policy. The policy wording and supporting text will set out the means by which the standard of reprovision will be assessed. Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.

2072

		and amenity greenspaces: "Where relevant, applicants will have to demonstrate consideration of how any	

2073

Draft policy	Topic	Summary of comments	Response

		loss can be mitigated, especially if this is located in an area which already suffers from a deficit." How would OCC determine whether a mitigation in an area which already suffered a deficit was adequate? OCC needs a clearly stated policy reflecting national guidance, which protects our recreational spaces, especially in working class areas.	
G1	Option A and low quality green spaces	Whilst supporting option A generally, disagree with option A's wording: *This would allow us to release poorer quality spaces for other needs.* Question who assesses this and what is factored into it? All green space should be protected, and brownfield land should be prioritised. TPOs cannot protect trees alone and TPO protection can be invalidated (e.g. if signs of sickness in tree). Do not allow mature green healthy trees to be felled for development. Do not agree with option D's wording that additional tree protections beyond TPOs could be considered too onerous.	The highlighted wording is from a section of the supporting background paper that contains possible opposing arguments to adopting the preferred option. Our response to this line of argument is contained in the same section.
G1	Mitigation against loss of trees	It should be acknowledged that mitigation against loss of existing mature trees and hedgerows is often inadequate, simply replacing with new trees or hedges will not replace the existing biodiversity.	This policy and others in the plan (G2, G3, G6) incentivises the retention of existing green infrastructure and natural features in development proposals and limits the loss of established features such as

2074

Draft policy	Topic	Summary of comments	Response
			mature trees and hedgerows to exceptional circumstances in line with Government guidance and substantial evidence backing or mitigation arrangements.
G1		Strongly agree with protections for green spaces. I would adjust the policy slightly to reflect a 'biodiversity first' approach, for example where you allow for the removal of living trees, instead of saying, "...where it is clearly justified" gives space for putting developers' concerns above the concerns of our lessening biodiversity. Perhaps this could be reworded to say, "Loss of woodlands, hedgerows and trees is not permitted. In situations where this is unavoidable, there must be two full ecological surveys to show two opinions, and there must be a rewilding plan for biodiversity gains, with an appropriate assigned ongoing plan and budget for supporting the establishment of a the new green area."	The circumstances where the loss of trees are highly limited in the policy and will be subject to justification by substantial evidentiary backing and mitigation arrangements. Other plan policies such as the greening factor (G3) and BNG (G6) policies also incentivise the retention of mature green infrastructure features, which in themselves contribute greatly to policy compliance where they are retained.

2075

G1	Protection of green space around designated sites	Major national sites of biodiversity importance (SSSIs SACs), and arguably local biodiversity sites also, should never have adjacent lower quality green land developed – important for buffering and supporting function of these sites. For example: can be crucial in rainwater supply to fen springs in SSSI/LWS fens hundreds of metres away.	Policy G6 sets out the requirements for the avoidance of adverse impacts on designated sites, including requirements for distance buffers. The policy wording and supporting text includes references to studies produced

Draft policy	Topic	Summary of comments	Response
			by the council, Natural England and others, and applicants will also be required to demonstrate that they have taken into consideration the recommended actions in their schemes.
G1	Protection of local biodiversity sites within G1 network	Draft policy protects only the sites which already have legal protection I.e. SSSIs and SACs. Local sites should be protected in same way as sites that are already nationally designated. Loss of local wildlife sites cannot be mitigated in respect of the biodiversity functions that are lost.	This is incorrect, draft Policy G1 includes all locally designated sites that form a part of policy G6's ecological network as 'core' parts of the network (because these functions cannot be easily reprovided). This includes the LWSs, OCWSs and LNRs.

2076

G1	Policies in neighbourhood plans	Green Spaces and Biodiversity policies of Headington Neighbourhood Plan have been ignored – would be a useful basis for the policy.	Policies for the local plan are developed on the basis of a broad evidence base and consultation, which have to be coherent as a whole and applicable to all areas and sectors of the city with as few exceptions and caveats as possible. Local plans policies also carry more weight than neighbourhood plan policies unless the latter cover issues that are not addressed in the local plan.

2077

Draft policy	**Topic**	**Summary of comments**	**Response**

G1	Scope of policy too wide	Treating every green fragment as sacrosanct, with a presumption against any net loss simply because it sits inside a city-wide "network", locks low-value, poorly located scraps of land into perpetual idleness and blocks the gentle infill Oxford needs. The draft G1 text even classes the smallest "supporting" and "other" spaces alongside the historic flood-meadows under the same nearabsolute protection. That would make it far harder to swap a redundant verge or disused private lawn for new homes plus a better-designed pocket park nearby—an outcome the NPPF explicitly allows where open-space quality is improved. A calibrated, site-by-site designation (Alternative 1) still gives strong, tailored safeguards to the genuinely strategic assets (core floodplains, SSSIs, heritage gardens, main sports pitches) while letting modest, ecologically poor plots be upgraded or relocated if a scheme secures equal or higher amenity and biodiversity value.	Small green spaces have the potential to bring about local amenity and environmental benefits, which can be cumulative across a wider area where they can be linked. For the city as a whole the cumulative benefits are best harnessed when green spaces are considered as part of a coherent network. As a spatially constrained city with limitations on the amount of significant new green spaces within its boundaries, the retention of green spaces is even more important. The network approach is also in alignment with the NPPF. The policy approach does not preclude development in suitable locations, although the emphasis is on the development process becoming a way for the delivery of enhanced/improved green infrastructure.

2078

G1	Residential Garden Land	Policy should generally prevent creation of nonpermeable surfaces especially on house	An Article 4 direction requires a specific broader process that is

Draft policy	Topic	Summary of comments	Response
		frontages in favour of guaranteed SUDS or other green areas – to allow rainfall penetration and mitigate impacts on drainage systems in relation to flood risk. Policy should go further and not allow SuDS either in Lye Valley catchment as this is not sufficient to mitigate loss of natural surface cover. Can Article 4 permitted garden development rights be removed within the defined catchment area of the Lye Valley?	led by the wider council and outside of the local plan framework. Qualifying schemes will be subject to the UGF requirements of policy G3, which is intended to incentivise the integration of natural surface cover. However the methodology is simple to use and developers at all scales and types will be encouraged to apply it on their schemes. Policy G6 addresses the protection of the ecological network including the Lye Valley SSSI.

2079

G1	Residential Garden Land	We support most of this policy but have concerns about the consequences of the policy to allow building on residential garden land. We would like to see a requirement for consultation/engagement 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 would like to see further creativity when building on residential garden land, to explicitly off-set by creating further green corridors with pocket parks, community gardens/tiny forest gardens in areas of	This aspect of the policy is more likely to apply to be applicable in built up areas that are already previously developed and not under any GI designation. In any case any proposals will be expected to be compliant with the requirements of all relevant policies.

2080

Draft policy	Topic	Summary of comments	Response
		social/green deprivation, which will have multiple positive effects including health, happiness, food growing, carbon sequestration and enhancement of biodiversity. This should be an essential prerequisite when paving over/ building on any garden spaces.	

G1	Objection - Re-provision	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. The term is not explained in the glossary. Green space in allocated sites is not even marked as such, it does not even officially exist.	The requirements for reprovision and the basis on which it may be considered acceptable will be described in the policy wording and supporting text. Reprovision can be made on a qualitative as well as quantitative basis, which allows consideration for improved green features even where the footprint is reduced (see policy G3). A requirement for 'like for like’ alternatives will mainly be applicable in situations involving a specific function (e.g. sports pitch, play space etc.). Site allocations will have specific requirements in relation to green infrastructure provision,

Draft policy	**Topic**	**Summary of comments**	**Response**

2081

			which will be site specific – where green spaces already exist, they will be identified in the policy wording along with guidance on where they can be retained or enhanced. Other relevant policies will apply in addition.
G1	Objection – Residential Garden Land	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.	This aspect of the policy is more likely to apply to be applicable in built up areas that are already previously developed and not under any GI designation. In any case any proposals will be expected to be compliant with the requirements of all relevant policies.
G1	Omissions in designated GI network	The Oxford draft local plan policy map identifies a number of sites around Osney Island designated as G1 (green and yellow – presumably corresponding to the G1A and G1B mentioned in the draft policies, p.66) and Greenbelt. However it crucially fails to recognise both the main river, from where it passes under the railway up to Botley Road, and the Osney	Blue corridors are already subject to strong protection through national policy, and other policies in the Local Plan (see policy G7 on flood risk). Banks to watercourses are addressed in requirements for policy G2 (10m buffers to watercourses). The expectation

2082

		Stream, as part of the ecological network in the area. It is curious that the local	

Draft policy	Topic	Summary of comments	Response

2083

		primary school and church are marked G1A (green) when the far more significant river network, including its banks, is not marked. This needs to be rectified and these areas should be designated G1A. We suggest the banks of the rivers are marked with a green line, and the marina and Osney Lock Hydro (currently missing from the map) are marked green. Members of the Osney community participated in the consultation last year on the County Council Local Nature Recovery Strategy (LNRS). As a result, both the main river corridor and the Osney Stream are marked green on the draft LNRS map – making them part of the nature recovery network. The draft Oxford local plan map is inconsistent with the draft LNRS map and should be brought into line with it. The suggestion of marking additional areas In green proposed in the previous paragraph would achieve this. We are concerned that a failure to clearly designate these stretches of river as G1A leaves them as 'other spaces' which could create ambiguities about whether the stated biodiversity policies, which we support, apply to this area.	is that this should ensure these spaces are not built upon and incentivises their renaturalisation where possible to improve the benefits they provide for people and nature. The LNRS mapping highlights suggested areas where habitat creation and improvement actions could be delivered to offer the greatest benefit towards local biodiversity priorities where opportunities arise. The elements in those maps play a different role to the designations under policy G1 and is therefore not something we are looking to completely mirror due to the differing purposes. Many of the Local Plan's protected spaces will be able to offer opportunities to support the types of measures the LNRS identifies, and we will continue to consider where it is possible to align with various elements

2084

			of the LNRS and its general priorities as we further

Draft policy	Topic	Summary of comments	Response
			develop the Local Plan, even if this will apply in other policies other than G1.

2086

G1	Objection – policy not effective – amendments suggested	There appear to be overlaps between the GI policies and also conflicts with the wider aspirations and proposed allocations of the Plan. Policy G1 refers to protection of green infrastructure (GI). The Plan defines core and supporting GI which 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. In addition, 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? 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. 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	Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the designated spaces. Formulating 'exceptional circumstances' will be a subjective exercise and run risk of depriotising spaces that may still bring about benefits. Categorisation as a 'supporting space' does not automatically preclude development proposals coming forward, and it will be made clear in the policy/supporting text that reprovision can be made on a qualitative as well as

2087

Draft policy	Topic	Summary of comments	Response
		trees nearby should be considered. 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. Suggested Amendment: 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. 2. Provide more flexibility in the policy to ensure it takes a positive approach to development. 3. Consider combining the policy with Policy G6.	quantitative basis, which allows consideration for improved or more functional green features even where the footprint is reduced. Creating a standalone G1 policy as opposed to consolidation with G6 is considered to be a more effective way of addressing the wide range of green spaces that may warrant protection on grounds other than biodiversity or ecology, such as heritage significance, local amenity etc. The policies map is under constant review and improvements in accuracy and usability are made on an ongoing basis following user feedback, which is always welcomed.

2088

G1	GI within Key Employment Sites/ future site allocations (ARC)	The undeveloped plots at ARC Oxford (Plot 3000; 8200/8400; and 9200) may constitute land within the G1C category. These plots form undeveloped land within a 'Key Employment Site'. These sites (and the consented proposals at Plot 2000) are	The policy approach behind the G1C is consistent with NPPF approach. Spaces in this category are likely to be fragmented, smaller or have

Draft policy	**Topic**	**Summary of comments**	**Response**
		critical to securing employment floorspace. It is unreasonable to ascribe a level of protection that would prevent these coming forward. ARC requests these sites are excluded from the G1C space designation, or any other designation that would undermine their status.	other characteristics that reduce their multifunctionality in a GI network context. This categorisation does not preclude development if it is demonstrated that there is reprovision or that the space is surplus to requirements, as appropriate to the application.

2089

G1	"Loss of trees" criteria too strict	Do not support introduction of "extended criteria" for tree loss set out in G1 that requires evidence of tested alternative layouts to preserve trees (regardless of quality), as well as general evidence that these have been minimised in accordance with BS 5837:2012. Extant Policy G7 (OLP2036) remains sufficient. Requiring extensive evidence for all trees as proposed (regardless of quality) adds a disproportionate burden. BS.5837:2012 already embeds a structured, evidence-led approach which must be taken into account in planning applications and design of development that does not need to be repeated in local policy.	The policy criteria with respect to tree loss follows the current adopted policy approach and also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.
G1	Loss of Tree criteria not strict enough	We also have concerns about the tree policy in 4.1.e) which sets the replacement of lost trees at "minimum of no net-loss of tree canopy cover".	The policy criteria with respect to tree loss follows the current adopted policy approach and

2090

Draft policy	**Topic**	**Summary of comments**	**Response**

		We feel that this is not ambitious enough due to the important role played by trees in nature recovery and climate mitigation. The policy could be replaced by a minimum of 1.5 times the amount of tree canopy lost. This is also particularly important when planting new trees, as many will be lost due to extreme climatic fluctuations, so to plant ambitiously and hopefully is to be encouraged.	also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.
G1	Exemptions of private spaces	The City should focus on areas, such as parks, which are owned and managed by the city. Private developments should not be subject to so-called green planning permission requirements.	All green spaces in the city, particularly those that perform ecological functions such as flood storage and biodiversity sites, have a cumulative impact on the natural environment of the city whether or not they are public or private., which makes it prudent to have policies that address how development affects them. It is also a requirement of national policy to have an approach in place.
G1	Recommended amendments to strengthen policy	The policy could be further strengthened by: - specifying minimum buffers for ancient woodland and other irreplaceable habitats - setting an overall canopy cover target for the Oxford City Council area	

2091

		- requiring that new planting is from suitable species and UK sourced for biosecurity	

Draft policy	Topic	Summary of comments	Response
		- targeting new planting at areas prioritised in the Local Nature Recovery Strategy and/or of low tree equity. The Oxford Urban Forest Strategy made the connection between areas of deprivation and low tree cover. That connection is mapped further in the UK Tree Equity scorecard and map https://uk.treeequityscore.org/ which identifies the neighbourhoods in greatest need of new tree cover. We recommend this approach be integrated into the Local Plan.	

2092

2093

G1	Strongly disagree with preferred option	What will happen to sites which are not to be considered part of the Green Infrastructure Network? You say that you intend to go beyond the requirements of the NPPF. Green spaces are covered by the NPPF "golden rules" (s.156-7). These don't mention reprovision, so talk of mitigation may be appropriate, however NPPF s.104 which covers public open space has very specific requirements requiring not mitigation, but reprovision of open space. The wording of NPPF s.104 should be reproduced in the 2042 plan. You propose identifying a network of GI/BI sites for protection. The spaces "to be most strongly protected are those that provide a multitude of functions." This is logical. The list of functions is long: Accessibility, Tourism, Heritage, Food	The policy approach is based on a hierarchy of protection for green spaces, with a requirement for reprovision of spaces identified as Supporting GI (which includes recreation and sports grounds) ideally onsite. The wording is consistent with the NPPF. Spaces identified as Core GI are so because they have functions that are specific to that site and cannot be replicated or reprovided anywhere else, e.g. functional flood plains,

Draft policy	**Topic**	**Summary of comments**	**Response**

		production, Formal sports, Children's play, Youth facilities, Tranquillity, Biodiversity, Carbon storage, Climate change adaptation. The local plan should use this list to inform development of sites, rather than as an excuse to shut them down. You suggest a hierarchy of protection for spaces within the Green Infrastructure network, in which ecological function takes priority over recreational/health functions. Firstly, recreation space should not be at the bottom of the hierarchy. Secondly, the local plan should not require mitigation for loss of recreation sites. It should reproduce the wording of NPPF s104. Conflating green and public open space results in vagueness of statements such as those underlined below: "limited opportunities to provide new space means that loss of existing green features needs to be carefully considered and resisted wherever necessary" and "sets out conditions by which certain types of green space may be lost to other forms of development, however, there may also be additional considerations which would apply to applications that affect certain types of spaces including how these might need to be reprovided." Such statements could be used to support any decision.	designated sites (SSSIs, SACs) etc. Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.

2094

Draft policy	Topic	Summary of comments	Response
		The local plan should clarify the criteria which will be used to determine whether GI is expendable.	

Statutory Consultee Responses – Draft Policy

G1

Natural England

Draft Policy	Summary	Response	Outcome

2095

2096

G1	Welcome identification/protection of those spaces forming part of the Green Infrastructure core network G1A and G1B. Encourage Council to include existing green infrastructure features such as irreplaceable and priority habitats in addition to ancient woodland, veteran trees and important hedgerows, within the protected network. Flag that the Green Infrastructure Framework Principles and Standards for England should be used to help meet NPPF requirements for GI. They include recommended standards to inform policy for the quality and quantity of multifunctional green space including the production of GI Strategies, access to natural	Thanks and welcome the support. We consider that irreplaceable habitat is sufficiently protected through national policy and policies of the Plan refer to this elsewhere. Significant areas of priority habitat are located within areas that are protected by the core network, as well as on the ecological sites. Policies G1 and G6 then set out requirements where development impacts priority habitat elsewhere. We have referred to the GI Framework in drafting the Local	No further action proposed at this time.
Draft Policy	**Summary**	**Response**	**Outcome**
	green space standards, urban greening factors and good design principles.	Plan, including incorporating the Urban Greening Factor into local policy.	

G1 and site allocations	Note that several proposed site allocations impact on the GI Core network, particularly on G1B assets. Suggest that site allocation policies impacting G1 spaces include an estimate of the likely quantity of sufficient on site GI reprovision required to mitigate for any losses, the type of reprovision required and if it is not possible to provide the reprovision on site, then identification of options/locations for offsite delivery to another part of the network within the city.	It is not possible to accurately estimate this at plan-making stage as it is highly dependant of the detail of any subsequent application. The allocations will make clear where they include parts of designated GI network and that the requirements of policy G1 apply. Where possible we will suggest ways that applicants could meet the requirements.	Ensure relevant allocations flag presence of GI network and where possible set out broad suggestions for meeting the requirements of policy G1 where a proposal would impact these spaces.

2097

Draft Policy	Summary	Response	Outcome
G1	Policy G1 - Figure 4.1 – Sport England is concerned that the hierarchy proposed in Figure 4.1. Playing fields should be protected from development, change of use or development	The Plan sets out criteria by which development proposals are to be assessed. The policy approach is to resist the loss of supporting spaces (including	No further changes proposed.

	should only be accepted where the tests in paragraph 104 of the		

Sports England

Draft Policy	Summary	Response	Outcome

2098

	NPPF are met. Figure 4.2 – Sport England has the same concerns with this suggested policy text as it seeks to rewrite the clear tests in National Planning Policy Framework (paragraph 104). For example, it is welcome that the Council is updating its Playing Pitch Strategy. This is the appropriate document for assessing whether or not a playing field is surplus to requirements (paragraph 104). Sport England recommends that the Council reviews paragraph 103 and 104 of the NPPF and seeks to protect much needed sport and recreation facilities and identify new opportunities to meet needs. The draft policy fails to do this instead it appears to discuss how they can be removed rather than protected. Draft Policy G1 – the council needs to draft a new policy that conforms with paragraphs 103 and 104 of the NPPF, referencing existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, which the NPPF advises should not be built on. Sport England does not object to the Council having green infrastructure policies (see NPPF paragraphs 188 and 199 and the definition on page	playing fields, sports pitches etc) and the criteria are consistent with the requirements of paras 103 and 104 of the NPPF. The Plan is not intended to be an assessment tool for determining whether or not a space is to be considered surplus i.e. suitable to be lost with no reprovision. The Playing Pitch Strategy currently in development will be part of the evidence base that will provide a quantitative and qualitative analysis of current provision and expected need for such spaces in the city. Where proposed schemes affect supporting spaces, evidence will be required from applicants that broader	

2099

		considerations are taken into account specifically	

2100

Draft Policy	Summary	Response	Outcome
	73) but the Council must have robust policies in place that protect existing open space, sports and recreational buildings and land, including playing fields and formal play spaces. Built sports facilities and play areas also need protection from development and the plan requires a policy setting this out, not one that appears to support the change of use of these facilities for development.	for sports facilities and amenity spaces – including a demonstration that spaces can be reprovided with no deficits against demand, opportunities are taken for suitable alternative provision where that is appropriate, or that consideration has been taken of any specific local needs.	

2101

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome

Policy G1 Protection of GI	**Landscape and Nature Recovery – Biodiversity** Local Plan Policies map shows some sites classed as G1A as located outside the city boundary (including some designated sites, but not all). Clarification is therefore requested to address this inconsistency.	Noted – we will look into this issue.	Oxford City Action: Investigate why designated sites are outside city boundary.

Draft Policy	**Summary**	**Response**	**Outcome**

2102

	With regards to impacts on trees mentioned on pages 68 to 69, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may also be important to refer to onsite compensation in advance or as soon as possible after the impact being preferable in this section through following the mitigation hierarchy including temporal and spatial considerations.	Policy G5 deals specifically within enhancing on-site biodiversity.	No Action Required
	Landscape & Nature Recovery– Landscape The policy primarily focusses on spaces shown on the policy map and less on the connecting role of green infrastructure features.	Noted.	No Action Required.
	As the Local Plan does not propose a specific tree policy, this policy together with G2 also has to ensure that existing trees and other important vegetation are	Policy G5 also deals with enhancing on-site biodiversity.	No Action Required.

2103

Draft Policy	Summary	Response	Outcome

2104

	adequately protected from development. It is recommended that the policy puts a greater emphasis on avoidance and mitigation of impacts on trees in line with the mitigation hierarchy before offering the option of compensation. Existing green infrastructure features e): the policy only requires no-net loss in canopy cover at 30 years. Does the policy not wish to be more ambitious especially in areas where canopy cover is low? The policy would benefit from more detail on what information is required when assessing the impacts on trees such a tree survey to BS5837:2012 standard and an Arboricultural Impact Assessment (AIA).	Noted. The policy has been informed by evidence. Noted. Separate guidance is included on our website about trees in the planning process.	No Action Required No Action Required No Action Required

2105

Draft Policy	Summary	Response	Outcome
	The section on Residential Garden land focusses on the acceptability of developing gardens rather than the protection of the gardens as Green Infrastructure assets. The loss of structural garden vegetation to development including the creation of driveways for parking can have an adverse effect on green infrastructure connectivity between spaces of the GI network.	The NPPF requires us to define "residential garden land" for the purposes outlined in the policy.	No Action Required
	Consideration should be given to whether this policy should also seek to address the protection of existing gardens.	No proposed wording. No change proposed.	No Action Required
	"Planning permission will not be granted for development that results in the loss of other green infrastructure features such as hedges or ponds where this would have a significant adverse impact upon public amenity or ecological interest."		No Action Required

2106

2107

Draft Policy	Summary	Response	Outcome

2108

	Information should be provided on how this is proposed to be assessed. **County Council Property and Estates Team** Oxford County Council Property and Estates Team owns various school playing fields and other sites, which primarily fall within the "Supporting Green and Blue spaces" category. Whilst Oxfordshire County Council Property and Estates Team endorses the aims of this draft policy, it is considered essential that a flexible element is included to ensure that Oxfordshire County Council Property and Estates Team will not be prevented from delivering their statutory duties which may, at some point, include the expansion of educational facilities or areas which may be better utilised for other purposes or alternative provisions.	Where additional information is needed to support policy implementation, this will be covered in an appropriate Technical Advice Note (TAN) Noted No alternative wording suggested. No change proposed.	No Action Required No Action Required No Action Required

2109

Draft Policy	Summary	Response	Outcome

2110

	Oxfordshire County Council Property and Estates Team also considers the requirement for reprovision of the Green/Blue infrastructure onsite to be overall onerous and should be removed to promote a greater flexibility that would promote sustainable development. **Environment Team – Countryside Access** There is no reference in this Local Plan to public rights of way, although there is an occasional reference to footpaths. Within the City area and vicinity there are numerous full public rights of way - and they need protection and enhancement and new links by means of unambiguous policies set out in the Plan. NPPF paragraph 100 states that 'planning policies and decisions should protect and	It is important to replace GI/ BI that needs to be re-provided close to where it was lost. We are not proposing to change this part of the policy. The County Council already includes an online resource for PRoW/ footpaths etc. PRoW are already protected through existing legislation (e.g.,	No Action Required No Action Required No Action Required

2111

		Countryside and Rights of Way Act 2000, Rights of Way Act	

2112

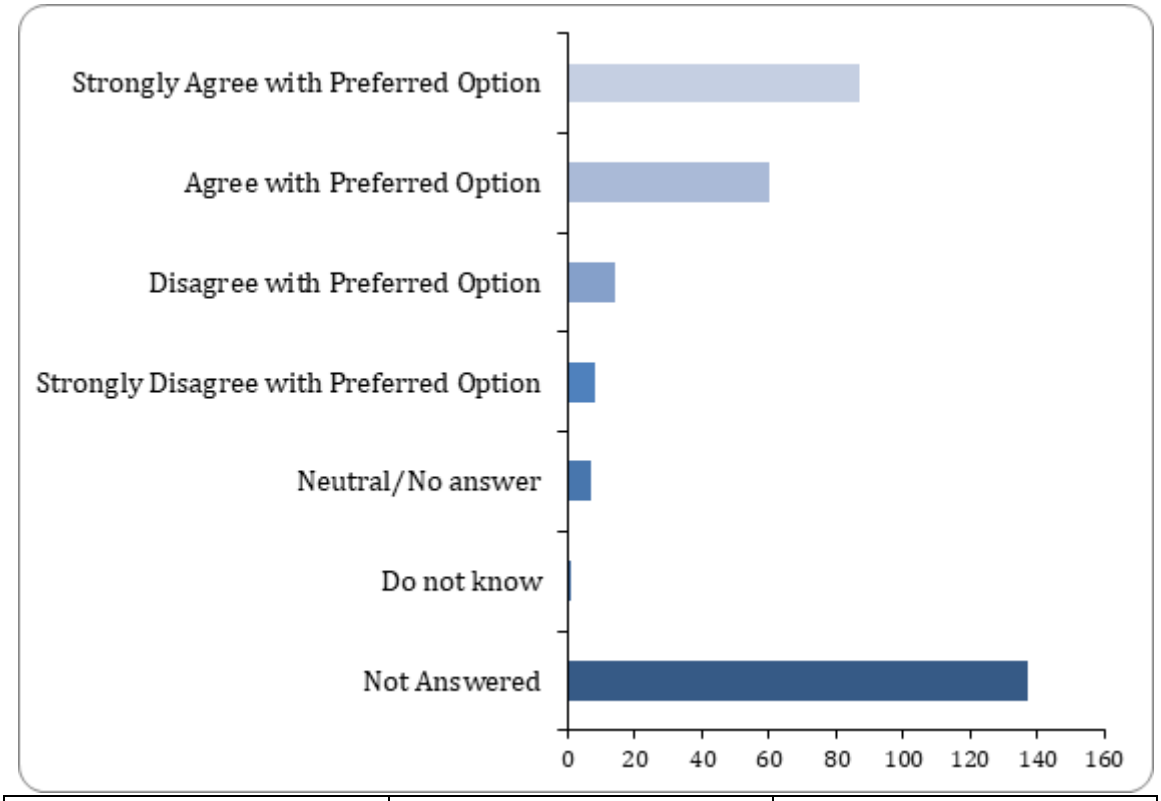
Draft Policy	Summary	Response	Outcome
	enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.	1990, etc). As such these do not need additional policy protection through the Local Plan. Known footpath/ rights of way enhancements required to mitigate the impacts of development proposed through the Local Plan should be set out in the IDP, relevant site allocation or area of focus policies.	No Action Required

2113

All Public Responses – Draft Policy G2

Please tell us what you think about policy on Policy Option Set 005b (draft policy G2): Enhancement and provision of new green infrastructure features.

There were 177 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	87	27.71%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	1	0.32%
Not Answered	137	43.63%

Draft policy	Topic	Summary of comments	Response
G2	Support for preferred option	This could provide desperately needed green infrastructure links and their health and environmental benefits for the City, its quality of life, nature recovery etc.	Support is noted and welcomed.
G2	General comment	To balance new developments with green offsetting carbon contributions.	Comment noted.
G2	Clarification	The Draft Policy states that for residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required. It states that for mixeduse sites, the area of residential use should be used for that calculation. We request further clarification is provided, as to whether this new space should comprise hard of soft landscaping. It is assumed that by 'area', the Plan is referring to 'plot' area or building footprint, however it would be helpful for this to be clarified in the wording. It would also be helpful to clarify how to calculate in the case of buildings with nonresidential ground floor uses with residential above.	The requirement will apply to the overall plot area. The type of landscaping can be a design choice, however applicants are advised to take into consideration other relevant policies to ensure they are compliant with their requirements, e.g. the Urban Greening Factor policy and the Biodiversity Net Gain policy.

2116

G2	Should be case by case basis	The preferred option for Policy G2 sets out that 'For residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by the residential development is required. For mixed-use sites, the area of residential use should be used for that calculation'. [We] consider that requirements for Public Open Space should be considered on a case-by-case basis, taking into	A case by case approach risks inconsistent application which will hamper how we monitor the effectiveness of the policy, and will not give certainty to developers or local communities on what the open space provisions

Draft policy	**Topic**	**Summary of comments**	**Response**
		account site context and surroundings, on the basis that prescribed requirements may unintentionally suppress the quantum of housing delivery, contrary to overarching priorities for the Plan.	are. and a lack of certainty for developers on what the expectations.

G2	BBOWT	Support but would like this text added: “Require green and blue infrastructure features on all new development……Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features.” For the policy to be effective we consider that clarity is required as to the definition of larger sites in order to ensure that the requirement for a percentage of site area to be open space is delivered. We would suggest that what is currently defined as major development (e.g. larger than 10 houses or equivalent) would define larger sites, and that 50% should be green space. A significant proportion of this green space should be nature rich, with some of it on sites larger than 1 hectare defined as nature reserve, with no access or managed access.	The policy will include a residential development site size threshold for which there will be a mandatory requirement for on site open space provision.
G2	General comment	Ok but only for academic and commercial. Housing the priority for development.	Comment noted.
G2	General comment	The problem is untrammelled development. Tokenistic inclusion of 'blue and green	Comment noted.

Draft policy	**Topic**	**Summary of comments**	**Response**
		infrastructure features' does not compensate for the loss of actual, functioning green spaces.	

2118

G2	General comment	Much as I like the intent and idea here, I think we're deceiving ourselves if we take the approach that development won't have an overall deletive environmental effect for the city, but we need to choose to do it anyway.	Comment noted.
G2	General comment	New developments take ages for vegetation to mature. Co2 absorption is so much more efficient with mature trees. Stop chopping down mature trees!!	Comment noted.
G2	Support for alternative option	Specific quality standards should be adopted as referred to in Alternative Option 1	Using a target such as described in Alternative Option 1 would not necessarily be effective as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. Work on the Local Plan 2036 also identified the challenge of managing the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites. It is therefore considered more effective to measure and provide

2119

Draft policy	Topic	Summary of comments	Response
			greenspaces on a more localised basis.
G2	Support preferred option	Support the option but disagree that green features on sites can be designed in ways that allow them to perform multiple benefits for the local area particularly biodiversity. Biodiversity and human recreation never go together – overly used areas for recreation do not allow biodiversity to persist – trampling etc destroy habitat. Examples include hay meadows of New Marston Meadows SSSI; King Georges Field,	The requirement applies to provision on new development. We agree that multifunctionality works best if the uses are complementary and appropriate for the type of development.

2120

G2	Policy requirements detrimental to development	Mandating bespoke green- and blue-infrastructure features for every development—on top of the Urban Greening Factor, biodiversity-net-gain rules and existing open-space levies—adds yet another cost layer that will either shrink site capacity or push build prices higher, eroding housing affordability. A rigid percentage of land for new open space on larger plots may look benign, but in a city where land trades at £5-10 million per hectare it effectively taxes every flat and lab bench, slowing supply and undermining the very climate goals it claims to serve. Oxford already benefits from extensive riverside corridors and historic parks; incremental, market-led greening (roof terraces, pocket gardens, tree-lined streets) will emerge where it enhances value without the need for another prescriptive policy.	The requirement for public open space is very carefully defined. It is particularly important in a densely packed city (where a lot of open space is not public) that, at the same time, there is access to open space. It is also important that the open space is of a sufficient size to be useable. Therefore, only the largest sites will be required to provide this. These sites themselves are generating new demand. It has been viability tested.

Draft policy	**Topic**	**Summary of comments**	**Response**

2121

G2	Focus on minimizing impermeable surfaces	An important focus should be on the need for permeable surfaces and minimisation of impermeable surfaces which is very important for water management/flood risk management and can contribute to greening/bluing. 'The potential for these benefits is lost if there is an overuse of artificial, impermeable surfacing materials like concrete, artificial lawns and tarmac.' This needs to be explicitly specified for all proposed developments subject to planning applications and consideration given to use of impermeable surfaces in areas such as domestic front and back gardens	The policy approach is addressed in policy G3 (Urban Greening Factor).
G2	Increase thresholds for minimum greenspace requirements	We welcome the holistic factors in this list of enhancements to the GI and BI, and the fact that public access, connectivity and community food growing are included. We would advocate for further hierarchy or prioritisation of certain features. For example, addressing climate change should take priority over heritage and appearance. We would like to see the bankside ecological buffer zone of at least 15 metres (rather than 10 metres) to protect our essential BI. There should also be a sliding scale of "new public open space" so that 10% is a minimum, but with a prerequisite that in socially / green deprived areas this scale could be increased to ensure developers don't plan for too dense areas in areas	The 10% public space requirement in larger developments is intended as a minimum and there are no impediments to going larger. A sliding scale will make it difficult to implement a consistent approach across all developments – most potential development sites in the city already tend to be small or constrained, and often in built up contexts, which would make the delivery of usable open

2122

		already lacking in green publicly accessible areas. Denser	

2123

Draft policy	Topic	Summary of comments	Response
		areas however will be encouraged within areas with ample green public spaces.	space alongside needed development challenging.

G2	Maintenance of new GI features	We note that the developers will be responsible for maintenance of GI for only the first five years, but this should be with genuine engagement with the local community. Then there should be ongoing consultation around the maintenance of green spaces around residential/community buildings to allow for community maintenance - working alongside developers and owners (not just a legal contract in perpetuity which enforces site owners to take the most "efficient" management actions)	Maintenance and management plans are expected to be organised as part of the design/construction process at as early a stage as possible. There is scope in the policy for different options to be considered depending on the context of the application, including community stewardship arrangements where practical.
G2	Provision for Recreation	The "Raising the healthiest generation in history report" (RHGIH 2024) quotes MP Natalie Elphicke saying "[The NPPF] lists bats. Why are we not listing children?" It recommends that "any childfriendly approach should set out clear 'quality asks' and not create vague principles that add barriers to development and house building." But the draft plan doesn't even create vague principles. The only time that the recreational needs of children/youth (apart from in the contexts of private gardens and LTNs) are specifically addressed is in Figure 4.2. which deals with mitigation of loss. Recreation is an	Recreation for all ages and abilities is one of the multifunctional benefits of green spaces identified in the plan. The wording of the policy and supporting text will reflect this. Where there are statutory requirements for development, particularly with established assessment tools and metrics, they will

2124

Draft policy	Topic	Summary of comments	Response
		afterthought. The recommendation is that "the provision of green and blue infrastructure are considered at the earliest stage in the design process" to offer "multi-functional benefits" which include health and wellbeing. But "the priority" is wildlife and flora, rather than recreation. When listing the range of factors used to determine the quality of GI the recommendation is that the "potential for recreation and movement should also be considered." Recreation shouldn't be lumped in with green infrastructure. The list of "tools and metrics" to inform assessments of existing GI includes the British Standards for Trees, but for recreation there is a recommendation that "a mixture of play features for young people will enhance wellbeing – these spaces do not have to be overly designed or dominated by fixed equipment, but could also be comprised of wild areas and facilities that encourage engagement with nature and free-play."	be the basis for monitoring the effectiveness of the policies.
G2	Strengthening tree policy	Welcome the mention of trees in point d). Suggest strengthening the policy with additional reference to the Local Nature Recovery Strategy.	Comment noted.

2125

G2	Disagree with preferred option	Because space is at a premium in Oxford, the draft plan proposes that GI should be able to "perform multiple roles that support the sustainability of a development and its occupants." This makes sense, but it does not make sense for multifunctionality to be the driving force. The 2022	Multifunctionality does not preclude a space from having a primary function. It allows the plan to recognise and cater for spaces that have additional functions

Draft policy	**Topic**	**Summary of comments**	**Response**

2126

		GI study picked out Bertie Park as a small, multifunctional park, but its primary function is recreation. The draft says "Where new open space is provided, the type of provision should be tailored to address existing needs or deficiencies in access locally." For larger applications with public open space provision, the suggestion is that engagement with the local community will help inform the type of space needed. For smaller applications it is unclear. But most consultation carried out by OCC is a waste of money. Many feel strongly about local issues, but few want to fill in forms either online or on paper. Many believe that it will make no difference. The draft policy states "In situations where the proposal relates to replacement provision that is mitigating losses elsewhere, this will need to be demonstrated to be equally or more accessible for people of all ages and abilities by walking, cycling and public transport to local users of the existing site where relevant." This would mean that councils would never be able to restrict access on sites where joy riding has been a problem, or access to bicycles where footpaths are not suitable for dual use, or include features to	such as biodiversity value, flood storage etc so that adequate policy protections can be applied where relevant. The planning application process includes a statutory consultation period where members of the public can make representations on a scheme. Developers are encouraged to engage with planning officers at the earliest possible stage so that any concerns are identified at the earliest opportunity, and engagement with the local community is also good practice particularly for major schemes. The format of *scheme specific* early stage consultations are decided by the developer without the involvement of planning, even with council housing company

2127

		prevent escape of livestock. It would therefore be helpful to	schemes. Participating in consultations

2128

Draft policy	Topic	Summary of comments	Response
		require that replacement sites do not pose any of these challenges to provision of access.	is the best way to have input on the content of a scheme, particularly at an early stage. Accessibility in this context only means that a space can be easily reached by local residents without having to use a private car, and that it can be used by people of all ages whether or not they have a disability. It has nothing to do with facilitating criminal activity such as joyriding, allowing bicycles on footpaths, allowing livestock to roam free or removing restrictions that promote public safety.

2129

G1/ G2/ G3		Local Plan 2040 para.8.66 (Reg. 19 plan) set out that there was a limited presence of GI features at ARC Oxford. This meant that it was likely to score below the minimum thresholds for green surface cover (Policy G3 – UGF (LP2040)). *"As such, proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the policy, demonstrated through*	The thresholds for UGF in the plan are markedly lower than the recommended minimum contained in Natural England's GI Framework which informed this policy, in recognition of the constrained nature of development sites in Oxford. Thresholds for non-
Draft policy	**Topic**	**Summary of comments**	**Response**
		submission of the Urban Greening Factor assessment." The above extract is clear recognition that the Council considers its own draft policies involving a combination of Draft Policy G1 and G3 is not deliverable at ARC Oxford. ARC consider this must be rectified by removing these sites from consideration as green spaces. The policy should recognise the potential for strategic sites like ARC Oxford to deliver GI holistically across multiple plots, with flexibility in how and where UGF targets are achieved.	residential schemes are lower still than that for residential led proposals. The intention behind the policy is to localise as much as possible the benefits that arise from the presence of natural features in development, which will difficult to achieve if offsetting is allowed.

2130

Statutory Consultee Responses – Draft Policy G2

Sport England

Draft Policy	Summary	Response	Outcome
G2	Sport England recommends that the Council completes the playing pitch strategy and then seeks to implement it without delay. The existing PPS would provide a good starting point for the City to look at current needs and start to allocate sites to meet the need for new sports facilities. An assessment for play should	The first draft of the quantitative analysis needed to support the Plan is expected to be completed by the Regulation 19 consultation stage.	No further changes proposed.
Draft Policy	**Summary**	**Response**	**Outcome**

2131

	also be considered. Paragraph 103 of the NPPF states that; 'planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.' Simply providing hectares of green space is insufficient and ignores all the many types of open space that should be provided. The Council should also update its strategy for built sports provision.		

2132

Oxfordshire County Council

Draft Policy	**Summary**	**Response**	**Outcome**
Policy G2 Enhancement and provision of new GI and BI	**Landscape and Nature Recovery – Biodiversity** When providing new public open space as a replacement for losses elsewhere (page 72), it may be helpful to refer to the requirement for biodiversity to be considered and a net gain to be delivered.	Policy G4 relates to how Oxford will deliver mandatory BNG.	No Action Required

Draft Policy	Summary	Response	Outcome
	The maintenance and management arrangements (page 73) also link to biodiversity net gain. It may be useful to clarify that the management period of 5 years would be a minimum with longer encouraged and if BNG is being delivered a minimum of 30 years would be required.	BNG is discussed in full in Policy G4.	No Action Required
	Landscape and Nature Recovery – Landscape Policy makes reference to provision of GI as a "fundamental component" in the design of new development. What is meant by a 'fundamental component' and how will this be assessed? This section would benefit from more detail. Should this policy include a link to the design code in Appendix 1?	Fundamental component – it will be for the decision-maker to determine what makes up a fundamental component when coming to their decision on planning applications. Assessment: The policy sets out that features should be highlighted clearly within the Design and Access Statement (where required) and/ or on landscape/ elevation plans…	No Action Required No Action Required No Action Required

2133

	Urban settings can be challenging environments for new planting and the right species choice and ongoing management are very important. The principle of the		

2134

Draft Policy	Summary	Response	Outcome
	right tree in the right place should be applied and reflected in the policy.	The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy.	
	Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term.	Noted.	No Action Required
	The Local Plan does not appear to set a target for tree canopy cover. Consideration should be given to whether this should be included in this policy or one of the other green infrastructure policies.	We can consider the inclusion of a canopy cover target within the plan.	Oxford City Action: Consider further whether to include a canopy cover target in the plan
	Public Health		No Action Required

2135

Draft Policy	Summary	Response	Outcome

2136

	Point e) should go further and implore the developer to consider how GI can be used to provide shade in relation to key urban realm features such as benches, gathering spaces and residential frontages. Point i) refers to community growing space but as per our previous consultation comments, this should also have its own standalone policy. **Environment team – Countryside Access** Further to our comment on Policy G1, there is also a need to provide for new public rights of way, and that should be referred to in Policy G2. **Innovation Hub**	This is already covered in the context of "urban cooling", which is specifically mentioned in the policy We do not consider that community food growing warrants it own policy as it is already covered elsewhere in the plan (e.g., Green and Biodiverse city – objective 4; Policy HD13 – outdoor amenity space, Appendix 1: Design Checklist, section N2 and other metrics including UGF). Any new routes should be identified through the IDP	No Action Required No Action Required No Action Required

2137

Draft Policy	Summary	Response	Outcome
	Innovative green infrastructure such as moss/green walls or shelters, green roofs etc should also be considered within this policy. Smart green roofs can provide an approach for climate change adaptation by collecting flood water and providing a cooling function in heatwaves.	Noted – Green roofs considered within Policy G8: SuDS.	Oxford City Action: Consider whether G2 is right place for these issues. No Action Required
	Urban Design (Placemaking) Paragraph 4.7 should include a reference to green and blue infrastructure being used to form place identity, in addition to health, wellbeing and environmental benefits.		No Action Required
	In relation to higher density areas/taller buildings, vertical green should be considered. Could more be said on this as this is a significant issue particularly in the city centre? (e.g., in paragraph 4.8)	We will consider whether this is the appropriate place to discuss these issues.	No Action Required
	'Larger developments will be expected to include on-site public open space such as small parks...' Play should not just be confined to a playground, other play elements	Green roofs/ walls are considered under Policy G8: SuDs.	No Action Required

	(play on the way, play affordances) can easily be		
Draft Policy	**Summary**	**Response**	**Outcome**

2139

2140	incorporated into developments where appropriate, e.g. Giant boulders instead of bollards, or undulating grass/hills rather than perfectly flat, building ledges or boundary treatments to offer seating or an affordance to balance, climb, jump from etc. (Paragraph 4.8) Greening should be structurally diverse (by type, e.g. low-level planting to bushes to trees), not just by species. Developers should also be expected to assess existing green infrastructure and identify where and how their site can strengthen the green network by creating new 'patches' or connecting with existing corridors. Where there are watercourses, greening should still be considered in relation to improving water quality. Greening can be used as natural filter for surface runoff which may otherwise be polluting the blue network. Could be point 'k' in policy.	Agreed however, ensuring the delivery of small parks to support new developments is also important. The other measures would benefit from inclusion within a public realm/ landscaping strategies for the city rather than in a policy providing new public open space. Noted. Plan includes a bespoke water quality policy – R5 and the “natural” filtering of water occurs through SuDS (Policy R8)	

Historic England

Draft Policy	Summary	Response	Outcome
G2	Encourage the Council to refer to the scope for new green and blue features to enhance the significance of heritage assets in Oxford and enable that significance to be better appreciated. Reference to setting of assets is also merited. This would help explain criterion G.	The policy sets out a number of functions that could be targeted including enhancing the historic environment. To expand on all of these points in supporting text could make it very long, particularly as the key message is that multifunctionality should inform the design process. We will consider whether additional detail is needed in the accompanying Technical Advice Note.	No further action at this time.

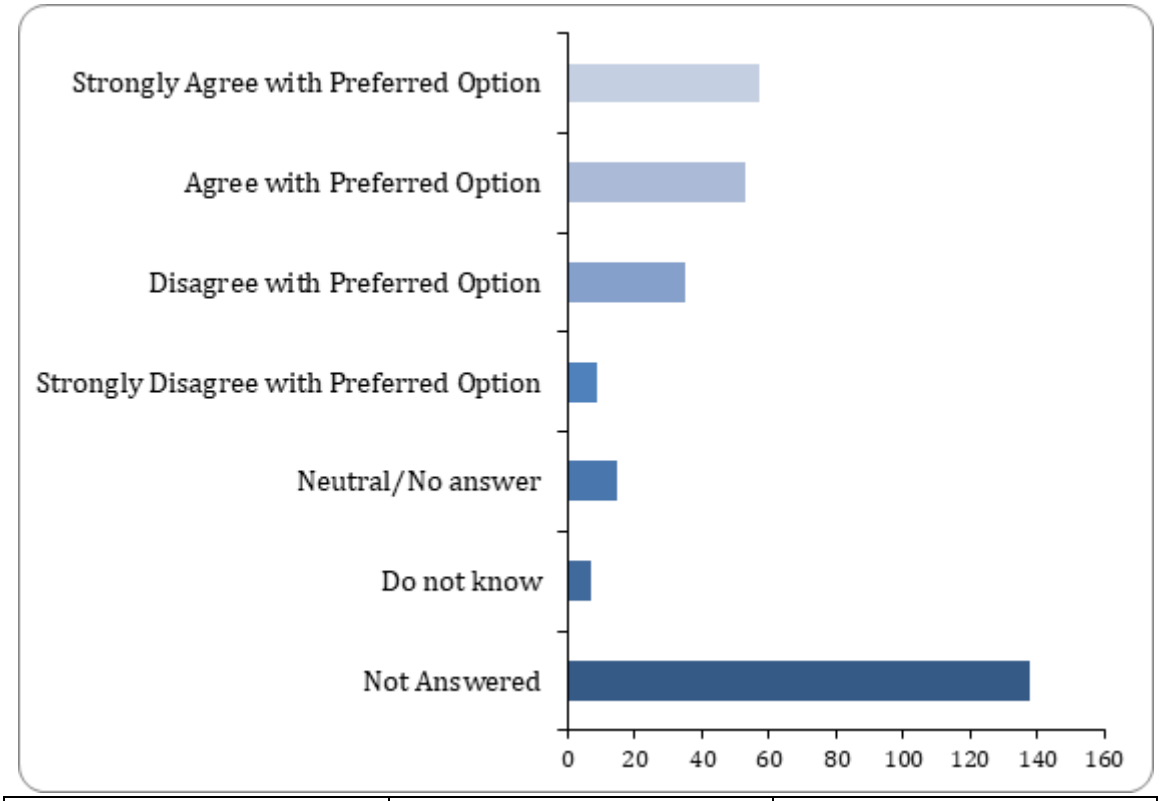
2141

All Public Responses – Draft Policy G3

Urban Greening Factor

Please tell us what you think about Policy Options Set 005c (draft policy G3): Urban Greening Factor.

There were 176 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	57	18.15%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	35	11.15%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	138	43.95%

Draft policy	Topic	Summary of comments	Response
G3	BBOWT support alternative option 1	Whilst we support the preferred option we consider that to be most effective it needs to apply to the vast majority of developments. Our preference is for "Alternative Option 1: The scale of application of the UGF tool could be mandatory across all developments in the city."	The support for use of the UGF tool is welcomed. We consider the threshold for requirement proportionate.

2144

G3	Object – Doesn't align with NPPF	It is requested that this policy be deleted. The NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 188) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 193). The incorporation of draft policy G3 will result in an unnecessary additional policy hurdle when the protection of green spaces and achieving net gains in biodiversity can be already achieved under draft Policies G1, G2, G4 and G5. 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 which have limited site areas and which 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	The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The meaures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the

2145

Draft policy	Topic	Summary of comments	Response

		greenfield land it would be 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. It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. However, 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.	development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.
G3	Support – Suggest amendment	It is welcomed that the updated draft policy wording provides further information on the expectation with regard to the green coverage in new developments. The draft policy states that 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. We request that the policy wording is adjusted to make clear that this is a target rather than minimum.	The scores contained in the policy are intended to be a minimum. The required score has been set at the level it has, to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework.

2146

G3	Object – Not justified	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	The required score has been set at the level it has, to encourage as much as possible the achievability of application for

Draft policy	**Topic**	**Summary of comments**	**Response**

2147

		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.	constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework. The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental and physical health and wellbeing and biodiversity.

2148

G3	Doubt about viability/achievability	Concern about investment needed for ecological expertise which the Council probably doesn't have	The tool is an online system/software which doesn’t

Draft policy	Topic	Summary of comments	Response
		or big enough team to do this. It would only become plausible with the development of a fundable budget to cover it.	require advanced technical knowledge. UGF can be completed through tools such as excel and google earth so not overly expensive
G3	Object – concern about misuse and undermining BNG	UGF is a blunt tool that is open to misuse and can in certain circumstances conflict with others such as BNG. I would want it to be subordinate to BNG and/or open space standards	The policy states UGF is to be used alongside BNG
G3	Support – thinks could go further	Suggested deeper more comprehensive ecological surveys before larger developments Greening should be along boundaries to mitigate climate change	
G3	No policy, leave to national policy	The extra level of complexity for a constrained city that needs to prioritise brownfield, leave to national policy of 10%	The biodiversity net gain requirement does align with national policy. The UGF is a separate requirement, which is particularly important in a constrained city, where biodiversity net gain may be off site, to ensure sites incorporate green

2149

			infrastructure with its many benefits.
G3	Suggested wording	We welcome the use of the "Urban Greening Factor (UGF) with particular attention on the naturalness of surface cover with particular emphasis on natural coverage." However, the target baseline score seems low in ambition.	The target scores have been tested and represent an achievable and good level of greening.
Draft policy	**Topic**	**Summary of comments**	**Response**

2150

		• 0.3 for residential or predominantly residential schemes • 0.2 for predominantly non-residential schemes Is too low as a baseline score. We would encourage others to read Natural England report: Urban Greening Factor for England – Development and Technical Analysis - NERR132This report highlights that the average target is 0.4 (40%)= residential 0.5 =greenbelt 0.3 = non-residential. We would recommend these levels to be the minimums for Oxford. The aim to get a local average of higher than these, such as Helsinki with 0.8 We would also like to see a sliding scale with lower socio-economic areas specifically highlighted as a higher target, such as a maximum minimum in the most deprived areas = 0.7.	

2151

Statutory Consultee Responses – Draft Policy G3

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome

Policy G3	**Landscape and Nature Recovery – Biodiversity / Landscape**		

Provision of new green and blue features – UGF	UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments, especially if located in areas of existing GI deficiency unless particular circumstances and reasoning are demonstrated.	It is a requirement for larger developments and encouraged on smaller ones. Larger (major) developments can offer the most scope for a wide variety of improvements.	No Action Required
	Major development should be defined.	Major development is defined in the NPPF (10 or more homes or 1,000 sqm non-residential floorspace).	No Action Required
	The application of UGF for non-major developments should be considered here as a way for smaller developments to demonstrate a measurable net gain in biodiversity to satisfy NPPF and local planning policy when they are exempt from the mandatory BNG requirement.	Policy already encourages smaller (minors/ householders) to apply the UGF.	No Action Required

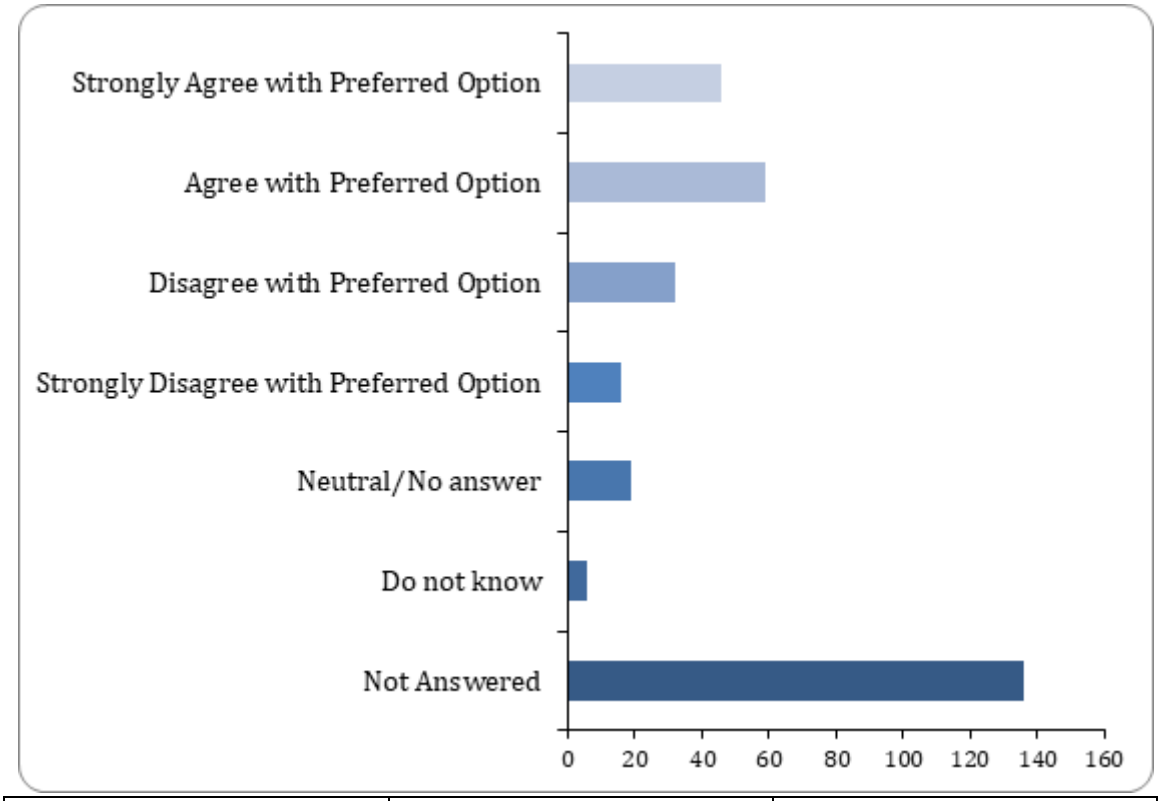
2152

All public Responses – Draft policy G4

BNG

Please tell us what you think about Policy Options Set 005d (draft policy G4): Delivering Mandatory Net Gains in Biodiversity.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	32	10.19%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	19	6.05%
Do not know	6	1.91%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
G4	Support	Agree with the preferred option of draft policy G4 to align with the statutory net gain requirements under the Environment Act (2021) to deliver 10% net gain and to follow the hierarchy of prioritising delivery of net gains onsite and where this is not feasible, delivery off site. If landowners/developers are able to achieve more, that is still possible and strongly encouraged under such as policy approach. there is no evidence for a policy which requires biodiversity net gains greater than 10%.	The support is welcomed.
G4	Potential legislation changes for small sites	The City Council will be aware of proposals under consultation by the Government to remove the 10% requirement for small and medium sized sites. Draft Policy G4 will need to evolve to reflect any changes to legislation in this regard	Comment noted.
G4	Unnecessary	This draft policy repeats national requirements and is therefore unnecessary and should be deleted.	The requirement is set out nationally, but the policy adds additional local context about how it is implemented.

G4	BBOWT	Whilst we welcome the hierarchy set out and hence we have ticked “Agree with preferred option”, we consider that the alternative option of seeking greater than 10% net gain should be taken forward, in addition to the hierarchy as set out in the preferred option. We recommend 20% net gain is sought. This is supported by the work done by the Oxfordshire LNP https://www.olnp.org.uk/lnp-projects/advocating-	

Draft policy	**Topic**	**Summary of comments**	**Response**

2156

		for-20-biodiversity-net-gain-bng . In addition all the other District level authorities in Oxfordshire are taking forward Local Plans asking for above 10% in one way or another, for example a standard 20%, or 20% on major development. We consider that there is equally justification for 20% to be sought within Oxford City as anywhere else in Oxfordshire and that 20% should be sought. BBOWT also recommends that content is included within a net gain in biodiversity policy to ensure that all habitat retained, enhanced or created (whether it is on-site or off-site) for the purpose of achieving both no net loss, and net gain, is retained forever (e.g. in perpetuity - for at least 125 years). Otherwise, the no net loss or net gain merely becomes a temporary net gain, and ultimately over time development will result in a large net loss to biodiversity.	
G4	Mechanism for offsite payment	Should establish a mechanism and or policy for such off-site delivery of BNG to be achieved by financial transfers to local environmental charities e.g. BBOWT and Earth Trust.	This mechanism is not in place and can't be managed by Planning.
G4	Monitoring	Onsite and offsite BNG should be monitored with a clear maintenance plan for onsite BNG.	
G4	Offsite land which is recipient of BNG should be exempt from development	Where BNG is delivered offsite according to the hierarchy, the recipient green space should henceforth NOT be considered for development	

		for a minimum of 30 years in line with the BNG requirement.	
Draft policy	**Topic**	**Summary of comments**	**Response**
G4	There should be no hierarchy to work through- straight to offsite is fine	Every extra rung on the ladder before buying statutory credits adds transaction costs, legal complexity and delay- especially in a land-scarce city where suitable receptor sites are rare. This squeezes viability. The DEFRA metric and credit market guarantee ecological uplift already, so this approach has no measurable gains.	There are opportunities within Oxford, and it is considered important that the policy ensure these opportunities are taken where possible.
G4	Should be onsite	Proposals should be modified to ensure net gain is onsite. It can be very creative, such as a roof garden. If it can't be achieved, the site is unsustainable.	The requirement is simply not feasible to provide onsite on the majority of the constrained sites in Oxford, however creative the solutions are.
G4	Exceed 10%	Cambridge and other development-stressed LPAs have done this, why not Oxford? 20% better covers the large margin of error in BNG.	It is now required that exceeding the 10% requirement is robustly justified, with reasoning that we think it would be difficult to apply in Oxford.
G4	Comment on uses it applies to	Comment that it should not apply to housing, to encourage housing. Comment that it may be difficult on industrial sites.	The basic requirement, including

2158

			what it applies to, is set nationally.
G4 and G5	Objection	Must include provision for where the habitat is NOT swappable, it is not permitted.	Comment noted.

Statutory Consultee Responses – Draft Policy G4

Sports England

Draft Policy	Summary	Response	Outcome
G4	For information, Sport England has recently published guidance on biodiversity net gain to help show how biodiversity measures can be incorporated into playing fields without compromising their intended sporting use or long-term protection. https://www.sportengland.org/guidancehttps://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNGand-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNG#:~:text=About%20the%20guidance,10%25%20net%20increase%20in%20biodiversity.	Comments noted.	No further changes proposed.

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

2159

Policy G4 Delivering mandatory BNG	**Landscape and Nature Recovery – Biodiversity** A BNG of 20% is encouraged in line with other emerging local plans in Oxfordshire. It is recommended that prioritisation should be given to delivering ecological habitat enhancement and creation within ecological networks at county level over delivering habitat enhancement and creation outside of ecological networks within Oxford city outside of the LNRS.	Oxford is a small, constrained city with limited opportunities to deliver the mandatory 10% net gains. Increasing the requirement to 20% would not result in more biodiversity net gain in the city but rather an increase in delivery outside of Oxford. District Plans already propose 20% BNG across Oxfordshire. It is important that BNG impacts are received locally. Noted.	No Action Required No Action Required

Draft Policy	**Summary of comment**	**Response**	**Outcome**

2160

	Encouragement should also be given to using offsite offset areas outside of ecological networks within Oxfordshire as a step before considering sites further afield. It is considered that this approach would be more aligned to the Local Nature Recovery Strategy (LNRS) once published. The encouragement of delivering more technically offsite difficult habitats that may deliver lower BNG units (due to the application of the difficulty multiplier within the metric) where feasible is welcomed and this approach should also be considered for onsite habitats where feasible.	See response above.	No Action Required
	Public Health We concur with the Landscape and Nature Recovery Team that we'd want to see a BNG minimum net gain of 20%.		No Action Required

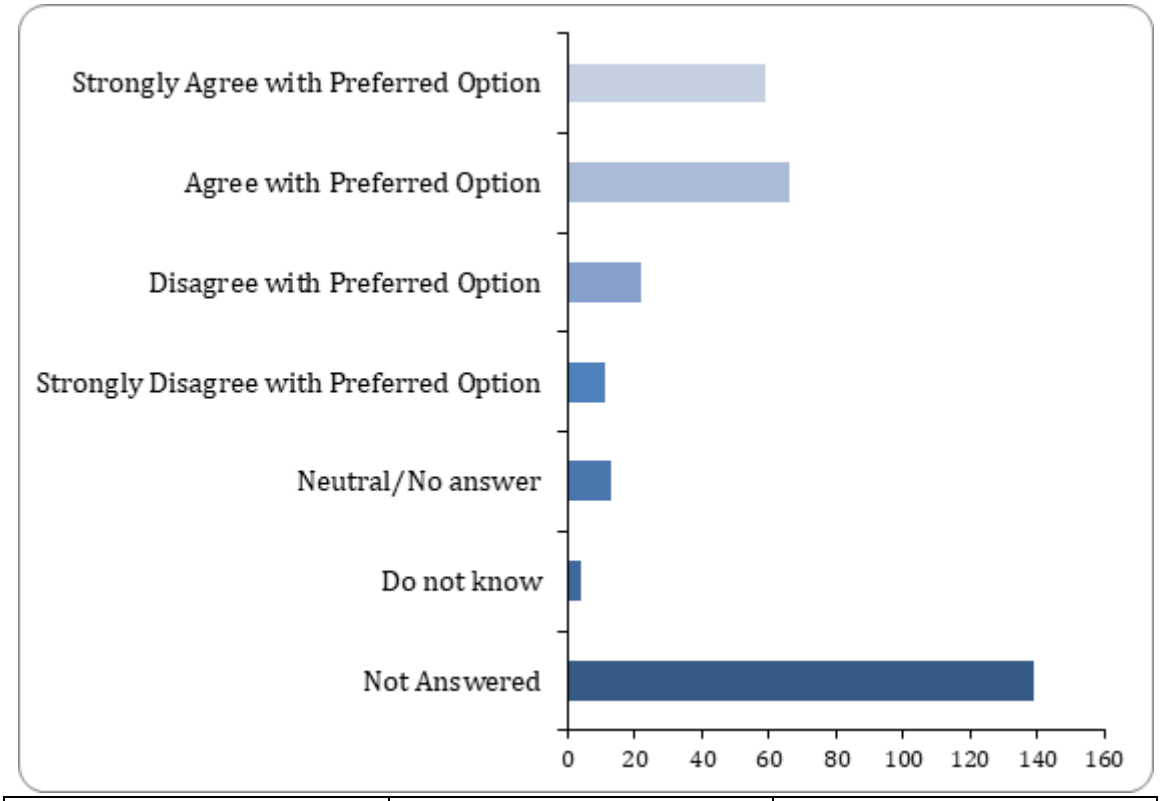
2161

All Public Responses – Draft Policy G5

Onsite biodiversity

Please tell us what you think about Policy Options Set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

There were 175 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	66	21.02%
Disagree with Preferred Option	22	7.01%
Strongly Disagree with Preferred Option	11	3.50%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	139	44.27%

Draft policy	Topic	Summary of comments	Response
G5	Support	It is important to take all opportunities for enhancement (some mentioning there should be more mention of trees).	The support is welcomed.
G5	Superfluous, do not have policy	It is considered superfluous to impose additional prescriptive requirements, in addition to mandatory Biodiversity Net Gain, on all sites. It may be more appropriate to impose such prescriptive measures only on sites where BNG is provided offsite, to ensure a degree of support for wildlife is still provided on-site in these circumstances. The requirement duplicates other requirements and adds consultant fees and squeezes value.	Whilst there are overlaps between several policies, they do also all have a slightly different purpose and function. It will generally be the case that features designed-in in response to one policy will also help meet the requirements of another policy.
G5	Support alternative option	Prefer option 1, 2 or 3	Noted
G5	Local Nature Recovery Strategy	The Local Nature Recovery Strategy (LNRS) has yet to be published, and this should be acknowledged within the Plan. A further stage of consultation should be undertaken to include LNRS guidance. Failing this, it should be stated that this Plan will adhere to guidance from the LNRS when available. All green spaces should be protected and there should not be a hierarchy.	The LNRS is in the process of being finalised and will be adhered to.

2164

G5	Not enough or strong enough	What is more important is protecting existing. If wildlife and habitats are destroyed they can't be replaced. Bird and bat boxes are not biodiversity. Ecologists should be required, not just encouraged.	Other policies do also protect existing green infrastructure.

Draft policy	**Topic**	**Summary of comments**	**Response**
G5	More flexibility needed.	Alternative option 1 is preferable. There should be flexibility for design solutions that recognise sitespecific conditions and challenges in greening certain constrained sites (e.g. brownfield industrial). If it must be tick box, then there should be space for designers to incorporate their own natureinspired ideas. It must be customisable to fit what's appropriate to the surroundings.	The policy does have flexibility as there is no prescriptive use of any particular measure, and measures appropriate to the site can be selected.
G5	BBOWT	BBOWT strongly welcome the inclusion of this policy, and the preferred option.	Support welcomed.
G5	Viability	It is unclear how these requirements are factored into viability testing.	Whole plan viability testing has taken place, which includes all policies with a potential 'cost' implication.

2165

G5	Suggested amendment	CPRE recommend that on-site biodiversity enhancements be made mandatory for all developments, regardless of whether BNG has been delivered on-site or not. We also propose that the wording in the following sentence be strengthened by replacing "should seek to" with "must": “All extensions and new-build development must incorporate ecological enhancements into landscaping or building facades/roof spaces, tailored to the priority habitats and protected	This is the intention of the Policy G5. Comment is noted.
Draft policy	**Topic**	**Summary of comments**	**Response**
		species present within the site and surrounding area.” Regarding the sentence: “Seeking advice from a suitably qualified ecologist on the ecological enhancements selected is encouraged,” we suggest clarifying that such advice is required only for minor and major developments. Requiring this for household extensions could create unnecessary barriers for homeowners.	

2166

G5	These aspects should not contribute to BNG or mitigation	• Tree planting should not be judged as contributing towards BNG especially young trees which easily die and decay without maintenance, releasing carbon • Bird and bat boxes – maintenance issues and are unlikely to be used • Green roofs – maintenance issues	Regulations around BNG are separate.
G5	Should not apply to extensions	Do not disagree with the principle of Draft Policy G5. However, greater clarification should be provided that the provisions relate to new builds and not conversions of buildings.	This is considered to be clear.

2167

Statutory Consultee Responses – Draft Policy G5

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Policy G5 Enhancing onsite biodiversity in Oxford	**Landscape and Nature Recovery – Biodiversity** Could strengthen requirement to include an element of native planting. Suggested amendment: *'Planting should be designed to maximise the biodiversity value as far as possible while still delivering other functions where needed'.* It would be useful to define what species are considered invasive in the context of the policy and whether schedule 9 of the Wildlife and Countryside Act 1981 is referred to.	We can consider whether to include this amendment going forward. We can consider the inclusion of a reference here.	Oxford City Action: Consider proposed wording going forward. Oxford City Action: Consider proposed wording going forward.

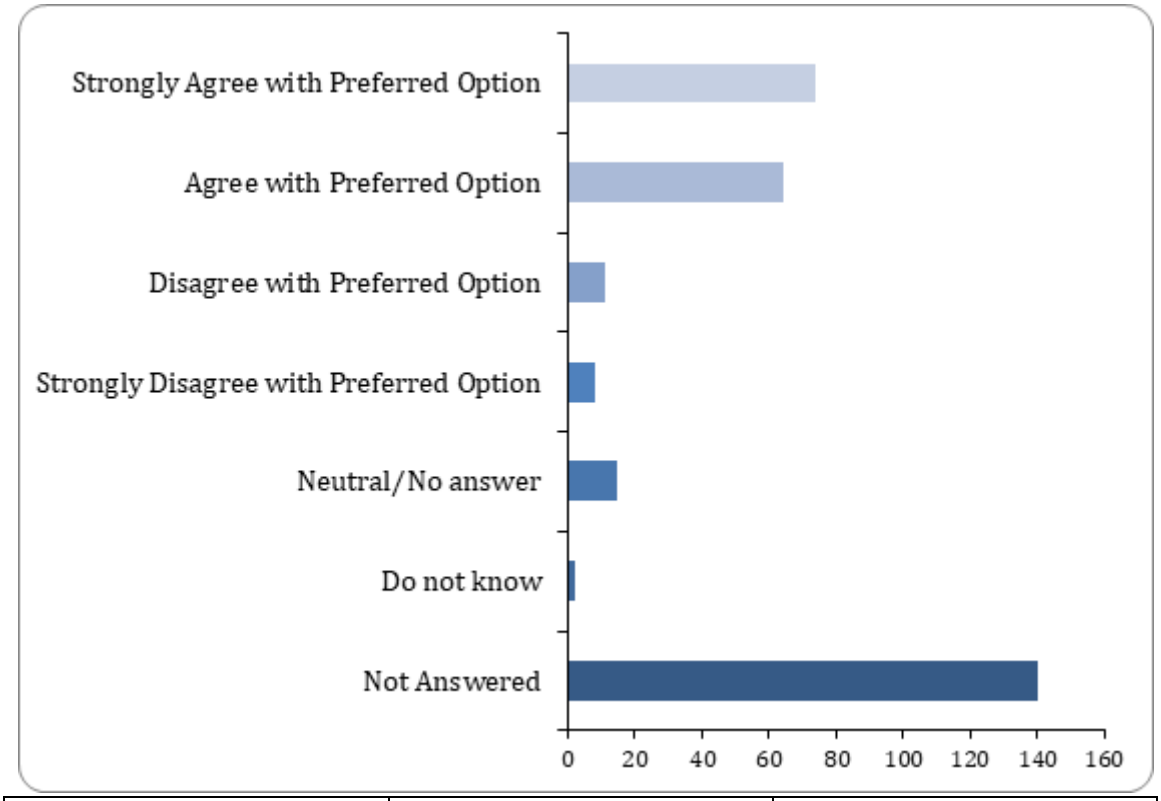
2168

All Public Responses – Draft Policy G6

Ecological network

Please tell us what you think about the policy options set 005f (draft policy G6): Protecting Oxford's ecological network

There were 174 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	74	23.57%
Agree with Preferred Option	64	20.38%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	15	4.78%
Do not know	2	0.64%
Not Answered	140	44.59%

Draft Policy	Summary	Response	Outcome
G6	General support for aspects of policy	Welcome the inclusion of specific policy with respect to the hierarchy of sites such as SACs, SSSIs, LWSs, OCWSs, pLWSs, pOCWSs. Also welcome the inclusion of specific policy wording relating to particularly vulnerable sites such as the Lye Valley SSSI and Oxford Meadows SAC with requirements re hydrology, although feel this should go further.	The support is welcomed.

2171

G6	Irreplaceable habitats	Strongly consider additional wording needed in relation to irreplaceable habitat. The preferred option text states: “Reiterate national guidance for how to deal with irreplaceable habitats.” But we could not find text that does that, or that addresses the following text in the NPPF: “193…..c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons70 and a suitable compensation strategy exists;” We consider this text	The intention was to set this out in supporting text to the policy (which was not a part of the consultation), as it is not necessary to repeat national policy (which already sets strong protection for irreplaceable habitats). Whilst we would contend that it is not necessary for the policy to repeat national policy, we have however incorporated an amendment into the policy wording in response to this comment.

2172

Draft Policy	Summary	Response	Outcome
		should be included as policy text in the Policy in order for the policy to be sound. We suggest that this is best placed directly after the policy in relation to SACs. Similar text has been included in the draft Local Plans of several adjoining authorities.	

G6	Priority habitats and species	Whilst we welcome the inclusion of text relating to priority habitats and species in the draft G6 policy text we do not consider it to be worded sufficiently strongly to be effective in delivering the intention of the following NPPF text: "192….b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity." Alternative wording is needed and recommend the approach taken in the draft SODC/VoWHDC Local	A significant amount of priority habitat is located on land in Oxford that is protected strongly through the Ecological site designations and the Core Green Infrastructure network protections (biodiversity value was a key element that informed the Core GI network designation). Remaining areas of priority habitat are then protected through the wording highlighted in the comment. This is considered to be a proportionate and pragmatic approach which is in keeping with the NPPF.

2173

Draft Policy	Summary	Response	Outcome
		Plan or that in the draft Cherwell DC Local Plan.	

G6	Oxford City Wildlife Corridors	Oxford City wildlife corridors have played a key role in conserving wildlife within the City and their importance and role in planning should continue and be included in planning policy. We consider it vital that this latest Local Plan continues the emphasis on the importance of protecting the Oxford City wildlife corridor network, as in Policy of the Oxford Core Strategy to 2026 which stated in Policy CS12, with our underlining: "Local sites: No development should have a significant adverse effect upon a site that is designated as having local importance for nature conservation or as a wildlife corridor, save in exceptional circumstances where the importance of the development outweighs the harm, and where it is possible to compensate for the damage caused by providing adequate replacement habitat."	Whilst G6 protects the designated sites, policy G1's green infrastructure network (which also includes G6's sites) protects a wider range of green spaces in its core designation layer. This include sites that provide a wider biodiversity function including acting as corridors, though they might not be designated. The Local Plan also emphasises the importance of protecting and enhancing linkages between green spaces through its green infrastructure policies (G1 and G2).

2174

Draft Policy	**Summary**	**Response**	**Outcome**

G6	Protection of Lye Valley (and other calcareous locations) not enough due to impacts on ground/surface water flows	Comments flagging the vulnerabilities of Lye Valley (and other calcareous locations) from increasing development leading to reduced groundwater, and increased scouring from surface water via urban drainage. The current wording of G6 in relation to groundwater/surface water flows is "a very considerable weakening from the current Local Plan 2036" (Policies RE3/RE4). For instance, Lye Valley and similar areas are only mentioned in the supporting text, not the policy itself.	The policy sets out a framework of protection for all the SSSIs from the impacts of inappropriate development (on top of the requirements in national policy). Each SSSI is susceptible to different types of impact/adverse effect, and the key ones are set out within the policy. The policy then specifically flags that areas like Lye Valley are susceptible to impacts on groundwater/surface water flows and folds in the requirements set out previously in separate policies in Local Plan 2036. As such, we disagree that this has been weakened.

2175

G6	Policy specific to protection of lowland fen habitats the Lye Valley	Whilst welcoming reference to protecting the Lye Valley in G6 – stronger requirements within a separate policy are needed. Also to ensure protection of alkaline spring-fed lowland fens found within and around the city. These lowland fen habitats are UK priority habitats, and also are irreplaceable habitats, so that the NPPF	National policy already sets strong protection for irreplaceable habitats which does not need to be copied in the Local Plan. Policy G6 sets a framework of protection for habitats of various types from adverse effects of development, and this would include lowland fen wherever it is found and other habitat that forms part of designated sites like the Lye Valley. However, as per earlier response, we are happy to add

Draft Policy	**Summary**	**Response**	**Outcome**

2176

		policy on irreplaceable habitats applies to them. This habitat is exceptionally rare and cannot be recreated elsewhere as it is dependent on a combination of geology and geography with a calcareous spring-fed water source of the right quality and quantity. This occurs at only a few locations in the UK. The fens are highly vulnerable to changes in water quality and quantity which may arise from development within their catchment. They are also vulnerable to trampling damage, increases in nutrients (from dog mess and air pollution), and changes in the grazing regime (which may be inevitable due to increased recreational pressures) that may be needed at some sites to maintain the plant species that make a fen special.	reference to the national requirements for development impacting irreplaceable habitats in the policy.
G6	Formal identification of calcareous emergence areas	Request formal identification of calcareous emergence areas including,	The role of the policies map, where this would need to happen, is not in identifying every type of habitat and location in the city. Other mapping resources are available for these purposes. There

Draft Policy	Summary	Response	Outcome
		but not limited to, Headington Hill and Dunstan Park, Ruskin College.	are a wide range of habitat and geological considerations which might be of relevance, not just calcareous areas. To attempt to identify all these would not only over complicate the policies map, and there may be other areas which have yet to be identified (e.g. arising from future surveys).
G6	Net gain needs to be onsite	Net gain needs to be achieved on site, not hived off to some other area which may have had a perfectly workable environmental community before then, and which may be too far away for residents to benefit from it. Net gain elsewhere is unlikely to be able to offset impacts of development on certain species e.g. loss of buildings/trees of importance for bats.	The Environment Act sets out how net gain should be approached. Policy G4 seeks to further set out our local preferences for onsite in first instance. G6 seeks to ensure impacts on existing species are appropriately addressed (e.g. following the mitigation hierarchy).
G6	Additional requirements for protecting the Lye Valley from adverse effects.	Varoius comments including: Add a statement that says: "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	An additional statement (or a full policy) is not considered to be necessary. Policy G6 already sets out that development would not be permitted where it would have an adverse effect on any SSSI. The policy explains that an adverse effect could

2178

			include various impacts including (but not limited to) hydrological

Draft Policy	Summary	Response	Outcome
		SSSI" to apply to all development, not just designated sites. Include a specific policy to address future issues which could impact the Lye Valley specifically, including risk of pollution from the sewer network as infrastructure ages, as well as new boreholes supporting heat networks of nearby buildings	impacts in relation to surface or groundwater. This requirement applies to all SSSIs including the Lye Valley and would be relevant to development anywhere within the impact risk zones that could lead to adverse effects on a SSSI like the Lye Valley. The supporting text of the policy will flag that there are particular hydrological impacts that the Lye Valley is sensitive to.

2179

G6	No further development in groundwater catchment	Request an Article 4 Direction in both groundwater and surface water catchment areas of the Lye Valley to reduce cumulative impacts of redirection of water to urban drainage. SUDS are unacceptable as they will fail and require maintenance.	The process for implementing an article 4 direction is complex, and must be justified and proportionate. It is also a separate process to the preparation of the Local Plan. Nevertheless, with the Local Plan the Council has sought to include a range of policies for reducing surface water run-off and reducing its water quality impacts (e.g. Draft Policy G8 and R5) as well as generally increasing green surface cover on sites to mitigate impacts of urbanisation (Draft policy G3).

2180

Draft Policy	Summary	Response	Outcome
G6	All development sites should need to assess potential indirect impacts on flora and fauna	"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." should be a statement that applies to all development, not just particular sites.	Policy G6 sets out protection for all these types of designations and applies to any development that could have adverse effects.

G6	Policy currently excludes natural habitats	"Proposals with a reasonable likelihood of adversely impacting semi-natural habitats" requires rewriting as it excludes natural habitats.	Whilst definitions vary, semi-natural habitat is typically defined as being any wild/natural habitat that has at some point been influenced by human activity, even if this was historic. This is generally the case (to varying degrees) across the majority of the city, which is why we typically use this term. However, for completeness, we are happy to amend the reference to natural or semi-natural habitats.
G6	Protection of nondesignated sites	The main priority of the Headington Neighbourhood Plan is "to conserve green space and increase public access and biodiversity". Do not believe that council is protecting important green spaces and features and requiring biodiversity	G1 protects a network of green infrastructure - core and supporting spaces as well as green features elsewhere. Equally open spaces benefit from some protection through national policy. G6 adds protection for national or local designated sites where there is particular

Draft Policy	**Summary**	**Response**	**Outcome**

2181

		enhancements and new green features on sites. The requirement for developers to protect non designated green spaces is too weak (i.e. it is easy for developers to justify loss by showing they have "considered the information from various sources where relevant", or claiming "exceptional need". All of Oxford's remaining green spaces should be protected with a requirement to improve their quality, access, connectivity and number.	biodiversity importance. G6 also sets out how potential impacts on habitat or protected species (regardless of where they are located) should be addressed. We will try to ensure that this broader picture of protection is set out clearly in the supporting text of the Local Plan.
G6	Biodiversity – suggested supporting text for biodiversity or a similar policy	Rep contains detailed wording suggestions regarding Great Crested Newt District Licence Scheme and a glossary to be added to the biodiversity policy or a similar policy.	We've reviewed the proposed wording but the level of detail goes beyond the scope of the policy and would potentially be more helpful to reference in some way through the supporting Technical Advice Note we intend to prepare to support the policy.
G6	Policy requirements for local sites	Various comments relating to the wording*: Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest*	Policy G6 needs to be read in conjunction with the protection for the green infrastructure network (policy G1). Local wildlife sites are protected through policy G1 as 'core' spaces

2182

Draft Policy	Summary	Response	Outcome
		features for which the site was selected.' Hard to see how this would provide any satisfactory outcomes,a ppears to mean that a developer can build on most of a nature reserve but retain or plant a couple of native trees to represent the site that had been lost. A few token bits of 'wildlife' cannot substitute for the loss of a whole location, its ecosystem and biodiversity. The protection of local sites and other green spaces must be increased, not just the legally designated sites (SSSI, SAC). The Policy should state categorically that they MUST not be either developed or harmed by any development. This is particularly important in Headington which has seen huge developments in recent years and which continues to be the location for new major developments eg the Warneford site.	which would prevent development on them. Policy G6 then sets out additional considerations which might apply, e.g. if development happens near by that could result in adverse effects on the functioning of these spaces.

2183

Draft Policy	Summary	Response	Outcome
G6	Local authorities should be identifying and protecting existing habitats	Several comments say that local authorities should be identifying and protecting existing habitats, not leaving it to the applicant.	The Local Plan designates a network of habitats of national, county-wide and city importance. Separate policy G1 also protects a range of green spaces because of their identified importance to nature. Policy G6 simply requires that where applicants propose development, their approach is informed by a good understanding of potential ecological interest on their site and that they respond to this accordingly.
G6	Overall wording needs to be stronger	Many comments argue the wording needs to be strengthened so that policy "requires", instead of "seeking to ensure".	Comments noted – the requirements in the policy vary in strength depending on which elements of the ecological network they respond and their level of designation/sensitivity.
G6	Measuring value of ecological habitats	Further clarification is needed on how to measure the value of ecological habitats for the purpose of compensation.	The level of detail this would require is not something that can be easily captured within the policy or supporting text. The policy sets the framework for what is expected, but the approach to assessing ecological value on a site in order to meet these requirements will depend on the context of the site, the potential ecological features of interest and the type of application proposed.

Draft Policy	Summary	Response	Outcome
G6	No hierarchy – all nature must be protected and green corridors encouraged	Against a hierarchy of nature as it suggests some sites are expendable if not deemed important enough. Having isolated 'special' sites is ineffective as there is a need for joined up corridors and a critical mass of these.	National policy is clear that Local Plans should identify a hierarchy of international, national and locally designated sites. The Local Plan sets out various levels of protection for nature and green infrastructure beyond just the designated sites in the hierarchy.
G6	OCWS – Rock Edge	Rock Edge SSSI is showing increasing wildlife diversity of limestone flowers due to improved management and now worthy of OCWS designation.	Noted – the site will benefit from core protection in the green infrastructure network aswell as SSSI protections in national policy and policy G6.

2185

G6	Require developers to engage with environmental charities	There should be a policy or mechanism which requires funded engagement with local environmental charities such as with the Earth Trust or Berks Bucks & Oxon Wildlife Trust. This should be enforced by the Council to protect Oxford's ecological network.	It would not be appropriate for the Local Plan policy to dictate specific groups that applicants should pay to engage with. The policy sets the framework for how existing ecology needs to be protected when proposing new development. How applicants meet the requirements will depend on context of the site and potential ecological features that may be present, as well as the type of development proposed. There is no one-size-fitsall approach. We would be happy to consider referencing local groups and expertise as part of the supporting Technical Advice Note that we

2186

Draft Policy	Summary	Response	Outcome
			envisage preparing to support the policy in future.

G6	Defer to national policy with bespoke guidance for the handful of designated locations in Oxford	A few comments would prefer to remove local policies for protecting and enhancing on site biodiversity, instead relying on national standards and policies. Multiple comments say there should be bespoke guidance for the handful of locations that face proven risks, while letting BNG and EA regimes govern the rest.	A local policy is necessary to protect the range of locally designated sites in the city which are not protected in the same way as national sites in national policy. It also allows the Council to set out particular considerations and local requirements which are tailored to the variety of habitats and species present in Oxford.
G6	Noise and light pollution	Multiple comments say the policy should explicitly include noise and night-sky light pollution.	The policy currently names 'impacts from artificial light' as a potential impact however, as stated in the policy, this list is not exhaustive.
G6	General comments re: SSSIs in city	The number of wildlife SSSIs in poor condition is bad news for the city and evidence that wildlife is not thriving in many despite the condition assessments. Natural England's condition assessments are too out of date to be useful – disagree with condition assessment for New Marston	The condition assessments from Natural England are the most current source of information available to us, though we are aware that they have not been updated for some time. The Local Plan takes a precautionary approach to the SSSIs' protection, including mitigation requirements in any site allocations within proximity to the SSSIs and general

Draft Policy	**Summary**	**Response**	**Outcome**

		Meadows SSSI as overall favourable – no longer the case. Table of SSSIs should separate out the geological ones and whilst being in favourable status, this is for separate reasons to ecology.	requirements outlined in G6 that would apply to proposals elsewhere. We will try to ensure that the distinction between geological SSSIs and others is more clear when we reference them going forward.
G6	General comments re: local wildlife sites in city	Impression is given that all local wildlife biodiversity sites of merit and importance to the city have yet been identified and designated, but the city is far from having a full audit of wildlife rich areas and there are many with merit that are not designated (e.g. areas of Cutteslowe Park). Ecological Designation is biased towards sites the council actually owns, but there are many more designation-worthy sites in other land ownership e.g. half of Christchurch floodplain meadow; areas of calcareous alkaline spring-fen all around Headington; Ruskin College.	We acknowledge that there is a range of ecological potential outside of designated sites – this is why the first part of the policy sets out expectations for proposals (criteria a-c) which would apply anywhere in the city where there is a reasonable likelihood of adversely impacting semi-natural habitats or protected species.
G6	Allotments	Allotments can be crucial biodiversity areas for pollinating insects, even in urban areas. They are also a key part of	Allotments are protected in the Local Plan under Policy G1 including the three examples listed.

2188

Draft Policy	Summary	Response	Outcome
		'improving the health and well-being of people' (one of the Local Plan's objectives). They provide opportunities food growing, recreation, relaxation and socialising on its open spaces. Therefore, Brasenose Farm, Fairacres and Cutteslowe allotments should be protected and not be classified as grey belt.	

2189

G6	Wildlife sites connectivity	Wildlife sites within and outside the city are connected through green corridors. Support for city wildlife sites and green connectivity is not emphasised and should be. Dark zone connecting Magdalen Wood East and Magdalen Wood West is important for species movement e.g. bats and should be maintained. Green wildlife bridge across the ring road in this area is needed. Also flag concern that any building just outside the city limits has the potential to break/block the essential green	Policy G6 needs to be read in conjunction with the protection for the green infrastructure network (policy G1). We protect a much broader range of sites in the city as either core or supporting green infrastructure and part of the rationale is supporting a linked up network across the city. Policy G2's criteria also includes strengthening links between green spaces, particularly ecological sites
Draft Policy	**Summary**	**Response**	**Outcome**
		connectivity upon which wildlife within the city depends.	

2190

G6	Protecting Lye Valley	• Update to all Site Policies that impact the Lye (MROFAOF, SPE7, SPE6, SPE8) Request a 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 have, and could potentially, cause damage.	Policy G6 sets the framework of protection for the sites within the Lye Valley and sets out what applicants are expected to do to avoid adverse effects wherever proposals could lead to them. The specific site allocations that are located within impact risk zones for the Lye Valley will include requirements for mitigating risks also. Flood risk is dealt with through policy G7 and mapping of flood risk is included in the Strategic Flood Risk Assessment.

2191

Statutory Consultee Responses – Draft Policy G6

Natural England

Draft Policy	Summary	Response	Outcome
G6 – protection of SAC/SSSIs	Welcome the commitment to safeguard key sites within Oxford's ecological network which include Oxford Meadows SAC and the numerous SSSIs. Encourage the Council to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI's and stipulate within the allocation policy	We are undertaking a Source Pathway Receptor Analysis for the SSSIs as well as Habitats Regulations Assessment for the SAC and this will help identify all the relevant sites that might impact on these	Source Pathway Receptor Analysis and HRA work to be published alongside Reg 19 consultation. Key findings will be reflected in relevant allocations including sitespecific mitigation

Draft Policy	Summary	Response	Outcome

	that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required.	designations, in line with your comment. We will ensure any recommendations from that work, including sitespecific mitigation requirements, are reflected in the relevant allocation policies.	requirements where necessary.
G6 – Irreplaceable and priority habitats	Encourage the Council to be ambitious in terms of the protection, enhancement and strengthening of the ecological network and suggest that you include a commitment to the protection of irreplaceable habitats and priority habitats such as lowland fen, within the policy wording.	See our other response re: priority habitats. In relation to irreplaceable habitats, whilst we would contend that it is not necessary for the policy to repeat national policy, we have however incorporated an amendment into the policy wording in response to this comment (and others).	Policy updated for Reg 19.
G6 - LNRS	Encourage the Council to consider the Oxfordshire Nature Recovery Network and emerging Oxfordshire Local Nature Recovery Strategy. LNRSs have been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area. Given that national guidance on LNRSs and their	The Council has sought to ensure the LNRS is reflected in several ways through the Local Plan. We have included specific references to it and the opportunities it identifies within certain site allocations, and have made sure the offsite BNG	No further action proposed at present.

Draft Policy	Summary	Response	Outcome
	relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.	hierarchy references LNRS areas within its steps where onsite BNG is not feasible. Policy G6 protects designated sites which are identified as having existing importance in the LNRS, meanwhile policy G1 protects a network of green spaces, many of which are also opportunity areas for enhancement identified in the LNRS.	

2193

Sports England

Draft Policy	Summary	Response	Outcome
G6	Sport England is concerned about what this policy means for any playing fields or other sports facilities within these designated areas. It is not unusual for grass pitches to be located next to or within local wildlife sites (or similar designations). With reference to the playing pitch strategy and other	The policy relates to mitigating adverse impacts or additional pressures to designated sites that may arise as a result of new development. There are unlikely to be locations where there are permitted established uses that are incompatible with the sensitivities to designated sites.	No further changes proposed.

Draft Policy	Summary	Response	Outcome
	documents that record playing fields and recreation facilities the Council must carefully balance any new policies that could prevent Oxford's residents from enjoying the outdoors and keeping physically active. Often natural areas can benefit humans and nature so encouraging policies that support but must be given appropriate consideration in an urban environment.		

2194

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy G6 Protecting Oxford's biodiversity	**Strategic Planning** The Oxford Meadows Special Area of Conservation is the largest SAC in the county and much of it lies within Oxford City's boundary. This SAC, together with Sites of Special Scientific Interest and areas identified as at risk of flooding cover much of the other undeveloped land in the City, and therefore these issues are very significant in the Oxford City context. This policy	Noted.	No Action Required

Draft Policy	Summary of comments	Response	Outcome

2195

	establishes the importance of protecting sites in accordance with a hierarchy, which is welcomed. **Landscape and Nature Recovery – Biodiversity** It is appreciated that groundwater catchment areas for Oxford Meadows SAC, Lye Valley and New Marston Meadows SSSI's have been specifically highlighted within this policy. It may be useful to highlight that other designated sites may also be impacted hydrologically, and this should be considered as part of an application. Reference to Road Verge Nature Reserves (RVNRs) as a type of non-statutory designated site would be welcomed within this policy. Further information regarding RVNRs and RVNRs within Oxford city can be found at https://www.oxfordshire.gov.uk/sites/default/files/file/countryside/RVNRSurveyReport.pdf. The supporting text to the policy includes references to the emerging Oxfordshire Local Nature Recovery	We are not considering hydrological evidence for other designated sites. We can consider the inclusion of a reference to this within the policy/ plan. We can consider this if the study is published/ adopted in	No Action Required Oxford City Action: Consider proposed wording going forward. Oxford City Action: Consider proposed wording going forward.

2196

Draft Policy	Summary of comments	Response	Outcome
	Strategy (OLNRS). Consideration should be given to whether it should not also be referenced in the policy text.	a timely manner to meet our plan-production deadlines.	

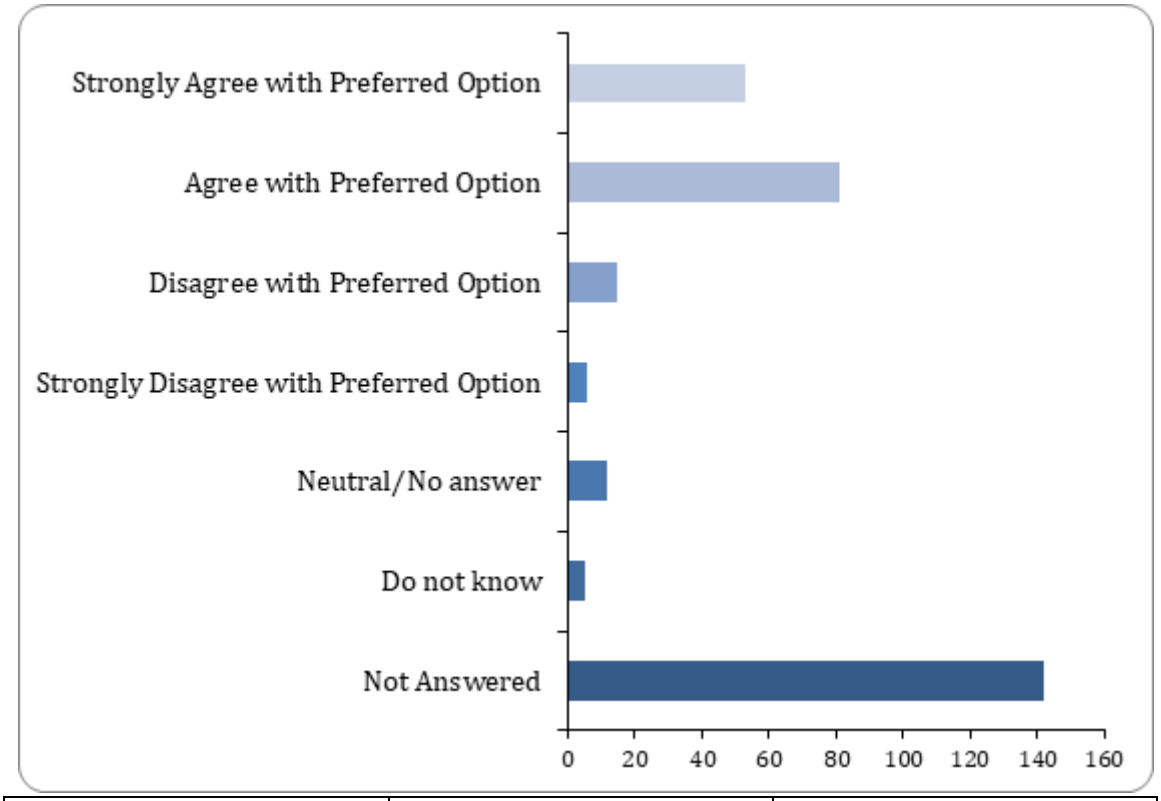
2197

All Public Responses – Draft Policy G7

Flood risk

Please tell us what you think of policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments

There were 172 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	53	16.88%
Agree with Preferred Option	81	25.80%
Disagree with Preferred Option	15	4.78%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	12	3.82%
Do not know	5	1.59%
Not Answered	142	45.22%

Draft policy	Topic	Summary of comments	Response
G7	Policy is ineffective	Policy is ineffective as development in Flood Zone 1 areas has caused by run-off repeated flooding in Flood Zones 2 and 3. All development must demonstrate net-zero greenfield runoff rates to stop downstream flooding. Increasing and intensive urbanisation including from transport infrastructure is a far greater cause of floods than climate change, yet it is not even acknowledged. Requirement of a proportional FRA for all flood zones including offsite cumulative risk, as well as ensuring that sites in Flood Zone 1, that are surrounded by Flood Zone 2/3 land would still require safe access/ egress during a flood event.	All sources of flooding must be considered for any site including risk of surface water flooding in Flood Zone 1. The Level 1 SFRA considers the cumulative impact of development on flood risk within the catchment. Safe access/ egress to the site would be assessed as part of the planning application.
G7	Preferred Option	Agree with Preferred Option, but not with point k), as redevelopment should be allowed to encroach into Flood Zone 3b as it could still result in a decrease in flood risk through careful design.	The Environment Agency has been clear that this approach is unacceptable. Careful design can avoid redevelopment of a site encroaching on Flood Zone 3b.

2200

G7	Support Alternative Option 1	Strongly agree with Alternative Option 1 - prevent development of greenfield sites within flood zone 3a, but with specific exemptions (e.g. for allocated sites).	National policy does allow for some types of development in Flood Zone 3a but for more vulnerable development such as housing, the Exception Test

Draft policy	**Topic**	**Summary of comments**	**Response**
			would be required and need to be passed.
G7	Support Alternative Option 2	Strongly support Option 2 - just rely on national policy. This policy should only include locally specific flood risk mitigation requirements that are not previously covered in national policy. National policy already demands a sequential test, an exception test and site-specific FRAs. The requirements in Policy G7 would add blanket FRAs for a minor development in the city which is considered too onerous and would slow brownfield intensification.	Oxford has a unique flooding environment and particular constraints on development in the city. There is a risk that a more generalised approach misses opportunities to address this.

2201

G7	Do not allow development in the flood plain	No development should be allowed on the flood plain. They are also important ecological habitats for nature plants, insects and animals.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF.
G7	Do not allow development in Flood Zone 3	No development should be allowed in Flood Zone 3b. Should be a ban on development on low-lying Flood Zone 3 land as flood defences do not protect against groundwater flooding.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way

2202

Draft policy	Topic	Summary of comments	Response
			that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF. All sources of flooding must be considered for any site, including groundwater.

G7	Climate change not considered	The whole plan envisages much too much development on land prone to flooding e.g. many of the specified sites. Climate change means there will be an increased risk of storms and flooding, and the categorisation of land may already be out of date. It is unreasonable to expect residents or businesses whose neighbouring property becomes liable to flooding to suffer this so that developers can benefit from building on flood prone land.	National guidance is clear that flood risk must be considered now and for the lifetime of development – climate change projections are considered.
G7	Other sources of flooding	Applicants should be required to consider flooding from all sources, not just fluvial. Additional controls are required re basements which should be forbidden in 3b and 3a where fluvial flooding has occurred in last 10 years. Assumptions must be made that flooding will become more frequent, both fluvial and pluvial, as evidence is already suggesting. The flood risk maps do not adequately take account of pluvial flood risks, especially where	National policy and guidance dictates that all sources of flooding must be considered. In March 2025, the Environment Agency updated their mapping for flood risk which included showing surface water flood risk.

2203

Draft policy	**Topic**	**Summary of comments**	**Response**

		large scale development has taken place in the neighbourhood.	The policy states that proposals for basement accommodation within Flood Zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation.
G7	Importance of natural flood prevention measures	Any natural flood prevention measures such as tree planting and rewilding would be preferable to more concrete and drains. Policy needs to stress more clearly that the biodiversity value of the SuDS scheme must be maximised. Water that is currently retained by the extensive vegetation and the clay soil such as at North Oxford Golf Club will enter the drainage system so much more quickly in the future once it is developed.	Draft Policy G8 addresses Sustainable Drainage Systems (SuDS) and the importance of green SuDS.
G7	Canal & River Trust	Navigation authorities should be consulted by the local planning authority concerning sites adjacent to, or which discharge into, canals – especially where these are impounded above natural ground level. Happy to help with the evidence for the SFRA where possible, despite the PPG not	Noted.

2204

Draft policy	Topic	Summary of comments	Response
		specifically recommending consultation with the Canal & River Trust.	

Environment Agency

Draft Policy	Summary of comments	Response	Outcome
Policy G7 Flood Risk and FRAs	Suggested a couple of minor changes to the wording in the policy in respect of criteria e) and n).	Agree with the suggested amendments.	Criteria e) and n) of the Policy has been amended to incorporate the suggested wording.
	Detailed comments were received in respect of the OFAS (Oxford Flood Alleviation Scheme), Strategic Flood Risk Assessment (SFRA) and the proposed site allocations.	Noted – work is ongoing to resolve comments.	These comments will be addressed in detail in the Statement of Common Ground

2206

Oxfordshire County Council

Policy G7 Flood Risk and FRAs	**LLFA** No further comments	Noted.	No Action Required
	Landscape & Nature Recovery – Landscape		

Draft Policy	Summary of comments	Response	Outcome

	The reference in the policy to the multi-functionality of SUDS is supported. It is recommended that SUDS are designed in a way that they are attractive spaces that offer landscape, visual, ecological and recreational benefits	Noted.	No Action Required

Thames Water

Draft Policy	Summary	Response	Outcome
G7 Flood risk	Generally support Policy G7 as it is in general accordance with the NPPF and the PPG, particularly support the reference to sewer flooding.	Support welcomed.	N/A
G7 Flood risk	Flag that often infrastructure for sewage treatment is located close to rivers. It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept	Noted.	N/A

Draft Policy	Summary	Response	Outcome
	that water and sewerage infrastructure development may be necessary in flood risk areas.		

G7 Flood risk	Flood risk policies should also 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.	The policy is clear that applicants need to consider flooding from all sources, which would include sewer floording. It also sets out that an FRA should demonstrate that the proposed development would not increase flood risk offsite;	No further change proposed at this time.

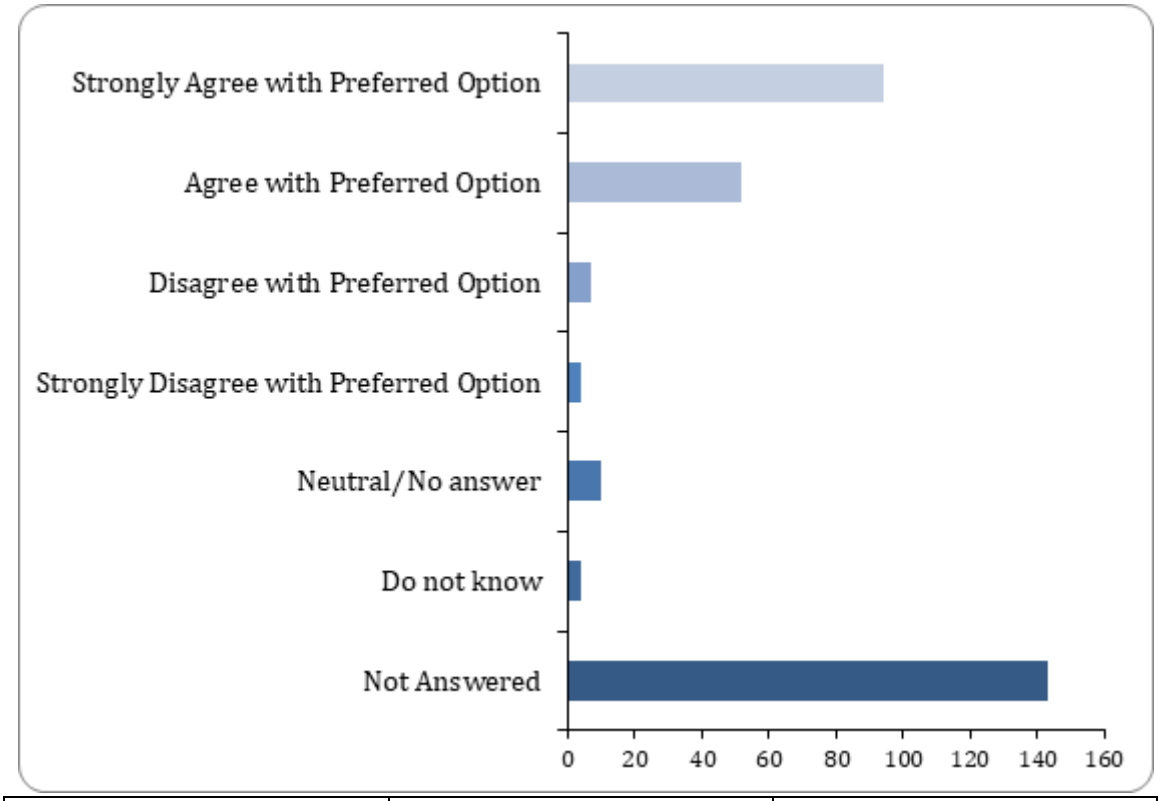
2208

All Public Responses – Draft Policy G8

Sustainable Drainage Systems

Please let us know what you think of policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDS).

There were 171 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	94	29.94%
Agree with Preferred Option	52	16.56%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	143	45.54%

Draft policy	Topic	Summary of comments	Response
G8	Additions to Preferred Option	Developers should first be encouraged to integrate closed-loops systems into their designs, such as systems to catch and clean or reuse greywater (e.g. handwashing and showers to flush toilets); urine-diversion dry composting toilets; rainwater harvesting. Object to discharge to a combined sewer even in exceptional circumstances. This should not be built in at the design stage.	Noted. This is at the bottom of the drainage hierarchy, and it is expected that applicants would need to sufficiently demonstrate why all other options would not be possible.
G8	Support Alternative Option 1	Development should not be allowed on sites where SuDS are not feasible. There should be no exceptions from the requirement to provide for satisfactory drainage of all new properties. There is a danger that arguments for sites not being feasible will be put forward. Do not rely on national policy – should be done locally as requires local knowledge.	The draft policy echoes Paragraph 181, bullet c) of the NPPF (2024) which expects SuDS to be incorporated as part of any planning application *"unless there is clear evidence that this would be inappropriate".* Support for additional details is welcomed.

G8	Support Alternative Option 2	Do not include a policy about SuDS but rely on national policy instead.	Guidance in national policy about SuDS is limited in terms of 'good design' and regarding wider objectives (e.g. water

Draft policy	**Topic**	**Summary of comments**	**Response**
		National guidance already obliges major schemes to incorporate SuDS and demonstrate they mimic natural run-off. Draft Policy G8 would go much further, demanding SuDS on every application and banning grey SuDS. The cost of this would mean very little brownfield development in Oxford would come forward.	quality). The policy provides additional detail, e.g. design standards which are specific to Oxford.
G8	Local requirements	Reduce the mandatory development site size for SuDS to 50/5000sqm/100, especially where upstream from previously flooded downstream sites. 100 dwellings far too high. 20 would be better.	As per the NPPF (2024), SuDS should be incorporated as part of any planning application unless there is clear evidence that this would be inappropriate.
G8	Grampian condition required	A Grampian condition for all development in Oxford should be required to ensure Thames Water can manage surface runoff.	It is not practical to do this - each planning application is assessed on their own merits.

G8	Green SuDS and drainage hierarchy	Add that actual SUDS mean areas of vegetation - preferably including trees - to ensure long-term drainage effectiveness. Without enforcement, SUDSs are alleged rather than effective. Actively discourage the use of paving or decking. Encourage use of water butts to capture rainwater and then use it to water gardens. This reduces the	The draft policy can only apply to new development, but green SuDS are prioritised. Any new proposals must submit a maintenance plan demonstrating how SuDS will be managed and remain effective for the lifetime of the development.

2213

Draft policy	Topic	Summary of comments	Response
		amount of water in drains and allows absorption of surface water.	Drainage hierarchy in this policy prioritises storing rainwater for later use.
G8	Drainage concerns in Lye Valley	No further development (including house extensions) should be permitted to connect to the Thames Water sewer network within the Lye Valley fen catchment. Smaller extensions are only acceptable if they connect to a soakaway but not into the surface water drainage system. SuDS infiltration in Lye Valley is insufficient as a replacement for loss of natural surface cover.	It is not practical to have a blanket ban on development in the Lye Valley. Each planning application is assessed on their own merits. The draft Policy acknowledges that infiltration will not always be the most suitable means of SuDS.

G8	Inconsistency with national policy	Para.182 of the NPPF states that SuDS should be "*proportionate to the nature and scale of the proposal*". It is not proportionate to require all development proposals to provide SuDS and the caveat "*where feasible*" does not appropriately cover the conditions where SuDS would not be required.	The draft policy echoes Paragraph 181, bullet c) of the NPPF (2024) which expects SuDS to be incorporated as part of any planning application "unless there is clear evidence that this would be inappropriate".
G8	More flexibility in policy required	Draft policy is too rigid. Below ground features should be allowed in situations where site constraints exist e.g., groundwater, contamination, land-use efficiency, whilst still enabling SuDS to be used where appropriate.	Green SuDS are often considered at too late a stage in a scheme. If they are considered in the conceptual and design stages, they are more likely to be able to be well-designed into
Draft policy	**Topic**	**Summary of comments**	**Response**
			the proposal. They can provide a multitude of benefits that grey SuDS can't, including providing open space for recreation, habitats to support wildlife and adaptation to other climate hazards such as overheating.

2214

Draft Policy	Summary	Response	Outcome
	existing (older) surface drainage systems with sustainable urban drainage systems (SuDS).		

Statutory Consultee Responses – Draft Policy G8

Natural England

Draft Policy	Summary	Response	Outcome
G8	Fully support the requirement for SuDS on all new development. Recommend that SuDS are linked up wherever possible (including with other greenspace) to achieve greater benefits for water management and wildlife, to contribute to green infrastructure and support robust ecological networks. Given the risks to water quality which can be presented by antiquated drainage systems, also advise considering whether developments could be supported and encouraged to replace	Welcome the support and agree with the comments, though we would suggest these are better placed in supporting guidance which could help in implementing the Local Plan's requirements.	Consider how these points could be picked up in a future Technical Advice Note in due course.

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Policy G8 SuDS	**LLFA** The policy refers to the Local Standards produced by the LLFA. This reference should be removed and/or replaced in the policy text with reference to any National Standards. The local standards are currently being reviewed following the DEFRA update Standards on 19th June 2025 and could be considered to not be up to date. Where a policy relies on these standards it needs to be able to be updated as the standards may develop further in the future.	We can consider how to address this issue. However, presumably once the LLFA standards have been updated, there will be no longer a need to rely on the national standards?	Oxford City Action: Consider proposed wording going forward.

Thames Water

Draft Policy	**Summary**	**Response**	**Outcome**
G8 SuDS	Support Policy G8 in principle. Flag that it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or	Noted – the SuDS policy sets out various requirements which seek to ensure an	No further change proposed at this time.
Draft Policy	**Summary**	**Response**	**Outcome**
	surface water sewer in accordance with the drainage hierarchy.	appropriate drainage strategy is pursued including prioritising green, multifunctional SuDS features where possible before other options.	

2216

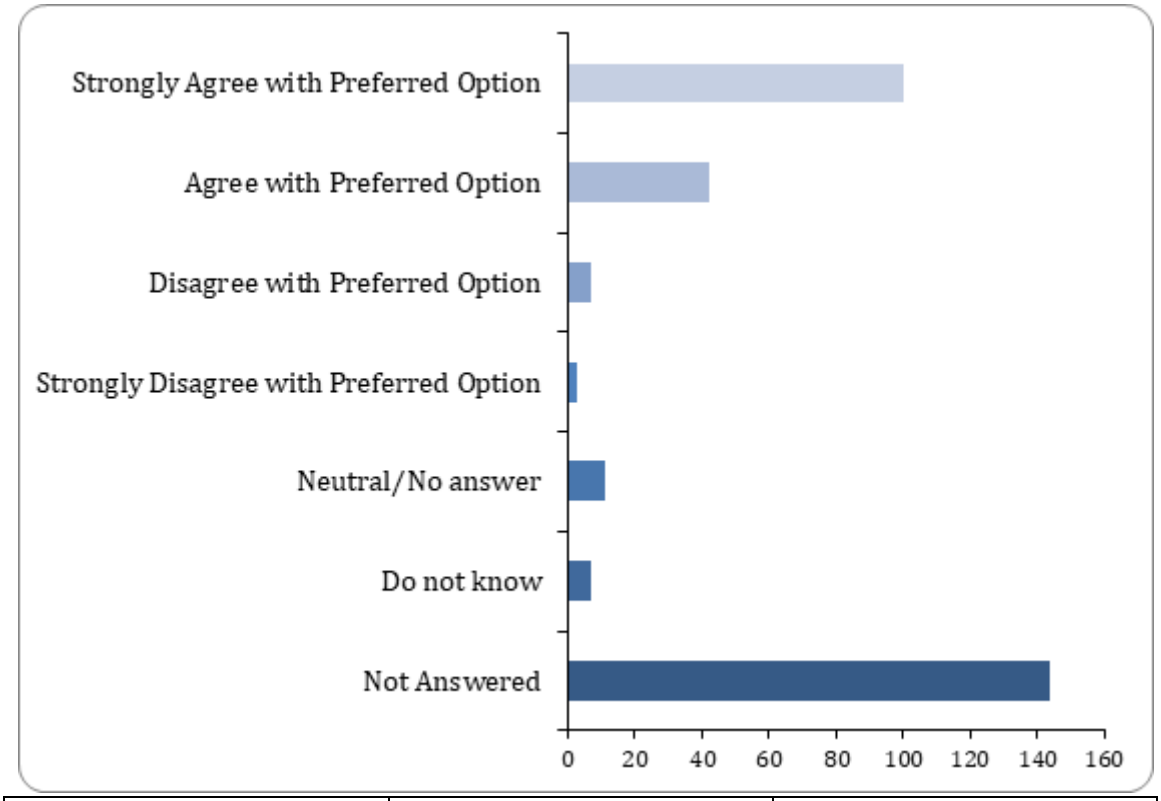
G8 SuDS	Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system.	Policy R5 – water resources and quality sets out requirements for separating foul and surface water on new development and encourages applicants to take opportunities to separate these on existing development.	No further change proposed at this time.
G8 SuDS	Flag that SuDS don't just help with flooding but also improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.	Agreed, the policy context (supporting text) will set this out clearly.	Updated policy to be published as part of Reg 19.

All Public Responses – Draft Policy G9

Resilient design and construction

Please tell us what you think of policy option set 008d (draft policy G9): Resilient design and construction.

There were 170 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	100	31.85%
Agree with Preferred Option	42	13.38%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	11	3.50%
Do not know	7	2.23%
Not Answered	144	45.86%

Draft Policy	Summary	Response	Outcome
G9	Preferred option	Support option 1 - Promote sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects. More likely to ensure requirements are not watered down in practice.	Noted
G9	Preferred option	Comments in support of option 1, other comments were expressing support for 2 and/or option 3.	Noted – the background paper set out the rationale for the Council's preferred option.
G9	General support for the policy	All elements covered by the policy are extremely important.	Noted – support welcomed.

G9	Adaptation should be prioritised over carbon reduction.	Climate adaptation (to overheating, rain) should take priority over carbon footprint.	Noted – however, we do not consider it to be an 'either/or' choice. There are important reasons to pursue both aspects of the climate change response. Cutting emissions helps to avoid impacts of more pronounced hazards in future, but adapting to risks now helps to lessen their impacts, particularly where these cannot be avoided, and can secure multiple other benefits for people.

2221

Draft Policy	**Summary**	**Response**	**Outcome**
G9	Need for proportionality for minor development.	Policy objectives are reasonable but also important to ensure proportionality of such requirements for minor developments or they will be unaffordable.	Noted – whilst the policy sets out the key things an application should respond to, it is flexible in the level of detail an application should provide, allowing this to be proportionate to the scale of the development.

G9	Additional costs for residents	Concern about more costs imposed on residents.	See response above re: the flexibility allowed for in how applicants respond to requirements. We would add that incorporating these resilience measures into a development during construction should be cheaper and easier than retrospectively trying to incorporate these into a building in future after it has been constructed. A resilient development can also help to save occupants in terms of the costs that could arise when a hazard like flooding or overheating hits by lessening the impact and helping to recover quicker.
G9	No need for local policy and/or concern	Should defer to national requirements. Some requirements e.g. Noise, lighting, dust and fumes are already tightly	Concerns noted, however, the Council considers the policy to take a pragmattic and proportionate

Draft Policy	**Summary**	**Response**	**Outcome**

2222

	about additional complexity to planning process	controlled through the NPPF, Building Regulations, the Environmental Protection Act and construction-management conditions. Bespoke local rules simply repeat those safeguards while forcing applicants to commission yet another impact statement and negotiate yet another set of mitigation measures, increasing cost and delay without delivering any extra protection. Concern about more complexity in planning process and whether the Council will have resource to assess applicants' submissions or defend the requirements.	approach to ensuring new development is designed to incorporate resilience to current and future climate change. This responds to the increasing climate change risk that faces the city (and the fact that Oxford is already at increased risk compared to other areas in the county). Whilst some requirements may be nationally set, other elements are not enforced nationally. The policy is clear that where evidence has been produced to meet other requirements, this can be referenced. It also helps to ensure that other elements of climate risk are considered.
G9	No need for local policy	Comments expressing no need for local climate policies, or that the Council should not meddle and should leave decisions to developers and their investors – no further reason given.	Noted – see earlier responses which set out why we consider this policy to be important.

Draft Policy	**Summary**	**Response**	**Outcome**

G9	Requirements should be stronger for new build and retrofit.	Requirements for new build/retrofits to have solar PV, heat pumps, green roofs in selected location should be made stronger.	These requirements are set out in other policies e.g. R1 deals with requirements for renewables and G2/G3 deal with requirements for additional greening.
G9	Policy should have defined catchments	Policy needs to define catchment ranges over which its requirements apply.	The policy applies across the city though certain risks will be higher in certain areas depending on proximity to certain hazards (e.g. flood plain).
G9	Requirements should apply to all sites/development	Requirements should apply to all sites/developments.	Noted – the policy applies to all proposals excluding householder applications (though these may be subject to other requirements elsewhere in the Local Plan). There is, of course, nothing preventing householders from following the principles of the policy also, and this would be encouraged.
G9	Assessments/mitigations should be informed by expertise	Assessments/mitigations should draw upon the (funded) expertise of local environmental charities i.e. BBOWT and Earth Trust.	The policy does not specifically flag particular stakeholders that applicants should engage with as this could change throughout the plan's lifetime and will also depend on the

2224

Draft Policy	Summary	Response	Outcome
			context of each application. Where necessary, applicants may of course benefit from additional expertise to inform particular aspects of their application and this would help in evidencing how they have met the requirements.
G9	Support addressing risks of overheating	Experience of working in buildings constructed before concerns about heatwaves/overheating were common shows that preparing for these impacts is essential. Some classrooms becoming unusable in heatwaves. Need good design/ventilation as well as trees to mitigate impacts.	Noted – the policy emphasises the need for addressing overheating and having a cooling strategy (addressing inside and outside exposure to heat) as one of its criteria.
G9	Should assume future impacts will be worse	Should assume that the worst floods in the future will be worse than those in the past.	In principle, this would align with a precautionary approach, although the picture of how flood risk is likely to change in future depends on various factors and will not be the same everywhere. We have incorporated wording into the introduction to the subsection of the chapter containing policies G7-

Draft Policy	Summary	Response	Outcome
			G9 which flags to applicants how we expect climate hazards in the city to worsen over time.
G9	Development in flood plain not suitable	Site which is part of a flood plain such as Marston Rd. and land behind and surrounding St. Clements Church seems not to be a good candidate for building on.	Where proposing development in areas of flood risk, applicants will be expected to follow the requirements of the Local Plan's flood risk policy alongside this policy.
G9	Require ground water and surface water studies	Require professional ground water and surface water studies and their impacts on ALL developments.	This is not considered to be a proportionate approach – some development has more risk of adverse impacts on ground water or surface water than others. Other policies set out requirements for additional evidence where necessary in response to potential impacts e.g. on flood risk (G7) or ecology (G6).
G9	Groundwater	Do not address ground water / Do not address ground water and surface water impacts on sensitive sites.	See response above

Draft Policy	Summary	Response	Outcome
G9	Excess water demand and hosepipe bans	Already have excess water demand and hosepipe bans.	The Local Plan includes a separate bespoke policy on water resources and water quality (policy R5). This policy cross refers to that policy and emphasises the need for water saving measures in light of added stresses on resources that are expected as summer become hotter and drier in future.
G9	Lye Valley	Current drainage flowing into Lye Valley needs to be assessed. Development is the biggest threat to the Lye Valley and should not be permitted. Lye Valley is an amazing resource and should definitely be strongly protected.	See responses against policy G6 in relation to Lye Valley. The policy applies to all proposals excluding householder development, wherever they are proposed in the city. Particular areas are neither scoped in or out of where the policy applies.
G9	Extend same approaches for Lye Valley to wider city.	Agree with approach and flag that what is good for the Lye Valley could and should become applied throughout the Oxford City Council area.	Noted – in a general sense this may be true, however, there could be other contextual considerations which will impact levels of climate risk in different parts of the city and

			should inform the interventions incorporated

Draft Policy	Summary	Response	Outcome
			into a development to address climate change hazards.
G9	Protect green and blue infrastructure	Protect our green and blue infrastructure at all costs.	Separate policies in the Local Plan seek to protect the green infrastructure network (see policy G1 in particular). The supporting text to G9 will also emphasise the valuable role green features can provide for adaptation.
G9	Policy should apply to sensitive nondesignated sites	Should apply also to sites that are sensitive but not currently designated as protected/sensitive sites.	As per earlier response, the policy applies to all proposals excluding householder development, wherever they are proposed in the city. Particular areas are neither scoped in or out of where the policy applies.

G9	Overdevelopment in city	Concerns about overdevelopment in the city.	Concerns noted, however, new development is a necessary part of how the city will continue to function and support residents and businesses in the future. The Local Plan's role is ensuring that this development comes forward in the right way. The policies of the Plan need to be read as a whole. There are a
Draft Policy	**Summary**	**Response**	**Outcome**
			range of policies throughout chapters 4 and 5 which seek to mitigate the impacts of development, and/or secure improvements in the environment.
G9	BBOWT	Concern that the wording of Policy G9 does not seem to refer to and/or conflicts with the need for protections for Lye Valley and Lowland Fens habitats more generally.	The policy has a completely different focus – specifically, it is about driving more climate resilient design in new development. Protections for the Lye Valley and other habitats are dealt with through other policies – e.g. policy G6.

Statutory Consultee Responses – Draft Policy G9

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Draft Policy	Summary of comments	Response	Outcome
Policy G9 Resilient Design and Construction	**Climate Action** Support references to adapting to the impacts of climate change. Reference should be made to climate-resilient landscaping, e.g., "*Landscaping and green*	Noted.	No Action Required Oxford City Action:

	infrastructure must be designed to withstand extreme weather conditions, such as heatwaves and droughts, through the use of drought-resistant plants, shaded areas, green roofs, and rainwater harvesting systems."	We can consider including a reference to climate-resilient landscaping.	Consider proposed wording going forward.
	Under (b) reference should also be made to cooling public space within the development, such as green roofs to reduce the heat island effect, shaded public space, and the use of light-coloured materials to improve outdoor thermal comfort.	We can consider adding a reference to urban cooling although reference already exists in Policy G2.	Oxford City Action: Consider proposed wording going forward.
	Under (d) examples could given for water efficient technologies, such as rainwater harvesting, low-flow plumbing, grey water recycling and smart irrigation.	We can consider whether to include examples of water efficient technologies.	Oxford City Action: Consider proposed wording going forward.
	Urban Design (Placemaking) Resilient design could also apply to buildings and spaces being adaptable to changing uses and functions. E.g. Covid-19 led many empty office units, some of which may have been repurposed as residential since.	Noted.	No Action Required

2231

Thames Water

Draft Policy	Summary	Response	Outcome
G9 Resilient design	Support Policy G9 (d) where it refers to water efficiency in line with our comments to Policy R5.	Support welcomed	N/A

All Public Responses to the Whole of Chapter 4

Draft policy	Topic	Summary of comments	Response
Chapter 4	Explicitly state that greenfield will only be developed if no brownfield sites are available/meet needs	The consultation for the 2040 Local Plan in 2022 included this policy option: "Option for policy approach - Allow development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites." which BBOWT supported. We would have welcomed a similar option being available in this 2042 Local plan consultation. In considering this policy area we ask that the Council takes into consideration that in the report for the Issues Consultation for the Local Plan to 2040, 81% of respondents rated: "Safeguarding the natural environment and its wildlife habitat" as being "Very important", and that in total 96% of respondents rated it as being either "Very	A number of growth strategies are considered in the Sustainability Appraisal. Ultimately, the approach taken by the Plan is that all green spaces have been considered against the GI strategy for the level of protection appropriate to them, and the majority of green spaces in the city are strongly protected because of their value.

2232

Draft policy	Topic	Summary of comments	Response
		important" or "Important". And that 85% of respondents rated: "Preserving open spaces" as being "Very important", and that in total 98% of respondents rated it as being either "Very important" or "Important". Comparing these questions to all of the other questions that were structured in the same way in the 2040 Local Plan consultation, these two showed by far the highest % in the "Very important" category. We ask that Oxford City Council responds to this very strong indication from the people of Oxford of how important to them biodiversity and green spaces are by taking forward in the next stage of the plan policies that are exemplary and ground breaking in facilitating both the protection and enhancement of the biodiversity and green spaces of Oxford, protecting both accessible green spaces and those that are not open to the public. The survey for the 2042 Local Plan now under development gave the following results indicating very strong support for protection and enhancement of biodiversity in the City: "72.43% of respondents declared biodiversity to be very important them and	

2233

Draft policy	Topic	Summary of comments	Response
		15.68% declared biodiversity to be slightly important to them."	
Chapter 4	Supportive	Cyclox support all policies in this chapter	Support is noted and welcomed.
Chapter 4	Supportive	We very strongly support all these policies, especially E1 Protection of green infrastructure which we believe should be given very strong weight, reflecting the importance of Oxford's network of green spaces to the character and setting of the city, the well-being of its inhabitants and climate resilience. There should be clear recognition that existing green spaces are a finite resource, not easily recreated when lost or damaged.	Support is noted and welcomed.

2234

Chapter 4	General comment – Greater Oxford Nature Park	Oxford is not only important because of its urban wildlife, but also because of the access to these green spaces. The majority of these sites are publicly accessible, with footpaths along the Cherwell winding through the extent of central Oxford. I have regularly been able to lead wildlife education sessions here for both adults and students from primary school age to master's degree level. This is an incredibly important aspect of working in Oxford's green	Proposals for the Greater Oxford Nature Park is part of wider proposals for the Greater Oxford authority area, which is beyond the scope of the current consultation.

2235

Draft policy	**Topic**	**Summary of comments**	**Response**

		spaces – everyone should be able to share, enjoy, and learn within them. Despite impressive efforts from education officers in organisations such as the Oxford Earth Academy, there remains much potential for wider outreach and education across the green space in Oxford. With the new Local Plan, there is a remarkable opportunity to join up and uplift these important green fragments across the city. It is critical that these green spaces are protected from the impacts of future development in Oxford. Damaging developments have already progressed despite major losses in biodiversity and in access for people to green space, such as in Spindleberry Nature Park in East Oxford.	
Chapter 4	General comment – Greater Oxford Nature Park	I am supporting the suggestion that is being discussed by a growing number of people that we need to value our green spaces in and around the city for nature based education. To be effective these spaces need to be accessible from schools and communities, biodiverse and	Proposals for the Greater Oxford Nature Park is part of wider proposals for the Greater Oxford authority area, which is beyond the scope of the current consultation.

Draft policy	Topic	Summary of comments	Response
		varied, connected with wildlife corridors to other sites to maintain biodiversity as this expands the effective space for species that need space, and large and diverse enough to cope with the numbers of young people in the city that need access to green spaces. Oxford has a really valuable asset in its 75+ green spaces which have a good level of biodiversity across the city. We could recognise these as a Greater Oxford Nature Park and develop a nature education strategy to boost the skills of our young people.	
Chapter 4	General comment	Please keep Oxford green and do not develop the green spaces around, thanks	Comment noted.
Chapter 4	General comment	Definition needs to be wider to include meadow, grassland, scrub, abandoned brown field site. All biodiverse sites and the connections between them.	Comment noted.

Chapter 4	Climate change and biodiversity	A network makes a lot of sense, and should be linked as much as is feasible. Climate change and the biodiversity crisis is by far the biggest	Comment noted.

Draft policy	Topic	Summary of comments	Response
		challenge we face... Too often planning application include a lot of greenwashing - it is difficult to quantify biodiversity loss and how to offset it. There could be a department employing ecologists... I am generally supportive of all things green. Hope you include schemes such planting pollinator friendly species, severely limit the use of pesticide, get on top of water pollution wherever possible, and so on.	

2238

Chapter 4	Policies do not align with plan objectives	The perceptive and sympathetic comments re: value of green spaces to the community and wildlife contrast strongly with the draft policies which allow developers to get around any planning constraints in respect of green spaces. Draft policies do not sufficiently protect our green spaces and wildlife from development - to the detriment of our community, environment and wildlife itself. The Draft Plan's approach is largely homocentric, concentrating on how a green	The plan introduces a Green Infrastructure (GI) Network and categorises green and blue spaces "Core", "Supporting", and "All other". This evidencebased categorisation provides an appropriate system of protection across the entire network as the most valuable green spaces are protected.

2239

Draft policy	**Topic**	**Summary of comments**	**Response**

		space benefits people rather than on its intrinsic value to wildlife itself. To develop land – whether for housing or other uses – is to privatise it. This Local Plan will result in privatising land which should be publicly accessible and depriving the community of amenities which benefit them. The Draft Local Plan prioritises development over the health and well-being of its citizens. This is not acceptable. It is not what people want.	
Chapter 4	Statutory weight of policies	Other concerns are held about the exemptions built into these policies. Having developed strong policies, we do not want developers to be able to easily avoid following them. As with other sections in this document, we would like to see more detail on the cases where exemptions to local plan policies will be allowed. We would also like to reiterate the need for developers to maintain biodiversity offsets in the medium to long term, to ensure this net gain is not lost.	Once fully adopted the local plan is a statutory document, and all planning decisions in Oxford will be required be in compliance with the policies it contains. The policies and supporting text will clearly set out the criteria against which proposals will be assessed. Exemptions do not

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Draft policy	Topic	Summary of comments	Response
			apply as a matter of course for all policies and where they exist, will be narrowly focussed in order to make the policy more effective while not undermining the overall objective.
Chapter 4	Short survey wording	The statement within the wording of Question 2 of the Short Survey – which states *we think it is important that Oxford is a green biodiverse city….We are protecting our important green spaces and features* – is misleading. This is not what the Council is doing.	Comment noted.

2241

Chapter 5 – A City that Utilises its Resources with Care, Protects the Air, Water, and Soil

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Headlines for Chapter 5:

- General support for policies in this chapter
- Recognising the urgent need for these policies, and those in Chapter 4, to promote sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects
- Support for carbon neutral development and more effective building design
- Concerns around carbon offsetting
- Further clarification requested over the scope of the policies
- Support for solar panels on housing and businesses
- Water quality and infrastructure should be a priority, and policies should go further

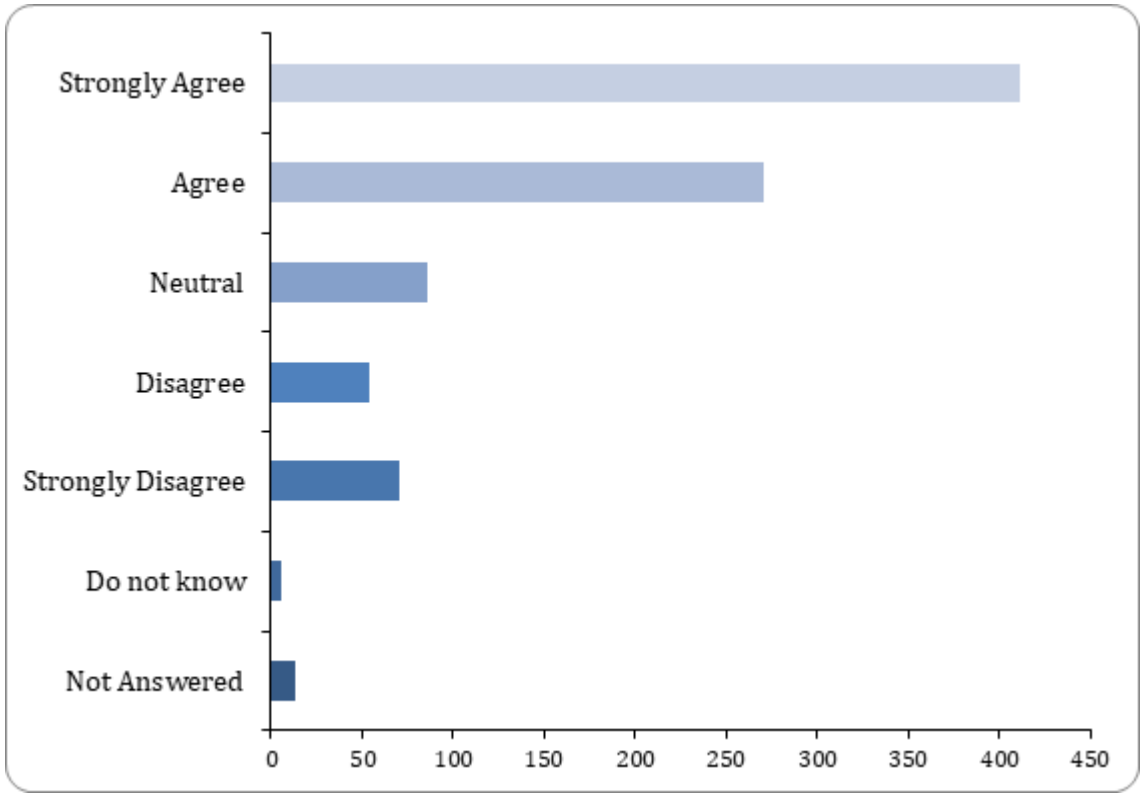
2244

Short Questionnaire Responses

Net zero carbon

We have drafted a policy that requires all new buildings are net zero carbon in operation from adoption of the plan. In a few exceptional cases, payment to offset carbon impacts will be allowed (for example for hospitals, which need to use more energy than it is likely can be generated onsite). To what extent to you agree with this approach?

There were 898 responses to this part of the question.



Option	Total	Percent

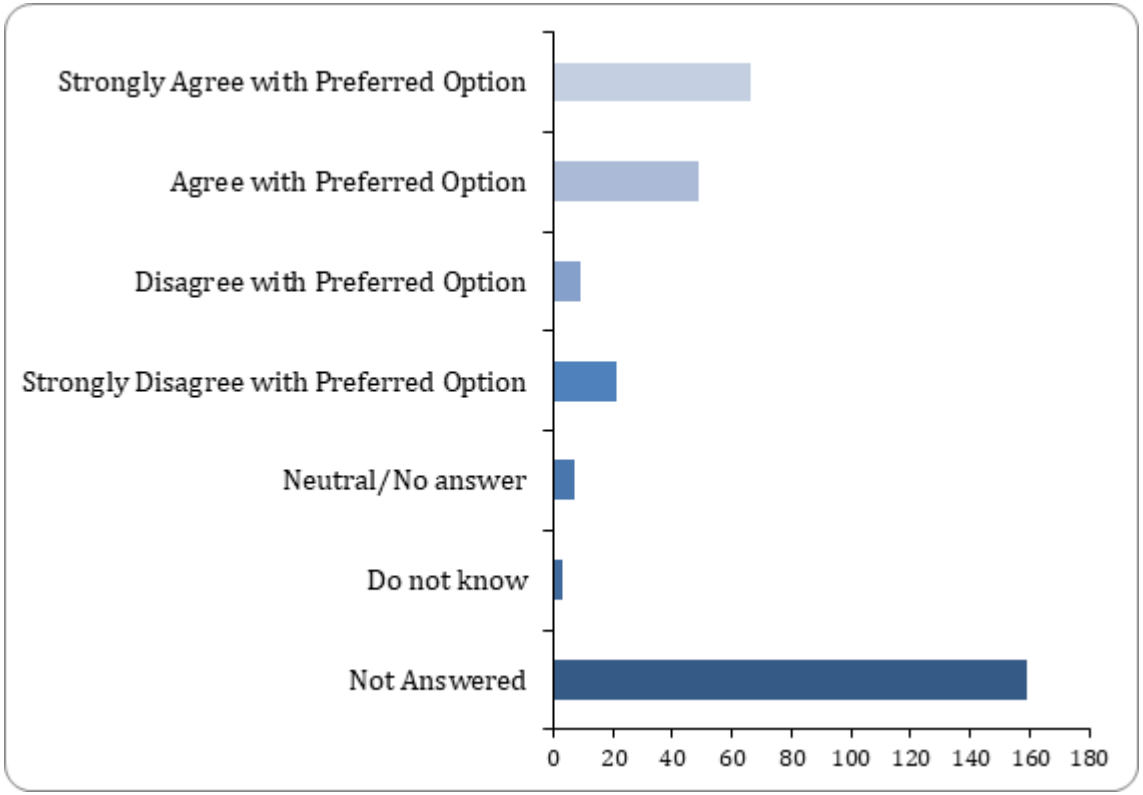
Strongly Agree	411	45.12%
Agree	271	29.75%
Neutral	86	9.44%
Disagree	54	5.93%
Strongly Disagree	70	7.68%
Do not know	6	0.66%
Not Answered	13	1.43%

2246

All Public Responses – Draft Policy R1

Please tell us what you think about policy options set 008a (draft policy R1): Net zero carbon buildings in operation. If you have any additional comments please put them in the comment box below.

There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	66	21.02%
Agree with Preferred Option	49	15.61%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	21	6.69%

All Public Responses – Draft Policy R1

Draft policy	Topic	Summary of comments	Response
R1	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	Noted.
R1	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R1	Support high standards	Support use of the energy efficiency hierarchy. Ambitious targets of measuring energy usage adhere to Passivhaus standards.	Support noted and welcomed.
R1	Welcome wording re: high energy demand non-resi uses	Various comments welcomed the changes to the policy requirements that have been made following previous representations (during Local Plan 2040 preparation), particularly in relation to ensuring that the exceptionally high energy demands of non-residential uses such as R&D/labs/hospitals are acknowledged and that higher EUI targets will be accepted where it is robustly justified.	Noted and support welcomed.

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R1	Should incentivise going further	Preferred approach should be minimum, with incentives offered for greener design of buildings.	The policy sets a strong, minimum baseline within the boundaries of what is technically feasible and viable (which we have to ensure to deliver a 'sound' plan through the examination process). We have tried to ensure that climate change is an overarching thread that runs throughout the plan – which emphasise its importance as an issue to be addressed in a variety of ways. Going further than the minimum is of course to be welcomed.

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R1	Oxford should lead the way	Oxford should lead the way and is well placed to deliver exemplary design.	Agreed – the strong suite of policies across the chapter as well as elsewhere (e.g. design policies) seek to encourage this.

R1	Policy should go further – all buildings should have solar PV	All new buildings should have solar pv on roof. Easier to install pv during construction than as retrofit. At least require that houses and new buildings have roofs that face the right direction. Buildings should go beyond net zero carbon emissions to optimising renewable energy generation where possible.	Whilst we agree in principle, the policy is technology agnostic in that it does not specify applicants should focus on any one technology. This leaves flexibility to respond to site conditions and also future-proof policy for new technological advances should they emerge. The requirement for matching energy demand through sufficient renewable energy generation seeks to ensure the capacity of microrenewable energy generation increases in tandem with energy demand. Implicitly this will most often be in the form of rooftop solar pv, but could be via other technologies where this could be more sustainable. Nevertheless, all new development should contribute to renewable energy generation, as would accord with the principle of this comment. Going beyond net zero is of course to be welcomed, we

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			have ensured that the supporting text

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			flags this could be possible in some instances.

R1	Should expand to incorporate BREEAM.	Policy R1 and its Energy Use Intensity (EUI) figures could be expanded upon to create some equivalency to BREEAM UK and/or other standardised measurements of development sustainability that are industry-recognised.	Noted – as the Local Plan is proposing high standards across various sustainability policies it was not considered necessary to require applicants to pursue separate certification, however, we will look to reference best practice standards in our supporting Technical Advice Note and applicants are not prevented from pursuing them if they desire.
R1	Oppose any allowance for applicants to avoid targets.	Strongly oppose any policies that enables applications to avoid the targets. If applications cannot meet the targets - even in exceptional cases - they should be refused. Also concerned about how the Council can enforce whether developers comply with the policy. If they do not comply with the meeting the targets - then strict sanctions should be enforced.	The policy sets out requirements that will need to be met for applicable planning applications. The approach to net zero design however is still evolving and there are potential challenges for certain typologies of development. Therefore, the policy sets out clear approaches to follow in circumstances where the criteria cannot be met. This is considered to be the most transparent and pragmatic way to set out how such situations will be dealt with in the face of

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			the known (and unknown) challenges in implementing the

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			new policy, whilst also maintaining the strongest position we can on this issue. Applicants would need to submit an energy and carbon statement detailing how they have met these requirements and the permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with the condition they could be subject to enforcement action.

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R1	Policy goes too far or is wrong priority	Approach is excessive. Net zero is contentious and politically charged. Milder policy needed with focus on adaptation. Oxford has more pressing problems than net zero/carbon reduction. Oxford has negligible impact on climate change. Should fund new technologies if this really is a priority.	National policy is clear that we need to support the transition to net zero by 2050 and take a proactive approach to mitigating and adapting to climate change. The city has a local net zero target of 2040. It is also a legal requirement of the plan-making process which would be tested for as part of examination. Beyond the benefits for reducing impacts on climate change, the policy has other drivers - including air quality (no direct burning of fossil fuels contributing pollutants),
			increasing energy security (more uptake of local generation), and increasing resilience to fuel poverty for occupants.

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R1	Policy is wrong priority	Net zero is too expensive. Poverty and erosion of local services should trump eco concerns. Net zero will kill Oxford's economy. Affordable homes should be priority.	The impacts of climate change are unequal and expected to hit the most vulnerable, including those in financial or health deprivation particularly hard because they are less able to absorb or recover from the impacts. As such these concerns are intrinsically linked (it is not one priority instead of another such as affordable housing). See response above for why this policy is important for reasons beyond mitigating climate change impacts. In relation to cost of the policy, its development is informed by viability testing alongside other policies in the Local Plan.
R1	If not net zero right now, should push for net zero ready.	As well as off-setting, should require that buildings that cannot be fully carbon zero right now, be designed in such a way to facilitate becoming carbon zero at a future date e.g. capacity to install a heat pump or other.	Agreed. The energy offsetting requirement does not replace the need for meeting the other criteria of the policy – including no fossil fuels – which would ensure it is net zero ready.
R1	Requirements are too onerous	Concerned that these requirements would be too onerous and discourage new development.	This could be in relation to a couple of factors. Too onerous to

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			achieve technically or in terms of ensuring a development is financially viable. On the first issue, the literature review included in the evidence base sets out the range of evidence from across the country that net zero in operation is technically feasible on many types of development. Where there could be challenges, we have included mechanisms in the policy – e.g. allowance for offsetting. On financial viability, the whole plan viability report details the testing of the policy alongside other requirements in the Local Plan which has informed the policy approach.
R1	Agree no fossil fuel should be allowed	Comments agreeing we should permit no fossil fuel use in new buildings.	Noted, welcome the support.
R1	Fossil fuels should be available as an alternative	Fossil fuels should be available as an alternative in case of power outages.	Noted. The policy aligns with local and national objectives.

R1	Wood-burning stoves	Would net zero houses ban open fires or wood-burning stoves? Another comment that wood-burning needs to be addressed through advertising and public education.	The policy sets the requirement for net zero development – it does not prescribe specific methods of heating which should be used to achieve this. Separate policy on air quality would also
			apply and any application proposing wood burning would need to comply with that as well as other local requirements – e.g. the city's smoke control zone which was expanded in 2024.
R1	Onsite renewable energy preference to meet energy balance	Concern that the high energy needs of some types of development (e.g. labs, life science buildings), mean it is wholly unrealistic for all energy needs to be met through onsite renewables. Non-residential uses will inevitably be required to pay an 'energy offsetting' fee.	Noted, however, meeting energy demand through energy that is generated renewably is a key component in net zero carbon design. The policy is as flexible as possible about how this is achieved. It does not require energy demand to be met through renewables onsite only, other options are allowing applicants to utilise offsite locations elsewhere in the city, or paying into the offset fund.

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R1	Onsite renewable energy preference to meet energy balance	Requirement that all energy needs are to be met on-site through renewables before looking to offsite options is inefficient (e.g. requires designing for peak demand and would often lead to a lot of excess energy being sent to an already congested grid) and could mean the energy is simply wasted. Approach is also costly and will affect financial viability.	Matching energy demand with renewables, ideally onsite, is a key element of net zero carbon buildings in operation. The policy does allow for offsite solutions where matching energy demand through renewables onsite is not fully feasible.
R1	Onsite renewable energy preference to meet energy balance	Restrictions on sites with valuable heritage may not be appropriate for on site generation, further restricting the options available to the applicant.	The policy does not require all renewable energy demand to be met onsite, this is just the preference to reduce need for
		Another comment flagged the concern that the requirement to achieve energy generation to match needs on site is in conflict with other policies of the plan (such as Policy HD8, which seek to ensure best and efficient use of land.	offsite solutions. Where insurmountable heritage constraints did apply, this could be a reason for looking to offsite (or offsetting) to meet some of the energy demand. Policy HD8 is clear that net zero carbon design is one of the considerations that should inform built form/efficient use of land.

2259

R1	More area-wide approach needed	Policy should be revised to support a more effective, area-wide approach - such as Local Area Energy Plans - and express interest in working with local authorities to develop this strategy.	Comment noted – the policy is focussed on design at the scale of new buildings, this does not mean that the Council is unsupportive of broader areawide approaches.
R1	EFW incinerator energy	Assume that energy use which is to be met through equal amounts of new renewable energy generation (ideally onsite) does not include the use of EFW incinerator energy? This is the dirtiest method of providing heating etc	The policy is not explicit about any particular technology that should be used to meet the requirements of the policy. The preference is that applicants will utilise the most effective and sustainable technologies for their particular site to meet the requirements. It is considered unlikely that an EFW solution would be put forward to meet energy needs of a specific development, but where that were the case, it would need to conform will all the policies in the
			Local Plan including those on air quality and amenity.

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R1	More detail needed in relation to energy offsetting approach	Various comments wanting more detail on how the energy offset mechanism will be applied, including in relation to: - More transparency on what the charge will be and how it is calculated, as supported by evidence. - How the Council will use these contributions, as no fund, or schemes have been established to ensure that the contributions will deliver appropriate offsetting.	It is envisaged that the offsetting fee will be published on the website and updated when necessary (e.g. to reflect inflation). This will give applicants clarity on pricing in advance. The draft process for calculating the offsetting contribution will be set out in draft in the Reg 19 background paper and would ultimately be published as part of a Technical Advice Note. The way the fund will be managed and the fees utilised for projects will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself. We agree that it is important that the funds are utilised as effectively and transparently as possible, and to fund projects which deliver true offsetting within the city.

R1	Offsetting charge impact on viability	Concern offsetting charges lead to uncertainty around the financial cost on development. This is a further financial burden on commercial development which further calls into question the viability of such developments.	See response above which sets out how we will convey the price and proces for determining offset fee in advance to applicants.
			Policy S4 details how viability concerns arising from offsetting will be addressed and includes a mechanism by which these can be reduced incrementally if needed, though the development will still need to meet the other requirements of R1.
R1	Audit trail for offsetting fund.	Council will need to ensure that it has a suitable audit trail for payments made and projects delivered and the amount of carbon offset.	Noted and agreed – this will be considered further as the process for managing the offset fund is further developed, which is a separate consideration to the Local Plan development.
R1	Oppose offsetting	Requirement that compensatory renewable energy capacity be onsite is a silly gimmick and should certainly not be law.	Offsetting is an option that can be used as a last resort, the preference is for applicants to meet the policy requirements in full through onsite solutions.

R1	Offsetting as last resort	Offsetting should be used only in extreme.	Agreed, the draft policy set out that it should only be considered as a last resort.
R1	Offset mechanism is a get out clause. If needed, should be spent appropriately.	Oppose the offset allowance – this is a get out clause for developers. If needed, offset fund should be directly used/ring-fenced by the City Council for the retrofitting of community buildings for community energy hubs, such as local schools, nurseries, village halls and community centres. Particularly targeting areas of highest fuel poverty.	Offsetting (as a last resort) is the most pragmatic way to address the challenges that some types of development will face in the context of existing technological constraints. Funds can help to deliver retro-fit to existing buildings which currently contribute to emissions. The process for spending funds and identifying suitable projects is subject to further work alongside the Local Plan. It is important that the funds are used to deliver true offsetting that would not happen otherwise and be in line with the objectives of the policy. We agree that, where possible, it would be valuable for these projects to also secure wider public benefits such as delivering retrofit to community buildings and those in greatest

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			need, although the explicit criteria will need to be considered further.
R1	Have alternative forms of energy use rating been considered?	Despite different EUI targets for high energy use developments, concern that these and space heating demand targets are not useful for a number of building types which can make implementation more challenging. The use of the Display Energy Certificates (DEC) could be considered as this methodology allows for various building types within its methodology.	Using Energy Use Intensity as the key performance metric provides for a standardised approach to measuring performance across all buildings. All buildings should be able to calculate performance using EUI (overall energy use, divided by gross internal floor area). The specific EUI targets they can feasibly achieve may differ between typologies (hence different targets for resi/nonresi/high

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			energy uses in the policy). It is also the performance
			metric recommended by a growing body of industry.
R1	Support in principle	Where applicants have limited land control, delivering renewables offsite is not likely to be achievable and, where the City already recognises a significant shortfall in land available to meet the City's need for housing, it is questioned how reasonable an approach this is.	The policy also allows applicants to pay into an energy offsetting fund where they are unable to deliver renewables onsite or on land elsewhere in their control.

2265

R1	Objection (focus on viability)	Unclear how requirements have been tested in respect of sheltered and extra care housing proposals. Of the viability testing undertaken in respect of older person's housing in the 2023 study, there are multiple scenarios where even in the highest value bands and lowest benchmark land value scenarios, 0% affordable housing is viable and indeed, some of the land values generated are negative. This implies that there will be situations where the various sustainability enhancements are unviable for this typology. Recommend that viability evidence is updated to reflect comments before any enhancement costs such as proposed here may be considered viable.	The policy's development is being informed by whole plan viability testing. Comments from this consultation will be taken onboard where applicable.
R1	Concerns over viability and deliverability	The requirements of the policy may harm the viability of large schemes because of other requirement burdens. Meeting both regulated and unregulated energy targets entirely through onsite renewable energy is unlikely to be deliverable. The requirements add a costly compliance layer that the Plan itself admits will be "more challenging" and may require offset payments for high-energy research labs and hospitals. Viability impacts will push applicants to cascade and end up trimming off other public benefits like affordable housing.	The policy's development is being informed by whole plan viability testing. As set out above, where applicants are unable to provide enough onsite renewable energy generation to meet energy demand, the policy allows for other options (e.g. offsetting). The viability cascade as set out in policy S4 sets out a clear strategy for how contributions should be

2266

			reduced, beginning with energy offsetting (development will still need to meet other requirements of R1), before looking to other topics like affordable housing.
R1	Policy exceeds national requirements	Concern that the Council is pushing for energy efficiency standards of new homes that go beyond the Future Homes Standard (FHS). Also concern that Council is going against Written Ministerial Statement of 2023. It was flagged that requiring net zero in line with building regulations has various advantages including requiring the same approach that all developers can understand and which can be rolled out at scale. Any jump in standards also necessitate phased transitional arrangements to enable market to adapt. Some comments were that the Council should stick to national standards (and set no local standards) in light of this. If going beyond current or future standards it must be done in a way that is consistent with national policy and Council should fully assess consequences (e.g. viability and feasibility).	Relying on national standards alone, even with the uplift that will be brought in through the Future Homes and Buildings Standard would not deliver truly net zero buildings in operation. The local policy is important for supporting the local net zero target of 2040; reducing the number of buildings that will require retro-fit in future; as well as reducing exposure of future occupants to risks of fuel poverty. The approach proposed is consistent with net zero carbon policies that are increasingly being adopted across the country and as is reccomended by various national bodies.

2267

R1	Alternative standards should be used – more aligned to Future homes standard	A pragmatic route would be requiring net-zero-ready fabric (national Part L uplift, no new gas) and let developers meet unregulated loads through market-led efficiency gains and grid-scale decarbonisation— as the Future Homes Standard is designed to do—while still encouraging onsite renewables where they are technically and economically rational.	Noted, see response above.

R1	Policy forces householders to seek alternative ways of heating extensions to main house.	The policy is not justified and is ineffective. 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, e.g. a householder can insulate the rest of the house at the same time as the extension construction.	The draft policy set out that 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. As such the requirement for no fossil fuel in the extension is only engaged in the latter case (where the extension would result in selfcontained dwelling). We will look to whether there is a way to make this clearer in the Reg 19 draft.

2268

R1	Policy is overly prescriptive, lacks flexibility	Draft Policy R1 is overly prescriptive, lacks flexibility, and lacks a tested, evidence-based exemption process which risks deterring investment key employment sectors. Example given relates to proposed 20 kWh/m^2/yr cap on space heating and the blanket ban on fossil fuels - Lab buildings often have unavoidable high energy use due to mechanical ventilation, pressurisation systems, and internal environmental controls.	The policy sets key energy performance standards but allows for flexibility in how these are achieved – e.g. not being prescriptive about technologies. There are also mechanisms in the policy which set out what applicants should do if any requirement can be shown to be not feasible.
R1	Policy is not supported by evidence	Policy is not underpinned by sufficient evidence.	The policy draws on a range of evidence that supports the technical feasibility of delivering net zero (and the situations where it is more of a challenge) that has been produced across
			the country from a variety of comparable local authority areas. This is summarised in the Literature Review. The policy is also supported by the range of analysis set out in the net zero carbon background paper.

2269

R1	Policy creates substantial uncertainty for complex science and innovation facilities	Policy creates substantial uncertainty for complex science and innovation facilities. Requiring 100% on-site energy generation is unrealistic for R&D campuses (due to have high energy loads and limited roof or land space for renewables).	As covered earlier, where onsite renewable energy generation to meet energy demand is not achievable, there are other options allowed for in the policy.
R1	Policy could have various negative impacts for design and expense.	Requirements could distort site design, waste land, or necessitate expensive, inefficient infrastructure.	We have set the policy to be as flexible as policy to enable variations in site context and needs of different proposals whilst still requiring key performance standards to demonstrate net zero in operation.
R1	National policy does not support need for full selfsufficiency.	National policy supports low-carbon design and energy hierarchy principles, not full self-sufficiency.	The city has a local net zero target of 2040 and the national requirement is 2050. The policy sets requirements which will help to ensure that new development that will exist beyond both of these dates would not require extensive retro-fit in future. It will also help to address other challenges like air pollution, energy security and fuel poverty.

2270

R1	Lack of published viability testing	Viability of these requirements have not been tested through a published viability assessment. When coupled with other policies, it risks pushing R&D schemes beyond deliverable limits.	The whole plan viability testing will be published at the next stage of consultation. The development of the policy is informed by viability testing alongside other policies in the Local Plan.

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R1	Policy should do more regarding heat networks	Policy is limited in what it says about heat networks. Words like 'consider' are too easy to ignore. Central government policy (DESNZ) is strongly towards the delivery of heat networks in urban areas and Local Plan should be a catalyst. It is suspected that connected to a heat network will be cheaper than other solutions. It is recommended that the Policy be strengthened by mandating connection or, failing that, mandating a business case to be undertaken with an existing HN operator to demonstrate that a connection is not viable. Wording should state that it is an "*expectation*" or "*requirement*" to connect where networks are available and have capacity. Also, limited acknowledgement or support given to assist overcoming challenges to the development of heat networks in Oxford i.e., extensive heritage assets and rivers	The policy sets out a framework of performance standards for ensuring new buildings are net zero in operation. There can be a variety of technological solutions that would enable the various criteria to be met. The Local Plan continues the approach of the adopted Local Plan in not explicitly favouring any one technology – so as to allow the most sustainable solution to come forward for each site, depending on its context. This also allows for future-proofing of the policy where new or improved technological solutions become available. We are aware that heat networks can be seen as playing an important role in certain contexts and have explicitly flagged this as a consideration in the policy – however, we would maintain that

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			flexibility should be retained for applicants to pursue the most sustainable option for the proposed development. We would be open to exploring how further support for applicants pursuing heat network connection could be expanded upon in supporting guidance for the policy such as the intended Technical Advice Note that is envisaged.
R1	Connecting to existing energy networks as an alternative to onsite generation.	Alongside on-site generation of renewable energy, policy should give equal weight to connections to existing renewable / LZC energy technologies (e.g., district heat networks) to fulfil heating requirements of developments. As currently worded, could discourage developers from connecting existing networks. Additional wording suggested to add to the energy hierarchy requirement – allowing connection to offsite heat source alongside onsite renewables.	As set out above, we acknowledge that there can be a variety of technological solutions that would enable the various criteria to be met – this could include connection into a heat network where available. We disagree that the wording would discourage applicants from pursuing this option where it is the most fitting solution for their site and for meeting the policy requirements.

R1	More clarity needed on types of applications policy applies/does not apply to	Policy sets out requirements for additional deliverables/ supporting energy-related information for all new development but does not distinguish between different types of development (and their nuances). E.g. Policy sets out that the Council would expect this information to support planning applications for renewable / LZC developments, (despite it being irrelevant to such developments). Should seek to introduce policy wording/ supporting text to confirm that this would not apply to renewable / net zero carbon technology development (such as energy centres/ infrastructure associated with district heat networks and other renewable energy development).	The starting point of the policy is that all new buildings should be net zero carbon in operation. It is acknowledged that various types of development will have their own nuances and requirements. The policy sets out what is expected of proposals where compliance with the requirements is not possible and allows for applicants to justify this.

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R1	Policy should address need for Energy Centres.	Neither the Policy nor the Local Plan makes reference to energy centres which are fundamental to developing heat networks. The plan does not allocate any sites for energy centres and is unsupportive and restrictive planning policy context for any planning applications. Applicants would need to overcome any policy designations / allocations on otherwise suitable sites to make development permissible. Energy centres are key to net zero carbon goals and can bring wider positive benefits e.g. jobs, public health. Additional wording suggested including that low carbon energy centres be supported alongside development of heat networks; that Council will work proactively with developers to overcome constraints like heritage, infrastructure and crossing water; that Council will expect developers to connect to a network where is has sufficient heat/capacity; and that where applicants propose not to connect they provide robust justification.	We agree it would be helpful to also flag support of energy centres alongside general heat network development and will amend the policy as such. However, an allocation in the Local Plan is not considered necessary to allow the development of an energy centre to come forward in a suitable location in the city. An allocation would also not negate any additional policy considerations in the Local Plan that development would need to comply with where these are of relevance to developing in a certain location.

			See previous responses which address other elements of these comments.

2275

R1	Suggested Energy Centre Site Allocations	Whilst aware of the development constraints within the Oxford, have identified two suitable sites for an energy centre that would minimise impacts on heritage / Green Belt / other environmental considerations. Propose that Council removes/ reduces GI protection and allocates for energy centre: • Former Hinksey Campsite – part of core GI network but considered to have limited scale/ quality of GI on site and not of significant ecological value. Site is no longer in use as a campsite and no longer confers social benefit. • Park Farm - currently allocated for residential development thus principle of development is accepted. Allocation now being removed indicates site is not needed for housing. Site is not publicly accessible, limited in green features and has minimal opportunity for biodiversity – thus unclear why it has supporting status in the Green Infrastructure. Securing site allocations to allow energy centres to come forward will enable the benefits of the proposed network to be realised. A future network would ultimately require multiple energy centres to power the network in future phases, thus both are needed as allocations.	As set out above, a specific allocation in the Local Plan is not considered necessary to allow the development of an energy centre to come forward in a suitable location in the city. The Local Plan has sought to identify sites for designation within the Green Infrastructure Network (as either core or supporting spaces) where they meet particular criteria regardless of location. Where a site may be identified as beneficial for another use, this would not negate the considerations regarding its identified green infrastructure value.
R1	More guidance/support needed for sports facilities	Sport England is concerned that new or upgraded community facilities may not be delivered, or old community buildings may be retained that cannot meet current standards for accessibility. Sports facilities will face different challenges to other sectors when seeking to make their facilities more sustainable. Important that the Plan considers including polices that operators of these facilities can	We appreciate that there will be various nuances and challenges for each type of development. The policy includes varying targets for some different types of development as well as

2276

		navigate. Could the Local Plan point to our guidance on delivering sustainable sports facilities and flood prevention?	mechanisms that can be followed where particular site/proposal specific constraints will make certain requirements challenging. There are limits to how far we can diversify the policy to meet every different type of application however. We intend to produce an updated Technical Advice Note which provides additional guidance in meeting the requirements of policy R1 and this could be a place where we can link to more specific guidance for particular types of application.
R1	No mention of community owned energy/local energy hubs	No mention of "community owned energy hubs" or "local energy hubs"- which should be far more common features of any large application. With reference to the success of Low Carbon Hub projects in Oxford City Centre, there could be more emphasis on locally generated and owned energy hubs, as an inherent part of the design.	We will incorporate reference to these within the supporting text of the policy.

R1	No mention of cooling	There are multiple details about heating methods but no mention of air-conditioning or cooling systems. Although we are aware that a/c would increase energy use - the use of cooling systems would be used at a time of increased/excess solar energy (and when there is less need for heating) We are concerned that if city over-heating is not mentioned and the option of a/c and/or planting large trees near buildings (prioritising care homes, hospitals, schools and nurseries) is ignored, then the future of health and wellbeing could be at risk.	Pursuing high fabric efficiency, in line with designing in accordance with the energy hierarchy, should have equal benefits for keeping the building cool in summer as it does warm in winter. However, we agree that addressing overheating will be an increasing issue, and separate policy G9's resilient design requirements
			specifically set out that applicants need to thinking about this issue (criteria a and b) – including having a cooling strategy.
R1	Supplementary guidance should be produced.	Supplementary guidance should also be given to developers on how to meet the targets, including changing plans, such as position/direction of solar panels.	Agreed – the design checklist (in appendix) touches on various aspects of net zero design and should support applicant's iin approaching their design. Equally, we intend to produce an updated Technical Advice Note which provides additional guidance in meeting the requirements of policy R1.

2278

Statutory Consultee Responses – Draft Policy R1

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

2279

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R1 Net Zero Buildings in operation	**Climate Action** We are strongly in favour of the preferred option for this policy, and support the inclusion of regulated and unregulated energy in the net zero carbon mandate. Consideration should	Noted. We will consider setting a separate lower EUI target for schools compared to other non-residential uses.	Oxford City Action: Consider proposed wording going forward.

	be given to setting a separate, lower EUI target for schools, compared to other non-residential uses. We support the reference to heat networks and the need to consider connections at design stage where relevant. Consideration should be given to the solar orientation of new buildings and developments at design stage to maximise solar capture and ensure thermal comfort. The policy should specify a preference for onsite offsetting of residual emissions through naturebased solutions which also provide other adaptation-related benefits such as shade, cooling, and flood risk management.	Noted. Consideration is given to orientation and solar gain in policy HD11: *Privacy, Daylight and sunlight,* Policy HD13: *Outdoor amenity space.* The Design Checklist – Appendix 1.1 also discusses building orientation to maximise solar gain, glazing design to ensure thermal comfort. We can consider whether "on-site offsetting" would work in a constrained city such as Oxford.	No Action Required No Action Required Oxford City Action: Consider proposed wording going forward.
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

	This policy should require proposals for redevelopment of a building to improve the energy efficiency of the building and consider retrofit measures which could be undertaken alongside the proposed works. Proposals which significantly improve energy efficiency should be supported.	Policy R1 already sets out that proposals for conversions and changes of use. Policy R3 supports retrofit of existing buildings and expects the energy hierarchy to be followed.	No Action Required

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy R1	Part 2 of draft Policy R1 should be more specific and refer to limiting unregulated energy demands only, whilst still including a regulated total energy cap set by supporting evidence. Regulated energy is easier to limit than unregulated energy in these cases, so providing a regulated energy cap would allow for carbon emissions to be reduced whilst allowing flexibility for applicants. Support the aims but more evidence than the literature review is required, including viability, energy modelling. Part 3 regarding EUI is inaccurate. The wording 'the portion of the development's total EUI associated with space heating is no more than 20kwh/m2/yr should be reworded to ensure it accurately reflects the space heat demand metric.	We concur that the requirement in criterion 3 could be worded more clearly and will amend this for the Reg 19 draft of the policy. Regarding criterion 2, we disagree that the policy should only refer to limiting unregulated energy demands and the EUI target applies to total energy (regulated and unregulated). We envisage that the supporting technical advice note can incorporate additional guidance on how we expect applicants to justify where a higher EUI is	Reg 19 draft R1 wording for criterion 3 will be updated in relation to space heating demand. R1 supporting text will flag the preference for net zero carbon heat sources in heat networks.

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	Space heat demand is the amount of heat needed to keep the building at a comfortable temperature, regardless of how that heat is delivered, whereas EUI reflects the actual energy use at the meter. All industry frameworks recommend using actual space heat demand as the metric. Should change 'EUI associated with space heating' to 'space heat demand'. Recommend undertaking feasibility work to determine EUI requirements by building type, to assess whether they can be more ambitious where technically feasible. We recommend that Policy R1 states that heat networks should be powered from zero emission sources	needed and this could potentially include steps taken to reduce regulated and unregulated loads in turn. We agree that additional evidence is required in relation to viability, and will of course be viability testing the policy alongside the other policies of the Local Plan. However, we disagree in relation to energy modelling. The intention of the literature review was to set out the ever-increasing cumulative evidence base that justifies similar policies emerging/adopted across the country. This focusses on local authority areas whose evidence examines locally applicable building typologies to what could be expected to come forward in Oxford. These all generally show that net zero carbon development is *technically feasible* for types of development we expect to come forward under the new Local Plan.	

2283

		We agree that heat networks being powered from net zero	

2284

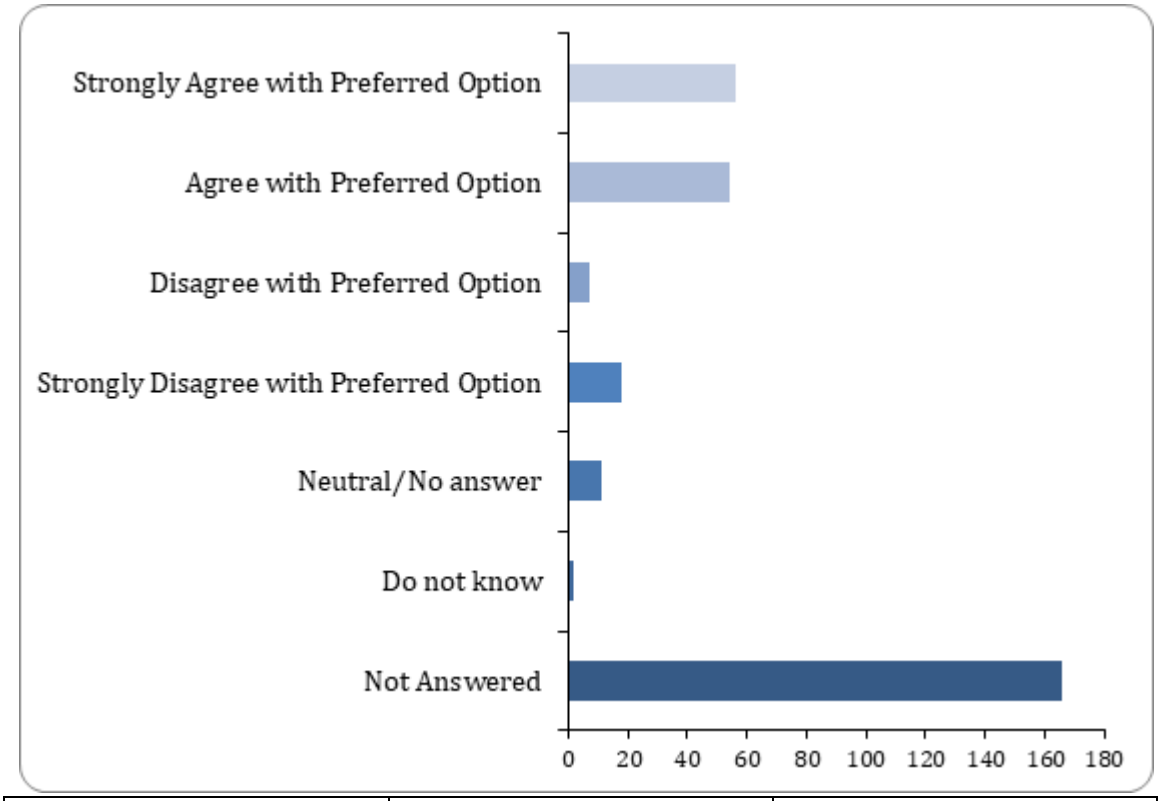
		sources should be the preference in the first instance and this should be highlighted in supporting text. However, we are unsure whether low carbon sourced networks with a clear pathway to net zero in future should be firmly ruled out, particularly if other sustainability considerations apply.	

2285

All Public Responses – Draft Policy R2

Please tell us what you think about policy options set 008b (draft policy R2): Embodied Carbon. If you have any additional comments please put them in the comment box.

There were 148 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	**56**	**17.83%**
Agree with Preferred Option	**54**	**17.20%**
Disagree with Preferred Option	**7**	**2.23%**
Strongly Disagree with Preferred Option	**18**	**5.73%**
Neutral/No answer	**11**	**3.50%**
Do not know	**2**	**0.64%**

Not Answered	**166**	**52.87%**

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All Public Responses – Draft Policy R2

R2	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	Noted
R2	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R2	Welcome the proposed policy	Various comments flagging support. Comments included that applications that seek to limit embodied carbon should be considered favourably, as well as where a fabric-first approach taken. Other comments included that policy is overdue and would bring in line with RIBA recommendations, or that it would address concerns about embodied carbon impacts of previous buildings in city being knocked down and replaced. Also, that the principle of this policy helps meet Net Zero objectives.	Noted and support is welcomed.
R2	Support principle of asking applicants to consider impacts and take actions.	Supportive of the principle that developments are expected to demonstrate consideration of embodied carbon in the construction process and take actions to limit this as much as possible through careful design choices.	Noted and support is welcomed.
R2	Mixed support and concern	Some comments welcomed the flexibility of the policy not having targets. Others felt that the policy is too rigid. Lacks clarity and that more flexibility is needed particularly for the science and innovation sector. Also some concern about onerous requirements but also support a quantitative approach.	The range of comments reflects the complexity of this topic. See responses below which respond to these issues raised.

R2	Policy should go further – explicit targets needed.	Some felt that the Council should take stronger position on sustainable development including embodied carbon in light of the current climate crisis. Some felt that the policy should include specific requirements for major development measuring embodied carbon during construction through a recognised methodology. Others have specific targets e.g. South Gloucs - 625kgCO2e/m2 for residential of four storeys or less, to 970kgCO2e/m2 for major nonresidential schemes	As the consultation set out, the topic of embodied carbon is incredibly complex, and still subject to evolving learning and guidance. The policy is intended as a stepping stone to potentially stronger requirements in future as understanding and approaches
			to reducing it improve. It takes requirements further than the currently adopted Local Plan by seeking to ensure applicants consider the issue of embodied carbon appropriately based on the scale of their development and demonstrate how they have sought to reduce it.

2289

R2	Policy should be removed, current barriers are too extensive.	Aecom, research highlights issues with the lack consistency in reporting on carbon assessment outputs, the quality of carbon assessments, large gaps in the availability of both product specific environmental product declarations (EPDs) and generic data, the variation in product carbon results for similar building products, and lack of consistency across carbon tools. Also highlights issues with the uptake of lower embodied carbon materials and products due to costs, risks and insurance, the need to upskill the industry and access to carbon tools. The challenges have not been addressed yet and are not likely to be addressed in the short term. Without consistent data and information, almost impossible for applicants to provide decision makers with reliable information on which to base a decision. Policy should be deleted.	Whilst understanding is still evolving, the policy is considered to be a flexible and pragmatic response to the need to take actions to limit embodied carbon wherever possible without setting strict targets (for the reasons set out in previous response above). As buildings become net zero in operation, embodied carbon in construction will become the primary source of emissions and this needs to be considered.
R2	National standards will ultimately address embodied carbon – no need for local ones	National standards already moving towards a unified approach (draft Part Z) – setting local standards risks double-regulation and overcomplicates approach with various potential consequences. Oxford should let forthcoming national standards handle the complex, rapidly standardising field of embodied-carbon measurement.	This is not certain – the policy wording includes flexibility to defer to national standards where they arise in future.
R2	No policy needed	No local policy needed – no further reason given.	Comment noted

2290

R2	Demolition is a last resort	Policy should explicitly set out that demolition is a last resort, especially when a building has not exceeded its expected useful life. Another suggestion was for the policy requirement to be more strongly worded: “prioritise the renovation or retrofit of existing structures, as part of an efficient use of resources and minimising carbon emissions”	Comment noted – the policy sets out expectations for applicants to show they have considered whether reuse is feasible.

2291

R2	Variety of concerns with criterion a (explore reuse of buildings before demolition)	Various concerns related to criterion a of the policy and the requirement to explore reuse before resorting to demolition including: - That feasibility of retaining existing buildings does not just relate to technical considerations such as structural limitations or operational requirements. - That the requirement ignores longer term sustainability benefits of replacing some buildings (e.g. where they are inefficient) which may outweigh carbon cost that come from demolition and that may derive larger carbon savings in the future, along with wider social and economic benefits - That is unclear how the Council will assess the feasibility of re-use vs demolition. - That this is an open-ended policy test which leaves the final assessment down to the judgement of the decision-maker at the end of the process, reducing certainty for applicants. - That national policy does not strictly prohibit demolition, nor does it suggest that carbon saving policies should be prioritised over the growth of the economy and innovation. - That the requirement stifles potential for innovation.	The policy is not intended to rule out demolition entirely, or to force applicants to retain all existing buildings. We agree there can indeed be good reasons for replacing existing buildings. The policy simply seeks to introduce a requirement that applicants begin the design process of their site by exploring potential for reuse of existing buildings and robustly demonstrating through their application that this has been determined to be unfeasible before resorting to demolition (explaining why). We have incorporated wording into the supporting text to the policy which expands on criteria a and acknowledges that replacement of buildings can have benefits which override their retention for a variety of reasons.

2292

R2	Support in principle – More focus on whole life carbon testing	Whilst supporting the approach to exploring reuse of buildings in principle, but flagging similar concerns to the above, one comment set out that the Council should place greater emphasis on whole life carbon testing to ensure that operational carbon of existing buildings is factored and that buildings constructed have a longer life span and are capable of flexibility rather than constructing a low embodied carbon building now which is no longer fit for purpose in future years.	Applicants need to set out in their Energy and Carbon Statement how the principles in the policy are embedded in design choices. There may be justifiable reasons why particular design choices need to be made which diverge from some of the principles and this will be for the applicant to explain through their statement. Whole life carbon testing could be one means of justifying a particular design choice, but we have not mandated this as a requirement in showing how the principles have been responded to. We have incorporated some wording into supporting text to help clarify this.

2293

R2	Support in principle – more focus on comprehensive redevelopment approach	Another comment in relation to the approach of criterion a was that the policy should support a comprehensive redevelopment approach where planning and place making benefits outweigh those achievable through the limitations/constraints imposed by reuse of existing buildings. A supporting paragraph should be introduced to go alongside part a) to reference that any such assessment 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 encourage redevelopment to deliver optimum outcomes. This would ensure that brownfield sites with existing buildings and those allocated for redevelopment in the Local Plan are optimised where a	As per response earlier, we have made sure to incorporate some wording in the supporting text that responds to this point.

2294

		retention approach renders development undeliverable. This would particularly be the case for the Templars Square site.	
R2	Impacts on need for intensifying employment sites should be considered	Oxford is seeking to intensify existing employment sites and there may be an existing building on a site that would not be suitable for the proposed employment use and would not result in making the best and most efficient use of brownfield land. It is therefore proposed that the following wording in bold is added to part a): “Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or where it is not making the most efficient use of brownfield land, before resorting to demolition”	As per response earlier, the wording we have incorporated into the supporting text to the policy expands on criteria a and acknowledges that replacement of buildings can have benefits which override their retention for a variety of reasons.

R2	Policy should be "retrofit/refurbishment-first" not retrofit/refurbishment *only*	Policy R2 should be a "retrofit/refurbishment-first" policy, not a "retrofit/refurbishment *only*" policy. Partially addressed in criteria (a), however the wording highlighting the potential benefits of replacing buildings should be included.	The policy is not intended to be a "retrofit/refurbishment *only*" policy. See earlier response.
R2	Concern justification of demolition will be too easy	Support principle that repurposing existing buildings should be default before looking to demolish. Concern that Council will be swayed by expensive reports that too easily justify demolition.	Comment noted.
R2	Additional guidance for the TAN	Suggest including text in future technical advice note on the re-use of existing buildings being dependent on whether they are suited to the requirements of the site.	See earlier response, we have added wording as part of supporting text which addresses this issue.
R2	Some elements of policy should be conditioned, not required up front.	At planning application stage, it is not always possible to define with any certainty the source of materials. This is not known until a contractor is appointed, after planning permission has been granted. As such certain elements of this policy should be conditioned and should not be required up front.	Comment noted
R2	Additional evidence needed to support applications	The policy introduces the need for complex Energy and Carbon Statements including Whole Life Carbon Assessments as well as quantitative measures for reducing embodied carbon, amongst various other additional reports through the new LP. Government has wider ambition to streamline the planning system and additional requests for information through local	The draft Local Plan seeks to ensure that applicants' evidence for demonstrating how the requirements of policies R1-R3 are met, is submitted as part of an Energy and Carbon statement. This is to ensure a

2295

		policy in support of planning applications should be examined carefully.	consistent way of collating this information across applications
R2	Support proposed threshold for Whole Life Carbon Assessments	Support only requiring submission of Whole Life Cycle Carbon Assessments for larger applications (developments of 100 or more dwellings, or 10,000m2 or more non-residential floorspace). This will enable flexibility for future development in the city which will ensure embodied carbon principles are incorporated without adding unduly high burdens on small developments.	Support noted.
R2	Object to requirement for Whole Life Cycle Carbon Assessment.	Embodied-carbon auditing is technically demanding, data-poor, and still evolving. Forcing every major scheme to commission a WholeLife-Cycle Carbon Assessment and negotiate bespoke reduction measures will lengthen pre-construction phases, raise consultant fees and tilt marginal brownfield projects into non-viability – ultimately impacting pipeline of needed development.	Comment noted, the draft policy requires only the largest scale developments to undertake WLCCA – rather than every major development.
R2	Whole Life Carbon Assessments for all development	Whole Life Carbon Assessment should apply to development at all scales. Given the sustainable development goals within this plan and the national targets it is important to understand the embodied carbon implications of all development.	Comment noted. It is important the policies are proportionate, justified and achievable, which the policy as written is considered to be.

2296

R2	Object to lack of detail regarding Whole Life Cycle Carbon Assessment requirements	Policy requires Whole Life Carbon Assessments (WLCAs) for largescale new-build development but does not specify: - The required methodology; - The system boundaries (e.g. whether lab fit-out, site-wide infrastructure or external plant are included); - Baselines or benchmarks by building type or use class; - Measurable reduction targets.	The policy does not set targets that should be met in terms of overall embodied carbon or how much reduction should be secured through design process for the reasoning as set out in response to earlier comments above. It is for the applicant to
		Lack of detail prevents meaningful engagement during design/ planning process & creates risk of subjective/ inconsistent decisionmaking.	set out how far they have limited embodied carbon in line with the spirit of the policy and within the existing constraints and specific requirements of their particular proposal. In terms of required methodology, including the specifics of what a WLCCA should cover, this would be expanded on in a technical advice note, which can more easily be kept up-todate to reflect evolving best practice and understanding.

22297

R2	Enforcing requirements of policy	Compliance should be strictly enforced with sanctions for noncompliance. If applications do not adhere to the specific targets set, then applications should be sent further guidelines, and if not followed, should be refused. No point in allowing plans to “demonstrate a robust feasibility survey” and then allowing to exceed carbon targets.	Whilst we appreciate desire for targets, and have responded above on this point, we do not currently see a way to introduce these and assess in a consistent way. Applicants would need to submit an energy and carbon statement detailing how they have met the policy requirements and the permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with
			the condition they could be subject to enforcement action.

2298

R2	Objection – policy not clear	This policy is not effective. It is not clear whether it applies to buildings in Conservation Areas (Designated Heritage Assets)	The draft policy clearly sets out that the first part (the principles set out in criteria a-e) applies to all development, and the second part (criteria f and g) applies to large scale new-build development that meets the size thresholds. It would apply to development within conservation areas or outside of them where they meet the above conditions – though of course other policies would also need to be considered (e.g. HD1 Conservation Areas).
R2	Clarification needed	Council should clarify what it means by major development.	The term major development is as defined in the town and Country Planning legislation.

2299

R2	Objection – specialist buildings not considered	Policy doesn't consider specialist nature of lab/ R&D buildings. These buildings often require bespoke, heavily serviced structures that may limit opportunities for material reuse/ application of low-carbon alternatives. Blanket requirement for reuse/ prescriptive performance thresholds risks undermining building safety, functionality, or future adaptability.	Criteria a-e are not rigid in their requirements, they set out particular principles in the design/construction process which need to be considered. Generally, operational requirements of a proposed development will be able to be factored into how they are responded to. E.g. in terms of criteria b – it does not explicitly ask for all materials to be reused,
			or for no waste to be generated – it asks for the Energy and Carbon statement to show that waste has been minimised and reuse of materials maximised, and of course, particular needs of a building's design and construction will influence how far these asks can be demonstrated.

2300

R2	Objection – not viability tested	Concerns about policy increasing cost of development, and that the cumulative burden with other policies has not tested through Viability assessment. Additional assessment, reporting and material specification costs all add pressure to schemes that already face tight margins due to lab specification, planning obligations, and land values.	The whole plan viability testing will be published at the next stage of consultation. The development of the policy is informed by viability testing alongside other policies in the Local Plan.
R2	TAN should be published before Reg 19 to inform comments	The Council intends to produce a TAN - this must be issued before/ at Regulation 19 for informed comment.	Technical Advice Notes are intended to aid applicants and provide additional support/guidance in meeting the policy requirements. It is not necessary for informing comments on the requirements of the policy itself.
R2	General comment	It is possible to carbon cost the Local Plan as it develops and site details develop?	Unfortunately, without being able to predict the finer detail of how each new development brought forward across the plan period would be designed – e.g. specifics of site layout, materials

2301

			used, processes of construction – any quantitative carbon estimate would be subject to significant uncertainties. The Sustainability Appraisal does seek to consider the impacts of the Local Plan against carbon emissions at a very high-level and in a more qualitative way, as it this is one of the 12 SA objectives. The assessment draws out the importance of including policies like R1 and R2 in mitigating carbon impacts as much as possible.

2302

Statutory Consultee Responses – Draft Policy R2

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy R2 Embodied Carbon	**Minerals and Waste Policy & Strategy** Odd choice to use the phrase 'from cradle to grave' when referencing whole life carbon cycle – in a truly circular economy there should be no 'grave', suggest using 'lifetime of the development' as an alternative phrase.	Noted. We can consider an alternative phrase for the next draft of the plan.	Oxford City Action: Consider proposed wording going forward.

2303

	Welcome point b in Policy R2 – minimisation of waste generation, and re-use and recycling of materials.	Noted.	No Action Required
	Climate Action We suggest referring to the use of nationally recognised tools in order to produce a relatively standard response for Lifecycle Assessments which will be easier for officers to assess (e.g. OneClick LCA).	We can consider whether it is appropriate to recommend a particular Life Cycle Assessment within the Plan or whether this issue would be better explored within a Technical Advice Note.	Oxford City Action: Consider proposed wording going forward.
	Innovation We are pleased to see the inclusion and emphasis on embedded carbon and the innovative choice of alternative materials that this focus can lead to. One such is the increased use of timber in construction. This also has the potential of reducing the quantity of concrete in foundations as wooden structures can be lighter than traditional build.	Noted.	No Action Required

2304

Historic England

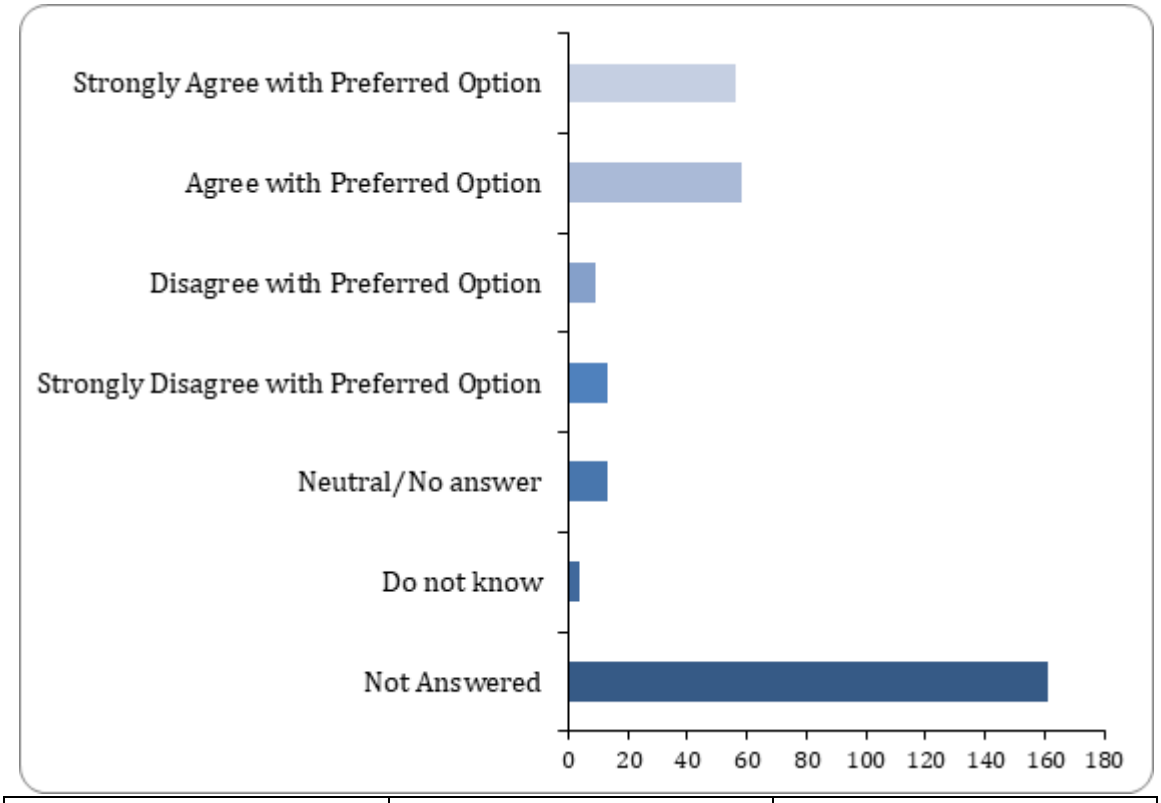
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R2	Welcome policy and encourage supporting text to make explicit the link to heritage conservation. Building re-use has the potential to contribute to the Council's positive strategy for the historic environment.	Support welcomed	N/A

2305

All Public Responses – Draft Policy R3

Please let us know what you think about Policy Option Set 008c (draft policy R3): Retrofitting existing buildings including heritage assets. If you have any additional comments please put them in the comment box.

There were 153 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	161	51.27%

Draft policy	Topic	Summary of comments	Response
R3	Preferred option	Support for different options in consultation e.g. some flagged support for alternative option 1, whilst others supported option 2.	
R3	BBOWT	BBOWT strongly agree with preferred option.	Support welcomed.
R3	Support for policy	Support for the Preferred option, including: the positive approach set out in the Policy in terms of retrofitting; the emphasis on a "whole building" approach; that it does not set out targets or introduce specific measures; the acknowledgement that historic buildings and heritage assets are more sensitive to change; the more nuanced approach to the retrofit of heritage assets/buildings/conservation areas.	Support welcomed.
R3	Support balancing temporary harm versus long term benefit.	Support balancing of 'temporary harm' vs 'long term benefit' and other trade-offs that prioritize climate resilience and our collective ambitions to reach net zero - against-aesthetic/heritage considerations.	Comments noted.
R3	Support retro-fit over demolition	Some comments agreeing with the need for retrofit before exploring demolition and that there are examples in the city where buildings have been demolished instead of repurposed.	Comments noted.
R3	Retro-fit of existing buildings will help cut emissions faster	A presumption in favour of fabric upgrades, heat-pump installation and solar PV on non-designated buildings will cut emissions faster than efforts to achieve net zero new-build.	Comment noted.
R3	Carbon-saving measures as a public benefit	Counting carbon-saving measures as a public benefit in ListedBuilding or Conservation-Area cases gives owners a clear,	Comment noted.

		workable path to decarbonise landmark stock without endless bespoke arguments.	
R3	Policy should go further – helping	Should go even further in encouraging historic buildings to be modernised in energy efficient ways. This might mean helping building owners to work with English Heritage to find compromises	The Local Plan policy is one tool in supporting applicants to drive retro-fit of existing buildings.

Draft policy	Topic	Summary of comments	Response
	occupants to access grants	that respect conservation goals and sustainability goals. Given how many historic buildings, Oxford has and in such a small footprint, it seems like we ought to be able to show leadership on this.	Agree that other ways to support building owners is important although this generally falls outside of the scope of the Local Plan preparation itself. Where possible we could look at how we can incorporate additional helpful guidance of relevance into our supporting technical advice note, which will need to be updated for the new Local Plan's adoption.

2308

R3	Refuse applications which don't comply	If applications do not show compliance with the policy, then applications should be refused.	Accordance with the policy requirements will be a material consideration in the process of determining planning permission for relevant applications, as with other applicable policies in the Local Plan.
R3	If retro-fit not feasible, this should be justified by applicant	Applications proposing retrofit of buildings should be considered favourably. Where retrofitting is not feasible / viable, then applicants should seek to provide adequate justification.	The policy cannot force applicants to retro-fit or to justify why they cannot, it provides a framework for how applicable applications should approach their retro-fit projects when they come forward seeking planning permission to do so.
R3	Flexibility needed	Policy should be flexible. Also common sense is needed in application of policy. Other flagged that it may not be realistic to make retrofitting compulsory. Instead, encouraging new	Agree that flexibility is important so that each project can be designed in the most suitable

Draft policy	**Topic**	**Summary of comments**	**Response**

		development or refurbishing sites to take up alternative new energy and other to reduce carbon emission may be more realistic.	way for its particular context. The policy does not set rigid targets, or explicit requirements in terms of type of retro-fit that should be undertaken. Instead, it sets the framework for how to approach design of the project, including promoting a whole building approach which helps to ensure that retro-fit measures are selected which most suit the building.
R3	Concern about heritage impacts from retro-fit	Concern that policy will allow historic buildings to receive ugly external changes in order to achieve carbon reduction and undermine conservation principles.	The purpose of asking applicants to take a whole building approach to the retrofitting of traditional buildings, including heritage assets, is precisely to avoid this kind of impact (amongst other reasons). The approach means ensuring that a proposal is informed by a thorough understanding of the building, including the particular characteristics/qualities for which it might be protected, and then ensuring that design of retro-fit measures factors these qualities in.

2310

Draft policy	Topic	Summary of comments	Response
R3	No policy wanted	Council should not interfere. There should be no policy for this topic.	Comment noted. The policy is intended to help support applicants who wish to pursue retro-fit so that they can approach these projects in the most appropriate way and avoid harmful impacts, which will enable them to be better placed to navigate the planning process.
R3	Policy is too expensive and waste of money	Concern about who will pay for the retro-fitting and that householders will be forced to retro-fit. Concern about expense generally not being justified and that policy is a waste of money that is paid for by tax payers.	The policy does not force anyone to undertake retro-fitting. Other than costs that might be associated with meeting the requirements of the policy for the applicant undertaking such a project, the policy does not directly impose costs on others in the city.

R3	Need for retro-fit may only be temporary	Heritage needs to be preserved beyond the current climate crisis. Future technical advances that may later negate the need for retrofitting.	Comment noted, however, we are unable to prepare policies based upon uncertain or unforeseen future technical advances. The policy responds to an existing need to support owners of current buildings who wish to pursue retro-fitting projects. As set out in earlier responses, the policy is intended to help ensure retro-fit projects

2312

Draft policy	Topic	Summary of comments	Response
			that require planning permission happen in the most appropriate way whilst balancing out our responsibilities towards protecting the historic environment.

R3	Connecting to heat networks	Should also strongly encourage connection to heat networks as these (particularly where designed to operate at higher temperatures than building-level heat pumps) provide a way of decarbonising hard to treat (listed) buildings with minimal impact on their existing fabric/heritage assets. The vast majority of emissions in 2040 and 2050 will be from buildings that already exist - encouraging/mandating connections to these when retrofitting should be a key lever in the City achieving this.	Comment noted – there could be a variety of ways to secure the most sustainable outcomes from a retro-fit project including connecting to/using heat networks/heat pumps. The policy does not rigidly require applicants to utilise any one particular technology, as the best solution may differ depending on context of the building and the wider site. Equally, technology is continually evolving and it is important that the policy approach is future-proofed as best as possible. The policy sets the framework for how to approach design of the project, including promoting a whole building approach which helps to ensure that retro-fit measures are selected which most suit the building.

2313

Draft policy	**Topic**	**Summary of comments**	**Response**

R3		Give more explicit encouragement to carbon-reduction technologies with an externally visible aspect -- e.g. solar panels and heat pump external units -- by encouraging their use including in publicly visible locations in more circumstances. Still seeing advice issued that solar panels should be reduced to produce a 'balanced' roof, the implication being that panels are an aesthetic negative compared to roof tile, and that this aesthetic is important enough that we should accept increased emissions. Proximity to a heritage asset is also being cited as a reason to remove or minimise use of solar panels. We should constrain ourselves to only restricting solar directly upon a heritage asset or in very close proximity to a highly sensitive asset.	
R3	Retro-fit against overheating	Retro fitting is important and needs to include resilience against heat.	Agreed, this is why the policy talks about retrofit measures that go beyond just energy efficiency. It highlights that the Council will support retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate. Resilience to overheating/higher summer temperatures is an important facet of adaptation to climate change.
R3	Homeowners need support	Comments about need for need expert assistance and/or funding (e.g. grants) to support people to achieve this objective.	Criterion c of the policy talks about the need for obtaining professional expertise where necessary/appropriate. The

Draft policy	Topic	Summary of comments	Response
			accompanying Technical Advice Note (TAN) will be able to point applicants to further guidance/support to some degree, as is the case in the existing retro-fitting TAN.

Statutory Consultee Responses – Draft Policy R3

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

2315

Policy R3 Retro-fitting existing buildings	**Climate Action** The reference to the adaptation benefits of retrofit is welcomed. Reference should be made to the need to maximise reuse and retaining of materials where possible during retrofit in order to reduce the embodied carbon of the proposal.	Noted. We can consider whether to include this reference in the Reg. 19 plan. Reuse and retention of materials is already covered within Policy R2.	No Action Required Oxford City Action: Consider proposed wording going forward. Oxford City Action:

2316

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

	Suggest inclusion of a statement about postimplementation monitoring e.g., *The Council may request postcompletion monitoring of retrofit outcomes for major schemes to support continuous learning and citywide performance improvements.*	We can consider whether to include some text about post-implementation monitoring for retrofit schemes however compliance with any such statement would be entirely voluntary and we would not need a planning policy to ask for such information. This issue may be better addressed through an "Informative" on decision notices.	Consider proposed wording going forward.
	Retrofit proposals should also consider their impact on natural resources including air, water, and soil, and take opportunities to mitigate environmental harm.	Noted.	No Action Required
	Urban Design (Placemaking) Retrofitting of buildings should also encompass improving accessibility for all, some heritage assets do not offer step free access.	Policy R3 addresses retrofit measures in relation to energy efficiency and climate change adaptation.	No Action Required No Action Required

2317

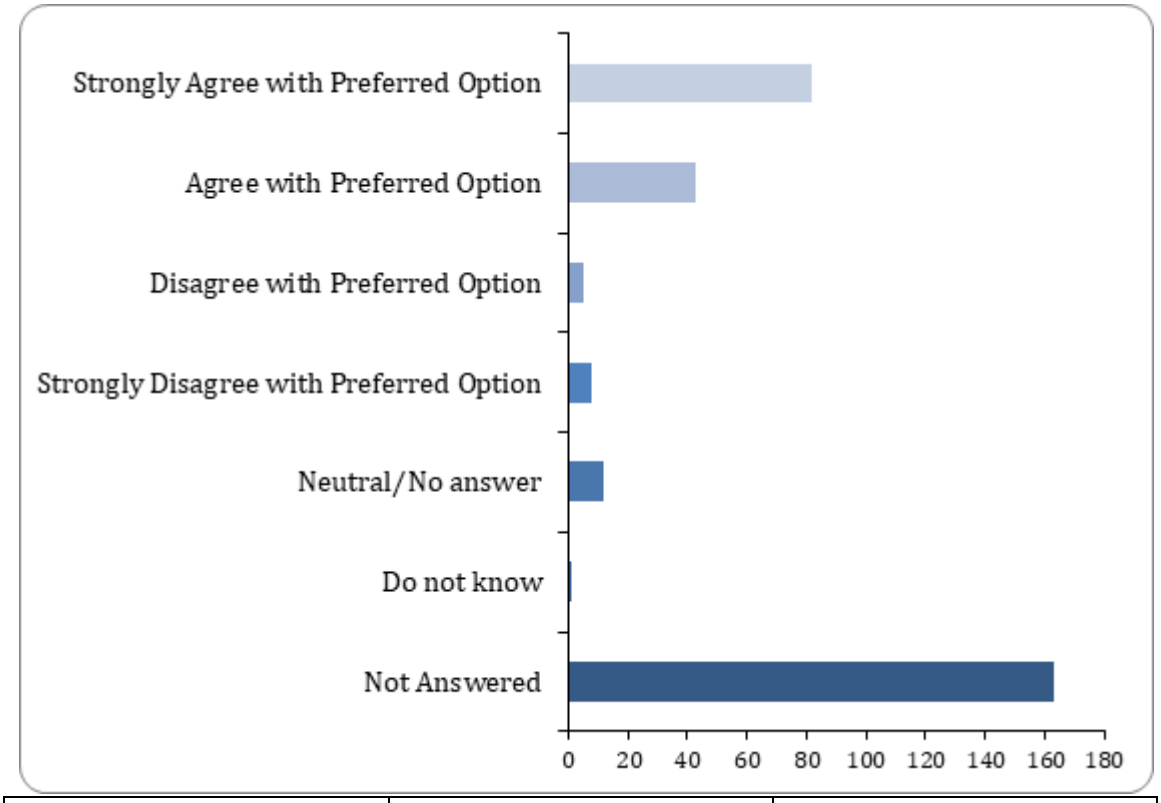
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	Also, policies throughout the local plan refer to conserving/protecting heritage assets, so retrofitting buildings could also include physical measures e.g. Boundary treatments, to provide a level of protection if a hostile incident occurred.	Where development involving heritage assets is proposed, this are specifically covered by policies HD1-5.	

2318

All Public Responses – Draft Policy R4

Do you have any comments on Policy Option Set 009a (draft policy R4): Air Quality Assessments and Standards. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	82	26.11%
Agree with Preferred Option	43	13.69%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	12	3.82%
Do not know	1	0.32%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R4	Preferred option	Various comments supporting option 1	
R4	BBOWT	Strongly support preferred option.	Support welcomed.
R4	Preferred option	Strongly support preferred option – target is more ambitious than elsewhere.	Support welcomed.
R4	Air quality a serious health issue.	Agreement that air quality is a serious health issue. Also comment that no development is more important than healthy children and clean air.	Agreed, the health impacts of poor air quality is a key driver for why we are proposing the policy.

2320

R4	No need for local policy which goes beyond national requirements.	National planning guidance already mandates Air Quality Assessments – some also commented that these are restrictive enough. Layering a blanket Oxford-specific AQA plus a tighter 30 µg/m³ NO_2 cap on every major scheme simply adds modelling fees, lengthens determinations and squeezes viability, yet cannot cure the dominant pollutant source—regional road traffic—without city-wide transport reform.	Any level of air pollution can have detrimental impacts for health including the minimum acceptable targets required nationally. The Council's air quality action plan is a key strategic document which captures the local ambitions for driving improvements in air quality in the city beyond national minimums. Whilst there are a range of initiatives for tackling air quality across various sectors outside of the Local Plan's influence, the Local Plan's policies play a role in ensuring that new development is designed in alignment with this wider strategy for the city by ensuring that new developments are not permitted which would conflict with these local ambitions.

2321

R4	No need for local policy	No need for extra micro-managing by the city, or 'don't need a local policy' more generally. Concern about increasing layers of regulation and policy requirements.	Comment noted – see other reponses (e.g. above) for why we believe a local air quality policy is necessary.

R4	Need common sense.	Need common sense.	Comment noted.
R4	Relationship between transport and housebuilding.	Inclusion of transport within housebuilding criteria is long overdue. Estates and developments should be designed with a presupposition that car travel is not the norm. Some general comments were made about the need for vehicle movements need to be reduced as far as possible, and that even hybrid and EVs are responsible for various non-exhaust emissions. Other comments included that the policy is not effective as it only addresses air quality, not the wider problems caused by traffic.That the Local Plan does not acknowledge Oxford's responsibility to tackle climate change by reducing the factors that lead to congestion and emissions. Nor does Local Plan offer solutions relating to reducing car traffic.	It is important to note that the Local Plan has limited influence over the transport network as much of this sits within the wider County Council's control. However, we acknowledge the strong need for reducing reliance on private vehicles and the various roles they play in contributing to air pollution and wider issues relating to congestion in the city. The policy is clear (in criterion a) that Air Quality Assessments need to consider the impacts of all the sources of air pollution generated during the development's operational and construction phases, including but not limited to transport. Separately, Chapter 7 sets out various policies in relation to supporting and encouraging more uptake of sustainable/active transport modes and seeking to ensure

2322

			occupants do not have to rely upon on private vehicles wherever possible.
R4	Parking at Headington hospitals	Oxford can (via planning) reduce destination parking especially at the Headington Hospitals.	
R4	Impact of woodburning needs to be addressed.	Air Quality assessments are meaningless if the impact of woodburning is not addressed (even from so-called eco-stoves).	Noted – air quality assessments would need to consider all sources of air pollution.
R4	Local Plan does not define areas of poor air quality.	Policy does not define areas of poor air quality..	Whilst there are monitored hotspots for more regularly occurring poor air quality in the city – such as those which are monitored and reported upon on the Oxonair website, the nature of the problem is that air pollution can arise from various sources and be transient or temporary in nature – e.g. where it relates to construction processes or changes in traffic patterns and can be difficult to map. We have incorporated a link to the council's air quality webpages and the above county wide mapping within the supporting text.

2323

R4	Change reference to mitigation to 'netzero'	The word mitigation must be replaced with 'net-zero'	The term net zero more broadly means to ensure no net increase – e.g. in the context of carbon emissions, it means ensuring the
			same amount of carbon dioxide is removed from the atmosphere to balance out anything emitted and ensure no overall net increase as a minimum. Mitigation is a broader term, but is effectively about avoiding, or else seeking to reduce the severity of impacts.
R4	Policy needs to be enforced.	Stressed that the policy needs to be enforced. Concern flagged about pollution impacts arising from various major developments in the city including Cherwell House, the Old Power Station, Network Rail, Gibbs Crescent, and that this is not reflective of a 'world-class city'. This includes periods when residents cannot open windows even in a heatwave and pollutants coating streets.	Similar to our earlier responses against policies R1 and R2, the policy sets the requirements that will need to be met through the planning application. The permission would be granted subject to a condition that the development is built in accordance with submitted documents. Were an applicant to fail to build in accordance with the condition they could be subject to enforcement action.

R4	Objection – Headington Hospitals parking provision (and others)	The policy and goals are ineffective without urgent reduction of Headington Hospital (John Radcliffe, Churchill and NOC) car parking provision. The three Headington Hospitals, football fields of staff car parking (70%) is mostly responsible for air quality, health and environmental issues caused by vehicles in Oxford as a whole, as the centre of transport and employment is now Headington, causing miles of traffic jams every day and gridlocking Headington and Oxford in general.	Comment noted, however, parking provision at the hospitals is not within the scope of this policy.
R4	Increase pedestrianised areas.	Pedestrianised areas must be increased; the number of 'through' roads in residential areas should be decreased; walking and cycling networks of high quality should be joined up throughout the City as a long-term goal Plan after Plan.	Comment noted – the Local Plan has varous policies which seek to support walking/cycling/wheeling (chapter 6).
R4	Is noise factored into policy?	Does air quality include noise? I used to live in countries where heat pumps are normal, and there is no such thing as a quiet heat pump.	Noise would be addressed through separate Policy R8.
R4	Council should prioritise	Agree with principle but feel that Council should prioritise and be less concerned about issues which are felt to have limited/no impact on city-wide air such as personal home-use bbqs and bonfires, which are part of the importance of quality of life.	Comment noted – the policy covers the design and operation of new development, it is unable to control how occupants behave in the development.

2325

Statutory Consultee Responses – Draft Policy R4

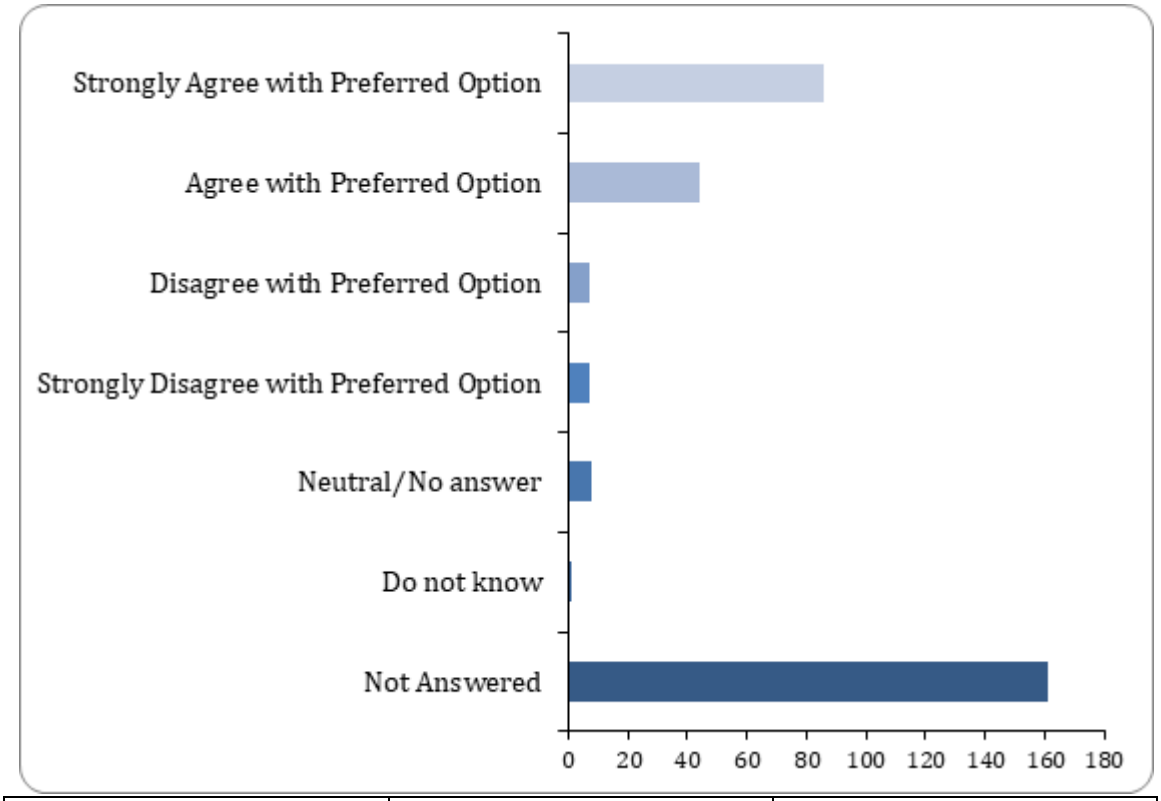
Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

Policy R4 Air Quality Assessments and Standards	**Strategic Planning** Air quality is a particular issue for Oxford, and the entire city is an Air Quality Management Area. Transport schemes and transport policy that the County Council is working on with the City Council have an aim of improving air quality. **Public Health**	Noted.	No Action Required
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**
	The inclusion of sensitive receptors (schools, nurseries, care homes and healthcare settings) is welcomed, although developers should also be considering the impact of schemes on outdoor amenity such as parks and greenspaces, especially where young children are likely to play.	Noted. The list of sensitive uses set out in the policy is not exhaustive.	No Action Required

All Public Responses – Draft Policy R5

Please let us know what you think of Policy Option Set 009b (draft policy R5): Water Quality and Resources. If you have any additional comments please put them in the comment box. There were 153 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	44	14.01%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	8	2.55%
Do not know	1	0.32%
Not Answered	161	51.27%

60

Draft policy	Topic	Summary of comments	Response
R5	Preferred option	Comments supported different options e.g. some flagged support for alternative option 1, whilst others supported option 2.	
R5	BBOWT	Strongly support preferred option.	Support welcomed.
R5	General support	Comments supported the policy generally including that anything to support the improvement in city's watercourses is welcome.	Support welcomed.
R5	Need for strongly emphasising using water prudently and protecting water quality so as to not allow new development to further exacerbate pollution problems in watercourses.	Comments about need for strong emphasis on using water prudently and for protecting water quality, and that new development should not be allowed to exacerbate water pollution problems or have an adverse affect on water bodies or groundwater. There were also general comments flagging ongoing concern about the pollution issues impacting the city's watercourses and the role of water companies and new development in this problem.	Comments noted – this new policy has been incorporated into the Local Plan 2045 to ensure the issues around water resources and water quality are taken seriously and considered as part of applications. The policy is being further updated following the Reg 18 feedback and we have sought to emphasize these messages within the supporting text to the policy also.

2328

R5	Bespoke policy is unnecessary.	Preference for folding water requirements into other policies. Bespoke policy duplicates requirements such as Building Regs' cap of water use to 110lppd, as well as EA regulation of foul-and-surfacewater discharge, as well as the Local Plan's other policies such as Flood-Risk/SuDS. Bespoke policy would mean applicant's need to prepare another consultant report and also push marginal brown-field schemes further from viability.	The building regs optional 110 lppd standards need to be enforced through local policy. The EA, along with various other stakeholders, have also put forward a strong preference to us that a bespoke water quality/resources policy is needed (indeed ever since preparation of Local Plan 2040). The policy's development is being informed by Whole Plan viability assessment which will consider any viability impacts arising from it, as with all policies in the Local Plan.
R5	Bespoke policy is unnecessary.	No need for bespoke policy/interference from the Council and/or national policy is sufficient.	See response above.

2329

R5	Importance of grey water reuse and stronger requirement in policy.	Various comments about need for incentivising/requiring grey water capture and reuse. Suggestion that Council could work with Thames Water to inform constructors of cost-saving implications of water-saving measures. Also that the policy could be more strongly worded in terms of mandatory inclusion of designs to use grey water. One suggestion to require all new builds to have water re-use from basins/showers/baths to flush toilets. Another suggested a change to wording by removing the words 'where appropriate: "All applications should demonstrate what other measures have been incorporated into the design to conserve water use including rain/grey water harvesting/reuse where appropriate."	Comments noted and we agree that grey water and rainwater recycling is an important way to help conserve water resources. We have expanded on the policy requirement in the supporting text to further emphasize the variety of measures applicants might be able to consider and that might be suitable for their proposal. The wording 'where appropriate' was intended to reflect that each application will be different and different measures may be suitable for each proposal – we will consider further whether this is necessary.
R5	Lawns are not sustainable – grey/rainwater should at least be used to maintain them.	Passion for lawns in the Colleges is ecologically unsustainable on water management and biodiversity grounds. At the very least, Colleges should be using grey water for watering these. Terrific systems being applied at the scale of households in both Germany and Australia that make really good use of grey water.	Maintenance and management of existing green spaces is something that is not within the scope of the Local Plan to influence. We concur with the importance of making use of grey and rainwater recycling wherever possible, see above comment.

2330

R5	Sewage	Concerned that the issue of sewage discharge and treatment is barely referred to at all, which is totally incompatible with the plans to build large number of houses in Oxford and the surrounding area. There is an assumption that Thames Water will provide the necessary upgrades to the water treatment plant at Sandford-uponThames ("Oxford STW") in a timely fashion to meet the large increase in wastewater discharge resulting from the large-scale developments proposed in the draft local plan. Any approval for residential development needs to be contingent on appropriate foul network and treatment facility upgrades being completed before any occupation of new development is permitted. The proposed Policy R5 is insufficiently robust and will, if not substantially amended, lead to an increase in pollution which will impact on peoples' health – including those using the watercourses for pleasure or workor other uses.	Comments noted - We have sought to ensure that the supporting text for the policy in the Reg 19 Local Plan emphasises the ongoing water quality concerns in the city, and the various impacts contributing to this including sewage discharges, alongside other updates to the policy to strengthen where practical. The Council continues to engage with Thames Water to ensure that they are aware of growth planned for in the Local Plan and that this can be accommodated and the supporting text will also encourage applicants to engage directly with them as early as possible as proposals come forward.

2331

R5	Threshold for foul and surface drainage is too high.	Policy Threshold for requiring a Foul and Surface water drainage is set too high. Smaller development can also impact the sewage network (both individually and cumulatively). Threshold should be set much lower, i.e. 10 dwellings or more. Strategies should consider existing developments' impacts before development allowed.	The requirement seeks to ensure the largest developments go further to demonstrate how foul and surface water will be managed through a strategy because they could have particularly significant impacts. It is acknowledged smaller scale development can still have an impact and the policy will still require proposals of smaller scales of development to demonstrate how they have mitigated impacts that are within the applicant's control.
R5	Improvements to Sewage treatment works should be monitored through the policy.	Various stages of improvements promised for the Sandford Treatment works should be monitored by the Council and the results obtained made available for public inspection as part of the suggested policy.	Whilst the upgrades to the sewage treatment works are an important step in addressing water quality concerns in the city, they are not directly in the control of this policy or the Local Plan and as such this would not be the correct mechanism through which to undertake the monitoring suggested.

2332

R5	Water shortages should be addressed.	All new planning applications must address the issue of water shortages which is clearly going to be a real problem during the timeline of the draft plan.	Agreed. The new policy is intended to present the issue of prudent water use more clearly through the Local Plan (where previously water use requirements were spread across various other policies) and sets various requirements for new development to address in relation to this issue.
R5	Impact on water bills	Concern requirements will mean increases in water bills.	It is unclear why or how the new policy would directly drive increases in water bills. Indeed, the policy should help to ensure that new development reduces its impacts on the water
			environment, and by extension, associated infrastructure that maintains this.

2333

R5	Retention of green frontages to properties to deal with draineg issues	Abandon unenforced SUDs maintenance as an idea and have a local policy requiring retention of earth/grass/other vegetation on frontages for all properties to deal with recurring drainage issues.	Addressing the issue of surface water run off requires a variety of responses and design measures. Equally, SuDS can take many forms, including areas of natural green space and other features. We concur, that limiting artificial surface cover on new developments is important (for a wide range of issues) and would direct you to other policies, including the new Urban Greening Factor requirements (draft policy G3) which seeks to ensure new developments have areas of natural surface cover.

2334

Statutory Consultee Responses – Draft Policy R5

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R5	**Strategic Planning** We welcome the introduction of a separate policy which deals with water resources and support the	Noted.	No Action Required

Water Resource and Water Quality	setting of a policy which require all dwellings (including conversions, reversions and change of use) to achieve an estimated water consumption of no more than 110 litres per person per day, and encouraging all non-residential development to demonstrate what measures have been incorporated to reduce water use. **Minerals and Waste Policy and Strategy** The County Council is responsible for wastewater treatment, Policy W10 of the Oxfordshire Minerals and Waste Core Strategy (2017) allows for proposals for the treatment and disposal of wastewater and sewage sludge.	Noted. Oxford does not have any wastewater treatment facilities within its administrative boundary.	No Action Required

2335

Environment Agency

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R5	Welcome the inclusion of water quality policy, but currently find it unsound as it is not robust in relation to addressing water quality concerns. Policy does not meet requirements of paragraph	Whilst we are keen to ensure that the policy meets the EA's expectations and responds to the requirements of the Water Framework Directive, it is	Meeting organised to discuss these comments with the EA and agree amendments to the policy that might overcome these concerns.

	187e of NPPF which requires plans and planning		

	decisions to ensure that there are no unacceptable levels of water pollution. Appropriate measures must be in place to ensure; delivery of growth does not outpace required wastewater infrastructure improvements and growth does not lead to a deterioration of the water environment. Development must only be permitted where it can be demonstrated that there is adequate provision for the treatment of wastewater in place to prevent wastewater leakage into the environment including rivers. This is to maintain and improve waterbody status in Oxford as required under Water Framework Directive. Suggest a few changes/amendments to the policy wording but are willing to work with Council regarding how the policy wording could be strengthened.	important that the policy requirements are justified and deliverable in terms of what can be expected of a developer making an application. We would propose a meeting in order to discuss these comments further with the EA in order to find the best way to respond to these concerns and strengthen the policy where possible.	

2336

R5	Pleased to see emphasis on separation of foul and surface water drainage. Should also highlight the hierarchy of drainage options that must be considered and discounted in the following order: 1. Connection to the public sewer 2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation) 3. Septic Tank. This must be considered when applications are made for wastewater/sewage/foul water disposal from all new development. In a sewered area such as Oxford City, private	We will reflect on how best to reflect this feedback in the Local Plan where appropriate, bearing in mind that some of this is set out in national guidance and may not necessarily need to be repeated here. Some of these considerations may be better reflected in supporting text or a Technical Advice Note. Again, we would like to discuss further with you.	As above.
	discharges to non-mains drainage systems must be avoided in line with the hierarchy of options. Deep infiltration systems for non-mains foul drainage or surface water disposal are not optimal discharge solutions, and should be avoided wherever possible. Techniques and designs which treat and manage rainwater and surface water drainage without allowing the runoff to soak into the ground (infiltration) is necessary for protecting groundwater sources. Changes suggested to policy for consideration.		

2337

R5	There are important and sensitive water resource receptors in Oxford such as designated bathing water at Wolvercore Mill Stream which should be recognised within the local plan policy, with a commitment to working to achieve and maintain sufficient status of these sensitive receptors. Changes suggested to policy for consideration.	We agree with the suggested change to bullet point two of the policy, we will also look to flag the presence of designated bathing water in the supporting text as it is useful context.	Amend to policy wording to reference designated bathing water. Reference to be added into supporting text also.

Thames Water

Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**
R5 Water resources and quality	Important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and	It will be important to continue to work together to ensure that Thames Water are aware of the Local Plan's provisions and that necessary	Continue to engage together. We would aim to document this as part of a Statement of Common Ground in due course.
	wastewater infrastructure to serve all new developments.	upgrades to infrastructure are planned for accordingly.	

R5 Water resources and quality	Recommend that developers engage with them at the earliest opportunity when bringing forward a proposal to establish the following: • The demand for water supply and network infrastructure both on and off site; • The demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Also flag that time to undertake upgrades to infrastructure can be lengthy, so early engagement from developers is important where possible. Thames Water offer a pre-planning service to assist applicants (on their website).	Noted, we concur it could be helpful to reiterate the recommendation of early discussions between developers and Thames Water where possible and can add this into supporting text to the policy.	Updated policy to be published as part of Reg 19.
R5 Water resources and quality	Support references to water efficiency and requirement of the water efficiency standard of 110 litres per person per day using the fittings approach. This is an important tool to help sustain water supplies for the long term, particularly in light of future climate change. This should be required by condition.	Support welcomed. We can make it clearer in supporting text that the requirement will be subject to a condition.	Updated policy to be published as part of Reg 19.

2339

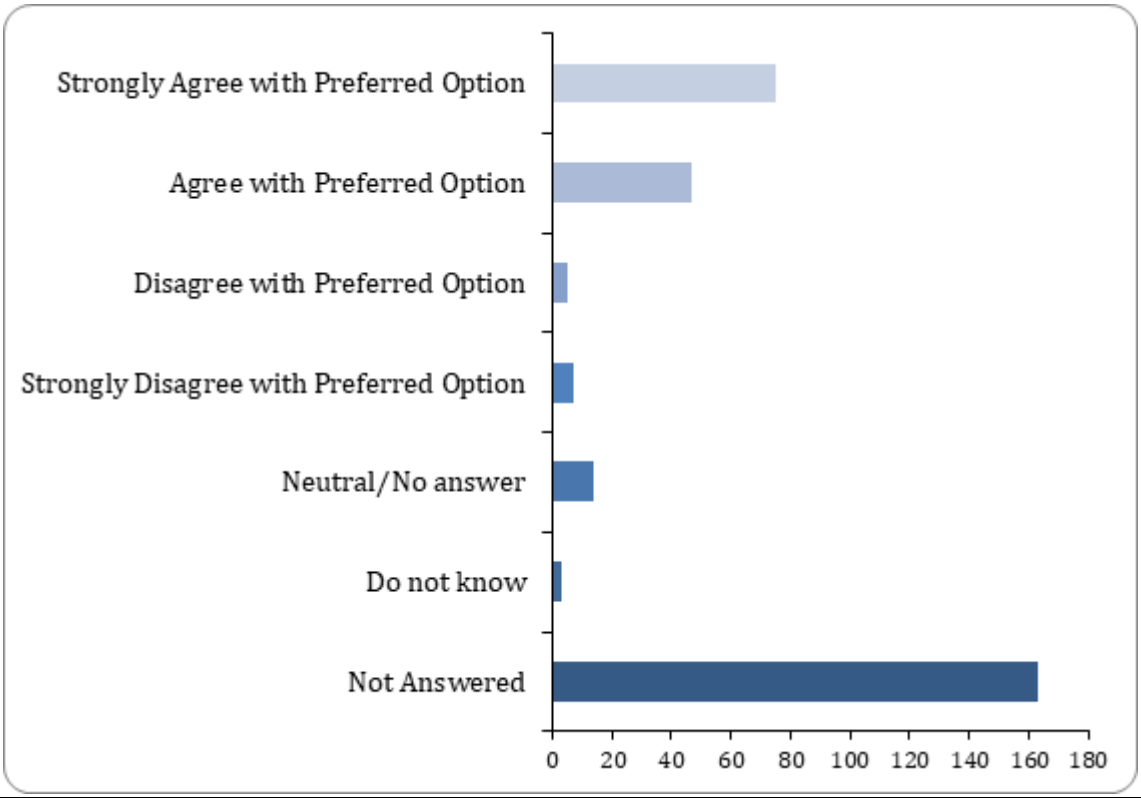
R5 Water resources and quality	Additional wording suggested to the policy in relation to requirements for conditions to ensure occupation aligned with delivery of upgrades, and about when development or expansion of water supply or waste water facilities would be permitted.	The Council does not currently consider these as necessary or helpful additions as they can be dealt with through existing mechanisms/other policies,	No change proposed at this time.
		but we would be happy to discuss further.	

2340

All Public Responses – Draft Policy R6

Please let us know what you think about Policy Option Set 009c (draft policy R6): Soil Quality. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	75	23.89%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	7	2.23%
Neutral/No answer	14	4.46%
Do not know	3	0.96%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R6	Support for policy	Generally support policy, or support option 1	Support welcomed.
R6	BBOWT	Strongly support preferred option.	Support welcomed.

2342

R6	No bespoke policy needed	No bespoke policy should be included. Duplicates requirements of DEFRA's Code of Practice, the Environment Agency's permitting and the Building Regulations. Additional local requirements would make redevelopment of brownfield edges and former allotments more complex, lengthen geotechnical investigation phases and push up costs, yet deliver marginal environmental gain in a city where peat outcrops are rare. Streamlining makes land recycling swifter and more affordable.	The Local Plan policy reflects the Council's priority for conserving and enhancing the natural environment, and soils are a key dimension of this. It will help to ensure applicants evidence how they have considered impacts on soils and sets out a consistent list of principles which we would look for applicants to respond to. Some of the references flagged in the comment are guidance to assist developers only (e.g. DEFRA code of practice). Where applicants need to undertake some of the same actions to meet other regulatory requirements, they can use this as evidence for how they have met the policy. The additional requirements around development in proximity to peat reserves responds to the limited national protections for these deposits despite the particular importance of their protection in

2343

			light of their relatively finite nature and the various benefits they provide.
R6	Current wording is too restrictive	The impact of the consideration of soil quality in all development proposals (as the policy is currently worded) would further restrict the opportunities for development. This could further sterilise development opportunities on sites where there are other conflicting constraints on the site.	The policy simply asks that applicants demonstrate how they have sought to mitigate impacts on soils and taken up opportunities for conserving and enhancing them. Additional requirements are set out for protecting the limited remaining peat reserves on undeveloped land in the city, for the reasons outlined in the above response. We feel that this is a pragmatic approach, without being overly prescriptive, which seeks to ensure the design of new development takes soils into account and limits further damage where possible.
R6	No bespoke policy needed	Council should not micro-manage and/or no need for bespoke local policy (no further reason given).	Comment noted, see above responses for why we consider a local policy is important.

R6	Objection – lack of clarity	Policy should define clear rules and metrics.	As a new policy for the Local Plan, we have sought to frame its requirements in the most practical and effective way possible. Every proposal will be different, and each site in the city will have a different context (e.g.

2345

			varying levels of historic development, varying quality of soils), thus it is challenging to set strict rules/metrics). The policy flags key considerations which applicants need to demonstrate they have responded to in relation to soils. These generally cover the broad ways development can impact on soils but will be of varying relevance to each application depending on what is proposed. Additional sensitivities around the city's remaining peat deposits have prompted more specific requirements (e.g. not allowing losses or dewatering of peat as a result of new development, and assessing potential for impacts on undiscovered peat in near vicinity to known deposits).

2346

R6	Unclear on impact for pitches	Unclear on what impact policy has for new playing fields or improvements to existing ones. Sport England has detailed guidance on the provision of new grass playing field available on their website.	Where a proposal relating to pitches requires planning permission and would meet the thresholds in the policy, the application would need to respond to the requirements in the same way as other types of development.

2347

R6	Addition to policy needed	Addition to policy needed in a local by-law requiring retention of degraded peat areas identified in the Oxford City Council area, pursuant to a general policy of restoring them through re-wetting and promoting the return of wetland biodiversity using Lye Valley as seed source.	The Local Plan sets a framework through its policies for how new development should happen in the city, including where this should come forward, what standards it should meet and how impacts on the wider environment need to be avoided/mitigated. Whilst this new policy seeks to protect existing deposits of peat from loss due to development, regardless of their condition, as well as asking applicants to mitigate impacts on soils more generally, it is beyond the Local Plan's scope to require general restoration of deposits in the city. This would need to be pursued through other mechanisms outside of the Local Plan's control.

2348

R6	More mapping of peat needed.	Welcome the precautionary 200m buffer around known peat reserves, however, stress that Council should actively be mapping peat (making use of local sources of info) and not just rely on Natural England mapping. Mapping should be included on policies map.	It is outside of the resources of the Council to pursue active investigation and mapping of additional areas in the city unfortunately. We intend to include peat reserves on the policies map to aid applicants.
R6	General comment on threats to peat	Peat is at risk from climate change (particularly hotter/drier summers). Need to find ways to ensure peat stays wet and protected	We concur that peat reserves are an important store of carbon –
		such as by preserving green spaces in catchment, reducing the ongoing threats to existing reserves e.g from erosion due to surface water run off after storms. Also favouring fen restoration in city (e.g. Lye Valley LWS). Another comment flags that peat conserves carbon better than a tropical rain forest so restoration is an elementary necessity for UK Climate policy.	this is one of the reasons for the new policy requirements around recorded peat reserves in the city – and that they are under threat from various pressures including climate change. As referenced in response earlier, whilst the Local Plan can include certain requirements in relation to mitigating impacts from new development on these important reserves, there are limitations to what else is within the scope of the Local Plan's influence – such as driving improved management of these areas.

2349

R6	Objection	Peat reserves should be identified including Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin's Lane Field), along with demarcation of groundwater and surface water catchments. The 200m buffer is considered to be entirely arbitrary. Once a report is written, what are the metrics to permit or not permit the development?	We intend to identify recorded peat reserves on the policies map to assist applicants. In the absence of clearly defined best practice, we identified the 200m buffer in liason with Natural England to be a pragmattic and proportionate area to investigate around recorded deposits in ackowledgement that there could be additional deposits which are not well recorded.

2350

Statutory Consultee Responses – Draft Policy R6

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	Landscape and Nature Recovery – Biodiversity		

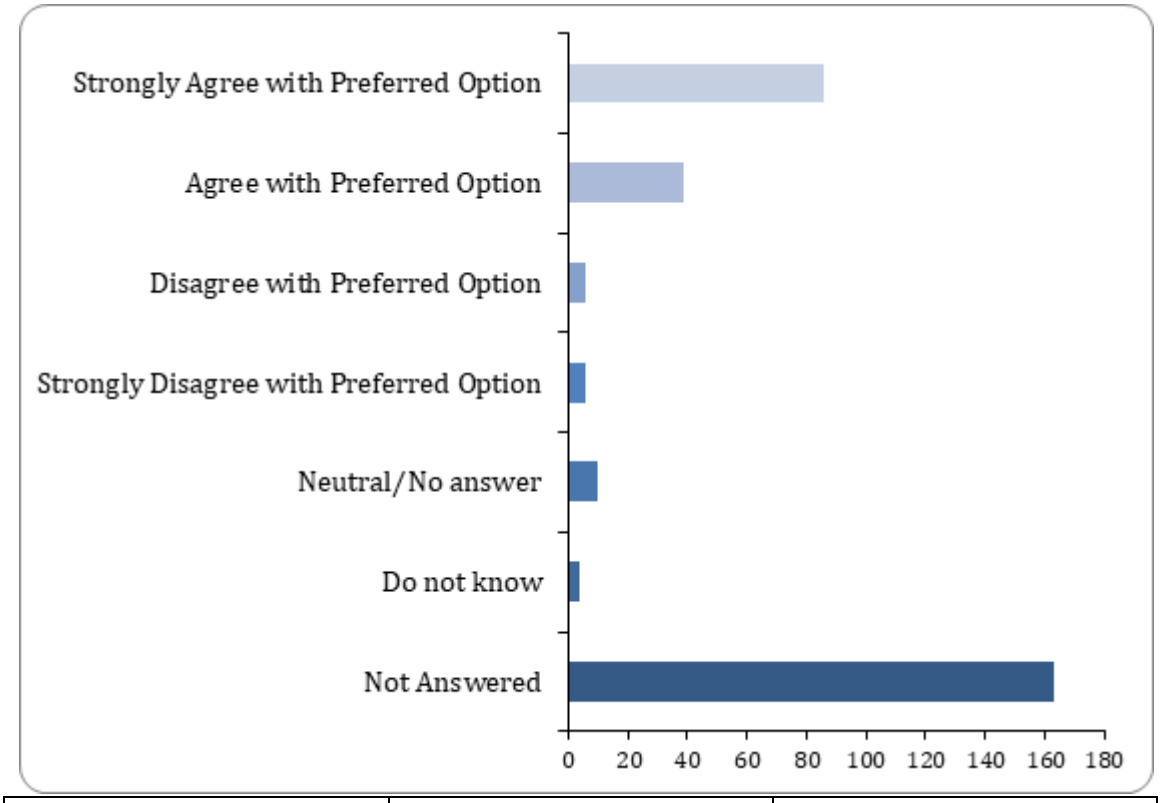
Policy R6 Soil Quality	It would be useful to define what is considered 'highest quality soils' in the context of this policy. For example, nutrient poor soils would have a high value for biodiversity and creating species rich grassland habitats but a lower value for activities such as agriculture that would value a high nutrient soil content.	We will seek to provide a definition of 'highest quality soils' in the Reg. 19 version of the plan.	Oxford City Action: Consider proposed wording going forward.

2351

All Public Responses – Draft Policy R7

Please let us know what you think about Policy Option Set 009d (draft policy R7): Contaminated Land. If you have any additional comments please put them in the comment box.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	39	12.42%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	163	51.91%

Draft policy	Topic	Summary of comments	Response
R7	Preferred option	Some general support for preferred option	Support welcomed.
R7	No need for bespoke policy.	No bespoke policy needed. Duplicates requirements of Part 2A of the Environmental Protection Act, the NPPF and the Environment Agency's Land-Contamination Risk-Management guidance. Local policy results in another report, validation step and more professional fees, with no material gain in public health or environmental protection. Streamlining supports brownfield schemes viability and allows new homes/workspaces to be delivered quicker.	The Local Plan policy reflects the extensive nature of historic land uses in the city which could give rise to potential risks from contamination and the need for this local context to be taken into consideration when developing sites in Oxford. It sets out the specific local requirements which the Council will need to see addressed to be satisfied that potential harms arising from contaminated land have been appropriately responded to.
R7	No need for bespoke policy.	No need for bespoke city policy – no further reason.	Comment noted, see response above.

2354

R7		Couple of issues flagged with wording which states that responsibility for securing a safe development rests with the developer and/or landowner. Lack of records about a site's remediation could mean subsequent development may undermine measures/expose problem again - proposed plans for developing Bertie Park given as example. Also does not specify a role for the local authority who may/may not have records of the previous contamination and remediation which applicant should be aware of. Council should be able to access a comprehensive record of previous contamination for remediated land.	The wording relating to responsibilities for securing a safe development lying with the developer/landowner are simply reflective of national policy. In relation to the Council's role, the draft policy sets out the requirements for the supporting information which the Council is asking proposals for new development to be accompanied by and which it will be assessing
			the application against. The supporting text for the policy will set out that the Council will refer to its own records of potentially contaminated sites when assessing whether land contamination is an issue, as well as other information sources.
R7	Thames water and contamination of water.	Concerns with trusting that Thames Water will be able to deal with wastewater and clearing up potential contamination of water. Would like to know more about the recent agreements made by Oxford City Council with Thames Water and Environment Agency.	Concerns noted. Information relating to the agreed upgrades for the Oxford Sewage Treatment Works were published online earlier in 2025.

2355

R7	Policy wording should be amended to ensure the requirement for a Preliminary Risk assessment in the first instance is included. This should be the initial assessment to be undertaken in an area where there is suspected contamination. Changes suggested to policy for consideration.	We agree with these changes, subject to a couple of minor tweaks, this will be reflected in the Reg 19 draft.	Policy R7 updated
R7	Risk of explosions after failed remediation	Concern about risk of explosions happening in new development areas because remedial measures have not been taken before the site was developed.	The policy sets out the assessments that the Council will expect applicants to undertake where there are potential risks of contamination, and requirements around any remediation where necessary. Where site investigation and remediation measures are needed, these will be required as a condition of any planning permission.

2356

Statutory Consultee Responses – Draft Policy R7

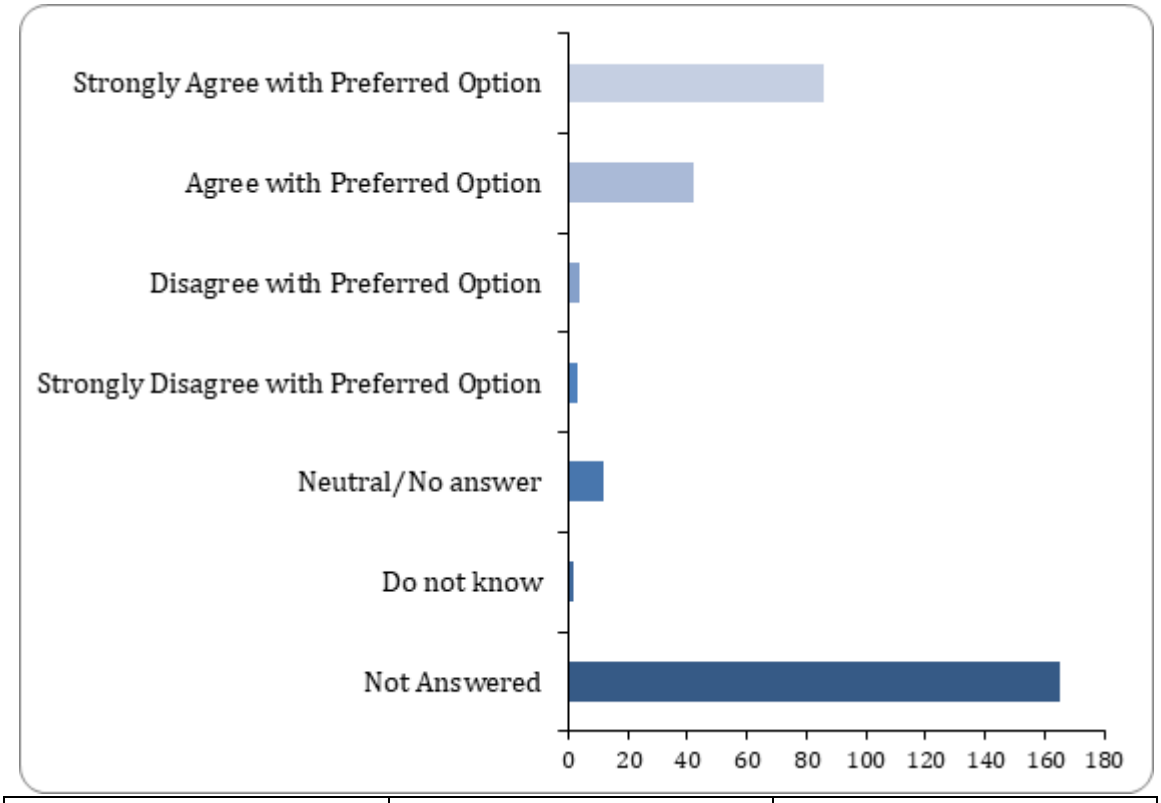
Environment Agency

Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**

All Public Responses – Draft Policy R8

Please let us know what you think of policy options set 009e (draft policy R8): Amenity and environmental health impacts of development. If you have any additional comments please put them in the comment box.

There were 149 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	86	27.39%
Agree with Preferred Option	42	13.38%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	12	3.82%
Do not know	2	0.64%
Not Answered	165	52.55%

Draft policy	Topic	Summary of comments	Response
R8	Preferred option	Some general support for preferred option and/or need for policy addressing amenity generally as well as that the Local Plan should support making Oxford neighbourly and help promote good collaboration between roads.	Support welcomed.
R8	Need to do better in future compared to previous developments in city.	Concern that amenity impacts have not been considered previously to detriment of existing residents and existing buildings. Examples such as over-development of Mill Street area, development in west Oxford quoted in some comments. Also comments that future developments need to be better.	Comments noted.
R8	Support wording re: Impacts on waste and wastewater.	Support the mention of impacts on waste and wastewater. Concerns about Thames Water being able to deliver.	Comments noted and support welcomed, see responses to comments against policy R5 which discuss these issues further.
R8	Support, with suggested addition	Support policy but wording in the Joint South and Vale Local Plan should be considered for inclusion in Oxford Local Plan also: "protect landscape character, dark skies and the natural beauty of the countryside in development decisions'	Comment noted – however the city's urban setting differs significantly to other more rural areas. The policy does set out that planning permission will only be granted for development that ensures that the amenity of communities, occupiers, neighbours and the natural environment is protected.

R8	No need for bespoke policy	No need for bespoke policy – no further reason given. Another comment suggested national requirements are sufficient.	Comment noted – the Local Plan policy brings together all of the key amenity impacts of particular relevance to developing in the city. It is considered important for

			ensuring that applicants appropriately address these issues as part of their proposal so that the amenity/environmental health of existing residents as well as future ones are protected.
R8	Support for the agent of change principle	Support the “agent of change” advisory principle (para 5.36) to protect valuable music and cultural venues	Comment noted - we have also flagged readers to the agent of change requirements of the NPPF in supporting text.

2359

2360

R8		Amenity of existing users of public amenities like recreation grounds should also be protected. New MUGAs can be noisy. Placement near housing means considering not only the rights of occupiers, but the rights of young people to have a place to go. Buffer zones are particularly important in this regard. Ignoring this simply sets up a situation where conflict that could have easily been predicted will then require management - with implications financially and social/health impacts.	The policy seeks to ensure that new development (regardless of proposed use) is designed appropriately to mitigate any relevant impacts on existing users, whilst also ensuring design is appropriate so as to protect amenity of users of the new development. Whether particular buffer zones are needed, and the specifics of what these should entail, will be highly dependant on location and types of uses proposed and this is difficult to specify in the Local Plan policy. See comment below regarding buffer zones.
R8	More clarity needed re: requirements for noise assessment	Wording at end policy in relation to noise and when noise assessment needed is very unclear. Should be written simpler and with targets, such as decibel levels and distance of buffer zones.	The requirements for any assessment will depend upon the particular context of the location where development is proposed.

			We may be able to provide additional guidance through a supporting technical advice note and will consider this in due course.

R8	Impacts of noise pollution	Noise pollution is often overlooked but has been widely shown to be detrimental to health.	Agreed that noise is an important health issue, which is part of the reasoning for why it is included as a consideration in the policy.
R8	Stronger policy requirements re: light pollution	Stronger policies needed for reducing light pollution, by requiring all existing and new developments to have lighting which is targeted, proportionate and sensitive. Increased use of very bright/poorly designed lighting in commercial and domestic development has negatives for people and nature.	We have expanded on the wording in the design checklist in the Local Plan appendix relating to external lighting about the need for lighting. The Local Plan's requirements would not be able to be retrospectively applied to existing developments.
R8	Various issues which should be covered in the policy.	'Etc' should include increased risk of flooding, loss of privacy, pedestrian and bicycle congestion as well as vehicular.	The criteria as set out in the draft policy address these issues to varying degrees, other than flooding – which is addressed through separate policy requirements (see policies G7 and G8 of chapter 4).

2361

R8	Policy should apply to construction too, and also mention public engagement.	Clause also needed to include during construction of these new proposals/developments and strong local public engagement to be undertaken.	The supporting text to the policy will make clear that impacts from development include not only the development in operation but also during the construction process. Public engagement during the planning process is a
			wider consideration than just this policy, there are no particular demands relating specifically to this policy (and not to others) that would warrant its explicit reference here.
R8	Policy should be expanded in relation to HMOs.	Preferred option needs expansion: enlarging existing HMOs should be obstructed on car parking, noise, amount of council bins required and any other applicable grounds.	The policy sets a framework of amenity/environmental health considerations which apply to all types of developments – though to varying degrees depending on the specifics of the proposal. This would already encompass applications relating to HMOs.

2362

Statutory Consultee Responses – Draft Policy R8

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy R8 Amenity and Env. Health impacts of developments	**Minerals and Waste Policy and Strategy** Welcome reference under point l) regarding impact on waste and wastewater infrastructure. Policy W11 of the Oxfordshire Minerals and Waste Local Plan Core Strategy 2017 prevents the permission of development that would directly or indirectly prevent	Noted.	No Action Required
Draft Policy/Evidence base/topic	**Summary of comment**	**Response**	**Outcome**
	or prejudice the use of a site safeguarded for waste management.		

2363

Thames Water

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome

R8 Amenity ad environmental health	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. Note that this is recognized at paragraph 5.37 of the draft Local Plan.	Without having specific detail about how individual sites would come forward, it is unclear how this would be achievable or beneficial without being subject to a lot of uncertainty. We have added in requirements for odour assessments where applicable in policy R8 in response to another comment from you. The Agent of Change principle will continue to be referenced in the policy.	No further change proposed at this time.
R8 Amenity ad environmental health	Where development is being proposed within 800m of a sewage treatment works or 20m of a sewage pumping station, the developer or local	Thanks for the suggestion, we will add additional wording into the policy to	Updated policy to be published as part of Reg 19.

2364

	authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station. The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer – and would be in line with various paras in NPPF and PPG. Additional wording suggested in relation to requirements for technical assessment looking at potential of odour impacts.	expand on expectations in relation to odour in proximity to the sewage treatment works.	

2365

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
R8	Definition of 'unacceptable transport impact'	Sports England flag that where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.	What would result in an unacceptable impact will be highly dependant on the

			nature of the location, existing

Sports England

			network, and what development is proposed.
R8	Impact on applications involving lighting	Sports England have concern about how policy applies to planning applications for sports lighting or lighting of streets to support active travel. Gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. Policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment'	Undoubtedly there are valid reasons for various types of lighting as part of new development, however, a balance needs to be struck between needs of the development and managing impacts on neighbouring uses. The policy is focused on ensuring that this balance informs the design process.

2366

R8	Impact on sports facilities	Sports England also concerned about how this applies to new outdoor sports facilities. The policy offers no context for applicants as to when a noise assessment will be needed, so it may be required for very minor planning applications. Sport England's planning guidance on 'Artificial Grass Pitches Acoustics Planning Implications' may be helpful for the development of this policy. The agent of change principle also works the other way, for example, housing development should not be located near existing 'noisy' uses such as existing MUGAs, artificial pitch facilities or playing fields with sports lighting. There does not appear to be a policy that expands on paragraph 200 of the NPPF so it is recommended that this is also developed.	The requirement for noise assessment will be highly dependent on the context including location, type of development proposed and is challenging to define explicitly. We will consider whether additional guidance could be helpful as part of a Technical Advice Note in due course. The supporting text will make it clear that amenity considerations apply both to impacts created by new uses, but also impacts arising from existing uses, and that both dimensions need to inform the proposal.

2367

All Public General Responses to Chapter 5

Draft policy	Topic	Summary of comments	Response

Chapter 5	Supportive	Various comments providing support for policies in this chapter.	Support noted and welcomed.
Chapter 5	Need for sustainable development	Comment across all policies about need for promoting sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects.	Agreed, the policies of chapter 5 (and in part chapter 4 in relation to adaptation) are intended to promote these topics.
Chapter 5	Solar PV arrays	Object to placing large swathes of solar PV in Green Belt areas. Council should prioritise maximising solar PV on all rooftops both residential, community, commercial.	The Local Plan does not allocate greenfield land for solar PV, nor does it seek to encourage this. See also responses against policy R1 below.

2368

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

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Headlines for Chapter 6:

- Preserving Oxford's unique heritage must be prioritised

- Other comments expressed a different sentiment, that heritage should not hold back green innovations (such as retrofitting), housing expansion and businesses
- General support for medium-to-high density development, to maintain green belt and third spaces however, infrastructure must also be to a high standard
- Some comments perceive the policies are ineffective, either because they are not specific enough or because they are seen to be included in the NPPF
- Affordable housing and new developments need to be of a high quality (good materials and design) to allow them to last
- New developments should merge with the character of the surrounding built environment, including heritage
- Green space is crucial for health, wellbeing and climate adaptation
- To become a cycling city, bicycle infrastructure needs to be improved • Cyclox supports all policies in this chapter

2371

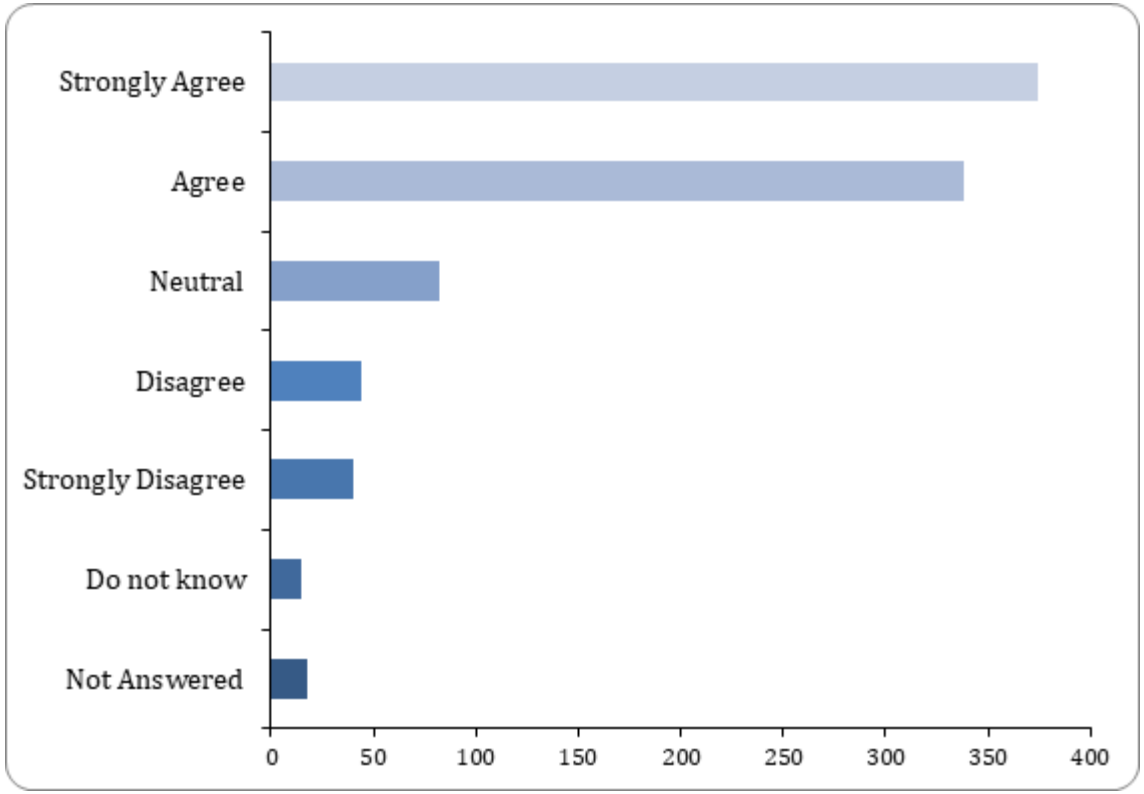
Short questionnaire responses

Good design

Good design is about ensuring development functions positively for the people who live and work there and that it makes best use of land and respects heritage. We have also drafted a policy that requires high density development and efficient use of land first and foremost, alongside policies to ensure design respects heritage including views of the renowned skyline. To what extent do you agree with this approach?

There were 893 responses to this part of the question.

2372

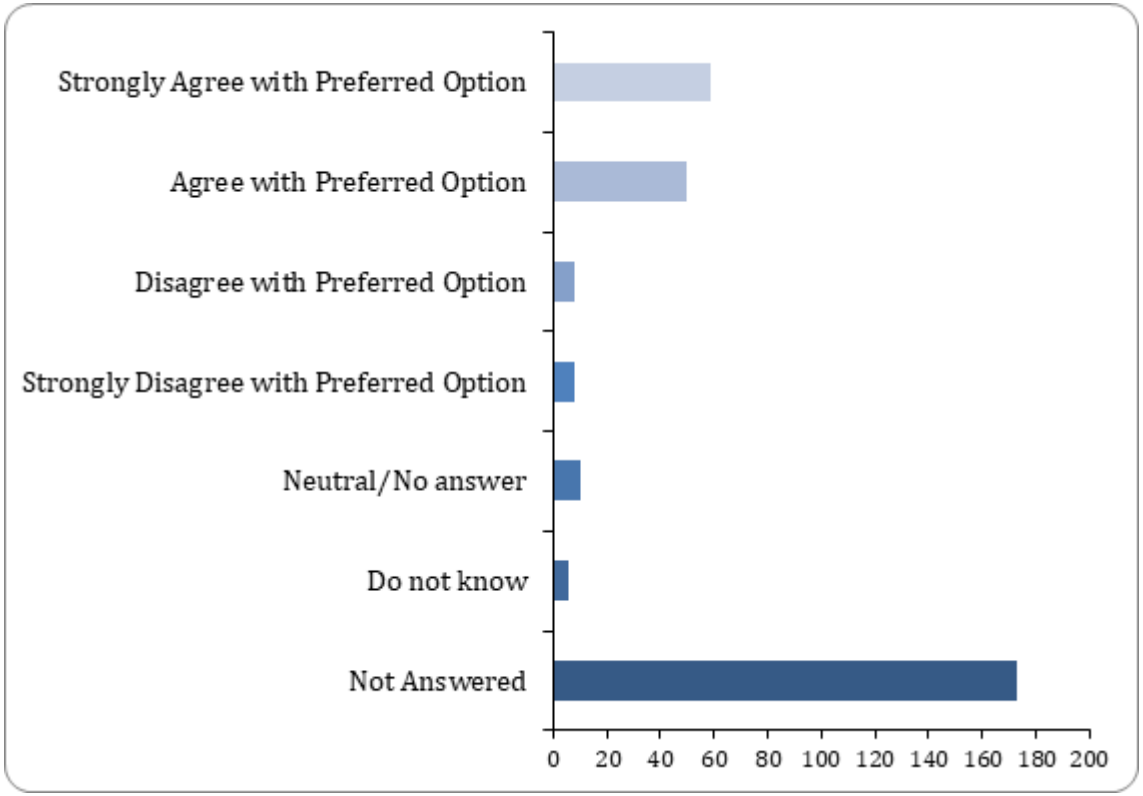


Option	Total	Percent
Strongly Agree	374	41.05%
Agree	338	37.10%
Neutral	82	9.00%
Disagree	44	4.83%
Strongly Disagree	40	4.39%
Do not know	15	1.65%
Not Answered	18	1.98%

All Public Responses - Draft Policy HD1

Please tell us what you think of policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets. If you have any additional comments please put them in the comment box.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%

Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	10	3.18%
Do not know	6	1.91%
Not Answered	173	55.10%

2374

Draft policy	Topic	Summary of comments	Response
HD1-HD9	Supportive	We strongly support these policies. Like those on green infrastructure, they should be given very strong weight in recognition of the outstanding heritage importance of the city as a whole and the contribution made by individual historic assets including many non-designated historic assets.	Noted, support welcomed.
HD1	Should be reworded to reflect NPPF	It is noted that the draft policy states that 'substantial harm to or loss of significance of a conservation area should be wholly exceptional'. It is considered that the word 'wholly' should be removed from the policy drafting as this is not consistent with the wording of paragraph 214 of the NPPF.	The NPPF provides a national context. The policy has been combined with others relating to designated heritage assets and reworded.

2375

HD1	Objection	Conservation Areas are not up-to-date and ineffective as many have large sections destroyed, so should be drawn to new boundaries, removing areas that no longer have anything to preserve. For example, Headington Hill "Conservation Area" includes Clive Booth Student Housing, Oxford Brookes Campus and modern housing estates, whereas much of Central Conservation Area, due to recent developments, has all the charm and atmosphere of Swindon, this is supported by NPPF Para 191. Almost all development in Conservation Areas will confer substantial benefit, by for example, providing more housing which will always be a "substantial public benefit" so Policy HD1 becomes ineffective. It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy. Conservation area boundaries should be reviewed with a view to removing parts which have been destroyed.	The conservation areas are considered to remain relevant. They all contain newer development and will always be evolving, but the special characters that led to their designation in the first place remain relevant and it is not considered that parts of conservation areas in Oxford are 'destroyed'. Instead of repeating all of the NPPF, the Policy (no redrafted Policy HD3) refers to the criteria in paragraph 214 or equivalent if updated (was para 201).
Draft policy	**Topic**	**Summary of comments**	**Response**

2376

		Proposed modifications: • Shrink Conservation Areas to parts where something remains to conserve. • Remove “substantial public benefits” clause, revert to NPPF para. 201 etc. • Update fluffy wording such as responds, considered, informed to specifics such as must not etc. • Add, (and consult), the Conservation Area Appraisals have not been added to the evidence base as they clearly have never been consulted in this Local Plan	

2377

Statutory Consultee Responses – Draft Policy HD1

Historic England

Policy/Topic	Summary of Comments	Officer Response	Outcome

HD1	Welcome the changes made to the policy. Only query relates to use of phrase “to avoid harm” in the paragraph at the top of p123. Is that phrase needed? Potentially it risks overlooking the potential to enhance the conservation area by responding sensitively. Also, it might make it	We have removed the wording from the policy as suggested.	Amended policy and addressed in supporting text.

Policy/Topic	Summary of Comments	Officer Response	Outcome
	harder to reach a balanced outcome, where harm is minimized. That being so, might “to avoid harm” be deleted?		

All Public Responses - Draft Policy HD2

Draft policy	Topic	Summary of comments	Response
HD2: Listed Buildings	Detailed wording comments about requirement to enhance.	The drafting of the policy risks implying that there is a policy requirement to 'enhance'. The NPPF para 210 encourages enhancement where desirable but does not mandate it (in line with the Act). Should be rebalanced so the statutory duty to preserve significance is clearly identified as the primary requirement, with enhancement presented as a desirable aspiration, rather than an obligation.	Re-drafted Policy HD3 covers all designated heritage assets and refers to the NPPF rather than incorporating its wording.

2379

Statutory Consultee Responses – Draft Policy HD2

Historic England

Policy/Topic	Summary of Comments	Officer Response	Outcome

HD2	Welcome the changes made to the policy. In the opening paragraph, suggest integrating the concept (from the NPPF) that the more important the asset, the greater the weight should be. Note typo “ess than substantial” Also, maintain a concern about referring to compensation in the context of harm to heritage significance. Suggest a different way of framing this in terms of the delivery	Happy to take these suggestions on board.	Policy HD3 refers to the significance of the asset. Deletion of wording in relation to compensation. Typo amended.
Policy/Topic	**Summary of Comments**	**Officer Response**	**Outcome**
	of other heritage benefits (*suggested wording provided*).		

2380

All Public Responses - Draft Policy HD3

No public comments about draft policy HD3.

Statutory Consultee Responses – Draft Policy HD3

Historic England

Draft Policy	Summary	Response	Outcome
HD3	Welcome changes to policy, but question whether the policy could be tailored further to be more locally specific and whether more context can be added to inform decision making. Trust that the detailed wording in the supporting text that was agreed through the SoCG for LP2040 will be carried forward. (S*uggested wording provided in appendix to their comments).*	The draft of the policy was absent of the supporting text which is where we planned to add more context, including detail we previously agreed for the LP2040. This has now been incorporated into the draft supporting text.	Supporting text drafted with additional contextual details. Policy wording updated to incorporate HE's suggestions.

2381

All Public Responses - Draft Policy HD4

Draft policy	Topic	Summary of comments	Response
HD4: Scheduled Monuments	Detailed wording comments about requirement to enhance.	The requirement that a proposal should identify 'enhancement to the significance of the Scheduled Monument (including its setting) where possible' goes beyond the Act, which focuses on preservation, and the NPPF which encourages but does not require enhancement.	Policy HD3 is re-worded with greater reference to the NPPF, rather than incorporating its wording within the Plan and to cover all designated assets.

Statutory Consultee Responses – Draft Policy HD4

Historic England

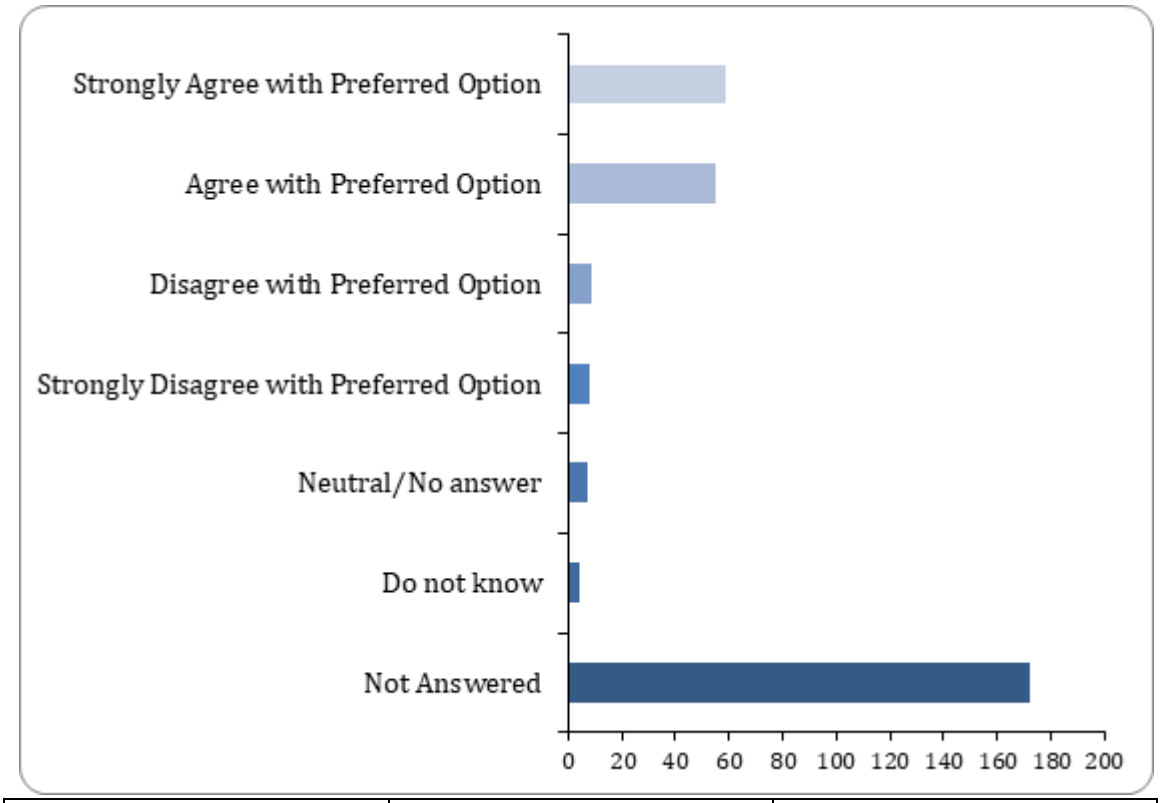
Policy/Topic	Summary of Comments	Officer Response	Outcome
HD4	Welcome changes made to the policy. As with HD2, maintain a concern about referring to compensation in the context of harm to significance and offer alternative wording for consideration (*suggested wording provided*)	Happy to take suggestion on board as with HD2.	Re-drafted Policy HD3 covers all designated heritage assets and refers to the NPPF rather than incorporating its wording.

2382

All Public Responses - Draft Policy HD5

Please tell us know what you think of policy options set 011b (draft policy HD5): Non Designated Heritage Assets. If you have any additional comments please put them in the comment box below.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	4	1.27%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
HD5	Policy wording should reflect NPPF	It is agreed that there are buildings within the City that do not warrant formal Listing but make an important contribution to the character and appearance of the area and therefore, should be afforded due regard in considering development proposals. 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 should reflect this test rather than the test associated with designated heritage assets.	Wording removed to align with the NPPF.
HD5	Allow for individual nominations for non-designated heritage assets	Historic England in Advice Note 7 (2nd Edition) clearly states that individual non designated heritage assets can be identified within conservation areas and makes the distinction between CA protection and NDHA protection via LA Registers. Other LA's have encouraged local people to get involved in identifying and surveying NDHA's in their conservation areas. The current rules the City Council have set out for registration have created a 2 tier system with communities and citizens outside CA's given preferential treatment allowing them to nominate possible NDHA's for consideration to be registered. This is because it is very possible that a CA appraisal will not identify all of the heritage assets might be valued by local people in that area and Conservation Area Protections differ in their criteria from the criteria that can be applied to NDHAs.	The Policy is clear that the Oxford Heritage Asset Register is only one way that non-designated heritage assets may be identified. A non-designated heritage asset is considered in the same way in a proposal however it is identified. There is no greater (or lesser) protection for those on the OHAR, or indeed for those listed in a conservation area appraisal.

Draft policy	Topic	Summary of comments	Response
		NDHA are usually criteria are more akin to those of formal listing which identify more than just external appearance for protection. The NDHA Register, like listing, can allow for interiors and special features within a buildings structure to be protected for instance. CA protection does not. So I ask that the Local Plan 2042 Policy HD5 includes a provision to allow individual non designated heritage assets to be nominates by members of the public or communities even if they are in a CA. Then that the criteria for nomination be modified to allow this also. This would remove the in equality that I have pointed out and probably add and protect many assets and their special features which being in a CA cannot.	
HD5	Comment	Goal seems to write a report rather than define the degree of harm that would acceptable.	Comment noted.

2386

Statutory Consultee Responses – Draft Policy HD5

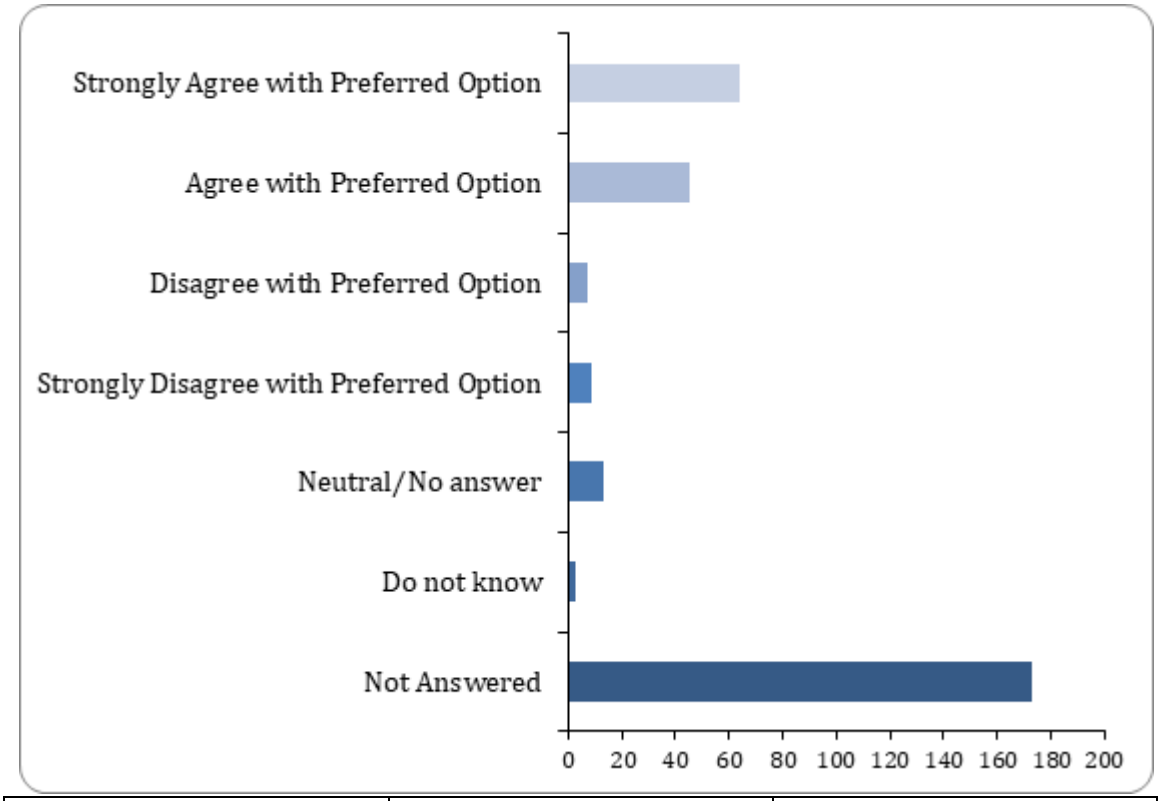
No statutory consultee comments on draft policy HD5.

2387

All Public Responses - Draft Policy HD6

Please tell us what you think about policy options set 011c (draft policy HD6): Archaeology. If you have additional comments please put them in the comment box.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	64	20.38%
Agree with Preferred Option	45	14.33%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	13	4.14%
Do not know	3	0.96%
Not Answered	173	55.10%

Draft policy	Topic	Summary of comments	Response
HD6	Support with suggested amendments	CPRE would like to see policy "proactively" map areas of known archaeological interest. We support the general intent to not allow development unless harm is removed, although feel the wording of the sentence in relation to mitigation is unclear and ask for this wording to be revisited: "mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures). "	The central area has such a concentration of archaeology of such high significance that it is very likely to be present. Other areas do not have quite such a concentration over a particular area, but the potential is across such large areas of the city that to map too many particular areas may falsely give the impression that areas outside them may have little interest. Wording re mitigation has been checked for clarity.
HD6	Comment	The policy reads as if central Oxford is the only place of any importance. Headington is far older as a settlement and manor, for example.	The policy explicitly refers to the 'City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present'.
HD6	Policy not strong enough	Language should be stronger. Should require professional site-based assessments. Should require protection rather than talking of 'mitigation' which admits harms.	The policy approach needs to be proportionate and cannot assume that the presence of archaeology will prevent development.

Draft policy	Topic	Summary of comments	Response
		college management plans) turns normal due diligence into a costly pre-planning obstacle course that discourages brownfield development.	policy that responds to this is required.
HD6	Support	Good and clearly expressed.	The support is welcomed.
HD6	Flood risk and basements	Basement additions to university/college areas should be resisted on drainage ground wherever appropriate, as well as archaeological ones.	Flooding and drainage issues are dealt with in separate bespoke policies.
HD6	Have no policy	Rely on national policy for archaeology only. The local elements (the City Centre Archaeological Area, mandating desk-based assessments for any 'suspected' deposits and whole-	The significance of archaeology in Oxford means that a bespoke

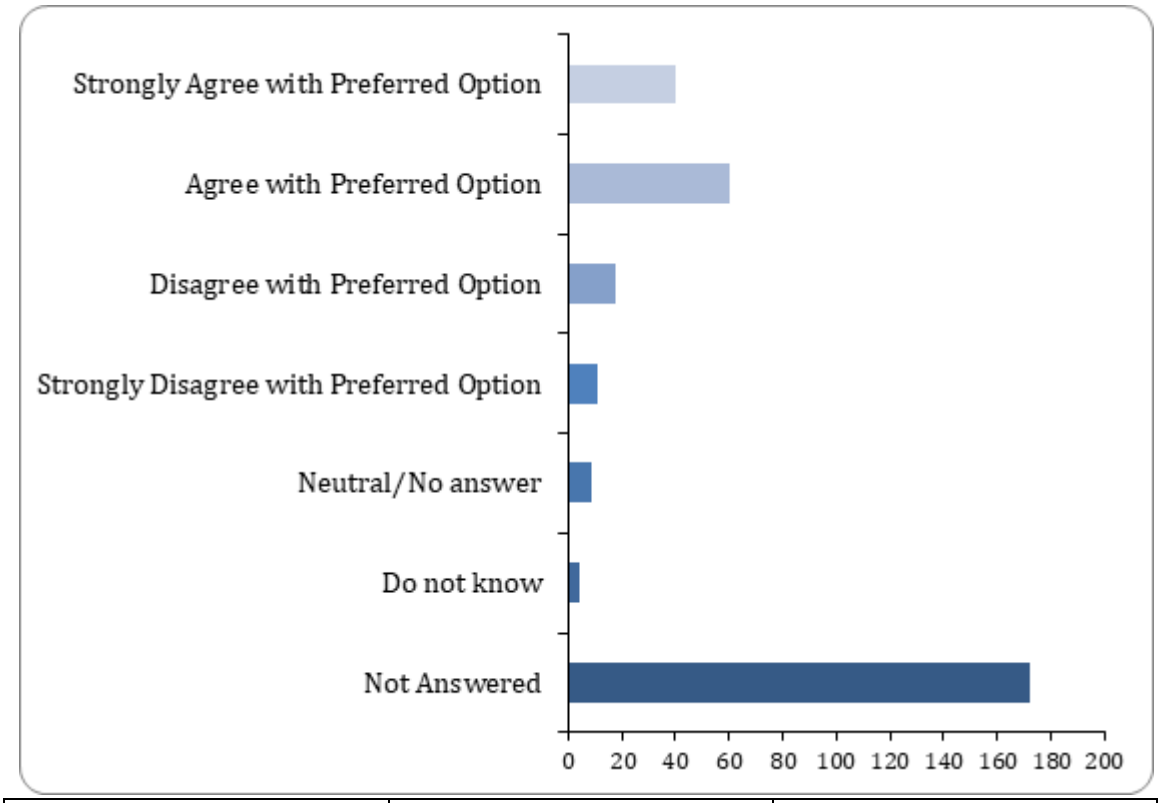
Statutory Consultee Responses – Draft Policy HD6

No statutory consultee comments on draft policy HD6.

All Public Responses - Draft Policy HD7

Please tell us what you think of policy options set 011d (draft policy HD7): Principles of High Quality Design of Buildings. If you have any additional comments please put them in the comment box.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	40	12.74%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	11	3.50%
Neutral/No answer	9	2.87%
Do not know	4	1.27%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
HD7	Strongly support	ONV supports high quality design in the city. This should be proportionate to the location and setting of the proposed development and should recognise the form of development proposed.	Noted, welcome support.
HD7	Support	Christ Church supports high quality design in the city. This should be proportionate to the location and setting of the proposed development, and also viability considerations.	Support for policy is welcomed.
HD7	Support	Yes… and building should be built with a life expectancy of greater than 20-30 years! We have a city full of buildings that have lasted >500 years so new developments should be built with longevity in mind to reduce their environmental impact.	Support for policy is welcomed
HD7	Should prioritise design checklist questions.	Design Checklist or Questions should include hierarchy of design priorities and consider various scales (major / minor) and types (residential / commercial) of development. The local plan should rely on either the checklist or the existing policy questions, not both, to avoid confusion and ensure policy compliance.	Elements of design should be considered in the round and can't be prioritised. The policy links to the checklist, where the detail is included.

HD7	Objection	Policy Is ineffective. The vast majority of applications, namely, householders, are excluded from the necessity to provide even a basic rationale for the proposal. Modification proposed: Remove Householder application exception, this is covered by the proportionality clause.	Many of the detailed assessment criteria under this policy will not be applicable to householder applications, and a mandatory requirement will require additional work from the application while not bringing significant value. It should be noted that householder applications refer to small scale proposals such as extensions that

2395

Draft policy	Topic	Summary of comments	Response
			are subordinate to existing buildings, and distinct from erection of new self-contained dwellings.

HD7		The policy has not reflected how new measures will meet the carbon emission reduction goal and how the design should cope with climate change.	The design checklist includes climate change resilience, carbon emissions and net zero building operations as considerations for assessing a proposal. The plan is to be read as a whole and this policy will not be applied in isolation. There are a number of environmental policies that are included in the plan, and they will be applied where relevant.
HD7		Alternative Option 2 is best as good design does not come from a checklist, but (for most development in Oxford being brownfield), from appraisal of the existing site and building and surroundings to find the effective solution.	Noted.
HD7		Agree with the principle; but the current approach to assessing "high quality" is fundamentally flawed, as shown by a number of developments in Oxford. For a start, the [design review] panel is not permitted to understand the local community within which the development sits, and makes its assessment based on some pretty pictures with no local context. It is also influenced by developers' assertions without testing them against local reality. Would like to see this changed and the whole panel approach rebooted.	Site visits occur in nearly all cases and understanding the local context is an important part of achieving high quality design. However, it is the case that the panel meetings actively involve the applicants, City Council

2396

Draft policy	Topic	Summary of comments	Response

			officers and the panel only, to keep focus on design issues. It is important to note this is only a part of the process of developing and assessing planning applications.
HD7		"High Quality Design" is much too vague a term and useless in practice. Any planning consultant can demonstrate that any building, whatever its quality, is "high quality" . It is a scandal that City policy has been so weak on heritage assets. It should be a fundamental principle that proposals should enhance and preserve the building affected and the area around it. There should be tight controls on materials, style and size to ensure that these are appropriate to the surrounding buildings and area. Conservation Area Appraisals must be produced for all Conservation Areas especially the Central City area which is still incomplete after many years and these should inform precise requirements in any area.	Applicants will have to demonstrate the merits of their proposals and provide justification for their choices through an assessment of specific criteria and design considerations. Pre-application discussions and where required design reviews are also part of the process of the assessment of applications. Conservation Areas in the city nearly all have had conservation area appraisals produced for them, including the Central City CA whose conservation area appraisal was adopted in November 2023.

Draft policy	Topic	Summary of comments	Response
HD7		"Responsive to the site" is often cited in rejecting designs of increased bulk and massing relative to the existing building or the nearby street scene. This suppresses densification, which forgoes increased housing capacity, which we are severely lacking, and particularly increased housing capacity at the most environmentally-sustainable locations. We should explicitly call out circumstances where increased height, bulk or massing are appropriate in order to deliver more housing than could be achieved at present building height and mass-- - Nearby (not necessarily immediately neighbouring) to other buildings of comparable size - Close to public transport links and amenities -- this would likely in practice mean close to district centres - Out of the immediate proximity of highly sensitive heritage assets - In locations with a CPZ or other parking management such that the consequences of increased motor traffic can be managed	Densification and the efficient use of space are supported in the plan where they are suited to the setting and create no adverse impact on the local and city-wide character, and where there is no adverse impact on the amenity of the occupiers of development or the adjoining uses. The plan includes an efficient use of land policy (policy HD8) and a views and building heights policy (policy HD9) which in combination with the High Buildings Study sets out locations in the city that are best suited for added height, and the criteria that proposals will be assessed against to avoid unnecessary harm to the unique visual and spatial environment of the city.
HD7	No policy required	Government interference in decoration just seems unnecessary. Even for the purpose of promoting aesthetics (which is of dubious value relative to the practical purposes buildings serve), variety is	Local authorities are required to prepare design guides or codes consistent with the principles

		valuable and having a checklist seems potentially counterproductive.	set out in the National Design Guide
Draft policy	**Topic**	**Summary of comments**	**Response**
			and National Model Design Code. It is a good way to set out the principles of good practice in design and placemaking, which go beyond just visual appearance. It can also allow for requirements to be tailored to specific local contexts. There is no fixed format, and the checklist we seek to use functions as a series of prompts for applicants to consider if key principles have been followed. They can also be a useful starting point for discussions with officers at early design stages to address any points of concern or contention.

2399

Statutory Consultee Responses – Draft Policy HD7

Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome
Policy HD7	**Strategic Planning**		

Policy/Topic	Summary of Comments	Officer Response	Outcome

	Appendix 1.1 appears to be comprehensive and includes consideration of accessibility and sustainable transport as well as climate change and net zero, use of sustainable materials and thoughts regarding future proofing. As such, we welcome the approach given to this Appendix. **Urban Design (Placemaking)** Paragraph 6.30 - Design quality must also be thought about in relation to the ongoing stewardship and maintenance once delivered, particularly in relation to public realm. Paragraph 6.30 - **spelling mistake** - The Council has a Design Review Panel ***wthat*** can give advice so that designs can be reviewed and improved at the informative stage prior to the formal determination of the application	Noted. Maintenance arrangements are considered in Policies, G2, G5, G6 relating to GI and designated ecological sites, policy G8 – SuDS, R2 – Embodied Carbon, and numerous references are included within the design checklist itself. Noted.	No Action Required No Action Required Oxford City Action: Review typos

2401

	Paragraph 6.31 - The function and uses of streets, spaces, buildings need to be considered		

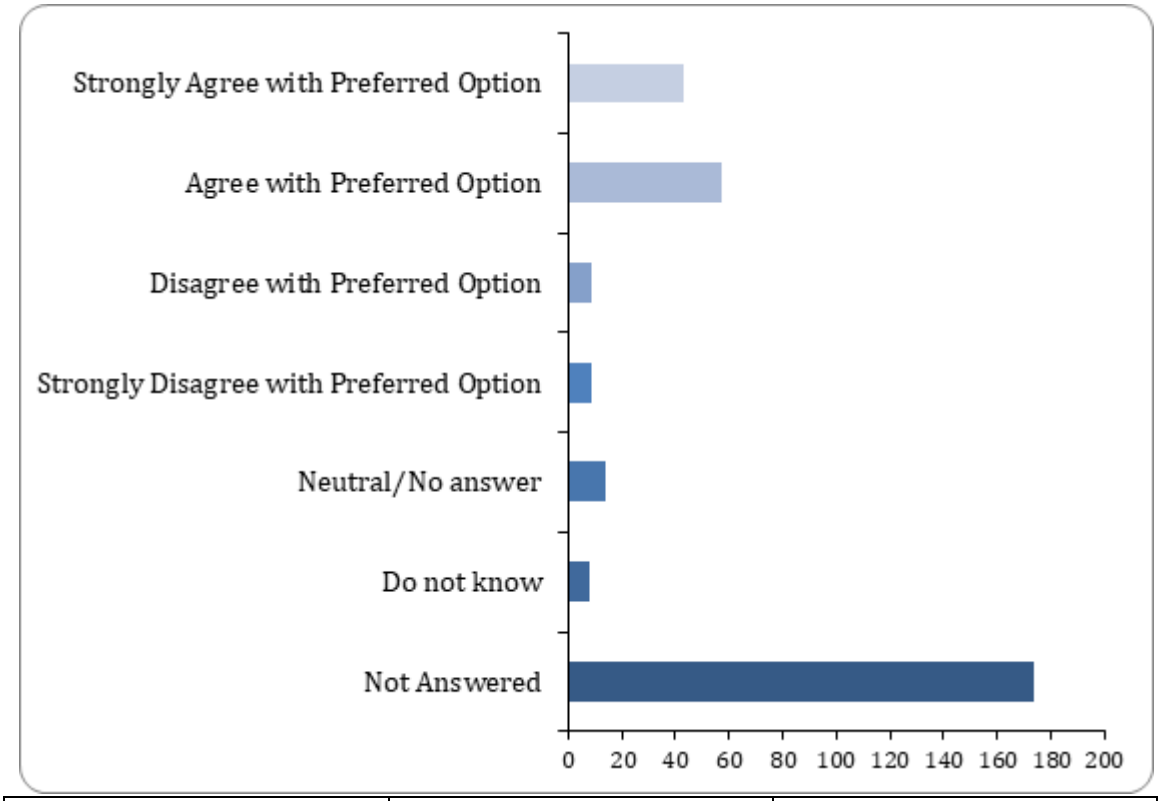
2402

Policy/Topic	Summary of Comments	Officer Response	Outcome
	as part of the design and not purely the appearance.		
	Paragraph 6.31 - **spelling mistake** - Building for a Healthy Life (BHL) is the latest edition of one of the most widely used design guides used in England and has, as its emphasis, healthy placemaking	Noted.	No Action Required
	Paragraph 6.34 - could there be a reference to enhancing the natural environment, not just protecting it.	Noted.	Oxford City Action: Review typos
	The background paper references an option E in the initial sustainable appraisal screening of options, which does not exist.	Polices G1-G6 specifically address the natural environment.	No Action Required
		Noted. We will update the background papers to support the next consultation stage.	Oxford City Action: Review background paper

All Public Responses - Draft Policy HD8

Please tell us what you think of policy options set 011e (draft policy HD8): Efficient Use of Land. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	43	13.69%
Agree with Preferred Option	57	18.15%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	14	4.46%
Do not know	8	2.55%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD8	Strongly support	Supports the preferred option of a policy requiring development proposals to make the best use of site capacity, in a way that is compatible with both the site itself and the surrounding area, with building heights and massing at least equivalent to the surrounding area. NPPF paragraph 129 sets out that planning policies and decisions should support development that makes efficient use of land. This policy will support intensification of existing employment sites where there is the opportunity to achieve increased scale and density to support economic growth in Oxford.	Support for policy is welcomed.
HD8	Support in principle - Clarification	The Universities and Network Rail support the principle of maximising efficient use of land and maximising capacity, but would draw attention to the final paragraph of the draft policy. It would be helpful to understand how these densities relate to different typologies to ensure these do not inadvertently reduce efficiencies.	There is no reason that setting out indicative minimum capacities should inadvertently reduce efficiencies.

2406

HD8	Design-led approach	The draft policy states that 'very-high density' residential development will indicatively be taken as over 100dph. We acknowledge the reference to 'over' 100dph is a starting point not maximum which is positive in the context of housing need and limited land availability. That said, we remain of the view that it should be clearly expressed within the main policy wording that a 'design-led' approach should be taken, based on the opportunities and constraints of a site and assessment of impacts. It is considered that this is the only approach that is capable of delivering the intention of the policy to 'make efficient use of land and maximise capacity'.	Policy HD7 sets out the requirement for high-quality design.
HD8	Policy requirements when creating	Draft Policy HD8 relates to granting planning permission only where development proposals make efficient use of land and maximise capacity and that sites across the City will be capable of	Allocated sites have their own bespoke policies in the plan, which contain site and context–

2407

Draft policy	**Topic**	**Summary of comments**	**Response**

	new transformative context.	accommodating development at an increased scale and density to their surroundings. In contrast, draft Policy HD9 sets out that planning permission will only be granted for development that will retain the special significance of views of the historic skyline, both from within the historic core area and from outside the historic core area. As per previous written representations, 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 draft 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.	specific guidance on appropriate type and quantum of development and design requirements – including density.
HD8	Suggested amendments	Car infrastructure, roads, driveways and garages are the single biggest cause of inefficient use of land, occupying space that could be a bedroom or extension, yet this not acknowledged anywhere. Modification proposed: The phrase "*is informed*" is practically meaningless, as is "*does not substantially impact*" Remove Para e) "opportunities for net zero carbon design" as it is unrelated to the topic, also remove, f) "flood risk" for the same reason.	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. n et zero carbon design may have implications on siting, height, massing etc and flood risk may impact the amount of developable land on a site.

2408

		Should include an exemption for coneervation areas.	

2409

Draft policy	Topic	Summary of comments	Response
HD8	Support	The aims of this draft Policy are supported, including building at appropriate densities as it is an important component of sustainable development. Making efficient use of any land in the City is a priority.	Support noted and welcomed.

HD8/ HD9	Conflicting policy requirements	Policy HD8 supports efficient use of land and maximising densities, while Policy HD9 helps protect the setting of Oxford, including its historic skyline, and views into and out from the historic core area. Encourage Local Plan to provide further guidance about how strategic allocations (inc. Osney Mead), can balance these competing policy interests and delivery required benefits and intensification. OUD generally encourages the Local Plan to recognise that largescale redevelopment / regen. projects need to acknowledge the existing context and can also create new transformative contexts.	Policies HD8 and HD9 (HD2 and HD6 in the Submission Draft Plan) do not inherently contradict as it is possible to make efficient use of land/ increase densities while responding to and protecting the historic skyline. Policy HD6 sets out the process and tools which help to limit harm to the skyline from development. Site allocation policies and Area of Focus policies provide clarity around redevelopment opportunities and areas where additional growth is encouraged/ expected. Note the point about further clarity in strategic allocations.
HD8	Should go further	There should be densification outside of the centre as well as inside it. Arterial roads are lined with low-density housing but they are highly accessible and justify and urban scale of development. They should be lined with minimum four-storey blocks of flats and offices with 100dph+ all along them arterial roads (except in conservation areas) not just in the district centres that are along them. Suggest 80dph suburban, 120dph gateways, 200dph centres.	The minimum indicative capacities do represent densification. The character of arterial roads does vary considerably. Some parts of arterial roads, near the ring road, will be gateway sites, but between these and the

2410

Draft policy	Topic	Summary of comments	Response
			centres, very high densities will not always be appropriate. The suggested densities are very high and not considered feasible.
HD8	Object	Stop interfering with development. Do not set minimum densities as they lead to poor design and prevent low densities that may be appropriate. Too many buildings out of keeping with height of surroundings and add to existing problems of infrastructure and amenity. Need to be careful- justified controversy when the University built high-rise buildings that damaged view in and around Port Meadow. The centre brings tourists to Oxford and provides economic benefit, which as it risk if it is allowed to deteriorate further (it is already harmed by increased heights and sizes). Open spaces are important. Green sites should have more retained. This affects density.	The policy does have enough flexibility to allow lower densities if it can be justified that they are more appropriate because of the context of the site. The densities do allow for amenity space, green space, etc.

2411

Statutory Consultee Responses – Draft Policy HD8

South Oxfordshire District Council and Vale of White Horse District Council

Policy/Topic	Summary of Comments	Response	Outcome

HD8 & HD9	We welcome the minimum density targets, which responds to concerns raised by South Oxfordshire and Vale of White Horse. Supporting evidence to justify them is	A background paper explaining the rationale for the densities will be published. Density of course	Background paper explaining densities to be published. Template for site capacity assessments
Policy/Topic	**Summary of Comments**	**Response**	**Outcome**
	needed. HD8 and HD9 may be contradictory as HD9 may restrict density in key locations.	is never unlimited and should always be design-driven.	to be shared ahead of next consultation stage.

Historic England

Draft Policy	**Summary**	**Response**	**Outcome**

2412

HD8	Strongly encourage more nuanced wording in the opening paragraph of HD8. Background paper 11 summarises the preferred option as "Require that proposals make the best use of site capacity, taking into account the surrounding area, building heights, massing and other contextual factors such as heritage and green infrastructure". While this is a reasonable description of HD8 in OLP 2040, the policy's emphasis has changed in OLP 2042. There may be circumstances where the expectation as stated in the revised policy, especially regarding scale, will not be realistic. Some form of caveat is needed. We suggest adding "most" to the opening paragraph.	We agree with the comment in general and will update the wording, though would propose slightly different wording.	Policy updated.

2413

Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome

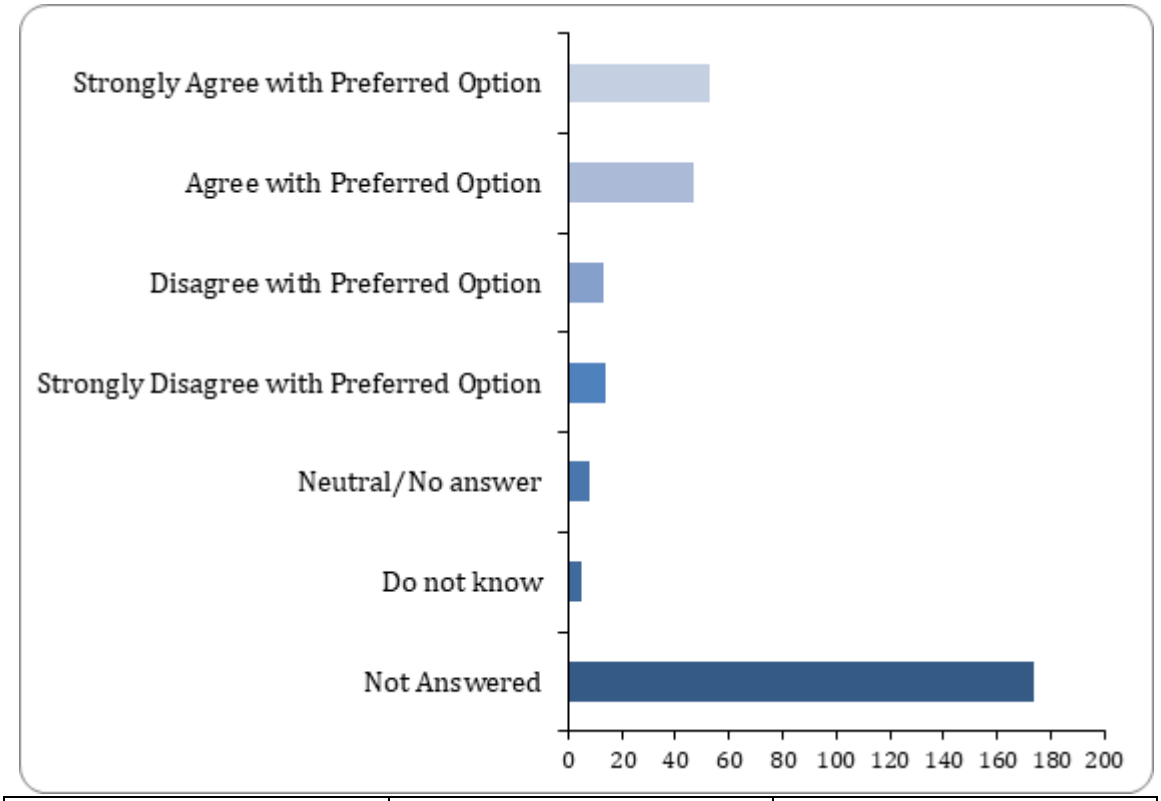
Policy HD8 Making Efficient Use of Land	**Strategic Planning** This policy approach is supported by the County Council as it will help reduce the unmet housing need identified in the plan. The approach to densities in a hierarchical manner depending on accessibility is welcomed as it should reduce reliance on private vehicles and increase access to sustainable modes of transport.	Noted.	No Action Required
	It is important however, to make it clear that this policy works in tandem with draft Policy HD7 and the principles included in Appendix 1.1. We encourage the City Council to make explicit reference to this, to ensure high quality developments.	We do not propose to make an explicit reference in the plan to that effect. The plan should be read as a whole and relevant policies applied in the decision-making process.	No Action Required
	Urban Design (Placemaking) Paragraph 6.36 - 'Transport hubs generally enable a greater density to be assumed.' - The same should apply to areas with key services such as hospitals, education, leisure/shopping - not just transport. Generally, people want to live near services, therefore there will be a greater demand for housing, increasing density.	Noted.	No Action Required

2414

All Public Responses - Draft Policy HD9

Please tell us what you think of policy options set 011f (draft policy HD9): Views and Building Heights. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	53	16.88%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	13	4.14%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	8	2.55%
Do not know	5	1.59%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD9	Support but VuCity requirement should be deleted	The aims of policy HD9 in terms of the impact of development upon views into and out of the City are acknowledged and supported by Mansfield College and ONV. However [the policy] requires the use of specific software (VuCity). It is not appropriate for a Local Plan to push a particular brand of software. This puts undue costs onto projects especially where an alternative modelling software is already being used by the applicants. This reference should be deleted, and the policy simply refer to the use of an appropriate 3D model. However, it is welcomed that the Council has introduced an acknowledgement that the software model may change over time.	The LPA has a licence with VuCity software to view the submitted 3D models. Alternative or generic software may not be compatible with the Council's systems which is why the policy is specific in its requirement for VuCity.

2417

HD9	Rewording to reflect NPPF	Previous representations submitted on behalf of ORVIL in response to the Reg 19 consultation on the LP2040) states that Policy HD9 should be revised to reflect the NPPF and the guidance as set out in GLVIA 3rd edition. It is acknowledged that (part e) of the draft policy references this guidance. However, it is considered that replacing 'special significance' in the first paragraph of the policy with 'important characteristics' would more appropriately respond to this guidance. It is considered that 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. Removal of the word 'bulk' does not dilute the intention of the policy due to the supporting explanatory paragraphs. **Objection 2:**	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. 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

2418

Draft policy	**Topic**	**Summary of comments**	**Response**

		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. It is also considered that 'limited in bulk and must be' 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 these words can be overly interpreted and it is considered unhelpful to include within the policy. Removal of the words does not dilute the intention of the policy due to the supporting explanatory paragraphs and text which site alongside policy HD9.	assessment of planning applications.
HD9: Views and building heights	Setting of View Cones	The policy states that planning permission will not be granted for development proposed 'within a View Cone or the setting of a View Cone' if it would harm the special significance of the view. The use of the term 'setting' is problematic, as the NPPF defines 'setting' as the surroundings in which a heritage asset is experienced but View Cones are not designated heritage assets. They are intended to manage townscape character and safeguard settings of heritage assets visible within them. Reference to setting should be changed to 'townscape' or 'landscape context'.	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.
HD9: Views and	Harm to View Cones	The policy does not allow harm to the special significance of a view, but it should allow assessment of level of harm outweighed against benefits.	The policy sets out guidance to inform design decisions about heights and to enable an

2419

Draft policy	Topic	Summary of comments	Response
building heights			understanding and detailed assessment of the impact of heights.
HD9	Policy too rigid	The rigid height thresholds and extensive assessment requirements across all sites should be reviewed as this approach may restrict good design and sustainable development, especially in less sensitive areas.	There are no rigid height thresholds set out in the policy at all. The assessment requirements are proportionate and are most extensive for only specific circumstances.
HD9	Support for policy	We welcome this Policy's intention to 'retain the special significance of the historic skyline' of Oxford. However we are concerned that, as currently written, the Policy places almost exclusive emphasis on views of the Historic Core Area. ... The Policy should explicitly prohibit such high buildings that would impinge on the skyline from Port Meadow, in order to ensure there is no repeat of the Castle Mill flats disaster and the more recent spoiling of Port Meadow views by the tall buildings at Oxford North.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. 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...'

HD9	Support in principle	We worked closely with the city council and other specialists to create the 'Assessment of the Oxford View Cone' Report in 2015, we strongly support reference to this report within the policy text. We are also pleased to see that reference is made to the view cones but also the wider setting of the views. This makes it clear that the 10 view cones do not provide a definitive list of all the views, and that the wider setting, or even views that do not fall within the 10 'official' view cones can also be sensitive and warrant a high level of protection.	Policies HD1 and 2, in particular (HD3 in the Submission Draft Plan), do carefully consider the setting of heritage assets and may also be of relevance, alongside Policy HD9.

Draft policy	**Topic**	**Summary of comments**	**Response**
		The policy, or its supporting text, also needs to be clear on the difference between 'views' and historic 'setting'.	
HD9	Objection	Policy is ineffective as it only appears to 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.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. 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…'

2421

HD9	Inconsistent with national policy	The preferred option for this policy states that 'Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view'. Under the terms of the policy, all levels of harm are unacceptable, regardless of the level of harm and the extent of any benefits which may outweigh that harm. This is inconsistent with national planning policy, in that it does not enable a balancing exercise to be undertaken. We would ask the Policy to be rebalanced.	The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights.
HD9: Views and building heights	Setting of View Cones	The policy states that planning permission will not be granted for development proposed 'within a View Cone or the setting of a View Cone' if it would harm the special significance of the view. The use of the term 'setting' is problematic, as the NPPF defines 'setting' as the surroundings in which a heritage asset is experienced but View Cones are not designated heritage assets. They are intended to manage townscape character and safeguard settings of heritage	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
Draft policy	**Topic**	**Summary of comments**	**Response**
		assets visible within them. Reference to setting should be changed to 'townscape' or 'landscape context'.	sufficient detail in the supporting text that provides clarity to the policy.

HD9: Views and building heights	Harm to View Cones	The policy does not allow harm to the special significance of a view, but it should allow assessment of level of harm outweighed against benefits.	The policy sets out guidance to inform design decisions about heights and to enable an understanding and detailed assessment of the impact of heights.
HD9	Policy too rigid	The rigid height thresholds and extensive assessment requirements across all sites should be reviewed as this approach may restrict good design and sustainable development, especially in less sensitive areas.	There are no rigid height thresholds set out in the policy at all. The assessment requirements are proportionate and are most extensive for only specific circumstances.
HD9	Support for policy	We welcome this Policy's intention to 'retain the special significance of the historic skyline' of Oxford. However we are concerned that, as currently written, the Policy places almost exclusive emphasis on views of the Historic Core Area. ... The Policy should explicitly prohibit such high buildings that would impinge on the skyline from Port Meadow, in order to ensure there is no repeat of the Castle Mill flats disaster and the more recent spoiling of Port Meadow views by the tall buildings at Oxford North.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. 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...'

2423

Statutory Consultee Responses – Draft Policy HD9

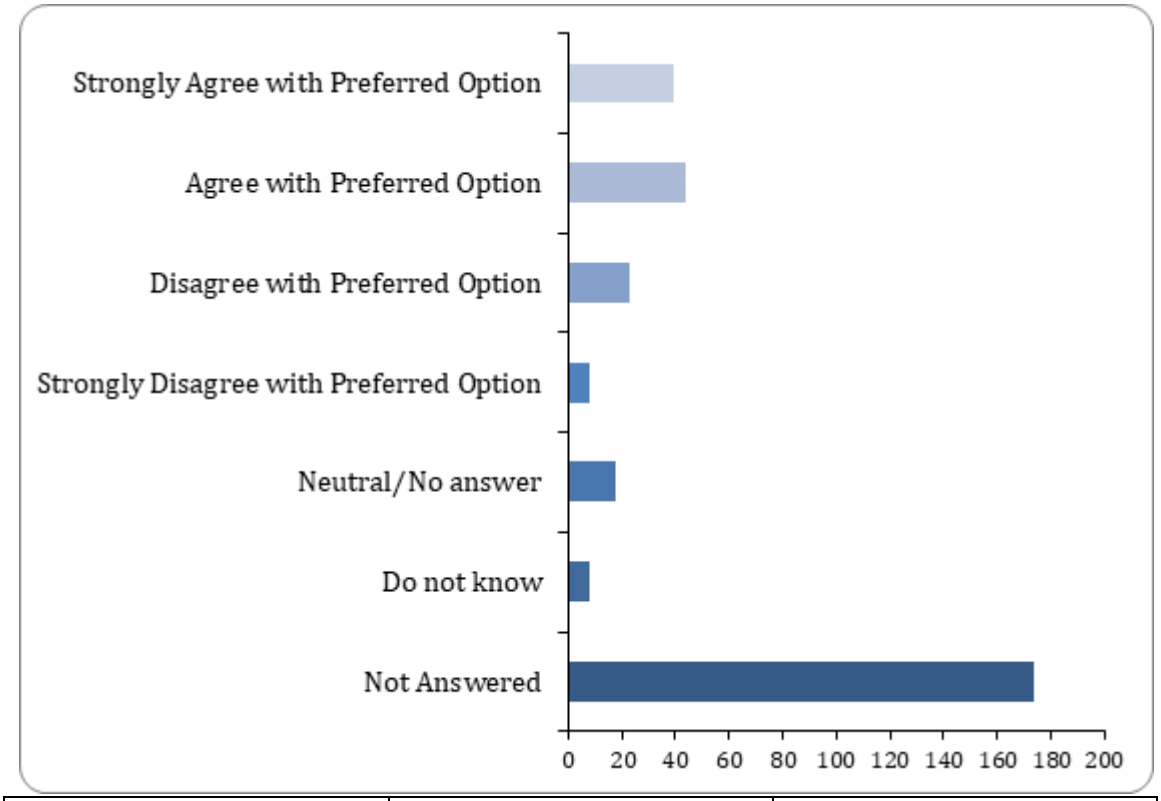
Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome
Policy HD9 Views and Building Heights	**Urban Design (Placemaking)** Paragraph 6.39 - Make reference to the view cones. Paragraph 6.47 - assuming views outside of Oxford City boundary do not extend into other districts besides Vale of White Horse? If not, reference other districts too.	View cones are referenced in paragraphs 6.45- 6.47. Some views extend out of the city (e.g., Boar's Hill, Raleigh Park and Elsfield). Although the view may extend beyond the city boundary, the policies in the plan only apply with Oxford's administrative area.	No Action Required No Action Required

All Public Responses - Draft Policy HD10

Please tell us what you think of policy options set 010a (draft policy HD10): Health Impact Assessments. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	39	12.42%
Agree with Preferred Option	44	14.01%
Disagree with Preferred Option	23	7.32%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	18	5.73%
Do not know	8	2.55%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD10	Objection – Not in line with NPPF	Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities - not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources. A report "' Healthier and Happier An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack adaptions such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. For the future plan to be in line with national policy and effective, the following wording should be included within the policy: *"Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment".*	The requirement for HIAs for all major development proposals is not at odds with the benefits associated with Older Persons' Housing. No changes are required.

HD10 (HIAs)	General comment	The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If	As set out in the last paragraph of the policy, additional information

Draft policy	**Topic**	**Summary of comments**	**Response**
		HIAs are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role.	and guidance can be found in the appendices and within the TAN.
HD10	Several comments against including a policy	Several comments saying they don't agree with including a policy and one saying there are already lots of health-related tests as part of the plan and a HIA is an additional level in the way of development	The HIA is not overly onerous, but helps focus on health impacts. Creating a healthy places is fundamental, and overarching, so this focus is important.
HD10	General comment	The inclusion of a health impact assessment sounds great, but it should be made clear not just what should be included in an HIA, but how the information is to be used. Oxford is very short of space. If HIAs are to be used e.g. to push through developments which conflict with national policy in disadvantaged or working-class areas, then this is not a good thing. These can be huge documents. If they increase the volume of paper that councillors and residents have to plough through, it is important to clarify both their scope and their role.	HIAs do not need to be extensive, but bring together elements of a proposal to show how they work together to impact health, and help show when any mitigations are needed.

HD10	HIA policy scope too wide.	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. As the plan and the policies, it contains has been prepared to address the key health issues it is therefore unnecessary for future development proposals that accord with this plan to undertake a separate HIA. If a development meets the	HIAs submitted in support of major development proposals will contain specific details relevant to the proposal which are in addition to the general overarching requirements of the Local Plan as a whole.
Draft policy	**Topic**	**Summary of comments**	**Response**
		policies in the plan, then it is by default addressing the health outcomes already identified by the Council. 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 the council as part of the plan wide HIA.	

HD10	Objection	Policy is not effective. The policy as drafted requires an assessment however it does not set a target for compliance. It is not clear how this is to be implemented (e.g., health impacts from increased traffic, loss of green space etc.).	As set out in the last paragraph of the policy, additional information and guidance can be found in the appendices and within the TAN. The TAN states "Planning officers will refer to Appendix 3 of the Oxfordshire HIA toolkit when assessing the submitted HIA report to ensure it adequately addresses all relevant health determinants."

2430

Statutory Consultee Responses – Draft Policy HD10

Oxfordshire County Council

Draft Policy	**Summary**	**Response**	**Outcome**
Policy HD10	**Public Health**		

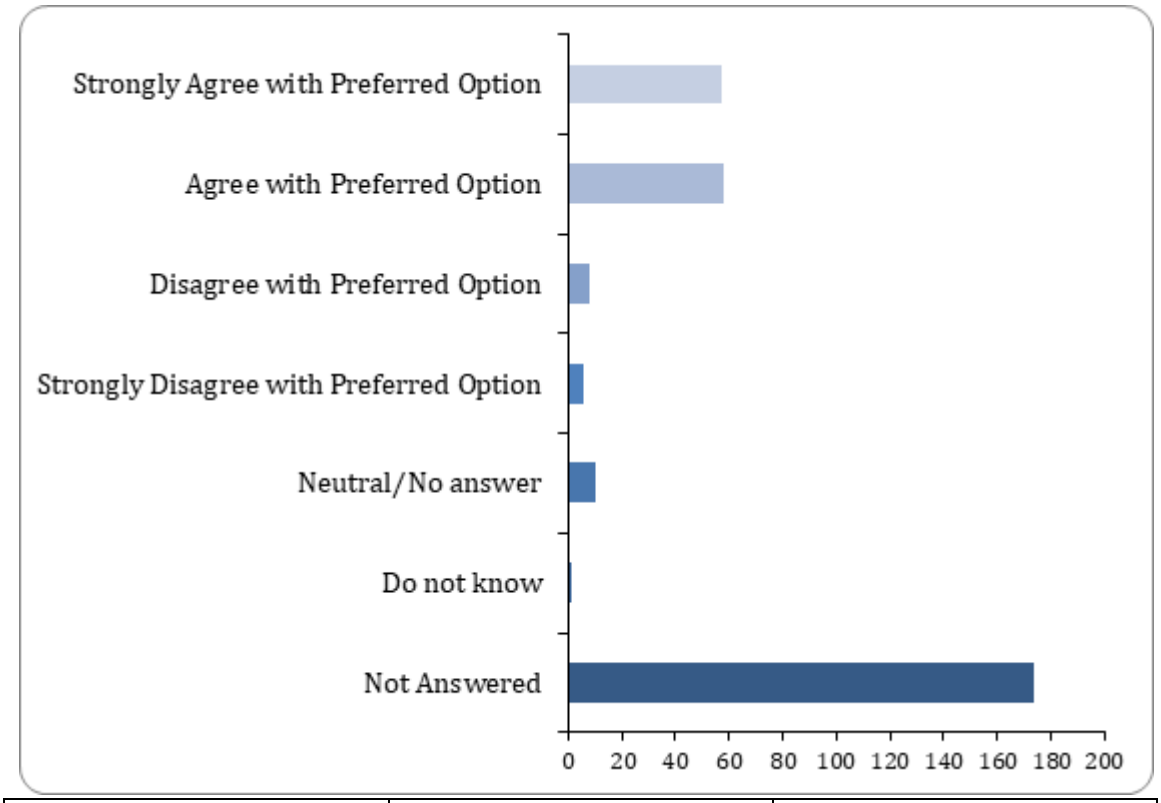
Health Impact Assessments	Health Impact Assessments needs to be specific on the threshold for triggering the need for a developer to conduct an HIA. For example, requiring all developments which include 50 or more residential units, or over 1,000sq.m if commercial, to do an HIA, as is the case in Birmingham's Local Plan. This helps to remove any ambiguity over whether or not a development requires an HIA and should actually remove some of the extra burden that has been outlined as a potential negative consequence of this approach in the SA. As such, Option A is our preferred approach for this policy, on the basis that formal thresholds are included.	Policy HD10 requires an HIA to be submitted as part of major development proposals. Major developments (as defined in the NPPF,) are developments of 10 or more dwellings or 1,000sqm or more nonresidential floorspace. Major development is not currently defined in the Glossary of the Local Plan	Oxford City Action: Consider whether Local Plan glossary should also include a definition of 'major development'

2431

All Public Responses - Draft Policy HD11

Please tell us what you think about policy options set 010b (Draft Policy HD11): Privacy, Daylight and Sunlight. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	57	18.15%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	10	3.18%
Do not know	1	0.32%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD11	General comment	This policy should address dual aspect to provide shade. We consider a problem here is the insistence on little bits of garden for individual houses means that the quality of space is inevitably really limited. A greater emphasis on community living and shared spaces would enable a greater density with a much better quality of life. This is another reason to encourage the greater involvement of community land trusts.	Policy HD13 (HD10 in the Draft Submission Plan) supports shared outdoor amenity space. Assessments of daylight and sunlight which follow BRE guidance include shade (overshadowing) and dual/ single aspects openings.
HD11	Policy unnecessary	Building Regulations and existing BRE guidance already secure reasonable daylight, sunlight and privacy for homes, while employers have clear incentives (and statutory duties) to provide acceptable working conditions. Extending a prescriptive local test to offices, labs and healthcare buildings would add another consultancy layer— modelling, section diagrams, over-shadowing studies—without materially improving welfare, but it would raise costs, lengthen determinations and make the compact, mid-rise schemes Oxford needs harder to finance. A flexible, performance-based approach— using national benchmarks where issues genuinely arise—will protect amenity while keeping land available for the new homes and workspaces the city sorely lacks.	The policy requirements will relate specifically to residential development and sensitive workplaces such as schools. It is not intended to apply to most employment sites, and the reference to sensitive uses and potential safeguarding issues is considered to be clear enough.
HD11	Too limiting	I'm concerned that this would limit density too much.	High densities can be achieved that still create decent homes with amenity space. When pushing density, these policies are even more important.

HD11	Green spaces and density	[Include] access to green spaces	Provision of green spaces is addressed in other policies (e.g. G2, G3)

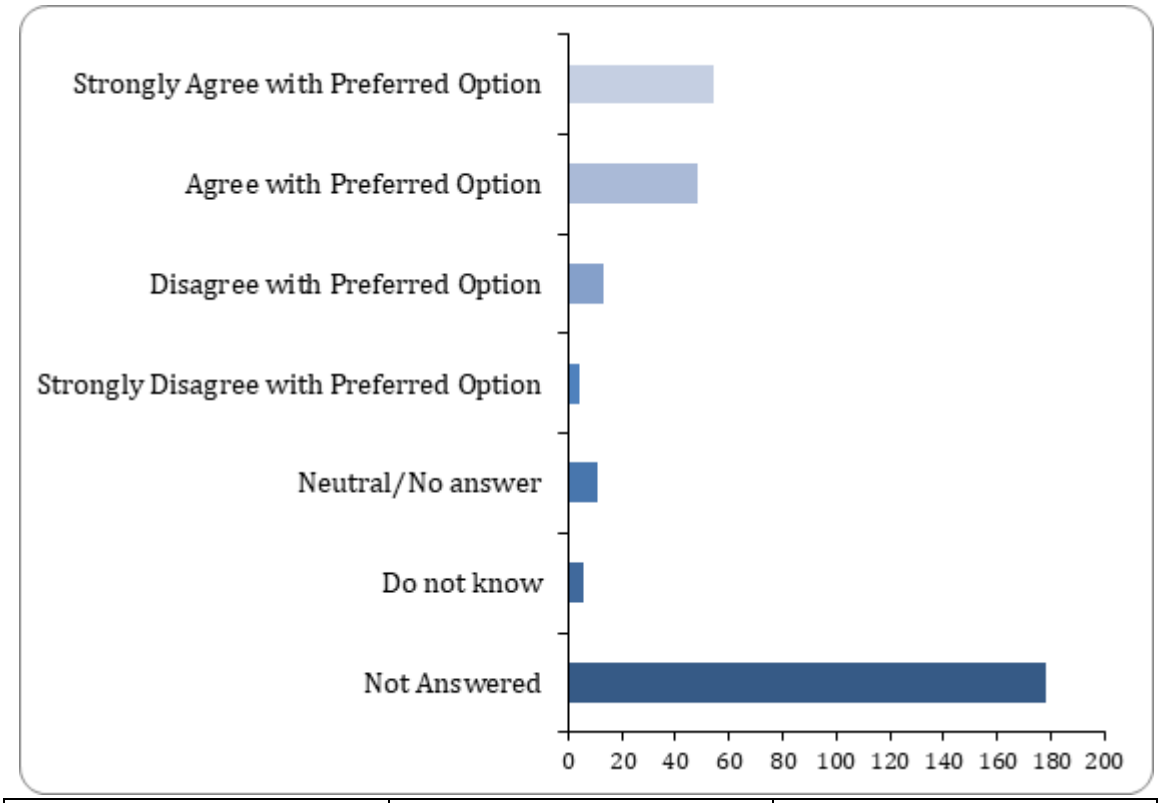
Statutory Consultee Responses – Draft Policy HD11

No statutory consultee comments on draft policy HD11.

All Public Responses - Draft Policy HD12

Please tell us what you think about policy options set 010c (draft policy HD12): Internal Space Standards for Residential Buildings. If you have any additional comments please put them in the comment box.

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	54	17.20%
Agree with Preferred Option	48	15.29%
Disagree with Preferred Option	13	4.14%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	11	3.50%
Do not know	6	1.91%
Not Answered	178	56.69%

Draft policy	Topic	Summary of comments	Response
HD12	No policy	Do not apply national space standards in oxford. A substandard small bedroom must be better than being on the streets or in a hotel. The layout of some houses does not allow change to make rooms up to size. Do not interfere. Push prices upward, limiting choice for singles, key workers and students who may prefer a smaller studio.	This applies to new development. The pressing housing need does not justify poor standards of accommodation, and the standards are applicable to a range of tenure types.
HD12	More space is needed	In communal areas- fixed seating and wider area of corridor or lobby space is not enough to support community living. Bigger and better planned shared spaces are needed. Expectation of remote working, need for study space, teenagers need more space.	Space standards are set nationally.
HD12	Ensure doesn't deter building	Support but must not deter building	The policy approach has been included in the whole-plan viability testing.

2438

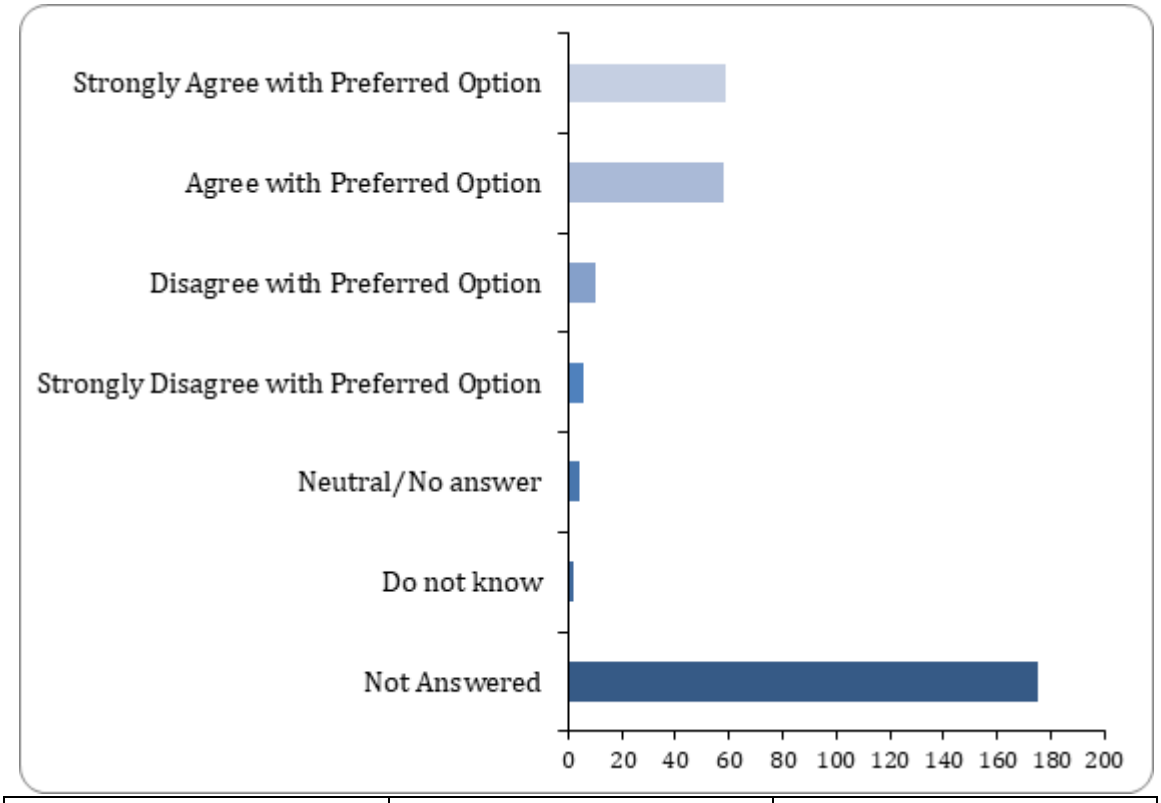
Statutory Consultee Responses – Draft Policy HD12

No statutory consultee comments on draft policy HD12.

All Public Responses - Draft Policy HD13

Please tell us what you think about policy options set 010d (draft policy HD13): Outdoor Amenity Space. If you have any additional comments please put them in the comment box.

There were 139 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	4	1.27%
Do not know	2	0.64%
Not Answered	175	55.73%

Draft policy	Topic	Summary of comments	Response
HD13	Support for policy	Support especially where high density and built up areas like Oxford	The support is welcomed.
HD13	Support with suggested amendment	CPRE support this policy and seek that communal food growing space is specifically encouraged within this policy.	Criterion f) states: "for communal spaces that there is a variety of space, including provision of space to sit and to play, and that space is adaptable to the changing needs of residents, being easy to maintain with resilient materials, but with opportunities for communal gardening or food growing."
HD13	Clarity over how the policy relates to student accommodation	The policy appears to apply for purpose-built student accommodation, but it does not offer detailed clarity of what ratio is expected, and what other factors (elements d-i) might be applied to the policy specific to student accommodation.	The Policy (HD10 in the Submission Draft Plan) does not apply to student accommodation.
HD13	General comment	This draft policy requires minimum levels of outdoor amenity space provision. This includes 1 and 2 bedroom apartments which are expected to provide either a private balcony or terrace or have direct and convenient access to a private or shared outdoor space.	Noted comment.
HD13	Require policy for non-resi	Set a requirement for outdoor amenity space for larger non-resi development	There are requirements for greening, but public spaces won't always be practical or

Draft policy	Topic	Summary of comments	Response
			outside space, even in tall blocks of flats.
HD13	Against policy	Believes the need for housing is greater than amenity space	Requiring amenity space should not compromise developments coming forward, but will ensure they are decent places to live.
			compatible with non-resi developments.
HD13	Concerns about policy long-term	Having little individual bits of gardens means that the quality of space is inevitability really limited and there should be a greater push for shared spaces	This level of detail is dependent on the design and vision for the development.
HD13	Concerns about balconies	Don't think balconies should be counted towards space – they're too cramped	Balconies have the advantage of providing direct access to private

2442

Statutory Consultee Responses – Draft Policy HD13

Oxfordshire County Council

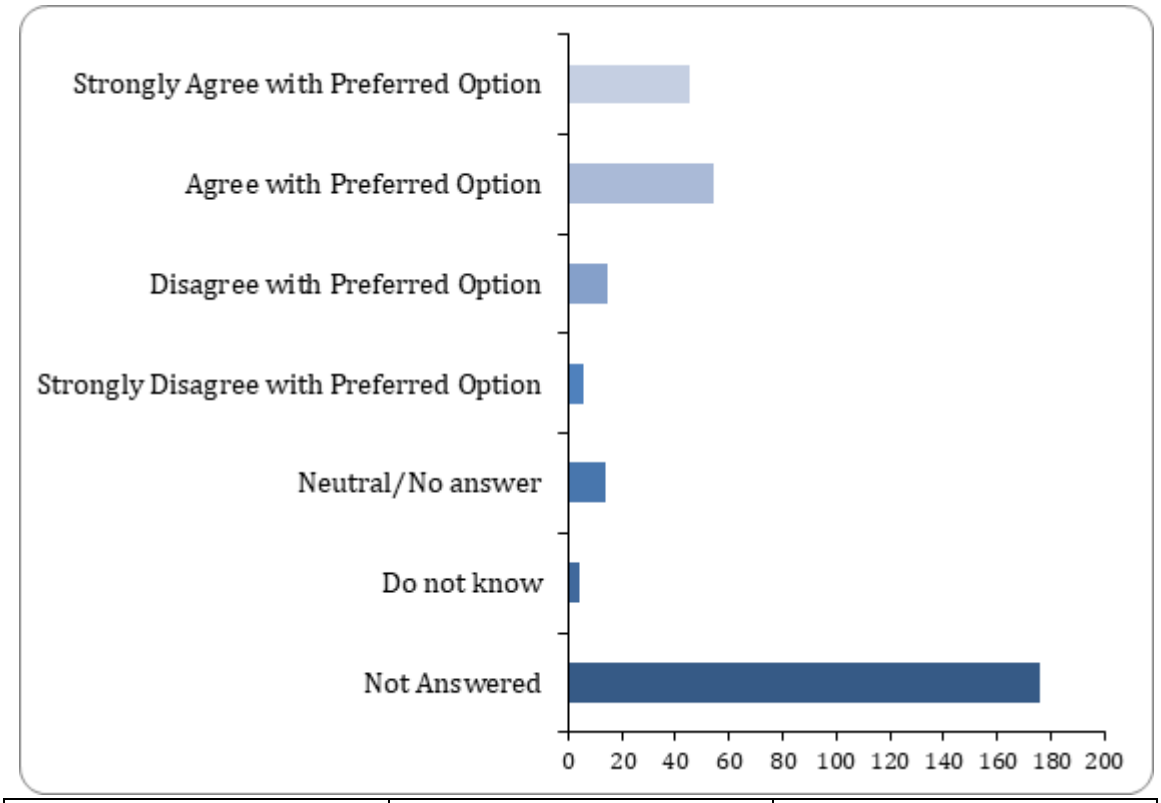
Policy/Topic	Summary of Comments	Officer Response	Outcome

Policy/Topic	Summary of Comments	Officer Response	Outcome
	Understanding and addressing the health risks of damp and mould in the home - GOV.UK		
Policy HD13	**Public Health** This policy wording currently only includes drying space for houses, flats and maisonettes of three or more bedrooms. It needs to make it explicit that even in cases where smaller properties (e.g. one/ two-bedroom flats) are unable to have private outdoor space for clothes drying, that adequate communal drying space will be provided. The Gov.uk website has provided some guidance on how to reduce potential indoor air quality issues through the provision of drying space:	We consider that the policy as drafted is sufficient and supports a proportionate amount of outdoor space based on proposed property sizes.	No Action Required

All Public Responses - Draft Policy HD14

Please tell us what you think about policy options set 010e (draft policy HD14): Accessible and Adaptable Homes. If you have additional comments please put them in the comment box.

There were 138 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	15	4.78%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	14	4.46%
Do not know	4	1.27%
Not Answered	176	56.05%

Draft policy	Topic	Summary of comments	Response
HD14	M4(3) does not remove need for specific older persons' housing.	It is common for Local Authorities to conflate the needs of wheelchair users with the needs of older people in the community. Although adaptable and accessible housing can assist it does not remove the need for specific older persons' housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.	Policy HD14 (HD11 in the Submission Draft Plan) works together with other policies, including Policy H12, which sets criteria for older persons accommodation

HD14	Should go further	Those requiring accessibility arrangements shouldn't be restricted to affordable housing. We also recommend that 10% of new homes are built to the M4(3) standard across all tenures to meet current and future disability needs. Where exceptions are allowed, accessible accommodation must be provided on the ground floor. All multistorey buildings should be accessible by lift, especially if social housing. It's discriminatory to restrict those with a physical disability to live on the ground floor. The standards are essential to ensure inclusive, future-proof homes that support aging in place. Therefore 100% should be M4(2) and 10% M4(3), recognising the critical shortage currently. This supports inclusive communities but also reduces long-term costs that may otherwise fall to the local authority- e.g. stairlift installation about £6,000 cheaper. The local plan could also help address disabled people's housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning.	The Planning Practice Guidance[1] is clear that local plan policies for wheelchair user homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. The PPG is also clear that requirements are based on local need. The exceptions criteria do require that option to use the ground floor is fully explored.

2447

Draft policy	Topic	Summary of comments	Response
HD14	Do not have policy	Rely on NPPF	The NPPF does not set any specific requirements/thresholds for Oxford.
HD14	Viability	As per comments already made in respect of viability, it is currently unclear if the M4(3) standard requirements are viable for older persons housing and we recommend that the council update the study and provide clarification on the testing undertaken for sheltered and extra care housing. Lifts, wider corridors, reinforced bathrooms- adds £8-10k per flat and potentially reduces number of units. Price out the households the policy aims to help.	The policy approach has been considered in the whole-plan viability testing.

2448

Statutory Consultee Responses – Draft Policy HD14

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome

Policy HD14 Accessible and Adaptable homes	**Housing Services / Public Health** We appreciate the recognition in the supporting text to Policy HD14 that homes need to be built with the flexibility to be adapted to the changing needs of residents. The policy requirements include 100% of affordable dwellings and 15% of market dwellings on major sites being constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4. There are some further requirements to a higher level in the policy, as well as exceptions identified. The City	Noted. We will consider suitable wording to ensure the continued application of the policy should changes in Building Regulations arise.	Oxford City Action: Ensure wording is futureproofed for changes in legislation

Draft Policy	Summary	Response	Outcome

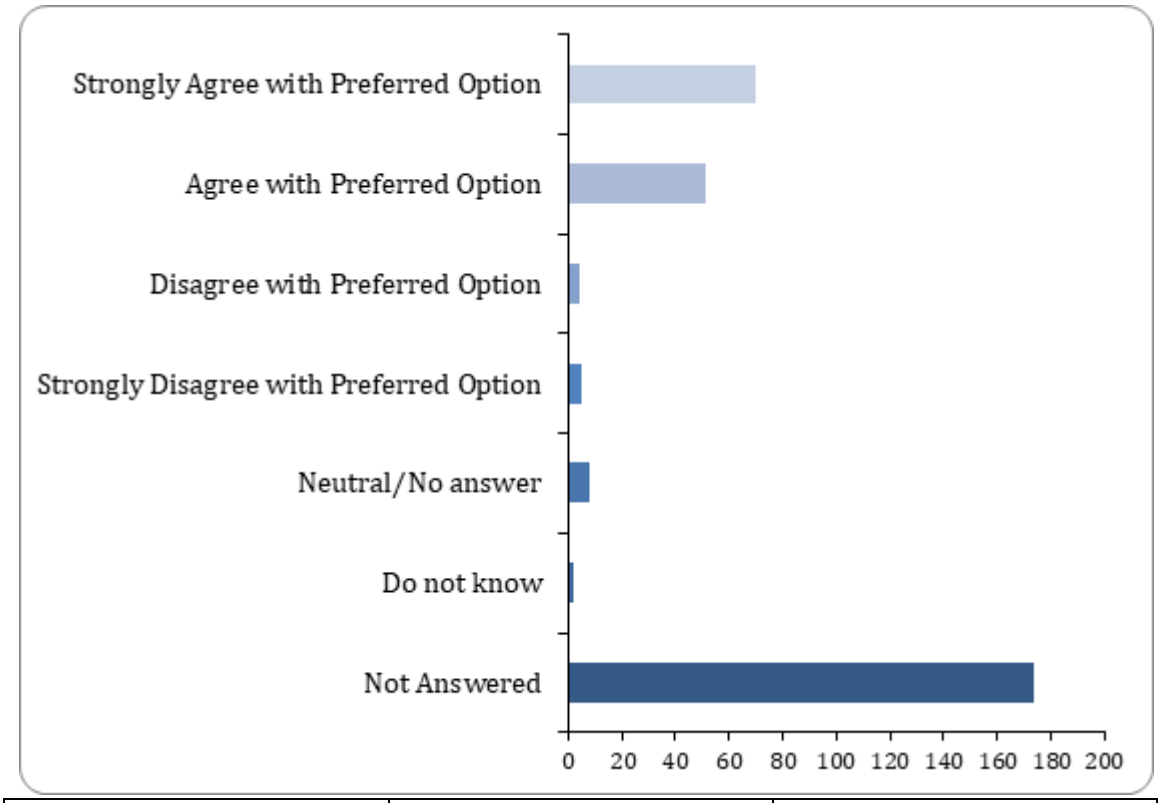
	Council needs to be confident that even if the Building Regulations change, that the requirements of the policy will still apply. The County Council wants to see 'lifetime homes' built to the maximum extent possible so that people do not need to enter the care sector prematurely. The County Council does not wish to see more care homes built in Oxford City.	Noted. In this instance we assume that you are referring to accommodation with 24/7 care rather than extra care housing, i.e., self-contained on-site homes with on-site care available as required.	No Action Required No Action Required

2450

All Public Responses - Draft Policy HD15

Please tell us what you think about policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features. If you have additional comments please put them in the comment box.

There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	70	22.29%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	5	1.59%
Neutral/No answer	8	2.55%
Do not know	2	0.64%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
HD15	Parking and Bike Parking TAN	TAN 12 (Parking and Bike Parking), dated 2022, is now outdated; Cyclox submitted evidence of best practice in 2024 at the request of Cllr Louise Upton to support its update. Key issues that need addressing include the types of cycle stands, appropriate spacing, and the need to locate cycle parking on the carriageway rather than the pavement. Policy HD15 should cross-reference the cycle parking standards in Appendix 7.4, which itself requires revisions to align with LTN 1/20, as outlined in Policy C7.	Updated policy implementation text to reference Appendix 7.4 and TAN.
HD15	Supportive	Divinity Road Area Residents Association support this policy.	Noted and welcomed.
HD15	Non-interference	Asking Council not to interfere with private property.	Noted

Statutory Consultee Responses – Draft Policy HD15

Oxfordshire County Council

Policy/Topic	Summary of Comments	Officer Response	Outcome

Policy HD15 Bin and Bike Storage	**Transport Strategy** There is an opportunity to reference accessibility by exploring solutions to improve the street space and public realm. It is worth noting that the County is working on a Street Design Code which will incorporate a Kerbside	Noted. Once published (and adopted), we can consider inclusion of relevant	No Action Required Oxford City Action: Watching brief for County studies publication

Policy/Topic	Summary of Comments	Officer Response	Outcome
	Strategy, this will incorporate street design, and we would welcome reference to this. For officers' knowledge it is anticipated this will be approved later this year or early next year. Suggested additional wording for second bullet point on page 148: Servicing features can create a cluttered appearance: impacting movement and accessibility	references to supporting strategies produced by partner authorities. Suggested changes proposed are to a bullet point relating to policy	

	and detract from the design of the development, but they can sometimes be designed as an integrated element of the architecture that can contribute positively to the overall design of the buildings or development and not impinge on movement and accessibility. Detailing of these features can be an important contributor to the character of the area.	considerations rather than to the policy itself. No changes proposed to policy text.	No Action Required
Policy/Topic	**Summary of Comments**	**Officer Response**	**Outcome**

2455

	Public Health To maximise modal shift and encourage more people to cycle, cycle storage needs to be located as conveniently as possible. In many cases, this should be at the frontages of homes, or close to building entrances. We echo this statement for charging points for E-cycles.	Noted.	No Action Required

2456

All Public Responses to the Whole of Chapter 6

Draft Policy	Topic	Summary of Comments	Response
All policies	Supportive	Cyclox support all policies in this chapter	Noted, support welcomed.

All Policies	Objection	All policies in this section confuse method with targets, are ineffective and fluffy, and where not just regurgitate the NPPF so are pointless.	The policies regarding heritage need to clearly comply with the NPPF, but attempts have been made to make them Oxford-
Draft Policy	**Topic**	**Summary of Comments**	**Response**
			specific. Other policies do reflect Oxford's specific needs.
HD1-HD9	Supportive	We strongly support these policies. Like those on green infrastructure, they should be given very strong weight in recognition of the outstanding heritage importance of the city as a whole and the contribution made by individual historic assets including many non-designated historic assets.	Noted, support welcomed.

2457

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

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Headlines for Chapter 7:

- Reinvigoration of the City Centre, particularly support for more specialist shops and less empty retail spaces
- City centre needs a community-based club providing leisure, sports facilities and third spaces for families and young people
- More pedestrian, cycle and wheel infrastructure needed
- New homes need to be within walking distance of retail and services
- Developers must be required to include cycle racks
- Some disagreement with the removal of mandatory parking spaces in new developments
- Developers need to be encouraged to provide EV charging in new residential dwellings

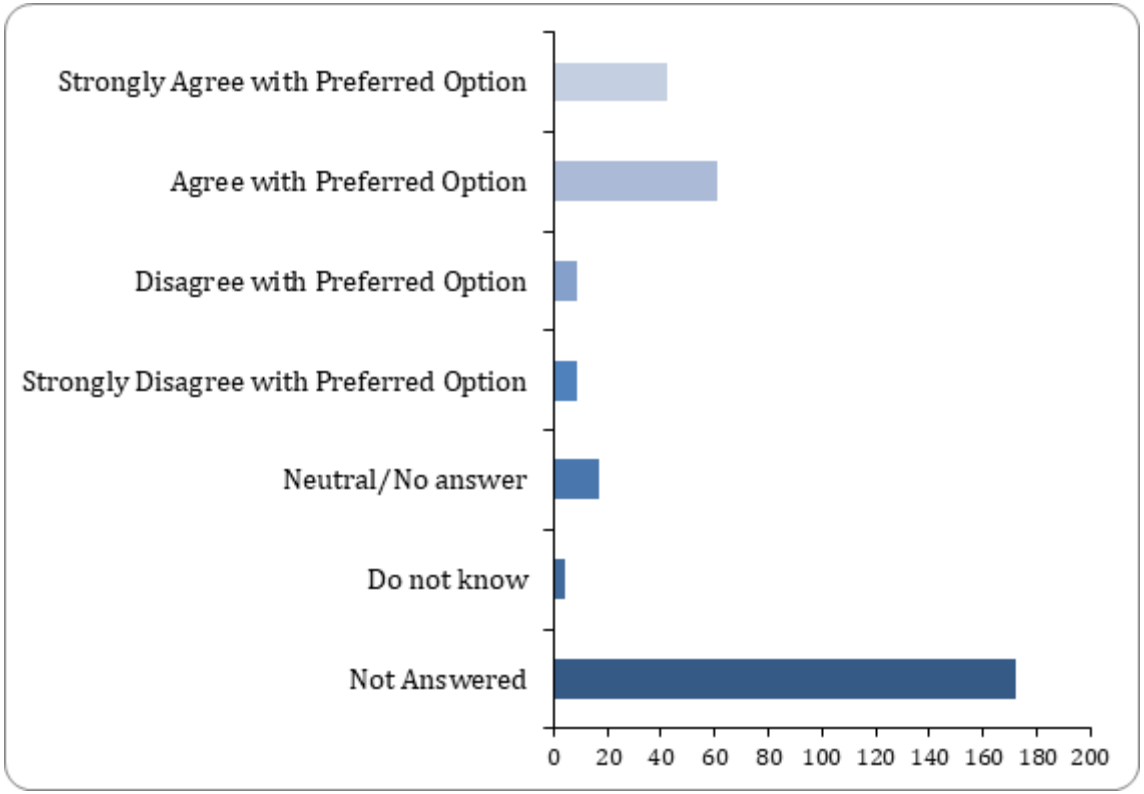
2460

All Public Responses – Draft Policy C1

Please tell us what you think of policy option set 013a (draft policy C1): Focusing Town Centre Uses in existing centres.

There were 142 responses to this part of the question.

2461



Option	Total	Percent
Strongly Agree with Preferred Option	42	13.38%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	9	2.87%

Neutral/No answer	17	5.41%
Do not know	4	1.27%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
C1	More homes in centres	Policy should encourage homes, e.g. above shops/other businesses.	Policy C2 makes it clear upper storeys may be used for housing.
C1	List of facilities for town centres	It is noted that 'community facilities' are referenced, but not specifically uses pertaining to education and learning. Templars Square currently includes existing education and learning facilities, therefore, these uses should be included as suitable.	The policy is about where new Use Class E and other main town centre uses will be permitted, and education and learning facilities do not fall into these categories, but it is not to say they won't be permitted in these locations.
C1	Do not separate town centre uses by type or location	A more flexible policy that encourages a mix of uses across different centres and does not limit student accommodation/hotels to the larger centres would better support community cohesion.	The local centres are not generally considered suitable locations for new student accommodation.
C1	Hierarchy of Centres	In broad agreement with the hierarchy of centres defined in the Plan. However, the city centre should be differentiated from the District Centres as the highest order centre in the hierarchy.	There is not a difference between what would or wouldn't be permitted in the city centre compared to the district centres, so there is no need for the differentiation.

2463

C1	Out of centre development	Where out of centre development is proposed, the implications of its comparative accessibility by non-sustainable modes of transport should be included as a policy criterion and reflected in	The policy does require that, if an out of town location is justified by the sequential test it must then

Draft policy	Topic	Summary of comments	Response
		the assessment of its impacts on the city centre. If a higher level of dedicated parking provision is deemed necessary than for equivalent uses in the city centre, then this should be identified as a conflict with Draft Policy C8 (Motor Vehicle Parking Design Standards) since it confers competitive advantage on such locations and would be contrary to the sustainable transport objectives of the Plan. As such, it will require a commensurately higher level of public benefits in the overall planning balance to outweigh the policy conflict. .	demonstrate good connectivity by sustainable travel and that impacts on the road network are mitigated. In response to this comment, additional wording about minimising parking has been added.

C1	Threshold for retail impact assessment	• The requirement for retail impact assessment for proposals for out-of-centre developments exceeding 350m2 should be justified in the Plan given the default threshold of 2,500m2 in the NPPF. It is assumed to reflect to the oversupply of retail and leisure floorspace in the city, as evidenced through widespread repurposing of such floorspace for other purposes in the city centre, and endorsed by the evidence base1. This needs to be clearly stated in the Plan. This requirement for a costly assessment is not justified and the approach does not support 15-minute city goals.	Given the overall aims of the plan is to ensure sustainable modes of travel, any proposals in less accessible locations could be particularly damaging to these aims, and the requirement for retail impact assessments from small out of town units is considered justified.

2465

Draft policy	**Topic**	**Summary of comments**	**Response**
C1	Flexibility within Use Class E	Caution against limiting the flexibility to change between uses within Class E, if that is what is foreshadowed in paragraph 7.3, bullet 5, which would be contrary to the Government's intentions through the Use Classes Order and permitted development regime, and prejudicial to the commercial imperative to be able to respond to rapid changes in the retail and leisure industries as foreshadowed in NPPF, para. 90(a).	There is no intention or means to prevent change within Use Class E.

C1	Supportive	Cyclox are pleased to note that you are aspiring for residents to be within 20 minutes' walk or a short cycle ride of most services. This will encourage people to walk or cycle and is consistent with your overall aims.	Support is welcomed.
C1	Additional local centres	The policy should define additional Local Centres such that all homes (or say 95%) are within a 15-minute walk of a Local Centre. Some potential additional local centres were mentioned: Littlemore; Greater Leys; Botley Road; Abingdon Road/New Hinksey, Lower Wolvercote, Cutteslowe, Kassam area when development happens.	The NPPF is very clear that defined local centres and 'town centres' suitable for town centre uses, and that they must be more than a small parade of shops of significance only to the immediate neighbourhood. These smaller centres in many cases
Draft policy	**Topic**	**Summary of comments**	**Response**
C1	Headington district centre boundary	Headington District Centre includes Bury Knowle Park. This is not effective and not justified. It is therefore unsound as most of the uses are clearly inappropriate for a Core Green Space such as Bury Knowle Park.	Bury Knowle Park has strong protection as part of the Core Green Infrastructure Network. It is in the district centre as a key part of the offer of the centre that is part of its attraction to the community (including the library), but it does not mean that town centre uses would be permitted on the park.

2467

Draft Policy	Summary of comment	Response	Outcome

Draft Policy C1 – City, District and Local centres	**Transport Strategy** At paragraph 7.1 – It would be beneficial to acknowledge here that there are areas of Oxford which suffer from severance from the city centre due to the road ring road and the barrier this creates around the city.	Noted. We can consider whether adding a reference to severance is appropriate in this section of the plan.	Oxford City Action: consider inclusion of text

Statutory Consultee Comments – Draft Policy C1

Oxfordshire County Council

2468

Draft Policy	Summary of comment	Response	Outcome

	Adding reference to Oxfordshire becoming a Marmot Place would be welcome to showcase how this can help tackle health inequalities and support Oxford in becoming A Liveable City with Strong Communities. Suggest adding wording which plays emphasis on the benefits Mobility Hubs will bring. For example, support LTCP targets and provide transport choice for the residents of Oxford. The opening sentence is not clear on the definition of mobility hub. It reads that the city and district centres as a whole, are mobility hubs. This sentence should be reworded and provide clearer language. One example could be: "The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible." **Public Health**	We note that Oxfordshire County Council is initially focussing on three of the Marmot Principles and has developed a number of projects aligned to them. We can consider whether to add a reference to the plan on this issue. We do not consider this cross reference is necessary as mobility hubs already feature in the LTCP. A Definition of Mobility Hub is contained in the Glossary of the Local Plan. We will ensure that any text about Mobility Hubs provides clarity as to what they are.	Oxford City Action: consider inclusion of text No Action Required Oxford City Action: consider inclusion of text

2469

Draft Policy	Summary of comment	Response	Outcome

2470

	This appears to be the only policy which contains any reference to hot food takeaways (HFTs). While we support the notion that proposals for new HFTs will not be permitted outside of the city, district or local centres, this doesn't go far enough to adequately restrict unhealthy food environments. There should be a standalone policy focusing on the restriction of HFTs and, similar to many other local authorities in the UK, this should specify a minimum 400m/ walk buffer zone from schools. From March 2025 the new National Planning Policy Framework contains an explicit direction to 'prioritise preventing ill-health' stating that local planning authorities should refuse applications for hot food takeaways and fast-food outlets that are near where children congregate (unless in a designated town centre).' In Oxford, children living with excess weight is concentred in some areas, particularly more deprived areas (in some cases with levels of excess weight being over 40%) and close to local centres where there are already hot food takeaways (proliferation –	We are not considering the inclusion of a stand-alone policy on HFTs. Our policy approach broadly aligns with the national policy approach as it does not allow HFTs outside designated centres. The NPPF definition of town centres states that: *References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.* The inclusion of a 400m buffer zone policy in Oxford would effectively increase opportunities for HFTs in additional locations across the city that are outside the city, district and local centres.	City and County Council officers met to discuss the County Council comments on Hot Food Takeaways. Following on from that meeting, no changes have been proposed. However, the County Council still consider a location policy approach to Hot Food Takeaways as described in their response should be included in the plan.

2471

Draft Policy	Summary of comment	Response	Outcome

2472

	increasing numbers of hot food takeaways is linked to higher levels of excess weight). To both tackle excess weight and health inequalities, the wording of the Oxford Local Plan should be strengthened by including a standard restriction on any new hot food takeaways within 400m radius of any school AND by not allowing new hot food takeaways in geographical areas with consistently higher levels of excess weight in children – above the Oxfordshire and England averages. Given the geography of Oxford City the wording could be "no new hot food takeaways will be granted within 400m radius of any school or in any geographical areas with higher levels of excess weight in children than the England or Oxfordshire average (with the exception of within Oxford City Centre)." Similar wording has been incorporated into Local Plans elsewhere. There is backing data to support this approach readily available from the public health team – including accurate excess weight data for children and number and type of hot food takeaway (including proliferation in areas of excess weight).		

2473

	A Healthy Weight Health Needs Assessment undertaken in 2023 found frustration amongst Oxford		

Draft Policy	Summary of comment	Response	Outcome
	City population of the easy access to 'fast food' close to home leading to increased likelihood of consuming this which has higher calorific as well as fat, sugar and salt content. The suggested change links to local policy. Oxfordshire Joint Health and Wellbeing Strategy 2024-2030 as part of immediate actions for healthy people and healthy places on page 20 (published Jan 2024): Take opportunities to shift the environment toward being healthier – advertising healthy options rather than food or drink high in fat, salt or sugar, and restricting the introduction of new hot food takeaways. A letter from Oxfordshire's Health Overview and Scrutiny Committee to the Head of Planning and Chief Executive urged Oxford City to take this approach. The Local Plan cannot effectively deliver its vision for Oxford to be a healthy, inclusive and fair city without such a policy. The County Public Health team can support City Council officers, share detailed data on the subject and support a draft modification of the Local Plan.	We disagree that the inclusion of such a policy would mean that the Local Plan does not effectively deliver its vision. Especially as the proposed approach in the plan to restrict HFTs	

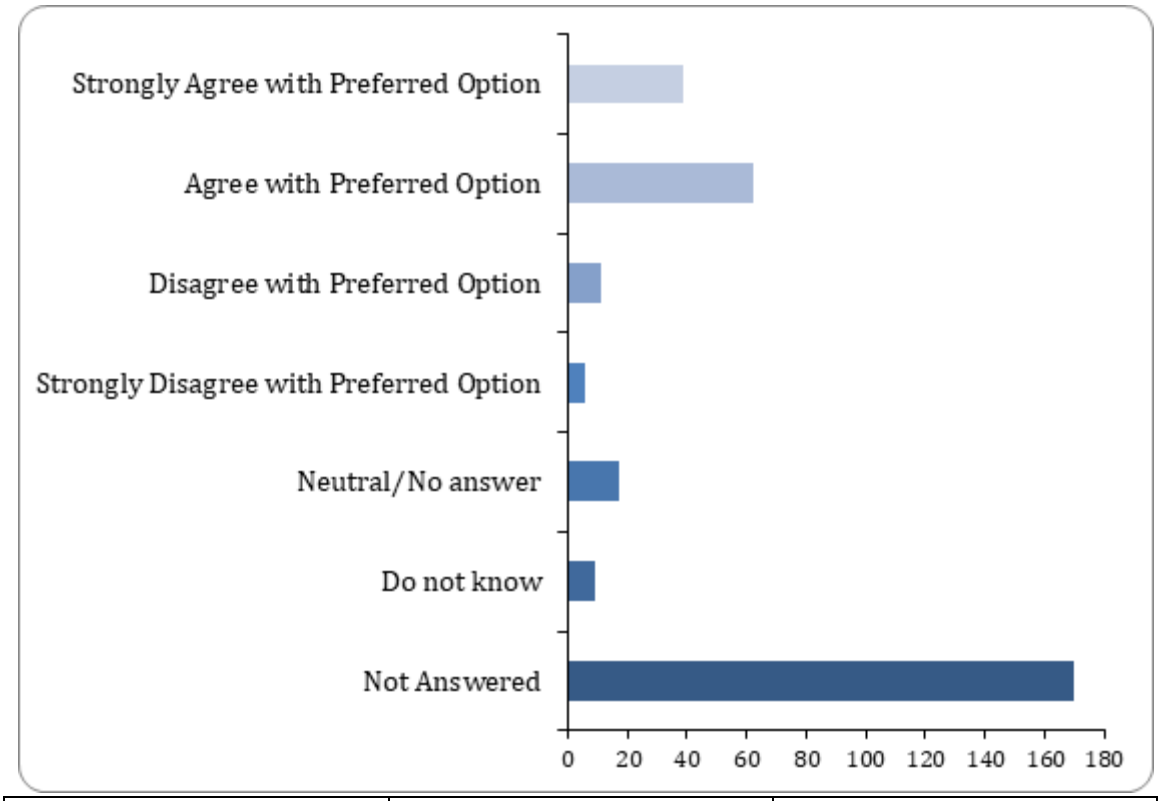
Draft Policy	Summary of comment	Response	Outcome
		to the city, district and local centres only is aligned with national policy.	

2476

All Public Responses – Draft Policy C2

Please tell you what you think of policy options set 013b (draft policy C2): Maintaining vibrant centres.

There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	39	12.42%
Agree with Preferred Option	62	19.75%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	17	5.41%
Do not know	9	2.87%
Not Answered	170	54.14%

Draft policy	Topic	Summary of comments	Response
C2	Change away from retail/Class E is needed	Too many empty shops/the ongoing repurposing of Class E floorspace is evidence of oversupply and shows it's clearly time to allow a change away from retail. Centres should reflect the wide variety of uses that serve different communities. Non Class E uses make an important contribution to overall vitality and viability and maintaining investment that protects against physical decline.	Use Class E is a very broad Use Class, allowing a very wide range of facilities within the thresholds (as well as the thresholds allowing many other uses a well).

2479

C2	Setting Use Class E threshold inappropriate	The NPPF does not set prescriptive targets for active frontages in District Centres, although it does encourage the vitality and vibrancy of centres overall. Setting a threshold in this manner will ultimately restrict the opportunities available to modernise and respond to the change in retail and shopping habits since the Covid-19 pandemic. Retention of existing thresholds (para. 7.4, bullet 7) that are a snapshot of current trading profile, operator representation and market circumstances may not facilitate the essential and rapid response to dynamic retail and leisure markets and could impact negatively on the longer-term vitality and sustainability of centres. With resi above there will be considerable pressure on ground floor space which will also need to incorporate residential	All the thresholds are set comfortably above current levels. In addition, the policy does allow significant flexibility, in allowing for justification of falling below the Use Class E threshold, as well as by Use Class E relating to a very wide range of uses.

2480

Draft policy	**Topic**	**Summary of comments**	**Response**

		entrances, escapes for upper floor uses, bins and bike store, all of which have a space requirement at ground floor. Where comprehensive redevelopment of a site in a District Centre is proposed then compliance with any threshold is not required, but instead demonstrated 'maximisation' of active nonresidential frontage is required. Further consideration is also required on what is currently deemed as an 'active frontage' within the Templars Square site ie. Internal vs external to the shopping centre. The current policies map suggests that internal areas are 'shopping frontage'. We do not consider this is correct. An active frontage is an outward facing unit/frontage, CBRE and ORVIL can assist with the process of defining the existing active and street facing frontages on the Templars Square site.	
C2	Supportive	Some comments in support of various aspects of the policy including that there's a suitable level of flexibility.	The support is welcomed.
C2	Unclear policy/clarity suggestions	Comment policy is not effective as it is unclear and comment that the first sentence requires amendment or the addition of further text or bullet points to reference the city and district centres.	Agreed- this has been amended.

Statutory Consultee Comments – Draft Policy C2

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Policy C2 Maintaining Vibrant Centres	**Transport Strategy** This policy should state Oxford City Council will incorporate the County's future Street Design Code which includes a Kerbside Strategy (anticipated later this year or early next year).	We can only include references to adopted/ published strategies.	Oxford City Action: Watching brief for County studies publication
	Suggested wording: The densification and growth of district centres and the city centre is encouraged. High density development is generally expected in the city centre and district centres as set out in Policy HD8, and this should be low car and have incorporated OCC's Street Design Code"	We do not see the need to cross reference other policies in the plan in this instance. The plan should be read as a whole. As the County's Street Design Code is not yet published, we cannot make reference to it.	No Action Required
	Including stronger language would benefit the following:		
	e) rationalisation of public car parking so it ~~is well~~located limits and reduces surface-level parking where possible, and makes better use of workplace surfacelevel car parking;	This change weakens the policy as is does not support "well-located" public car parking.	No Action Required
	f) public realm improvements for cycling ~~sts and~~ pedestrians and public transport users and		

2482

	rebalancing of the space within streets from vehicles	The amendments proposed seem to prioritise public realm improvements for cycling and focus on cycle parking (Policy C7 already covers cycle parking requirements). As such, the proposed changes to are not accepted.	No Action Required (see response for Policy C7 below re: children's bikes)
	to pedestrians; by providing cycle parking in convenient locations which benefit the public realm		

Draft Policy	Summary of comment	Response	Outcome
	using thoughtful inclusive design and materials, catering for standard and non-standard bikes, including children's bikes g) Public realm improvements for pedestrians and public transport users and rebalancing of the space within streets from vehicles to pedestrians. Within active frontages page 154, it would be helpful to include a sentence referring to maintaining active frontages through inclusive design to ensure accessibility and a positive experience for people. **Urban Design (Placemaking)** Paragraph 7.4 – some reference should be made in relation to densification around city/district centres, it is important to still ensure there is some	Policies covering the design of development proposals are covered elsewhere in the plan (e.g., Policy HD7 – High Quality Design). Bullet point h) of the policy makes reference to new opportunities for public realm and the incorporation of small green spaces where people can dwell, 17ocialize and play.	No Action Required No Action Required

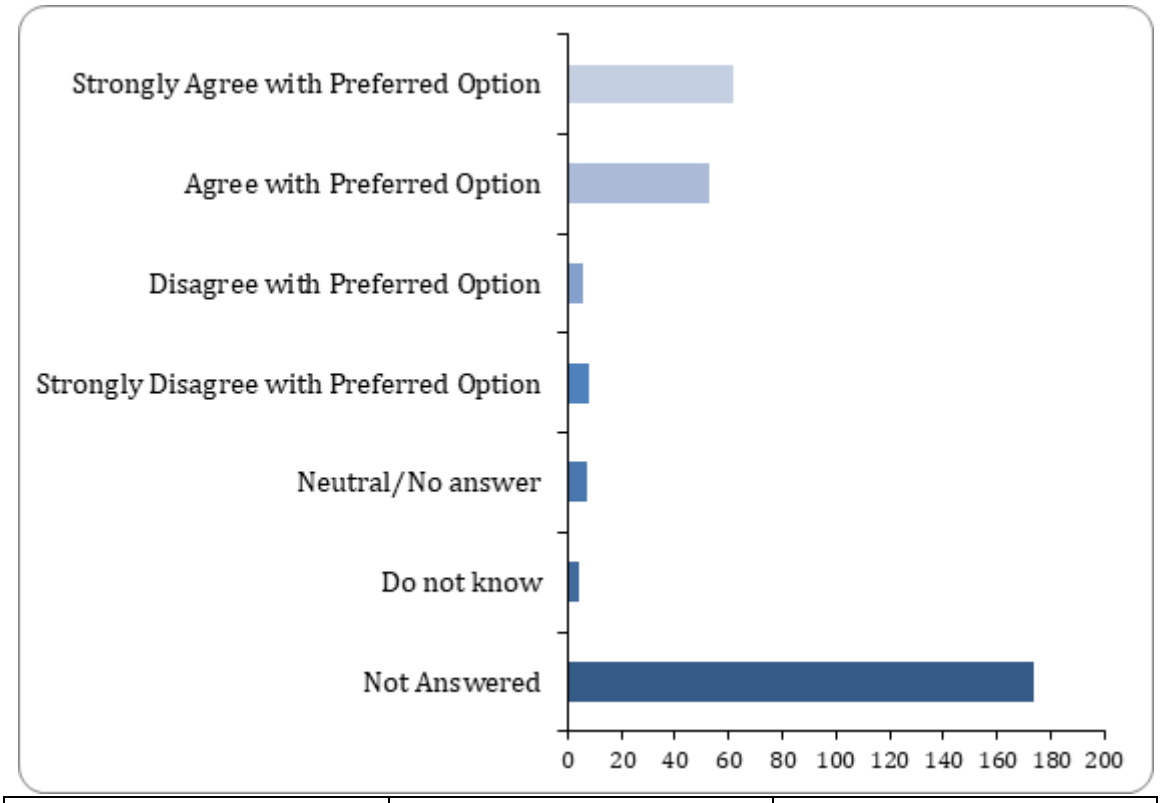
	open/public space for people to dwell, rather than expect everyone to pass through.		

2484

All Public Responses – Draft Policy C3

Please tell us what you think about policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities.

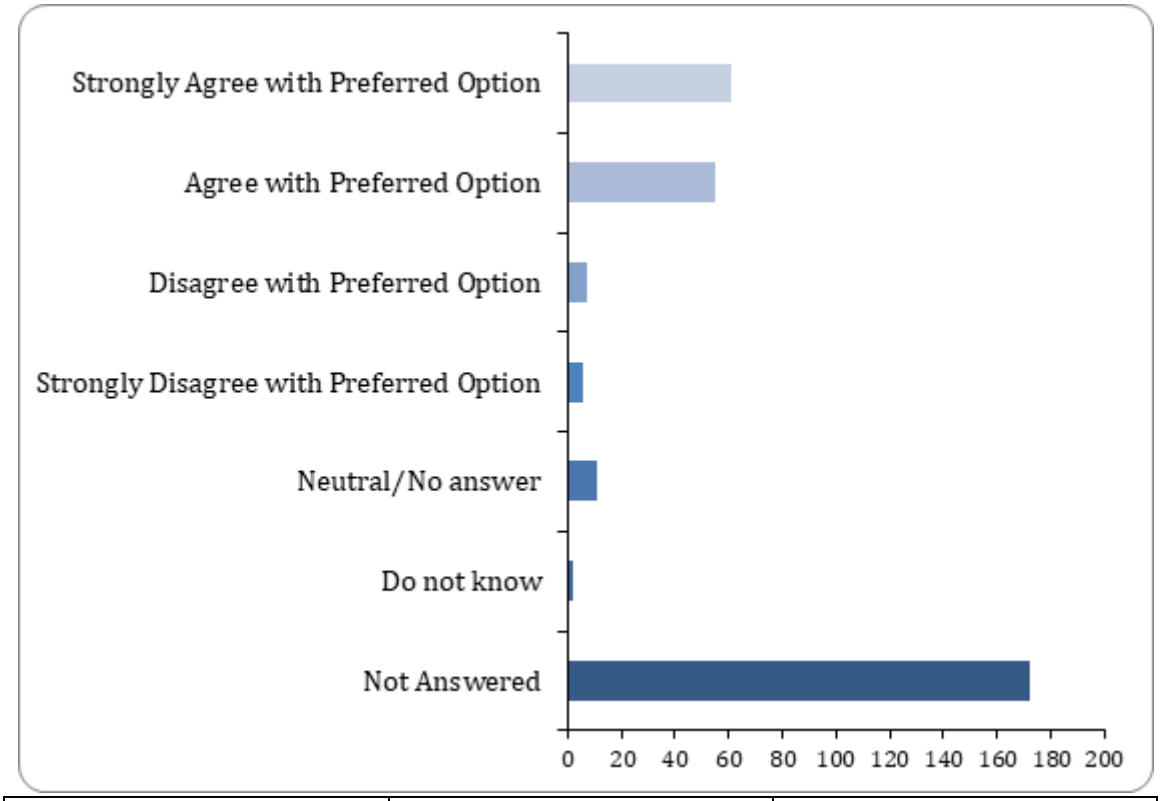
There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	62	19.75%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	6	1.91%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	4	1.27%
Not Answered	174	55.41%

Please tell us what you think about policy options set 013d (draft policy C3): Provision of New Local Community Facilities

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	61	19.43%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	11	3.50%
Do not know	2	0.64%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
C3	Exception to the policy should be applied to major sites	The policy relating to small-scale shops should be clarified to be clear that it is relating to individual isolated small shops that serve localised and more isolated communities.	The policy does say it applies to shops meeting the definition of Use Class F2- but brackets have been added to spell out what this is in terms of size and having no other facility within 1,000m.
C3	Greater protection needed.	Only like for like replacement should be allowed, following extensive community engagement. Loss of parts to fund other things is not sustainable.	It is considered important that the policy does allow flexibility for more modern or efficient combined facilities that respond to current needs.
C3	Do not protect community assets or be cautious about over protection	A few comments saying there should be no protection of community assets, including because there should be no meddling in assets not owned by the City Council (and whether the City Council should own assets it does should be reviewed). Also because protecting chronically underuesd facilities or those duplicated nearby or that could be more efficiently provided in a mixed-use development would be more useful. If replacements/contributions are proportional or there are other facilities in walking distance then they should be lost.	Regardless of ownership, community facilities can be really important for many social and quality of life reasons. There is no evidence at all that Oxford has chronically under-used facilities, and the policy does have flexibility to make a case for variations in provision.

		Too much expectation may mean developments don't happen at all.	

2489

Draft policy	Topic	Summary of comments	Response
C3	Supportive/ support with minor comments	Some support of protections. Comment that some spaces are not safe for all, e.g. some churches may not feel welcoming to LGBTQIA+ or other faiths, so not a community facility for all.	Comment noted.
C3	Use of colleges	Make the universities share facilities. Require private developer and college contribution to existing assets.	The policy does say that opportunities will be taken to secure community use and joint user agreements.

C3	Access	Not clear why these new facilities must be easily accessible by sustainable transport, but commercial developments and new housing not subject to the same tests.	New developments are generally subject to these requirements, but also it is the case that community facilities by definition attract people, so they must be able to travel there sustainably.
C3 & C6	Community-led regeneration	Would like to see policy to discourage vacant properties and support community-led regeneration e.g. introduce "meanwhile uses" and council using CPO and High Street Retail Auctions to bring properties back into use. See Cambridge example.	Policies are considered flexible enough to respond to any proposals, but promotion of these measures is outside the planning system.
C3 & C6	More protection for cultural, social and leisure activities	Draft Policies C3 and C5 do not adequately protect cultural, social and leisure activities and culture because they do not take into account that the people and communities are starved of access to facilities when community centres and venues are closed down for long	Significant redevelopment of facilities may take some time, and too many requirements about temporary reprovision may act to stifle opportunities for redevelopment.
Draft policy	**Topic**	**Summary of comments**	**Response**

2490

		periods, years in some recent cases for redevelopment to take place. They appear to have the intention of preserving community and culture by specifying that a space has to be retained or a suitable local equivalent has to be provided by the applicant. The wording is much like the existing policies in the 2036 Plan under which the above examples occurred. However, a newly built or appointed facility opened years after closure of the original means that the culture and community will either have moved on or just died.	

2491

Statutory Consultee Comments – Draft Policy C3

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Policy C3 Local Community Facilities	**County Council Property and Estates Team** Oxfordshire County Council Property and Estates Team overall support this draft policy; however, it is considered that the type of evidence that would need to be submitted with a planning application for a development that would result in the loss of a community facility should be specified either in the supporting or policy text to improve clarity.	Policy C3 clearly sets out that the loss of community facilities will not be supported unless one of the three bullet point criteria are met.	No Action Required

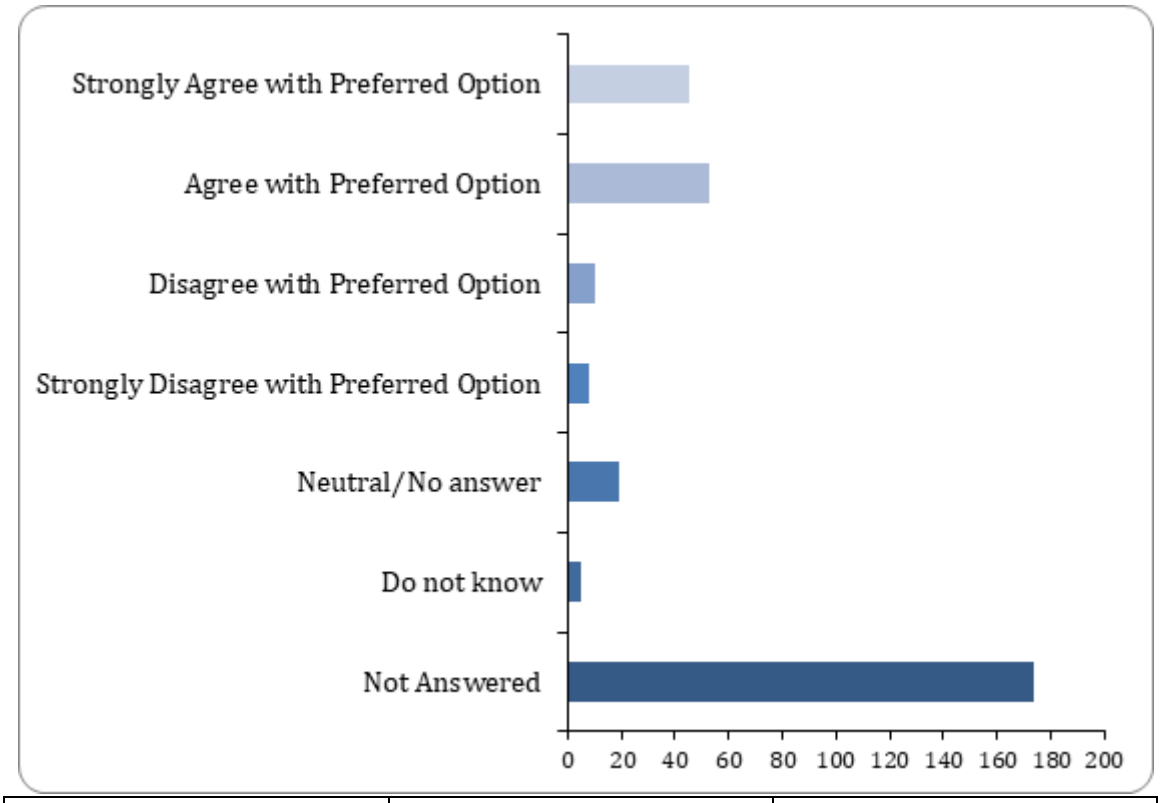
Draft Policy	Summary of comment	Response	Outcome
	It would be helpful to clarify the type of evidence that would be required to justify such development proposals, as OCC owns several community facilities and a need may arise in the future for their alteration which will be for the public benefit of the local community.	Evidence would need to be provided that one of the three bullet point criteria has been met.	No Action Required

2492

All Public Responses – Draft Policy C4

Please tell us what you think about policy option set 013e (draft policy C4): Protection and Alteration of Learning and Non-residential Institutions.

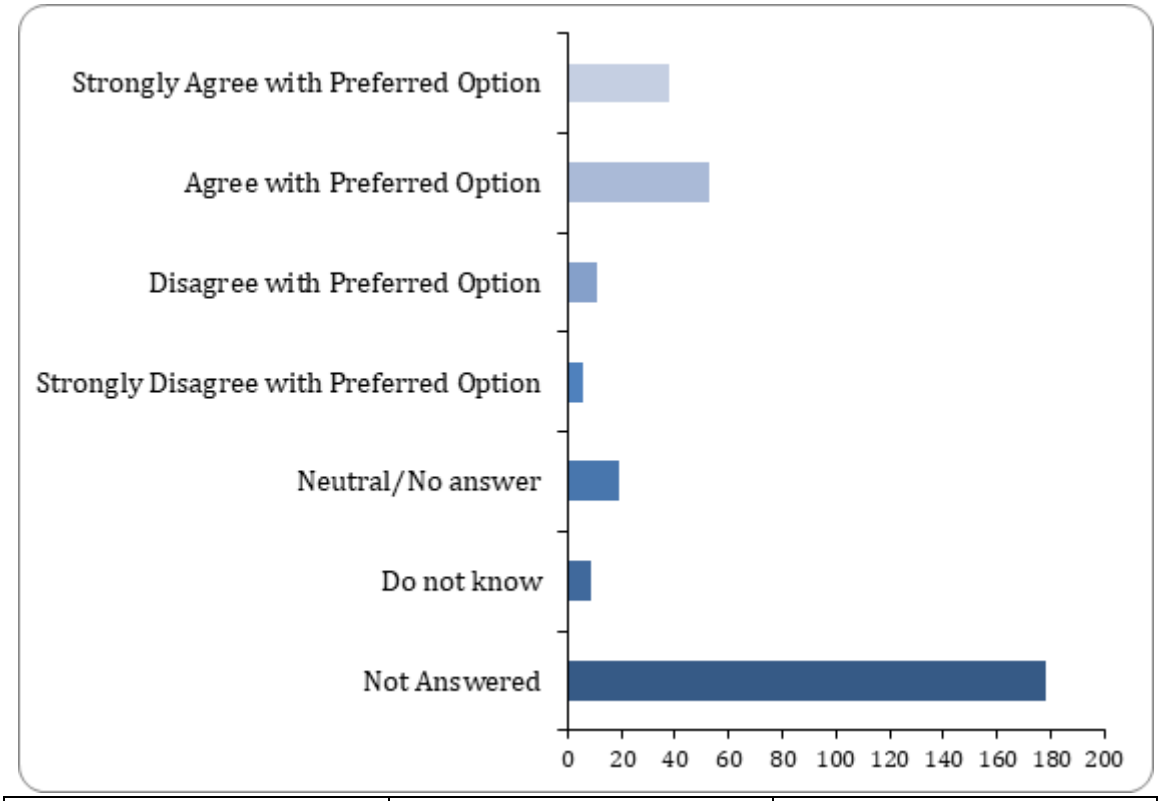
There were 140 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	19	6.05%
Do not know	5	1.59%
Not Answered	174	55.41%

Please tell us what you think about policy option set 013f (draft policy C4): Protection and Alteration of Learning and Non-residential Institutions.

There were 136 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	38	12.10%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	19	6.05%
Do not know	9	2.87%
Not Answered	178	56.69%

Draft policy	Topic	Summary of comments	Response
C4	Support	Support in principle	The support is welcomed.
C4	Should allow loss/should not have a policy protection.	Allow loss for homes Do not protect at all- market forces and national policy cover. Policy over-reaching Ossifies valuable plots even when it could be better used.	The use class F1 includes schools, museums and libraries, which are important pieces of infrastructure to support communities, needed in the city, which should have some protection. However, the policy is flexible enough, to allow responses to a change in need.
C4	Should be more restrictive of these use	No more private schools. No more expansion of education sector. Issues such as traffic stress. No capacity for more education institutions. Transport impacts need to be better managed.	The planning system is unable to treat private schools any differently to state schools. Accessibility by sustainable travel is key part of the assessment criteria in the policy.

C4	Policy should not exclude universities	Policy confirms “This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University.” This statement is objected to, with the basis of this being that there is no alternative policy that is considered to be comparable and allowing objective assessment of the need for new facilities. If the policy is to be brought	The universities meet different needs and have different considerations, and the policy is not intended to apply to them. The main impact of the universities is student accommodation, which is
Draft policy	**Topic**	**Summary of comments**	**Response**
		forward, the caveat should be removed, or an alternative University development specific policy should be proposed.	managed by policies in the housing chapter.
C4	Open to manipulation	Institutions may use the policy to get a footprint in the city that can then be repurposed for financial gain.	This potential occurrence can’t dictate whether or how new learning facilities should be allowed.

2497

C4	Objection	OCC has, at every single local plan, attempted to block any rivals to Oxford University or other institutions trading on the Oxford moniker. Modification Requested: Remove the phrase *"the proposal will meet local needs or an existing deficiency in provision or access"* - this is a a "backdoor method" of banning new institutions Many of the of requirements of this policy are addressed in other policies such as traffic and environmental impacts.	There is a third university with a presence in Oxford- the University of West London has a campus at Ruskin College, Dunstan Road. It is important new facilities meet local needs.

2498

Statutory Consultee Comments – Draft Policy C4

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

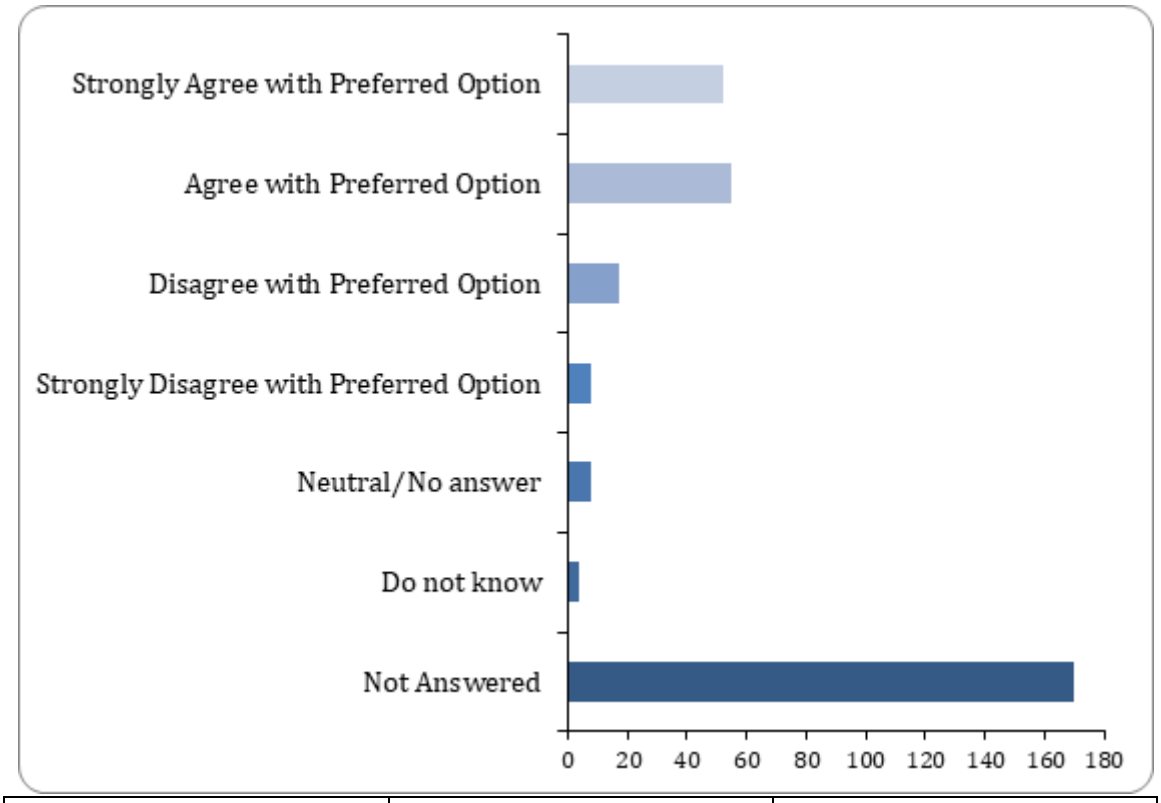
Policy C4 Learning and non-residential institutions	**County Council Property and Estates Team** Oxfordshire County Council Property and Estates Team supports this draft policy and would appreciate if some supporting text were to be added that would explain the level of information needed to comply with this draft policy when considering the cases where joint user and shared user agreements are not possible. **Education Team** Paragraph 7.9 makes reference to 'Local Education Authority' which is no longer the used definition. Please update to refer to 'Local Authority with responsibility for Education' within the plan (see also Page 188).	The policy does not set out requirements for the granting of planning permission based on securing community/ joint use agreements. Where opportunities exist, they should be taken. Noted. We will make sure the correct reference is used.	No Action Required Oxford City Action: Ensure correct terminology is used.

2499

All Public Responses – Draft Policy C5

Please tell us what you think about policy option set 013g (draft policy C5): Protecting Cultural, Social and Visitor Attractions.

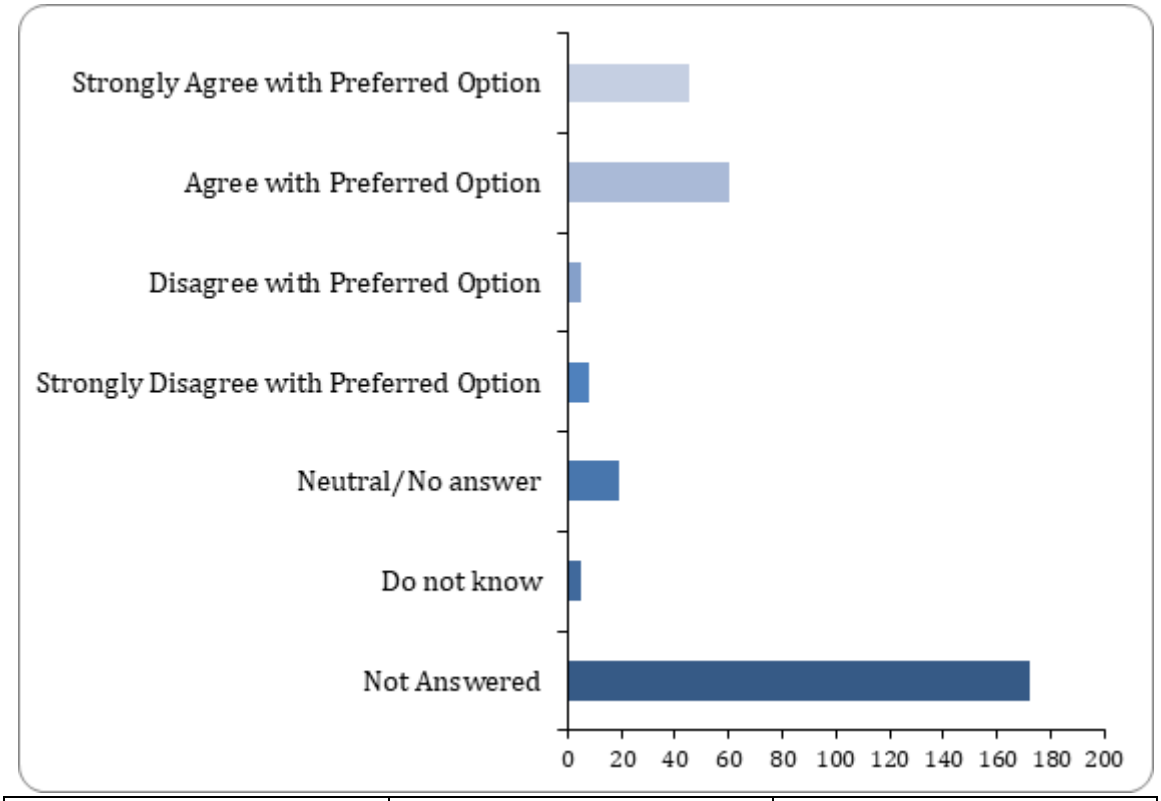
There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	52	16.56%
Agree with Preferred Option	55	17.52%
Disagree with Preferred Option	17	5.41%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	8	2.55%
Do not know	4	1.27%
Not Answered	170	54.14%

Please tell us what you think about policy option set 013h (draft policy C5): Provision of New Cultural, Social and Visitor Attractions.

There were 142 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	5	1.59%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	19	6.05%
Do not know	5	1.59%
Not Answered	172	54.78%

Draft policy	Topic	Summary of comments	Response
C5	Support	General support- good to preserve facilities and allow new.	The support is welcomed.
C5	Alternative options	Preference for alternative option 1/alternative option 2- more flexible/pragmatic, leave to the market, preferred option prevents dynamic change. Leisure tastes change and business models shift. Should not freeze every cinema, museum, etc.	The policy is implicitly clear that facilities do not have to be protected in exactly the same use within the general category, but addition has been made to the policy to make this clear. So a cinema does not necessarily need to remain as a cinema if alternative kinds of facilities would meet needs. This does give sufficient flexibility.
C5	Heritage	Historic use may be important to character.	Policy HD2, relating to listed buildings, is clear that the use of the listed building may be part of its significance.
C5	Pubs	Suggest use of CAMRA's Public House Viability Test, to ensure pubs are not deliberately run down so they can be redeveloped into more profitable uses.	Marketing evidence is required, with details set out in Appendix 7.1.
C5	Implementation	Implementation is key. Policies are too woolly. Need to make sure meet range of needs, including young people. Should	The vast majority of greenfield spaces in the city are protected

		ensure these facilities are not on greenfield sites. Should not limit things	by other policies. The conversion of a

Draft policy	Topic	Summary of comments	Response
		happening like a famous person's house becoming a museum after they die (or similar)	house (for example) to a museum is not ruled out by the policy, but justification and mitigation of impacts would be required, which is considered to be the right approach.

C5	Flexibility should apply. Supporting text suggestion	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. 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 circumstances where the loss of cultural venues is supported. this additional bullet point could be incorporated/read as follows: • Or forms part of comprehensive, mixed use development scheme.	There is not a need to make an exception to the policy for allocated development sites, as the policy itself allows sufficient flexibility.

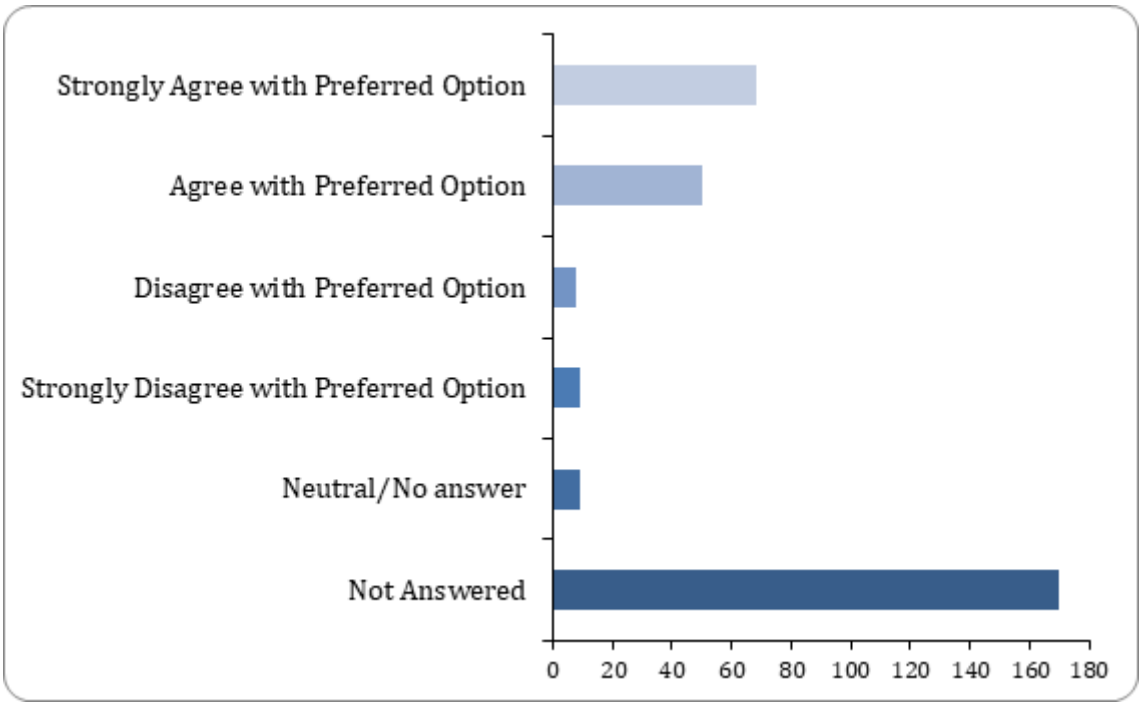
Statutory Consultee Comments – Draft Policy C5

There were no statutory consultee comments.

All Public Responses – Draft Policy C6

Please tell us what you think about policy option set 012a (draft policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

There were 144 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	68	21.66%
Agree with Preferred Option	50	15.92%
Disagree with Preferred Option	8	2.55%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	9	2.87%
Do not know	0	0.00%
Not Answered	170	54.14%

Draft policy	Topic	Summary of comments	Response
C6	EV parking should be prioritised over cycle parking	The idea of assessing travel and transport is good but current plans of restricting cars and parking bays is bad. Oxford should be planning for the future by providing an infrastructure for electric cars and independent transport with parking areas built under all new buildings with charging stations rather than letting developers off by simply providing an inexpensive bike rack.	The Oxfordshire Electric Vehicle Infrastructure Strategy sets out the policies and plans to realise the County, City and District Councils vision for EV charging in Oxfordshire. The design and location of any EV charging infrastructure should consider and avoid negatively impacting on street scene in line with the principles of high quality design and the supporting design checklist.
C6	No transport/travel policies	Do not include a policy requiring transport assessments/statements, travel plans, construction management plans or service and delivery plans.	Noted.

C6	Traffic – private school drop offs	Require all private schools within the city to have a transport plan for students that includes assessment of their impact and their steps taken to provide mass transport e.g. buses and prevent single occupancy cars from dropping off. The traffic vanishes from Oxford during private school holidays - address	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

Draft policy	**Topic**	**Summary of comments**	**Response**
		this and we will have much better traffic flows in oxford termtime too.	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.
C6	Better public transport	Public transport needs to be frequent, affordable and accessible. Subsidies may be needed to fully achieve this Council needs to work closely with the county and bus companies to achieve this.	Noted. A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel.

C6	A40 congestion – impact of Oxford North	I look forward to what you are going to do about the impact of the Oxford North Development on traffic congestion on A40 area.	The link road is already under construction, as part of the Oxford North planning permission.
C6	Policy to only include locally specific transport mitigation requirements	BMW support alternative option 1. Planning policy should be distinct from the validation requirements. The local validation checklist should set out when a Transport Assessment, Travel Plan and/or Servicing and Delivery Plan is needed, and policy should only include the locally specific transport mitigation requirements that are not previously covered in national policy.	Appendix 7.2 outlines when an assessment is likely to be required, as well as potential mitigation measures.

2508

Draft policy	**Topic**	**Summary of comments**	**Response**

C6	Construction Management Plans should be required for all developments	Developers of large sites should be required to liaise with other developers within a 1km range of their site and work together to ensure CMPs have minimum impact on local residents. Construction Management Plans should be required not just where large amounts of construction traffic will be generated, but also for developments where smaller amount of construction traffic may cause significant disruption to the surrounding area (e.g. on small residential roads where access to the site may be very limited).	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.
C6	Supportive	Cyclox support the proposed policy on Transport Assessments, Travel Plans, and Service and Delivery Plans, and align with the Coalition for Healthy Streets and Active Travel (CoHSAT)'s response. We highlight the poor condition of Oxford's pavements, which are often uneven, obstructed, and difficult to navigate for wheelchair users, people with buggies, and those with mobility issues. To address this, policies should require pavements to remain level across driveways - avoiding the current car-centric design - and mandate the use of Dutch Entry Kerbs, now adopted as Oxfordshire County Council policy. Developers and homeowners undertaking renovations should be required to implement these standards.	Appendix 1.1 of the draft Local Plan sets out a design checklist that development proposals are expected to consider.

2509

Draft policy	Topic	Summary of comments	Response
C6	Support but policy could go further to reflect NPPF	It is considered that this policy is sound with regard to the promotion of sustainable/active modes of travel, and the documentation that is required to support an application. The Reg 19 reps submitted by CBRE in Jan 2024 expressed concern with parts a) and b) of this policy. However, it is noted that the Local Plan 2042 reg 18 document now refers to 'no unacceptable impact on highway safety', rather than 'no impact on highway safety'. This is welcomed. It is also welcomed that the wording of part (b) has been updated to refer to 'no severe residual cumulative impact on the road network'. This wording could still go further to reflect the wording in the updated NPPF 2024, para.116, which also refers to mitigation and all reasonable future scenarios. It states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios". We request this is reviewed and incorporated in the next draft version of the Plan.	The current draft wording of additional policies covers these point. Draft policy C8 requires Transport Assessments to demonstrate that there will not be unacceptable impacts on the transport network. Draft policy C1 states "planning permission will only be granted where…impacts on the road network can be mitigated".

2510

C6	Support with suggested amendments	We strongly support the proposed policy for Transport Assessments, Travel Plans and Service and Delivery Plans.	Minor amendment.

Draft policy	Topic	Summary of comments	Res
		o Travel Assessments and Travel Plans should recognise that 32% of households in Oxford do not have access to a car. 92% of adults are able to cycle and about 60% of adults in Oxford cycled in the last year. Over 90% of Oxford adults walked (or equivalent) at least ten minutes in the last year. (Sources: Census 2021, Cycling UK, Sport England Active Lives). o In addition to the Street Design Guide, Policy C6 should refer to any further OCC or best practice guidance, such as Active Travel England planning guidance (https://www.activetravelengland.gov.uk/planning-active-places) and the use of Dutch Entry Kerbs to keep pavements flat (https://www.oxfordshire.gov.uk/sites/default/files/file/roadshttps://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transportpolicies-and-plans/hsd-1100-115_p01_series_1100_-_dutch_entry_kerb.pdfand-transportpolicies-and-plans/hsd-1100- 115_p01_series_1100_-_dutch_entry_kerb.pdf)	

2511

		o Appendices 7.2 and 7.3 need an addition for non-residential institutions to include for example libraries, museums and places of worship. o We strongly support the inclusion of CLOCS	
C6	Objection	A typical bureaucratic view of the world, plan=delivered. Modification requested:	Po ab en an im ap ad an be to the in
Draft policy	**Topic**	**Summary of comments**	**Re**

2512

2513		Paragraph b) what does "*…residual … impact*" mean? Paragraph c) the phrase "*and within neighbouring areas"* is ineffective. It is outside of the developer's control. The policy is ineffective, as the policy does not actually result in any reductions. It implies that an increase in traffic is acceptable (which it is not as roads are already 100% full). The policy is also ineffective as it muddles planning with delivery of the plan objectives. The policy must state what must be done, rather than what should be planned for. The policy is Ineffective as it states, "*is likely to*". This phrase is meaningless and only applies to the City Centre AQMA not the whole city.	Th po wo do ma dir ref the Th the de AQ 20 co ab Cit is co to ap

Statutory Consultee Comments – Draft Policy C6

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome

2514

Policy C6 TAs, Travel Plans and Service Delivery Plans	**Transport Strategy** Paragraph 7.11, page 160 - It would be positive to add to 7.11 a reference to improving health outcomes along with the other outcomes mentioned here. Key things to consider when drafting this policy – recommendation for the bullets in this section below: We suggest this also includes reference to the County's Freight Strategy, future OxRail 2040: Plan for Rail and future Street Design Code. It is also worth recognising the County are working on delivering an integrated transport policy which will be incorporated into LTCP, this will build upon the Oxfordshire Metro Concept. We recommend that C6 incorporates Vision Led Transport Planning as a requirement to ensure Oxford	Policy HD10: HIA already focuses on Health outcomes and requires a Health Impact Assessment. We can only include references to published/ adopted documents. Once these are published and available in their final "adopted" form, we can consider the inclusion of any costed infrastructure projects within our IDP.	No Action Required Oxford City Action: Watching brief for publication of county guidance/ strategies etc.

2515

Draft Policy	Summary of comment	Response	Outcome

2516

	City has the highest quality developments, showing how developers have used Vision Led Transport Planning to achieve sustainable transport infrastructure.	We can consider the inclusion of the phrase Vision Led Transport Planning within the policy.	Consider including the phrase 'vision-led transport planning'
	It would be helpful in Draft Policy C6 if it also references how this policy will support LTCP policy to remove 1 in 4 car trips by 2030 and 1 in 3 by 2040 and reduce vehicle mileage. Travel Plans and TA's should actively show how they will be supporting this policy, this will also support the monitoring of Travel Plans.	The LTCP is the statutory transport plan for Oxfordshire. As such, no need to duplicate its content. Especially as this may be subject to change/ review when the next iteration is delivered.	No Action Required
	Within Draft Policy C6, outcome h) including e-bike/ecargo bike charging would support the growth of ebikes and e-cargo bikes.	The plan already contains a policy on electric vehicle charging.	No Action Required
	Travel Plans should incentive sustainable travel and support the delivery of cycle training for children, adults and families to support positive travel choices and provide health benefits to local communities.	Noted.	No Action Required

2517

Draft Policy	Summary of comment	Response	Outcome

2518

	Place Planning and TDM teams (Central) We fully support the requirement for transport assessments to assess the multi-modal impacts of development proposals. The County Council's LTCP includes a transport user hierarchy to ensure future schemes consider walking, cycling, public and shared transport before the private car. It is important that development proposals also consider development impacts and any mitigation in this order too. We note this "The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments." Whilst this is helpful, it doesn't include this text in the policy wording itself. We think it would be incredibly helpful if specific reference to the County's Implementing Decide and Provide was included and worded as follows: *"All major development proposals must demonstrate that the methodology in Oxfordshire County Council's Implementing Decide and Provide: Requirements for*	Noted. We do not consider that the inclusion of adopted county council policy within our Local Plan is necessary.	No Action Required No Action Required

2519

	Transport Assessments document has been used to		

2520

Draft Policy	Summary of comment	Response	Outcome
	assess the need for infrastructure and provision of transport services." The latest version of the NPPF published in December 2024, includes the new requirement for development proposals to follow a vision-led approach to transport planning. This is referenced in paragraphs 109 and 115 and in paragraph 118 (p.33), which states: *"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored."* Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as: *"…an approach to transport planning based on setting outcomes for a development based on achieving welldesigned, sustainable and popular places, and*	We can consider the inclusion of the phrase 'vision-led transport statement/ assessment/ plan' in our Reg. 19 plan.	Oxford City Action: consider inclusion of text relating to 'vision-led transport planning'

2521

	providing the transport solutions to deliver those outcomes as opposed to predicting future demand to		
Draft Policy	**Summary of comment**	**Response**	**Outcome**

2522

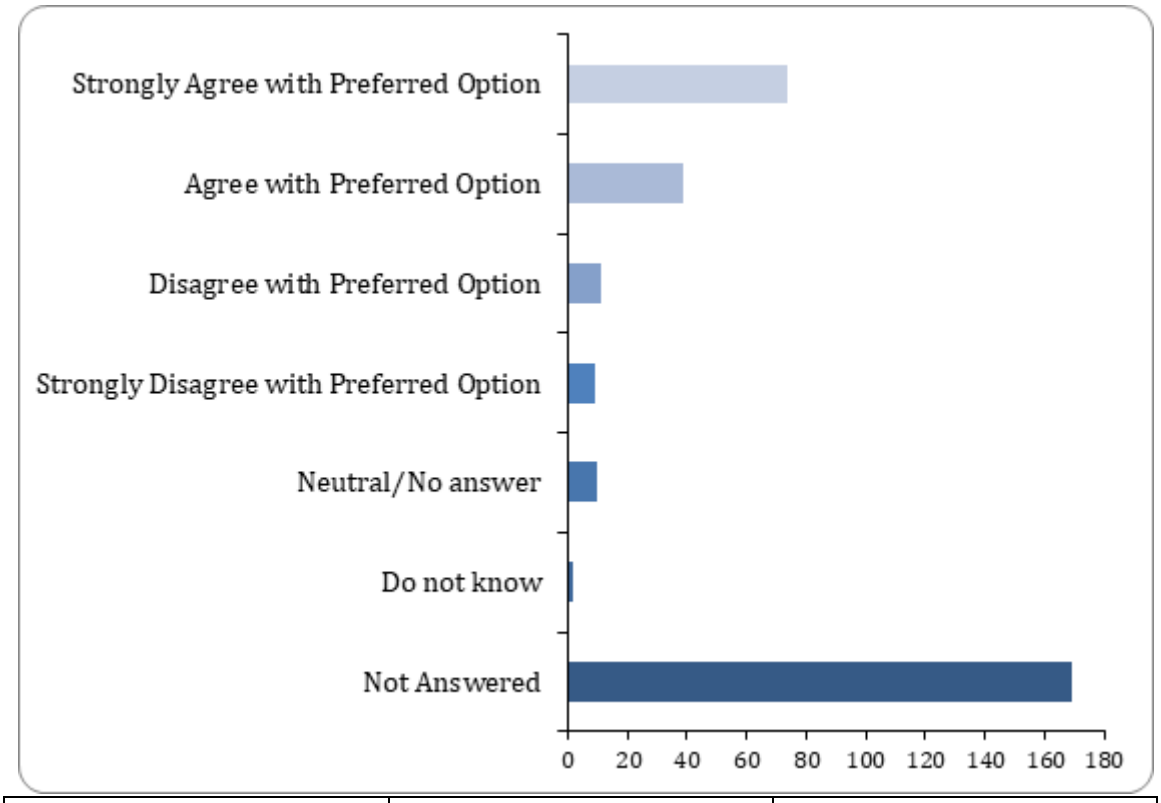
	provide capacity (often referred to as 'predict and provide')." When these changes to the NPPF were initially proposed it was stated in the supporting text for the accompanying consultation that (Chapter 8, paragraph 7, MHCLG), "To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect." At the time of writing, this guidance remains forthcoming. Thus, in the context of this description of the vision-led approach and in lieu of the updated guidance, the Implementing Decide & Provide document should be seen as the methodology that development proposals within Oxfordshire must follow in order to meet the requirement set out in paragraph 118 of the NPPF. However, it is expected that, once the updated guidance is made available, the County's Implementing Decide & Provide will be complementary to the national guidance and will remain necessary in setting out local requirements to ensure that a vision-led approach to transport planning has been followed.	Noted.	No Action Required

2523

All Public Responses – Draft Policy C7

Please tell us what you think about policy option set 012b (draft policy C7): Bicycle Parking Design Standards.

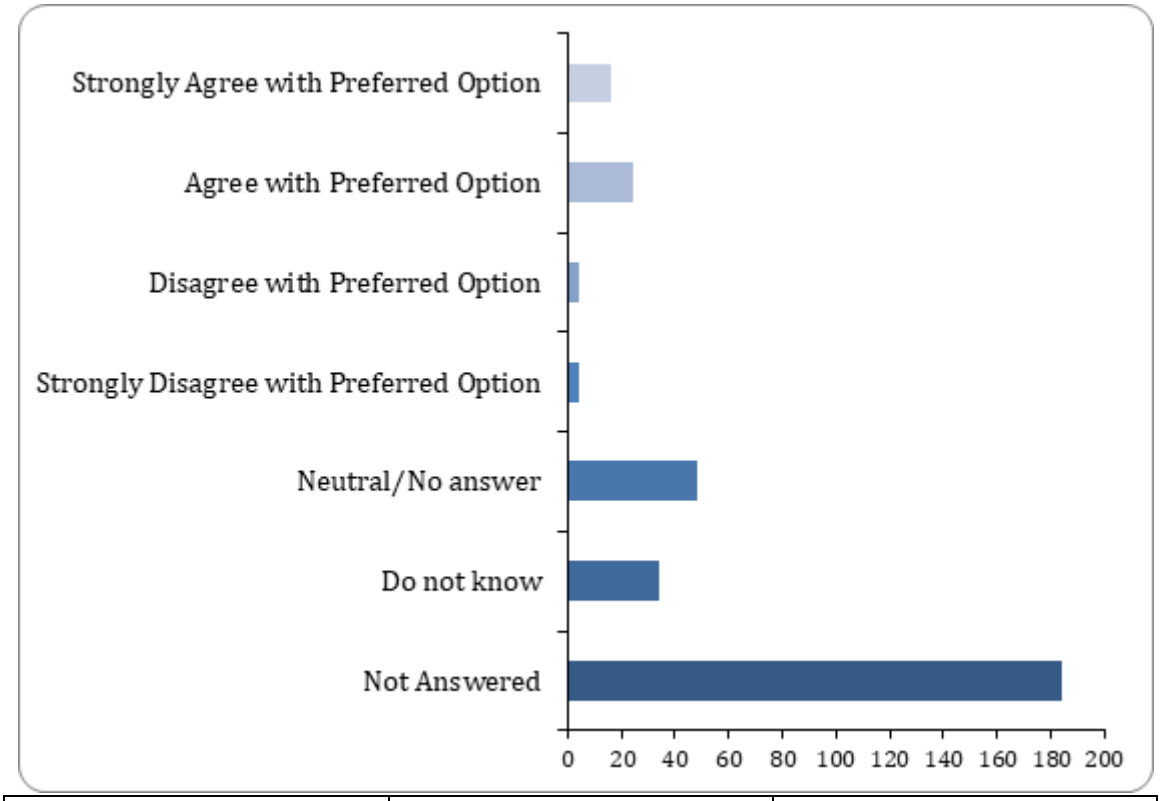
There were 145 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	74	23.57%
Agree with Preferred Option	39	12.42%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	10	3.18%
Do not know	2	0.64%
Not Answered	169	53.82%

Please tell us what you think about policy option set 012c (draft policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards.

There were 130 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	16	5.10%
Agree with Preferred Option	24	7.64%
Disagree with Preferred Option	4	1.27%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	48	15.29%
Do not know	34	10.83%
Not Answered	184	58.60%

Draft policy	Topic	Summary of comments	Response
C7		Provide a more thorough definition of "secure", that unambiguously excludes handles removable by anyone with a screwdriver, or the rows of useless ground-mounted hoops around the Kassam stadium.	Examples of good practice for cycle storage are provided within the Car and Bicycle Parking TAN published in March 2022.
C7		Very strongly agree - good bike parking and storage, across a range of bike types, is critical to encouraging an active travelling city.	Noted.
C7		Residential and Non residential schemes should provide equipment and facilities for community owned e:bikes for hire. More stringent rules needed on the location of e-bikes.	The Design Checklist set out in appendix 1.1 requires sufficient pavement space for different users needs. Appendix 7.4 requires bicycle parking to be future proofed to ensure that the infrastructure to support the charging of electric bicycles is supported.

C7		Draft Policy C7 already insists that every scheme hit Oxfordshire County Council's minimum cycle-parking standards—two spaces per bedroom for conventional housing, one per study bedroom for students, plus extra cargo-bike bays, e-bike charging points, showers and lockers in most workplaces . Pushing "higher levels" on top of those generous baselines will consume valuable ground-floor footage, add capital cost and, on tight brownfield	Policy aligns with Oxfordshire County Council's Parking Standards for New Developments. A key aim of the City Council and of the County Council as Highways

Draft policy	Topic	Summary of comments	Response
		plots, force a trade-off with additional homes or lab space. Developers are best placed to judge precisely how many longstay versus short-stay racks, cargo bays or charging sockets their occupants will actually use; market demand and Building Control already penalise schemes that skimp on storage. A principle-led policy—secure, convenient, level access, with flexibility for reduced provision where spare capacity exists (as the draft itself allows for student blocks) would keep Oxford cycle-friendly without turning the bike shed into another viability hurdle that slows supply across the city.	Authority is to promote a shift to sustainable modes of travel.

2528

C7		Nice idea, but it goes a bit too far. Tricycles and trailers occupy a great deal more floor space than efficiently stacked pedal bikes.	A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel. The availability of various forms of bike parking is a key tool in achieving this aim.
C7		BMW support the inclusion of bicycle parking design standards, but recommend that the policy acknowledges the local circumstances of business and their operations and phrases the policy to “encourage” rather than “require” since the preferred design options may not always be achievable or necessary.	The targets only apply to new developments, and are considered appropriate in order to meet the City and County Council's key aim to promote a shift to sustainable modes of

2529

Draft policy	Topic	Summary of comments	Response
			travel. In line with the County Council's Parking Standards for New Developments paragraph 1.2, "new developments will need to work collaobratively with Oxfordshire County Council to achieve these targets."

C7		Buses should be the priority over cycling. That's how most people should get around.	Noted.
C7		Indoor bike parking should not be provided indoors.	Noted.
C7	Supportive	Divinity Road Area Residents Association support this policy.	Noted.
C7	Support with suggested amendments	o This policy should refer to 'Cycle Parking' not 'Bicycle Parking', as this is a more inclusive term. o The policy reference the guidance on cycle parking quality, inclusivity and security in LTN 1/20, Chapter 11 and the 'Appendix: Specific points from Cyclox update to Oxford City Council Technical Advice Note on cycle parking' below. All of these are important, as people must feel their cycles will be secure to buy and adopt cycling, particularly with more expensive e-cycles. For new developments, internal or hangar type storage should be the standard.	Amendment proposed.
Draft policy	**Topic**	**Summary of comments**	**Response**

		o Appendix 7.4 has an error in use type F1 where it assigns 'student' spaces to museums, libraries and places of worship. These should be covered by the 'Leisure centres, assembly halls, hospitals and healthcare' part of Table 11-1 in LTN 1/20 and have 1 space per 5 employees, plus the greater of 1 per 50m^2 or 1 per 30 seats/capacity. It should be possible to simplify Appendix 7.4 with reference to LTN 1/20 Table 11-1.	
C7	Comment	Policy reflects existing policy and importantly allows for lower parking standards where justified. This is important as the cycle parking standards can result in excessive provision, leading to inefficient use of land, a proliferation of unsightly cycle stands and adverse impact on heritage assets, particularly in the City Centre. The policy sets out a sensible and pragmatic approach to deal with this issue.	Noted.

2531

Draft Policy	Summary of comments	Response	Outcome

Policy C7 Bicycle and Powered Two-	**County Councillors** We welcome reference to the County Council parking standards however we would like to request that the	As the city's cycle parking standards are required to support decision-	No Action Required

Statutory Consultee Comments – Draft Policy C7

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

2532

wheelers Parking Design Standards	wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan.	making, it is helpful for them to be included within an adopted Local Plan. While standards do change from time to time, we need to produce a new local plan every five years so would be able to quickly accommodate any changes to standards.	
	Transport Strategy		
	Paragraph 7.15 - we recommend a slight change in language to put greater emphasis on end of trip facilities for cycling. Suggested change to third bullet point: *"As well as parking facilities, changing rooms, showers and locker facilities in places of work can be <u>are</u> important in enabling people to cycle."*	While showers, parking facilities and changing rooms are important to some to enable them to cycle to work. They are not used by all and are not always available. As such "can be" is appropriate language in this context. Do not accept proposed amendment.	No Action Required
	Incorporating the importance of lighting should be added. In the paragraph relating to bicycle parking, it should also include – bicycle parking should be well lit.	This paragraph suggests cycle parking should be "well-lit" however the proposed amendment to the policy suggests it should be "inclusive". We	No Action Required

2533

Draft Policy	Summary of comments	Response	Outcome
	This removes one of the barriers to access and will improve natural surveillance as well as incorporating bike maintenance stand. Within the policy C7 a slight addition to the wording of the 4th paragraph: *"Bicycle parking should be well designed**, inclusive** and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street."* It is important to include children's bikes within this, they are often overlooked when developing bicycle parking, and to help enable families to cycle all barriers to access should be considered. Children's bikes are often too small to be locked to standard Sheffield stands as the top bar is too high. See suggestion to 5th paragraph of policy :	do not consider that this suggested change reflects the preceding reasoning/ rationale. As such we do not accept it. In principle, we have no real objection to this amendment, however, are there any specific County Council design standards for Children's bikes that we can provide to developers? Are they publicly available? Are there any cost implications?	Oxford City Action: consider inclusion of phrase 'children's bikes' within the policy

	"Bicycle parking should be designed to accommodate an appropriate amount of parking for the needs of disabled people, ***children's bikes,*** *bicycle trailers and*		

2535

Draft Policy	Summary of comments	Response	Outcome
	cargo bicycles, as well as facilities for electric charging infrastructure to charge batteries for E bikes."		

South Oxfordshire District Council and Vale of White Horse District Council

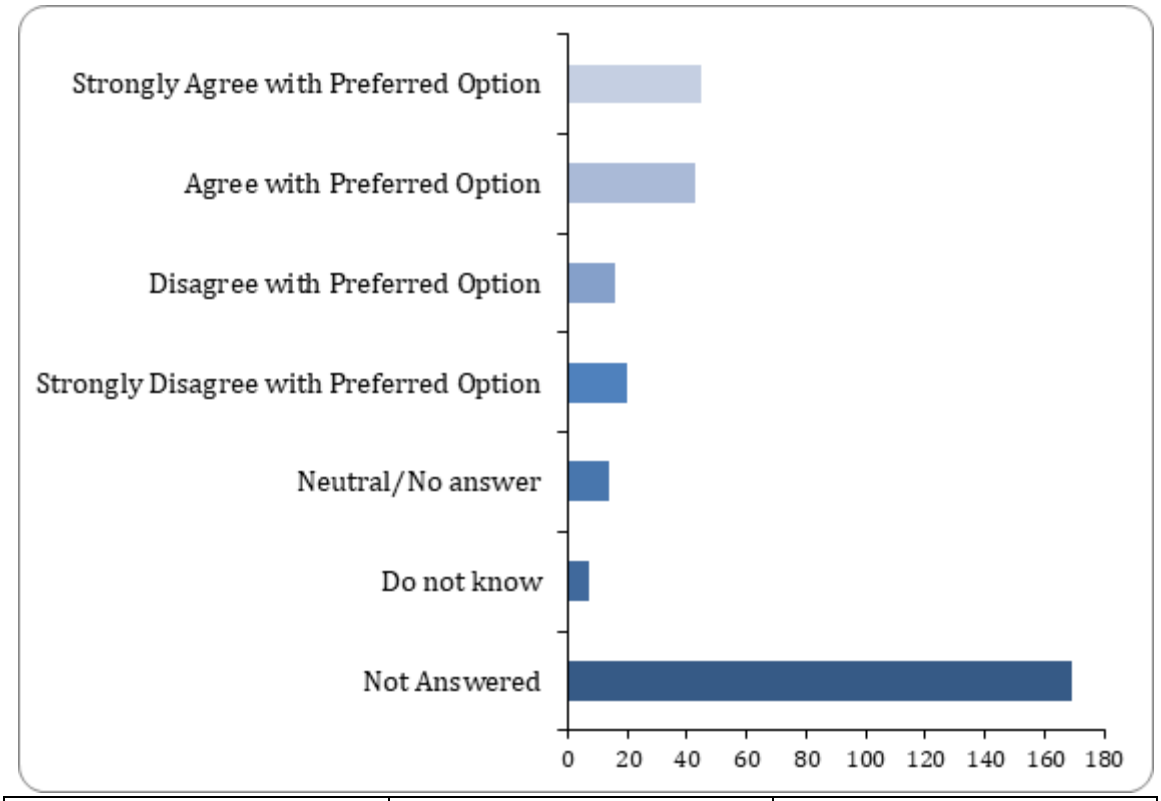
Draft Policy	Summary of comments	Response	Outcome
C7, C8, C9	Numerical or survey style data would be beneficial to justify choices for any standards in these policies. The background paper needs to provide justifications for some of the transport policy choices and standards made in draft policies in the Plan. Your use of Census 2021 data for modal share or origin-destination, rather than the generally more reliable 2011 data, also needs justification.	The policy approaches will be explained and justified in background papers. The Census 2021 represents the most recent data, which it is appropriate to use.	

2536

All Public Responses – Draft Policy C8

Please tell us what you think about policy option set 012d (draft policy C8): Motor Vehicle Parking Design Standards.

There were 145 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	43	13.69%
Disagree with Preferred Option	16	5.10%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	14	4.46%
Do not know	7	2.23%
Not Answered	169	53.82%

Draft policy	Topic	Summary of comments	Response
C8	Not effective-detailed policy wording	Policy is not effective as the word "scheme" is not defined (in particular for smaller developments such as end of garden development/site split or 2-3 houses). Also "frequency" is not defined by time (e.g. rush-hour versus 04:00 AM) *will only be granted for residential schemes* that are low car:* The language is unclear What does "only" mean in this context? (1) Homes would have only a 'small number' of shared spaces. What is meant by 'small number' is not specified. That should be specified as a percentage of the number of homes relying on these shared spaces. The phrase "*Seek a reduction*" is ineffective. Additional staff or residents will use a variety of transport modes some of which will result in an increase in traffic. A net reduction is therefore required to compensate this. Waffle that belongs in supporting text, a plan is not a goal. Low should not be used to mean 'no'.	An amendment has been made to change 'scheme' to 'development', and the asterisk explains what this means. The word 'only' is considered to be clear. A small amendment has been made to remove the phrase 'a small number'- this related to the listed types of spaces that would be allowed, but in that case it is agreed is unnecessary. In accessible locations, where there are existing spaces, a reduction will often be possible and expected.

2539

C8	Out of centre development	Draft Policy C8 should include a presumption against outof-centre developments that would require other than operational and accessible parking. The evidence of the	Additional wording about parking has been added to Policy C1.

Draft policy	**Topic**	**Summary of comments**	**Response**
		retail study supports a 'strong stance' regarding out-ofcentre development. Opposite view also given- that some retailers selling bulky items need to provide parking.	

2540

C8	Restricting residential parking is not the answer and creates issues.	We believe the Policy is badly misconceived in its extreme emphasis on reducing car parking at residential developments. It ignores the obvious fact that car ownership is not solely driven by a determination to drive on congested Oxford roads. Improving public transport will lead to fewer cars. Public transport must be greatly improved first. Delivery vehicles generate as much, if not more, traffic. Some need a car- those looking after elderly, families with children. Residents could not be sure of having anywhere at all to park a car, and would be in constant conflict with neighbours. (2) Outside the deliberately 'low car' schemes, residents will be unable to entertain any visitor that arrives by car.	A key aim of the City Council and of the County Council as Highways Authority is to promote a shift to sustainable modes of travel. The availability of parking is a key tool in achieving this aim. It is important that sites are not isolated and the alternative travel options are available in order for this to be successful, which is why the policy has two options for residential developments.

2541

Draft policy	**Topic**	**Summary of comments**	**Response**

		Stop the anti-car obsession. Priority should be green car, not low car. If there is low car, there must be facilities and connections or anti-social behaviour (e.g. Barton Park).	
C8	HMO parking issues	This policy needs to recognise the existing parking issues associated particularly with HMOs and proximity to district centres. HMO households may have multiple cars (making use of visitor as well as resident permits) and anti-social pavement parking is very common. The only answer is for both universities to restrict students from bringing cars into Oxford (with certain exceptions such as disability, need to travel to work placement etc.) as already happens in Cambridge. We appreciate that this goes beyond the Local Plan process but would like to see our concerns noted to highlight the issue and encourage wider action.	Comment noted. HMOs meet a wide range of housing needs and are not all occupied by students. Provision of parking is considered with HMOs, but car ownership cannot be controlled.
C8	Issue with CPZs not existing over greenfield sites at time of application, and public transport	For 'low car' status, an equivalent to the CPZ and the other criteria should be added for greenfield and brownfield sites as CPZs may not be in place yet. This should require low car status for any area likely to become well served by services and public transport, including through development plans. As such services are required by other policies, this should apply to all major	Additional wording has been added to the policy to clarify this, in response to this concern.

2542

Draft policy	Topic	Summary of comments	Response
	improvements not being in place.	developments. This loophole should be addressed by applying CPZ-equivalent rules to all development sites, and low-car schemes should be expected for all developments across the city.	
C8	Support for low car or no car	Think there will be a surprisingly low car or no car developments. Benefits for children being able to play and travel independently. Some support for completely car free developments. City needs radical reductions in car parking. All new office/lab employment space should only have disabled parking spaces.	The support is welcomed. It is noted that some consider the policy should go further. It is considered that the policy strikes the right balance.

2543

Statutory Consultation Comments – Draft Policy C8

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Policy C8 Motor Vehicle Parking Design Standards	**County Councillors** We welcome reference to the County Council parking standards however we would like to request that the wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the County Council parking standards with an open wording, noting the need to refer to the	See comment for policy C7 above as same rationale/ principle apply.	No Action Required

Draft Policy	**Summary of comments**	**Response**	**Outcome**

2544

	County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan. **Public Health** This is the only policy which makes reference to 'active travel'. As we stated in our previous consultation response, we believe the Local Plan requires a separate policy dedicated to active travel. **Transport Strategy** Paragraph 7.16 – health benefits should be included along with others already stated within this paragraph. **Place Planning and TDM teams (Central)**	Disagree that the plan needs a policy dedicated to "active travel". All active travel schemes should be included in the IDP Delivery Schedule. If new additional infrastructure schemes are needed to support development proposed in the plan, these should be set out in publicly available/ approved documents in order for them to be included within the IDP. Noted.	No Action Required No Action Required

2545

Draft Policy	Summary of comments	Response	Outcome

	Some sites coming forward are not on land currently developed, so are not within an existing CPZ. Notwithstanding this, the site still might be suitable for low car as a future CPZ could be introduced and as the proposed site access is already in an existing CPZ, and the site already benefits from good public transport connectivity and is within an acceptable walking distance of a local supermarket or equivalent. Suggest modification to bullet point a) as follows:	We are aware of this issue on certain sites. However, it can be addressed through specific site allocation policy wording rather than an amendment to this policy.	No Action Required
2547	*a) in Controlled Parking Zones (CPZs)* ***or the site access is within an existing CPZ****; and*	Disagree with proposed amendment to bullet point a). This issue would be better addressed through site specific policies.	No Action Required
	The text in the box refers to "TP" throughout but should this be "TA" i.e. transport assessment.	We will look into this issue and update as required.	Oxford City Action: Review and update as required.
	The current car parking policy for non-residential uses within LP 2036 (policy M3), in the case of the redevelopment of an existing or previously cleared	We have strengthened the policy to seek no additional car parking (except for blue badge/ servicing) and at	No Action Required

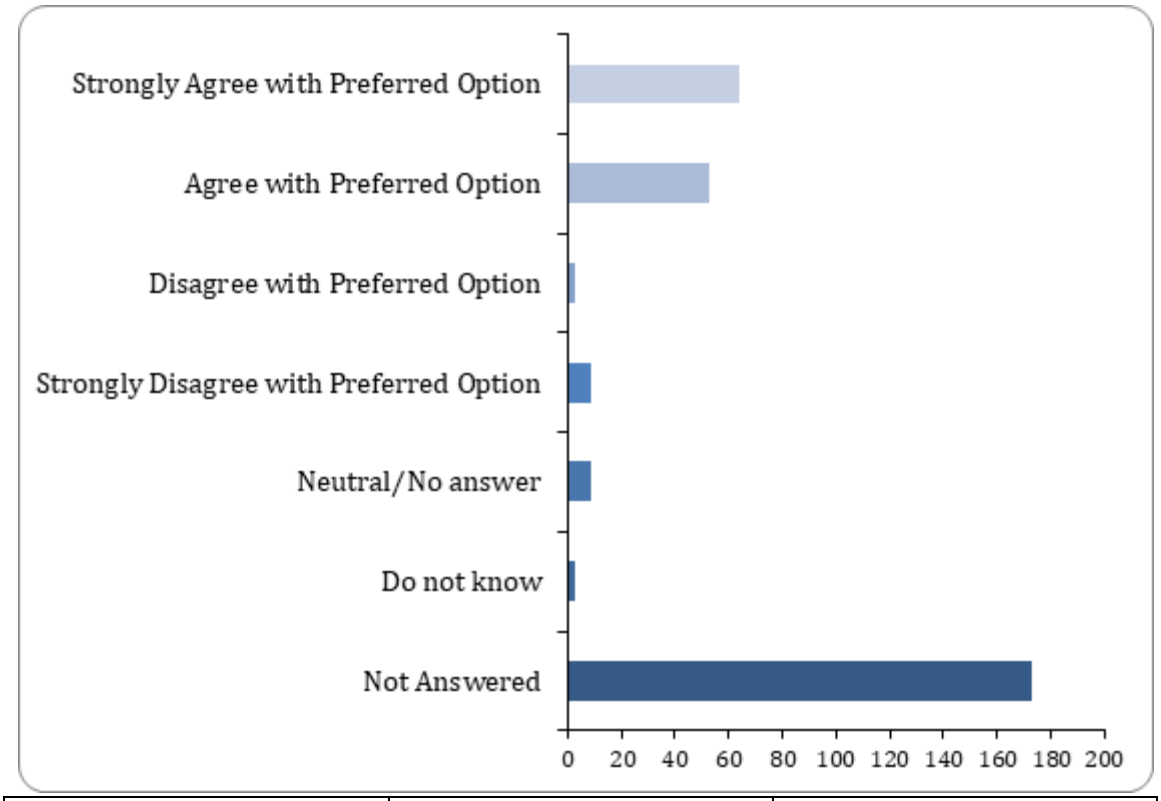
Draft Policy	Summary of comments	Response	Outcome
	site, was that "there should be no net increase in parking on the site from the previous level and the Council will seek a reduction where there is good accessibility to a range of facilities". This requirement, in the case of the redevelopment of an existing or previously cleared site, appears to no longer remain with the level of car parking to be demonstrated through the TA. The County Council fully supports no net increase in car parking in the case of the redevelopment of an existing or previously cleared site and given these can often be in locations which are congested and sensitive to changes in traffic flow. We feel the existing policy should be retained.	accessible sites, we are now seeking a reduction. Any increases need to be justified through the TA/ TP process. We feel this covers a wide range of sites and that specific reference to "existing/ previously cleared sites" is not required.	

2548

All Public Responses – Draft Policy C9

Please tell us what you think about policy option set 012e (draft policy C9): Electric Vehicle Charging.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	64	20.38%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	3	0.96%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	9	2.87%
Do not know	3	0.96%
Not Answered	173	55.10%

Draft policy	Topic	Summary of comments	Response
C9	Policy duplicates Building Regs	EV charging provision standards/ infrastructure already set nationally through Building Regulations. Is Draft Policy C9 necessary? If policy retained, support principle of enabling EV adoption. Agree that requiring a proportion of active charging points is reasonable. A minimum of 10% active provision is considered an appropriate and proportionate amount.	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. References to the amount of provision have been removed as these are covered by Building Regulations.
C9	Objection – blue badge/ car club requirements	Object to requirement that all new blue badge bays and all car club bays be fitted with live, ready-to-use EV charging infrastructure from the outset. Requirement not justified by evidence of user demand. Risks unintended consequences for usability/ safety and redundant infrastructure. Suggestion that these spaces should fall within the overall 10% requirement.	The provision of EV charging infrastructure is encouraged for blue badge/car club bays to help encourage take up of EV vehicles.

2551

C9	Support for policy	General comments received in support of a policy: • Essential for increasing uptake of EV's • Should be more than just disabled bays – the infrastructure should benefit everyone. • So few homes in the city have off street parking options, creating gullies across the pavements is necessary.	The support is welcomed. It is noted that some consider the policy should go further. It is considered that the policy strikes the right balance.

Draft policy	Topic	Summary of comments	Response
		• Should promote EV ownership rather than no car ownership. • Charging infrastructure must be flexible and widely available so that if necessary, motorists can park and charge their vehicle some distance from their own home.	
C9	Developer provision	On future residential developments, infrastructure for on street charging for EVs should be provided and maintained by developer at no cost to residents.	The charging provisions are set out in Part S of the Building Regulations 2010.
C9	Support for alternate policy	Prefer Alternate Option C	The reasons for the preferred option are set out in policy options set 012e of background paper 012: Transport

C9	Resident parking	For existing residents, be sensible about suggestions for charging when parking is difficult or impossible near or outside their houses (i.e. in terraced housing with onstreet parking).	EV charging infrastructure is required for residential and non-residential development in accordance with Part S of the Building Regulations 2010.
C9	Enforcement	How will on street charging work? Can you ensure that people move vehicles once charged?	This is beyond the remit of the local plan.
C9	Accessibility concern	You should mandate developments to adopt the British Standards Institution's PAS1899, accessible EV charging stations. EV charging is quite problematic for people with disabilities and PAS1899 has clear, valuable	The charging provisions are set out in Part S of the Building Regulations 2010. Oxfordshire County Council's Street Design Guide provides further guidance

2553

Draft policy	**Topic**	**Summary of comments**	**Response**
		recommendations.	on EV charging infrastructure for off plot parking.

C9	EV infrastructure design	EV infrastructure should be well designed and easily available, standards should be realistic.	Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. This covers both residential and non-residential developments with specific levels of requirements set out for each use. Oxfordshire County Council's Street Design Guide provides further design guidance.
C9	Facilitate EV adoption	The policy does not go far enough to facilitate EV adoption by residents who lack off street parking. The Council needs a policy to resolve this, for which there are several options from Council funded pavement gulleys to lamppost charging to clusters of fast charging stations.	The policy seeks EV charging infrastructure provision in accordance with Part S of the Building Regulations 2010. Oxfordshire County Council's Street Design Guide provides further design guidance on EV charging infrastructure for off plot parking.
C9	Low car housing	Encourage more car free housing then EV charging will not be required. Charging points should be allocated to blue badge holders.	The Local Plan seeks to promote low car housing. Draft policy C9 has been merged into Policy C8 and seeks the provision of live EV charging infrastructure for new blue badge parking

Draft policy	**Topic**	**Summary of comments**	**Response**

			bays on new build residential and nonresidential development.
C9	Support for new parking spaces to be “EV-ready” to lower costs	Mandating a charging point for every dedicated bay, and retro-engineering on-street spaces, adds cost and technical complexity just when the Plan is rightly pushing for low-car or car-free schemes. Developers respond by trimming unit numbers or hiking prices, while the market for EVs is still evolving and rapid-charging hubs are proliferating off-site. A lighter rule would simply require new parking spaces to be “EV-ready” (conduit and power capacity) and reserve full chargers only for Blue-Badge bays and pooled-car slots; private owners can then install hardware as demand materialises. This keeps upfront costs down, preserves streetscape flexibility, and lets Oxford meet both its decarbonisation and housingdelivery goals without over-specifying technology that may change faster than the Plan.	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. The policy includes reference to charging infrastructure being provided in accordance with Part S of the Building Regulations 2010. It also requires all new blue badge and car club parking bays to provide access to live EV charging infrastructure that is ready to use.
C9	EV charging for boats	Consider and discuss the implementation of EV charging for canal boats adjacent to new development with the Canal & River Trust where relevant as this may reduce potential conflict between boaters and residential property occupiers as a result of noise from generators/engines and smoke from stoves at a later date.	Comment noted. Additional text added to Policy H13 point 3 to include reference to EV charging for boats.

2555

Draft policy	Topic	Summary of comments	Response
C9	Policy does not support move towards car-free developments	Hopefully you don't mean this 'on all new residential developments with a dedicated parking space' to say that every new home will need to have a car-parking space of their own?? That would seem to be contrary to the requirements proposed for car-free developments. Make sure it's clear what you mean!	Draft policy C9 has been merged into Policy C8, Motor Vehicle Parking Design Standards. The policy includes reference to charging infrastructure being provided in accordance with Part S of the Building Regulations 2010.
C9	Charging provisions	For new build residential development, the number of charge points to be: one 11kw point per 20 dwellings. For New build non-residential development, the number of charge points to be: one 11kw point per 20 car park spaces	The charging provisions are set out in Part S of the Building Regulations 2010.

2556

Statutory Consultee Responses – Draft Policy C9

Oxfordshire County Council

Draft policy	Summary of Comments	Response	Outcome

Draft policy	Summary of Comments	Response	Outcome
	Oxfordshire's Electrical Vehicle Infrastructure Strategy (adopted March 2021 Oxfordshire Electric Vehicle Infrastructure Strategy) and Policy 29 of the adopted LTCP. As such, we would request the policy is updated to reflect the County Council requirements.		
Policy C9 EV Charging	**Strategic Planning** We note that this draft policy requires non-residential development to provide only 10% of EV charging infrastructure which is not in line with the County Council requirements of a 'minimum level of 25% for all parking spaces with ducting provided at all remaining spaces to 'future proof' such spaces to be upgraded in the future' as set out in Policy EVI 8 of	10% EV charging requirement aligns with the Building Regs.	Having reviewed the evidence, we have elected to align the % with the Building Regulations.

2557

All Public Responses to the Whole of Chapter 7

Draft policy	Topic	Summary of comments	Response

Chapter 7	Transport	Recommendations of the Citizens Assembly on Transport: While I acknowledge that the City has no direct responsibility for travel, I'm sure the City council can influence County plans and actions. To this end I urge the City council to do more to create better mobility and inclusive transport by following up on many of the recommendations which came out of the recent Citizens Assembly on Transport, including the recommendation to support a rail/bus interchange, the recommendation to support a car-free city centre	Comments noted.
Chapter 7	Community wealth-building	Community wealth-building is both redistribution of financial resources but also development of personal wellbeing and health in our communities. Plan needs stronger	Comment noted.

2558

Draft policy	Topic	Summary of comments	Response
		commitment to importance of social infrastructure and the foundational economy. Any new development should serve & benefit local residents primarily. Also see report on Community Wealth Building across Oxfordshire https://www.oiep.org.uk/big-conversations--oxfordshire-a-county-of-community-wealth-building	
Chapter 7	Omission policy: community-led stewardship	Community First notes policy expectation with regard 'to the appropriate maintenance/management plans [being] organised as part of the design/construction process' in policy G2. Yet argues the Plan could be strengthened by explicitly supporting community-led stewardship. This involves working with, supporting, and releasing the skills, experiences and energy of citizens and inspiring projects that reflect what local people want and need. For instance, green space management plans, nature recovery and biodiversity initiatives, volunteering strategies, local food initiatives, links to schools and business, skills development, cultural and historical celebrations, and climate action. The cross-cutting nature of stewardship lends itself to being a new standalone policy, most obviously in Chapter 7.	Agreed these projects sound inspiring. These appear to be largely things that can't be actioned by the Planning system, and would take place outside of it. The Stewardship Strategy does not seem to be something that could justifiably be required or expected to be implemented, although many of the intended function of it such as maintenance would be covered by a Planning Condition (but the details of how that is managed are not matters for the Planning System).

2559

Chapter 8 – Infrastructure, Areas of Focus, and Site Allocations

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Headlines for Chapter 8:

2561

Infrastructure

- Consensus that infrastructure improvements should occur before planned development, not after
- Need for the Infrastructure Delivery Plan to adequately mitigate the impacts of planned development
- Concern over increases in traffic congestion
- Lack of 5G coverage in Oxford **Areas of Focus**
- General support for overarching, spatial policies **Site Allocations**
- Several site allocations must include reprovision of play and sports areas, entertainment venues, public parking and community centres
- Encouragement to continue to prioritise brownfield sites (those already developed on)
- Concern over potential loss of green corridors in East Oxford impacting biodiversity and wellbeing
- Health risks associated with contaminated land

- Concerns over the impact of new high density housing developments on existing communities, such as in Kidlington and Water Eaton **General Comments Collected During Consultation**
- Support for 15-minute city principle
- Transport concerns: park and ride, congestion, anti-LTNs, potholes, stationary traffic outside of Westgate centre, cycle highways, trams etc.
- Council tax is too high due to over-regulation

Infrastructure

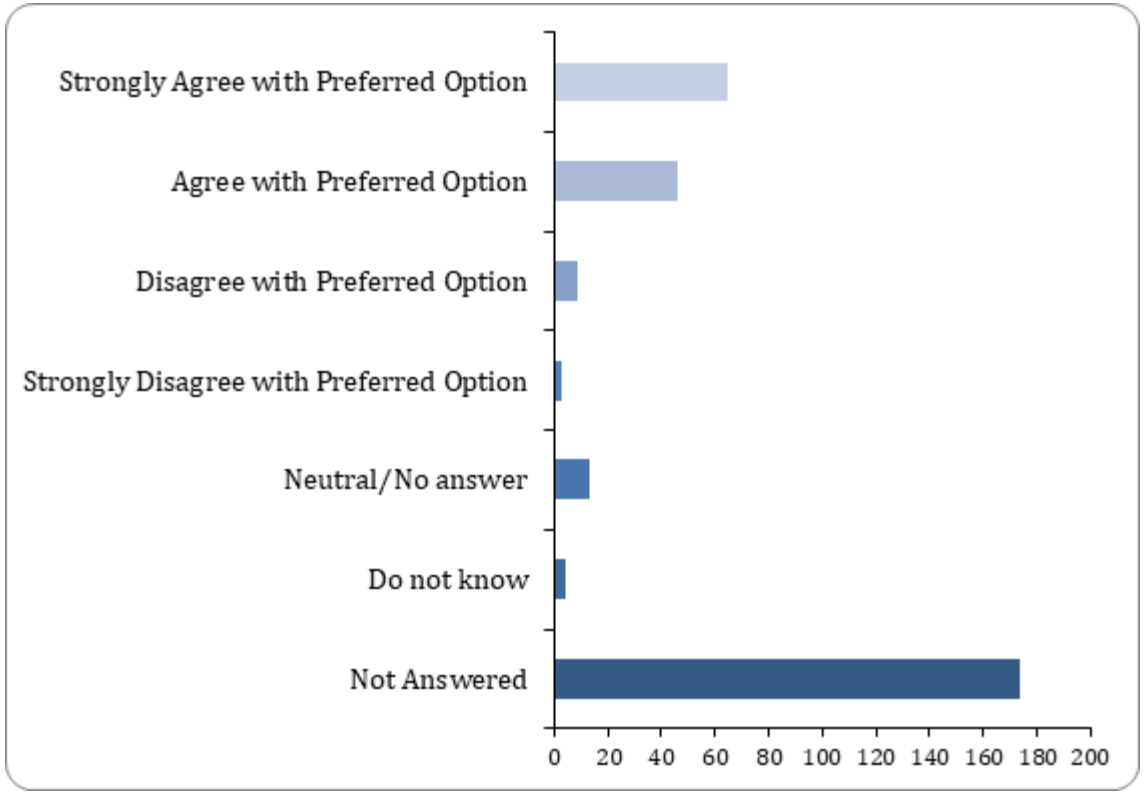
All Public Responses - Draft Policy I1

Please tell us what you think about policy options set 014b (draft policy I1): Digital Infrastructure to support new development. If you have any additional comments please put them in the comment box.

There were 140 responses to this part of the question.

2562

2563



Option	Total	Percent
Strongly Agree with Preferred Option	65	20.70%
Agree with Preferred Option	46	14.65%
Disagree with Preferred Option	9	2.87%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	13	4.14%

Do not know	4	1.27%
Not Answered	174	55.41%

Draft policy	Topic	Summary of comments	Response
I1	Broadband connectivity in new developments	Pre-installing gigabit-ready ducts and risers while trenches are open costs pennies per unit and future-proofs buildings for the knowledge economy Oxford relies on; denying it would mean ripping up pavements later at far higher social and financial cost. Requiring developments to have appropriate digital infrastructure from the development stage will aid accessibility and ensure that needs for later remedial works, with the associated disruption for residents of the city and those reliant on the spaces created, are minimised.	Comment noted.
I1	Scope of policy	• This policy is too narrowly focused on broadband and data centres associated with new developments. The policy framework in the Plan should be broadened to provide for the full range of contemporary digital infrastructure requirements, including digital screens associated with existing developments, which are essential to sustaining the vitality of contemporary city centres and ensuring inclusivity and equality.	The policy already includes requirements for minimising the visual and amenity impacts of digital infrastructure. In combination with other policies of the plan, there are sufficient instruments to ensure that installations are not sited in inappropriate locations or have unacceptable impacts.

2565

Draft policy	Topic	Summary of comments	Response
		• As evidenced through recent planning applications in the city centre, there is pressure for the installation of such technology, many in inappropriate locations, which is likely to escalate. A policy approach, with identification of opportunities in key locations for the installation of digital screens working collaboratively with key city centre stakeholders such as WOA, will ensure that such pressures are managed and such necessary infrastructure can be delivered in an appropriate manner.	
I1	Support with suggested amendments	In I1, Data centres may be a commercial use rather than a digital infrastructure, so might not need for a special mention here.	While they are commercial in nature, data centres are forming an increasingly important element of the digital infrastructure that supports the economy and day to day life, and as such their impact as a sector goes beyond what will be the case for a typical commercial enterprise.

I1	Policy not adequate as written	All new data centres should be required to provide details of likely water and electricity requirements. It is confusing that in relation to R5 that there is a limit on domestic water use but that in relation to data centres which use large volumes of water for coolant purposes no restriction is applied to them as part of the planning process. Similar considerations apply to electricity supply where the grid is unable	Policies R1 (net zero buildings in operation) and R5 (water resources and quality) include requirements for energy and water usage that apply to nonresidential/commercial development, which data centres will fall under. It is also unlikely that such proposals are likely to come forward at a significant scale within the city's boundaries due to spatial constraints that would limit the availability of suitable sites.

2567

Draft policy	Topic	Summary of comments	Response
		to satisfy demand at certain critical periods.	
I1	Objection to data centres	Object to the approval for data centres. These conflict with previous supports intensification of employment land. To my knowledge, data centres do not need to be located near to users and so should be treated in the same way as warehousing.	There is a move by government towards considering data centres and similar facilities as critical infrastructure in support of national and regional economic development. Approvals of proposals will still be on the basis of their being sited in suitable locations and in compliance with other relevant plan policies. It is also unlikely that such proposals are likely to come forward at a significant scale within the city's boundaries due to spatial constraints that would limit the availability of suitable sites.
I1	Specific policy unnecessary	I disagree if this makes it more difficult and costly to build more homes	Building regulations also include standards for broadband ready new homes, which this policy will be in alignment with.

I1	Specific policy unnecessary	Have no specific policy	The NPPF requires local planning policies to facilitate the development and expansion of digital infrastructure. They are also recognised as significant infrastructure in national policy and it is therefore considered appropriate to refer to them as such in the local plan.
I1	Specific policy unnecessary	5G internet is so fast and reliable for the home I'm not sure physical internet connections are so important anymore. It'd be interesting to know how many people are making the switch. Make sure there is decent 5G connection. If you insist on going for a physical connection then I think look beyond 1G, in another 5 years I think that'll look slow, that's not future proof.	Mobile connectivity still requires a level of physical infrastructure to support its operation. Building regulations also include standards for broadband ready new homes, which this policy will be in alignment with.

2568

Draft policy	Topic	Summary of comments	Response
I1	Mandate service conduits	One current issue is that every new development digs another channel under the streets, which collapse and are not properly resurfaced by the Council. (We have 50 or so of those in our street for example.). Would it help to have some policies that pre-position service conduits in key areas, and mandate developers to use those rather than creating yet more surface damage?	Through this policy and other design policies, developers are encouraged to consider the placement and integration of conduits, access points for maintenance etc from the earliest design stages. While the city council is not the highway authority that manages approvals for roadworks (that is the county council), the delivery of buildings that are already futureproofed for digital infrastructure will hopefully mitigate the level of disruption for new development at least.

Statutory Consultees Responses – Draft Policy I1

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Policy I1 - Digital Infrastructure	**Digital Connectivity** Oxfordshire County Council supports this policy however we would request a change to part d) of the policy as follows: *"**actively** ~~where required~~ support the effective use of buildings, outdoor spaces and the public realm to accommodate welldesigned and suitably located mobile digital infrastructure; minimise impacts of digital infrastructure. on the visual amenity, appearance and character of buildings and surrounding areas, and minimise impacts on the amenity of occupiers and neighbours of development."* This gives more strength to the requirement.	Unclear whether the change "strengthens" the requirement or not. Although it potentially widens its application, it may weaken situations where there an actual requirement to deliver digital infrastructure. Will consider how best to address this this in the next stage of the plan.	Oxford City Action: Consider wording of bullet point d)

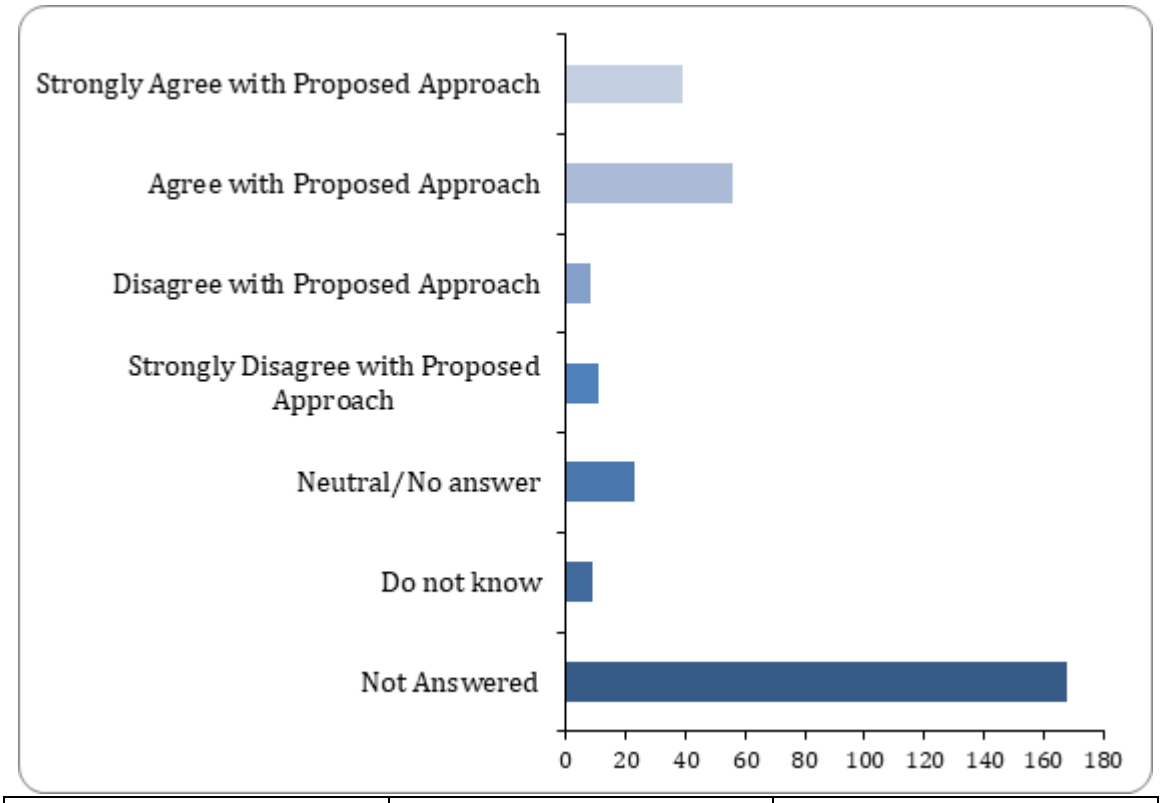
2569

Areas of Focus

All Public Responses to North Oxford (Northern Edge of Oxford) Area of Focus

Please tell us what you think about our approach to identifying the North Oxford (Northern Edge of Oxford) Area of Focus

There were 146 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	39	12.42%
Agree with Proposed Approach	56	17.83%
Disagree with Proposed Approach	8	2.55%
Strongly Disagree with Proposed Approach	11	3.50%
Neutral/No answer	23	7.32%
Do not know	9	2.87%
Not Answered	168	53.50%

Draft Policy	Topic	Summary	Response
Northern Edge of Oxford AOF	Collaboration with Wolvercote Neighbourhood Forum	The Plan proposes four 'Areas of Focus' that will each have 'an overarching policy'. One of these is proposed to be 'The Northern Edge of Oxford Area of Focus', which will (presumably, in view of its name) overlap with the Wolvercote Neighbourhood Forum area. However, the vagueness of its name makes this unclear. We are surprised there has been no consultation with WNF about it, and we note there is no mention of the Wolvercote Neighbourhood Plan in relation to it. Seven reasons are given for identifying this Area of Focus, one of which will be provocative to our residents: 'Generally lowdensity suburban development therefore has potential for intensification'. We ask that the Plan makes clear that the 'overarching policy' to be developed for this Area of Focus will be developed in collaboration with WNF, to ensure it fully takes account of the views of its residents.	Reference is made to the Wolvercote Neighbourhood Plan in the introduction to the North Infrastructure Area. The description of the area at Regulation 18 it is considered did make it clear the broad area applicable, and the bullet points of key considerations provided thoughts to respond to.

2572

Draft Policy	Topic	Summary	Response
Northern Edge of Oxford AOF	Support	The approach set out in the policy is supported. It would be useful to have wording to recognise that developments such as Oxford North have already contributed to providing significant improvements to pedestrian and cycling infrastructure as well as public transport.	Comment noted.
Northern Edge of Oxford	Support but no urban sprawl	But need to ensure that this AoF does not become urban sprawl and erode any further into the Green Belt.	The Plan only applies within Oxford City Council's boundary.
Northern Edge of Oxford	Support but need to think about infrastructure	Supports development and understands it is needed, but needs to ensure more infrastructure is built in accordance and improved active transport opportunities	Infrastructure needs in the North of the city are described in the Plan and in the Infrastructure Development Plan.
Northern Edge of Oxford	Disagree with car parking	Disagree with reducing car parking	Comment noted.
Northern Edge of Oxford	Concern about traffic	Transport policies are not strong enough and traffic is an issue in this area, the relocation of the Kassam could worsen this	The City Council is not the Highways Authority and the Local Plan set highways policy.

2573

Draft Policy	Topic	Summary	Response
Northern Edge of Oxford	Concern about water table	Concern about development and intensifying North Oxford because of the impact on the water table across the city	General policies of the plan are concerned with groundwater impacts.
Northern Edge of Oxford	Support and could go further	Encourage an extension of this Focus Area northwards to be 'Science North' cluster as a nationally significant economic asset that demands a measure of cross-boundary cooperation at a spatial strategy level.	The AoF cannot extend northwards a that would be outside of Oxford City Council's boundary .
Northern Edge of Oxford AOF	Align with neighbouring authorities	We support the acknowledgement that this area is adjacent to other urban extension sites in Cherwell District Council and we would urge that on Areas of Focus (AOF) of this scale, the Council works effectively and proactively to ensure there is a joined up approach with neighbouring authorities, to guarantee neighbouring sites work in conjunction with each other and provide the necessary wider infrastructure. Reference should also be made to the close proximity to the Green Belt to this AOF and the important role it plays in providing a green gap between North Oxford and Kidlington. It should be acknowledged that the green belt	Comment noted. The Green Belt area referred to is within Cherwell DC area.

2574

Draft Policy	Topic	Summary	Response
		needs to remain and be protected to ensure the gap is not lost and the areas of development merge into one another.	

Statutory Consultee Responses – North Oxford Area of Focus

There were no statutory consultee responses to this area of focus.

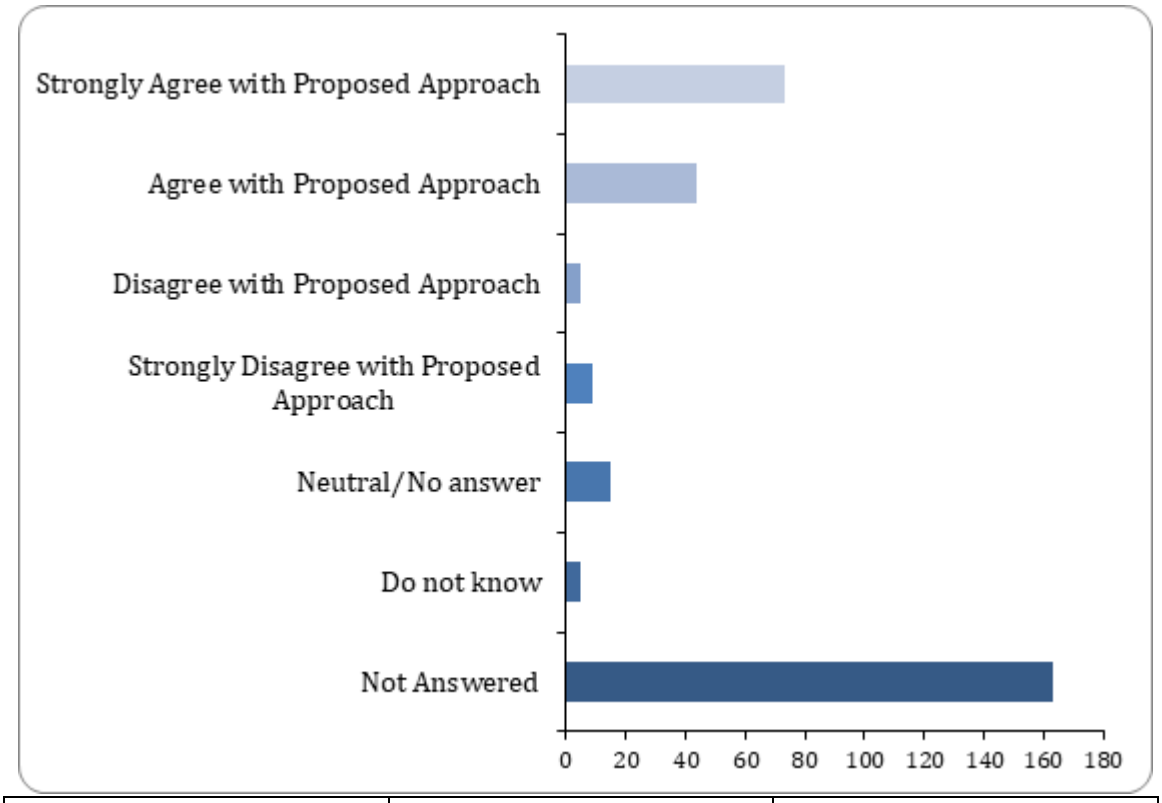
2575

All Public Responses to South Oxford (Cowley Branch Line, Littlemore and the

Leys Area) Area of Focus

Please tell us what you think about our approach to identifying the South Oxford (Cowley Branch Line, Littlemore and the Leys Area) Area of Focus.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	73	23.25%
Agree with Proposed Approach	44	14.01%
Disagree with Proposed Approach	5	1.59%
Strongly Disagree with Proposed Approach	9	2.87%
Neutral/No answer	15	4.78%
Do not know	5	1.59%
Not Answered	163	51.91%

Draft Policy	Topic	Summary	Response
Cowley Branch line, Littlemore and The Lyes AOF	Support	This area contains several of the city's key employment sites with the Unipart Site adjacent to the Area of Focus. Improved public transport connectivity, including the opening of passenger services on the Cowley Branch Line and the proposed station near Oxford Business Park will offer major opportunity. Many proposed developments are a long way from a station, so the Cowley Branch Line is needed.	General support noted.
Cowley Branch line, Littlemore and The Lyes AOF	Support	Network Rail welcome their inclusion of the Cowley Branch proposal and policy to maximise development value in and around the two proposed stations. Network Rail supports an approach which favours sustainable travel modes. The	Support noted. Added additional text in relation to level crossings.

Draft Policy	Topic	Summary	Response
		oxford station connectivity study has been designed to promote sustainable travel choices for Oxford Station and those stations nearby which also serve travel into the city. This has included a number of cycle parking's around Oxford station and leisure cark park to ease pressure within the immediate station environment. It should also be noted that the area surrounding Oxford Parkway station is likely to be subject to master planning activities over the next 12 months. Development sites coming across the area should seek to reduce car parking in line with Policy C8 – Network Rail recognise the ambitions to reduce parking within the Oxford Station area. The station gateway movement	

2579

Draft Policy	Topic	Summary	Response

		principles state plans should aim to limit parking provision where there is good accessibility to a range of facilities. Whilst promotion of sustainable transport methods is favoured, there is currently no provision at Oxford South for car parking, drop off/ pick-up, disable parking or bus links. The non-provision of bus access from Grenoble Road or Shuttle bus from Grenoble housing needs to be considered when providing accessible public transport options. The policy also makes references to the proposed CBL railway stations at Oxford Science Park and in the vicinity of ARC Business Park. In order for these stations to be delivered Mallams footpath level crossing must be formally closed as currently part of the PROW	

2581

Draft Policy	Topic	Summary	Response
		network and the nearby Spring Lane Level Crossing upgraded as an alternative to Mallams as part of the Cowley Branch project. The policy should therefore recognise and reference the need to close this level crossing before the stations can be delivered.	
Cowley Branch line, Littlemore and The Lyes AOF	Support and working in better partnership with south and vale	Good idea but better joinworking is needed. Support for more tree cover and would like to see urban sprawl and green belt is protected.	General support noted. Urban sprawl and green belt are covered under national policies.
Cowley Branch line, Littlemore and The Lyes AOF	Support	Lots of support for more tree cover and policies.	General support noted.

2582

Draft Policy	Topic	Summary	Response
Cowley Branch line, Littlemore and The Lyes AOF	General support	Support but would want to see infrastructure and travel infrastructure significantly improved	General support noted. The policy covers infrastructure improvements.
Cowley Branch line, Littlemore and The Lyes AOF	Disagree with elements	Disagree with high-rise condensed housing and reduced parking. LTNs have made traffic worse and better public transport links are needed.	The policy specifically support improvements to public transport links. The policy explicitly requires buildings of height to be carefully designed and this is also required under other policies in the plan (HD9).
Cowley Branch Line AOF	Templars Square clarification	According to the Preferred Options Draft Policy Map, Templars Square is outside of the Cowley Branch Line, Littlemore and The Leys AOF. The Templars Square site does however lie within the 1,500m buffer zone of the proposed CBL stations. Being outside of the CBL AOF, we are of the view that financial	As the nearest district centre to the proposed CBL stations, the role and importance of Cowley primary district centre in both serving the local community and local workforce is likely to increase, with associated increases in footfall at the centre. A recent announcement from Govt proposed £120m towards the £155m rail infrastructure costs. However, there is an additional suite of public realm and active travel related improvements which will be sought via S106 contributions, rather than CIL. As such, the plan introduces (through Policy S3) an expectation for financial contributions to be sought from new trip-generating

2583

Draft Policy	Topic	Summary	Response
		contributions associated with the delivery of the CBL would not be sought. We request clarification on this, given the impact such an approach would have on deliverability and viability. Any contributions towards the CBL should be delivered through CIL. It is noted that detailed policies around infrastructure contributions and site allocations are not included in the current consultation version of the draft Local Plan. Further review and comments will be provided when further detail is shared/becomes available in subsequent policy consultations on the draft Local Plan.	development within a 1,500m buffer zone of the proposed CBL stations in order to achieve public transport enhancements in this area including sustainable transport measures, in accordance with the paragraph 58 tests (NPPF, Dec 2024). We have included a specific cost for the "CBL S106 contributions" in our Local Plan Viability Assessment which will be published at the next consultation stage. The area of focus will have its own specific policy, which introduces area-specific policy requirements.

Statutory Consultee Responses – South Oxford Area of Focus

Oxfordshire County Council

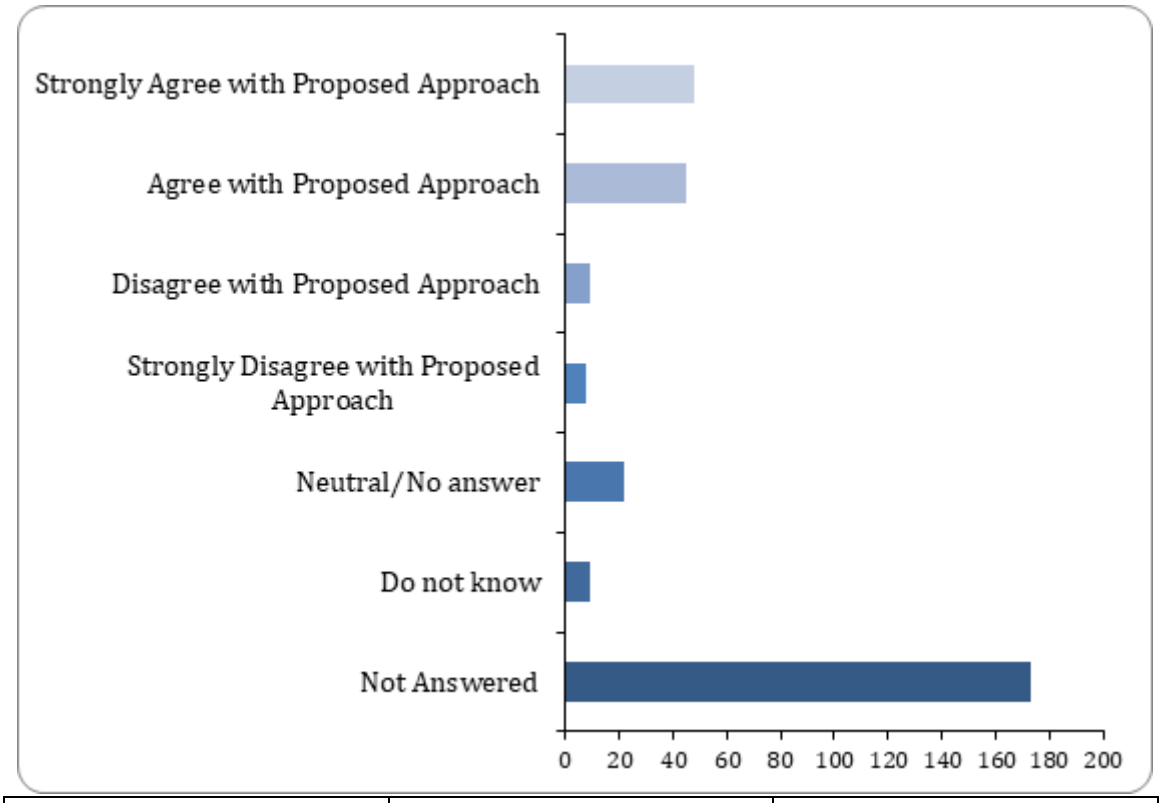
Draft Policy	Summary of comment	Response	Outcome
Cowley Branch Line, Littlemore and The Leys Areas of Focus	**Strategic Planning** We look forward to seeing the proposed wording for this area of focus, noting that work is underway regarding the Cowley Branch Line (CBL) therefore, the County Council will continue its engagement with the City to assist in drafting a local plan policy which captures the flexibility and requirements to deliver this important piece of infrastructure. **Place Planning and TDM (Central)** There is a need to better integrate employment sites to the city's P&R network. There is a need for existing and future development to be better integrated into the surrounding areas, particularly in terms of walking and cycling.	Noted. What infrastructure is needed to deliver these outcomes that is in addition to the schemes included in the IDP? Is it in publicly available documents that we can reference and include? Are the schemes within Oxford city?	No Action Required – see comment in relation to S3 above. No Action Required

2586

All Public Responses to East Oxford (Marston Road and Old Road) Area of Focus

Please tell us what you think about our approach to identifying the East Oxford (Marston Road and Old Road) Area of Focus.

There were 141 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	48	15.29%
Agree with Proposed Approach	45	14.33%
Disagree with Proposed Approach	9	2.87%
Strongly Disagree with Proposed Approach	8	2.55%
Neutral/No answer	22	7.01%
Do not know	9	2.87%
Not Answered	173	55.10%

Draft Policy	Topic	Summary	Response
East Oxford – Marston Road and Old Road AOF	Support	Centre of Islamic Studies supports inclusion of its sites on Marston Road (Govt Buildings and Harcourt House) within the Area of Focus.	The support is welcomed.
East Oxford – Marston Road and Old Road AOF	Opposition	Opposition to lots of development and losing character of the place. Existing buildings should be at the forefront	The intention of the Local Plan is to manage development but not to prevent it.
East Oxford – Marston Road and Old Road AOF	Concern	Concern about biodiversity and infrastructure in this area and loss of green space Concern about provision of better public transport and active travel routes	These concerns are addressed by the AoF policy.

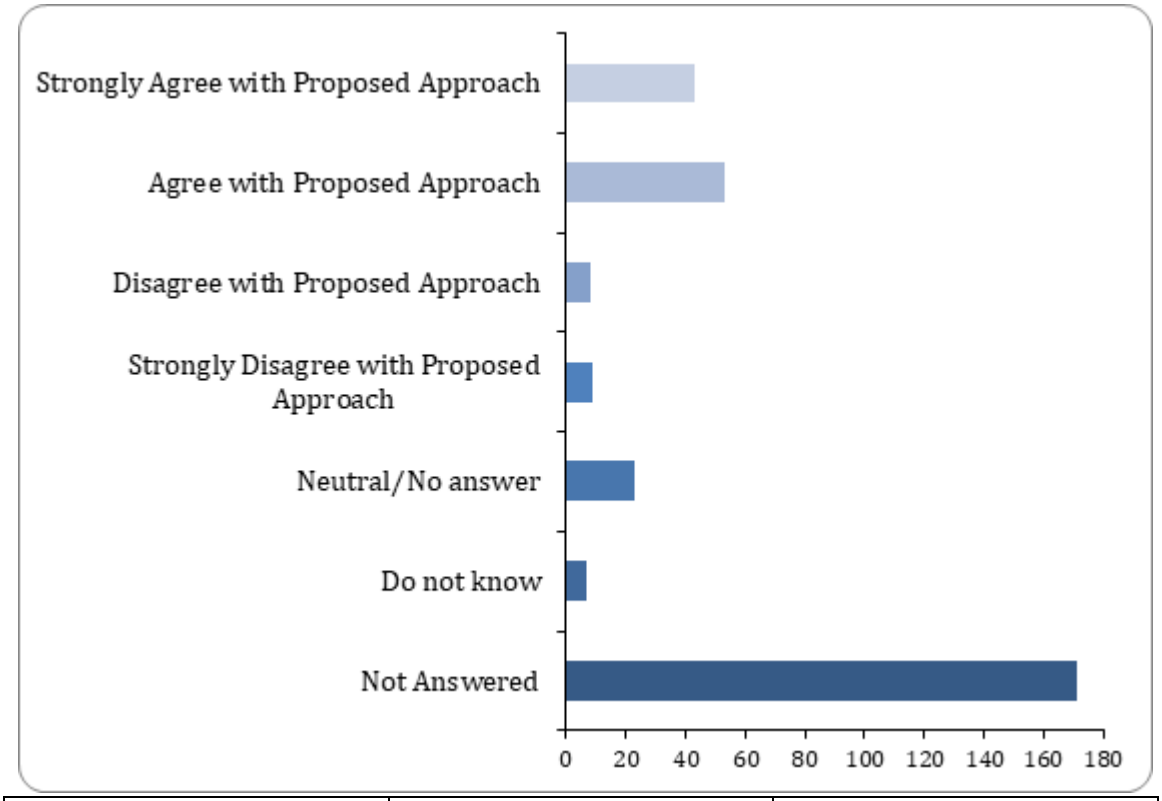
Statutory Consultee Responses – East Oxford Area of Focus

There were no statutory consultee responses to this area of focus.

All Public Responses to University Areas North of City Centre Area of Focus

Please tell us what you think about our approach to identifying the University Areas North of City Centre Area of Focus.

There were 143 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	43	13.69%
Agree with Proposed Approach	53	16.88%
Disagree with Proposed Approach	8	2.55%
Strongly Disagree with Proposed Approach	9	2.87%
Neutral/No answer	23	7.32%

Do not know	7	2.23%
Not Answered	171	54.46%

Draft Policy	Topic	Summary	Outcome
University Areas North of City Centre Area of Focus	General support	General support to this but thinks other areas should be prioritised Better public and active transport needed Protection of green space and urban sprawl Good to communicate with the University	The AoF does not prioritise this area, but is merely an acknowledgement that there are benefits to overarching policies across this area, as there are linked issues best dealt with by the broad policy than by small, individual site policies. List captures some of the issues covered by the policy.

2591

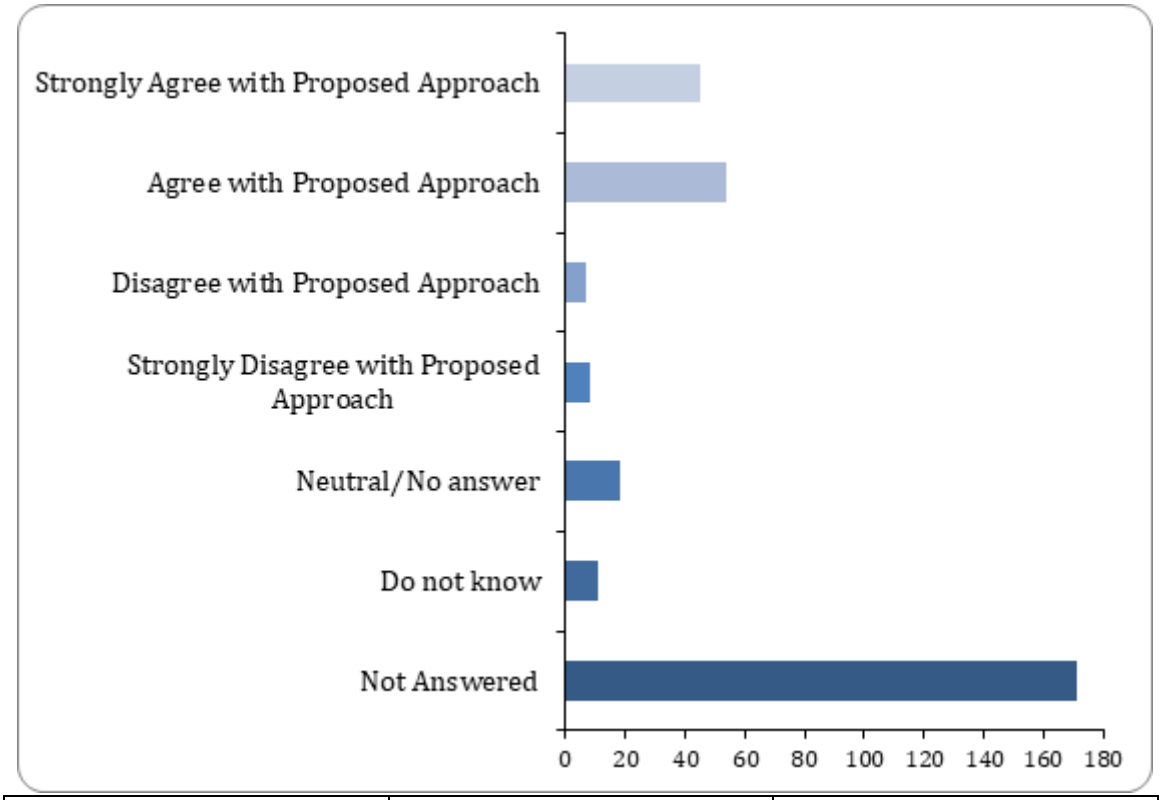
Statutory Consultee Responses – University Areas Area of Focus

There were no statutory consultee responses to this area of focus.

All Public Responses to West End and Botley Road Area of Focus

Please tell us what you think about our approach to identifying the West End and Botley Road Area of Focus.

There were 143 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Proposed Approach	45	14.33%
Agree with Proposed Approach	54	17.20%
Disagree with Proposed Approach	7	2.23%
Strongly Disagree with Proposed Approach	8	2.55%
Neutral/No answer	18	5.73%
Do not know	11	3.50%
Not Answered	171	54.46%

Draft Policy	Topic	Summary	Outcome
West End and Botley Road AOF	Nuffield Sites	A key objective for the Nuffield sites is for the masterplan to be a commercial led proposition which has the ability to revitalise the route from the station to the City Centre and to make a significant contribution to the creation of a wider Innovation District in the West End. The withdrawn 2040 Plan identified the West End and Botley Road AOF as 'an appropriate location for employment-related development opportunities which seek to build on Oxford's key economic strengths that link research, education and social enterprise in areas such as life sciences and energy. Given the high demand for commercial research and development space and specific developer interest, it is likely that this sector will be the main river of development across the area'. It also stated that 'there are also opportunities to accommodate a range of other sectors and uses, such as the creative and digital industries, as well as affordable workspaces for startups, co-working spaces, or even community uses where feasible across the wider area that this AOF covers'. These aspects of the withdrawn Plan	The Council has maintained a dialogue with landowners in relation to policy development. We have reviewed these comments and taken them into account when producing the Area of Focus Policy.

2594

Draft Policy	Topic	Summary	Outcome

2595

		continue to be supported by Nuffield as relevant for inclusion in the 2042 draft Plan, subject to viability considerations as outlined above. 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 startup businesses, research and development/life sciences occupants to head quarter office spaces. There is also the additional benefit that they are all in a single ownership allowing the owner to think strategically about the nature of the uses on parts of the sites, thereby promoting a Masterplan. Given the importance of the new Local Plan in establishing the planning policy framework and policy platform for the Nuffield West End Masterplan, it is important to ensure the 2042 Local Plan is sufficiently defined on site specific aspects whilst providing the necessary flexibility when applying wider Local Plan planning policies to such site proposals, to ensure they	

2596

Draft Policy	Topic	Summary	Outcome
		are able to successfully deliver a transformational development, new living accommodation, employment growth in the form of a new innovation district at the Nuffield Sites and enable the delivery of significant benefits for the community and for Oxford.	
West End and Botley Road AOF	Osney Mead	OUD continues to strongly support the inclusion of Osney Mead in the West End and Botley Road Area of Focus and the recognition in the draft Plan of the significant development and regeneration opportunities here.	The support is welcomed.
West End and Botley Road AOF	Support	Strongly supportive of development of Oxford's West End.	The support is welcomed.
West End and Botley Road AOF	Views/Building heights	Development within the West End and the Botley Road needs very careful management to prevent detrimental harm to the views out towards the western hills from the city centre, and views back from the western hills towards the historic city centre. This is a highly sensitive location – with Botley Road sitting within some of the key historic defensive views out from St Georges Tower to the west. More specific reference needs to be made to this to ensure buildings will be limited to appropriate heights.	These concerns are addressed through a combination of the AOF and other policies in the plan.

2597

Draft Policy	Topic	Summary	Outcome
West End and Botley Road AOF	Support	BL supports the recognition that that the West End and Botley Road Area of Focus will see significant development and regeneration opportunities.	Support noted.
West End and Botley Road AOF	Network Rail	Network Rail supports the allocation of the West End and Botley Road area as an 'Area of Focus' and the recognition that: a) 'The redevelopment of Oxford railway station presents the opportunity to create an easy and attractive transport interchange between rail, bus and active travel; and b) 'There is a significant opportunity to create highdensity urban living with good provision and access to open space and a vibrant mix of uses, and also that make a significant contribution to the knowledge economy'. Network Rail would encourage any future draft wording for the proposed Area of Focus to reflect the acknowledgements outlined above to enable the area to reach its full potential.	Support noted.

2598

West End and Botley Road AOF	General support but concern about infrastructure	Efforts need to ensure environmental, cultural, societal and commercial impacts Car parking needed. Concern about all infrastructure and transport infrastructure	These concerns are address by the AOF (where releveant), and by othe specific policies in the plan.
Draft Policy	**Topic**	**Summary**	**Outcome**
West End and Botley Road AOF	More homes needed	More homes needed to support development	The plan's over-arching strategy prioritises housing.
West End and Botley Road AOF	Support	Commentary supporting as this area is already built up with significant retail and commercial areas	Support noted.
West End and Botley Road AOF	Concern about flooding	Concern that majority of this area is in flood zone 3b	Policies elsewhere in the plan address flood risk. We have produced a Strategic Flood Risk Assessment which provides flood risk maps for the city.

2599

Statutory Consultee Responses – West End Area of Focus

There were no statutory consultee responses to this area of focus.

Comments on All Areas of Focus

This section contains all comments received regarding all areas of focus, including public and statutory responses.

Topic	Summary	Response	Outcome
AOFs	Options do not consider opportunities outside of city boundaries	The Draft Plan identifies Areas of Focus. There is a critical omission in the options presented in that it does not consider opportunities for expanding beyond the city's boundaries. In reviewing the reasons for identifying the areas as presented, supporting the regeneration of existing areas within Oxford, supporting infrastructure investment – would all equally apply. The draft Plan refers to ongoing discussions with neighbouring authorities and identification of areas of focus beyond the city's administrative boundaries would assist and focus discussions.	While the surrounding context and other activity in neighbouring districts may be taken as one of the wider considerations, the spatial and allocation policies within the plan can only apply within the local planning authority boundaries.

2602

AOFs	Scope of AOF beyond site allocation	ChCh generally supports the proposal to identify several 'Areas of Focus. The 'West and Central Area quadrant of the City' quadrant includes the 'West End and Botley Road Area of Focus'. ChCh agrees that this area "offers some significant development and regeneration opportunities". ChCh notes that the Areas of Focus have huge potential to help deliver the housing and economic needs of Oxford, in	The AoF policies cover issues relevant across a larger area, with multiple sites and also areas that are not identified sites or don't have a site allocation policy.
Topic	**Summary**	**Response**	**Outcome**
		particular the West End and Botley Road area. However, it is not clear from the Draft Document for consultation what these Areas of Focus will cover over and above any site specific allocation policies.	

2603

Oxfordshire County Council

Topic	**Summary**	**Response**	**Outcome**
Areas of Focus	**Place Planning and TDM (Central)** We welcome the opportunity to review overarching and area specific policy.	Noted.	No Action Required

2604

Site Allocations

This section contains all comments received regarding site allocations, including public and statutory responses.

1c – Red Barn Farm No comments.

1a1 - Northern Gateway (Oxford North)

Site no.	Site name	Summary	Response
001a	Northern Gateway	Objection – Do not allocate due to traffic, environmental (proximity to SAC) and economic reasons. This is directly next to the A34 the most congested and underspecified arterial route in the country, this will have severe countrywide negative impacts.	A lot of development in this area is already permitted and built out. This was supported by significant transport infrastructure works.
001a	Northern Gateway	Support - ONV supports the allocation of the Northern Gateway area within the Local Plan. At this stage the proposed wording for the final policy has not yet been provided. However, discussions are ongoing with various parties with regard to these policies. In relation to Oxford North, whilst ONV recognises the wider need for housing in Oxford, the focus of Category 1 employment sites must be for employment uses and housing should be located elsewhere, including using the	Not all of the housing part of the hybrid application has yet come forward.
Site no.	**Site name**	**Summary**	**Response**

		strategy of meeting the need in adjacent districts with efficient transport routes to the employment sites. This has already happened in the context of the Northern Gateway, through the Cherwell Local Plan Partial Review – Oxford's unmet Housing Need plan that allocates circa 4,500 homes to the north of the development. Such housing will provide sufficient housing to meet the labour demands for Oxford North without diluting the site's potential to boost the supply of jobs locally. We believe that the Council should look beyond its boundaries to address such issues.	

2607

1e - Pear Tree Farm

Site no.	Site name	Summary	Response
001e	Pear Tree P&R	Among the already allocated sites there are three within our area: OUP Sports Ground; Northern Gateway; Peartree Farm. We ask that it be made clear that development at the last of these is conditional on a direct pedestrian/cycling route being constructed to link the site to Parkway station, which will require collaboration with Cherwell District Council.	This connection is noted as important in the draft allocation policy.

6b - Banbury Road University Sites – Parcel B No comments.

8a - Bertie Place Recreation Ground

Site no.	Site name	Summary	Response
008a	Bertie Place Recreation Ground	Whilst we are aware that the site has previously been allocated for housing, this should not come at the expense of a public playground for children and families, which it is not intended to replace like for like. Other sites should be explored which does not result in the loss of a well-used community facility	All suitable and available sites with development potential are being considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure. The allocation policy seeks to balance between providing housing on a suitable site and ensuring that the key function of the site as a public open air recreation ground is retained.
008a	Bertie Place Recreation Ground	Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	The designated core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). Development schemes affecting supporting

Site no.	Site name	Summary	Response

2608

			spaces, such as Bertie Park, will be required to reprovide affected spaces to the same standard or higher (see responses for policies G1 and G2).
008a	Bertie Place Recreation Ground	The considerable difficulties with the reprovision of the site have led OCC to suggest inclusion of Bertie Park as a site for development in the 2042 plan without the inclusion of a planning condition requiring re-provision. The impossibility of complying with NPPF s.104 means that grounds for its inclusion should be re-visited. It should not be re-included solely on the basis that it has been on the plan for a quarter of a century. Or that we have been consulted before.	The allocation policy specifically includes a requirement for reprovision of the existing playground. Reprovision will also be a requirement for any scheme to be compliant with the policies in the emerging plan (see policy G2). We consider this approach is compliant with national policy, this is addressed in more detail in the sections dealing with green infrastructure, policies G1 and G2 in particular.
008a	Bertie Place Recreation Ground	1. Flooding. All advice from the Environment Agency indicates significant increase in flooding 2. Safety. Advice from the police is that alternative recreation area is not a safe place for children to play.	The allocation policy includes site specific requirements for surface/ground water assessments, incorporated sustainable drainage systems and
Site no.	**Site name**	**Summary**	**Response**

2609

			management plans to deal with surface water flooding risks. The policy requirement with respect to the reprovision of current recreation facilities is that the playground is within the site boundary, at the same standard or higher (see policy G2), and it is expected that sound design principles such as those included in guides such as Secure by Design are followed.

2610

11 - Canalside Land, Jericho

Site no.	Site name	Summary	Response
011	Canalside Jericho	Nothing's happened for so long. The view of the church from the towpath should not be blocked by housing. This is on the canal, built for boats, and should be a boatyard. There are few spaces along the canal to sit and enjoy it. An open square, greenery, cafes and a wharf are more appropriate for the site.	It is likely some enabling development would be needed to bring the site back into use.
Site no.	**Site name**	**Summary**	**Response**

011	Canalside Jericho	The community and councillors have been very clear for many years that they need a new community centre, a public square and a boatyard, and it must be accepted that there won't be much room for housing. Definitely not student (especially speculative) house.	Comment noted.

12 - Churchill Hospital

2611

Site no.	Site name	Summary	Response
012	Churchill Hospital	Proximity to Lye Valley (abutting Lye Valley North fen) means that future of the site is of crucial importance to the fen ecology and water supply. Maintaining calcified alkaline groundwater supply to Lye Valley needs to go into the site-specific policy for the Churchill site.	Comment noted.

012	Churchill Hospital	BBOWT welcome that this allocation no longer includes the meadow, which is an Oxford City Wildlife Site. The meadow is not only vitally important in relation to the Lye Valley but is also subject of an ecological compensation scheme for a housing development in Littlemore. Nevertheless, any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from shortterm very high water flows. This matter is well dealt with in the detailed study in the evidence library on the Lye valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.	The site allocation policy will state that development proposals will need to avoid adverse effects on the SSSI. This is also required under Policy G6 of the plan.

2612

012	Churchill Hospital	Protected species constraints go beyond nesting birds and roosting bats. The most recent planning application on the site identified presence of reptiles (e.g.viviparous lizards), a number of which had to be captured and translocated to a specially built refuge on the site edge nearer the SSSI. Also, proximity to Lye Valley suggests slow worms and grass snakes could be present on site (as they are found in the valley). Thus, reptiles should be added to protected species constraints flagged in policy. Note that wording of sentence in relation to species constraints in reg 18 is incomplete.	We have conferred with ecologists, and the policy has been updated to include reptiles.

2613

2614

012	Churchill Hospital	Parking Issues: The hospital has a total of 1506 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff. Modification Requested: (Rep relates to LP2040 Policies) References to Policies G1, G3, G5 are not relevant and are not related to the SSSI – Policies G6 and G7 Many specific statements about the Lye should NOT be included in the Site allocation policy but should be applied more generally (See comments on Policy G6+G7). Reduce parking in exchange for further development as discussed (Response R6 – Air Quality) The phrase "issues including parking are considered in a comprehensive way to make the most efficient use of land." should be amended to: "in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits."	Policies G1 – G3 and G6 are referenced in the site allocation policy as all are relevant and applicable to developments on this site. The site allocation policy also provides some additional detail in relation to the SSI and future development on this site.. The site allocation policy references potential contamination of hospital and historic uses on the site. Wording relating to parking and efficient use of land has been updated. Development proposals will be considered against requirements set out in the plan as a whole which would include landscaping

2615

		"A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI." Add "in operational phase" "because of the use as a hospital some areas of potential contamination are present on the site" – site contamination is mostly caused by asbestos and WWII contaminants, not hospital use. WWII buildings and assets must be identified and retained.	buffers and impacts on the SSSI during operational phases. The site allocation policy specifically references the WWII buildings as non-designated heritage assets which should be enhanced.

2616

14 - Templars Square

Site no.	Site name	Summary	Response
014	Templars Square	Crucial to local life and being allowed to die store by store. We need the shops in a warm and accessible indoor centre.	The draft allocation policy is clear that the centre must keep its district centre function, although retail specifically is not its own use class in the planning system anymore. However, being covered or not will be a detailed

Site no.	Site name	Summary	Response
			design decision and is not a requirement of the policy.

16 - Cowley Marsh Depot No

comments.

17 - Crescent Hall

Site no.	Site name	Summary	Response
017	Crescent Hall	Comment: Substantial Roman pottery activity has been identified in the general area.	The potential for the site to contain archaeological remains is low to moderate. (The site is within a very large zone of general potential for Roman kilns).

18 - Diamond Place and Ewert House

Site no.	Site name	Summary	Response

018	Diamond Place and Ewert House	Site should include medical facilities if possible.	The draft allocation policy lists healthcare uses as a suitable use on the site.

20b2 - Elsfield Hall, Elsfield Way

Site no.	Site name	Summary	Response
020b2	Myers Briggs, Elsfield Hall, Elsfield Way	We are pleased to see a proposal to convert the existing office accommodation to residential, which will be more appropriate at that location.	Support is welcomed.

2618

21 - Faculty of Music, St Aldates No

comments.

24 - Government Buildings & Harcourt House

Site no.	Site name	Summary	Response
024	Government Buildings and Harcourt House	Very important that any development have very minimal impact on the character and sense of seclusion of Headington Hill Park. Windows of buildings overlooking the park would have significant detrimental impact.	The importance of the interface with the park is noted in the draft site allocation policy.

Site no.	Site name	Summary	Response
024	Government Buildings and Harcourt House	It is noteworthy that this site has remained vacant for a very long time and that the Policy SP16 was prepared in 2016 so 9 years ago and the site had been vacant for at least 10 years before that. This is an attractive spot in a prosperous part of the City there is absolutely no reason why it could not have been redeveloped years ago and yet the Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment.	The landowner has stated their interest in developing this site during the plan period.
024	Government Buildings and Harcourt House	The introduction of additional requirements (e.g., building performance/ ecology), on sites with longstanding viability challenges is likely to hinder redevelopment	Whole-plan viability testing has been carried out.
024	Government Buildings and Harcourt House	Welcome acknowledgement of the lawful employment use on site. We would wish to see the full range of uses set out under existing OLP2036 policy SP16 carried forward including complementary uses.	Noted. We will consider suitable uses for the site that align with our overarching strategy. LP2036 recognised Harcourt house as an employment site (Cat. 3). LP2045

Site no.	Site name	Summary	Response
		The Centre maintains an aspiration to include commercial research and development use within a site redevelopment to complement academic research. The commercial activities would be 'spin out' application of academic research as is the norm in the modern academic arena owing to obvious benefits from the co-location of cutting-edge academic research and its commercial application. The current Local Plan which allows for complementary uses has been important in allowing the Centre to advance development proposals.	considers Harcourt House as a "non-designated" employment site and introduces specific criteria relating to the redevelopment of non-designated sites outside of the city and district centres.
024	Government Buildings and Harcourt House SA Form	Disagree with negative rating against SA objective 11. The site contributes little to the character of the area and could be seen to detract from the heritage asset. Redevelopment of the site presents an opportunity to enhance the area, which should be viewed positively.	The reason for the negative SA rating on the SA Form is because in its current state, the site, as you point out, "contributes little to the character of the area and could be seen to detract from the heritage asset".

2620

26 - Jesus College Sports Ground (Herbert Close) and 32, 234 - Lincoln College and Jesus College Sports Grounds

Site no.	Site name	Summary	Response
026, 032, 234	Jesus and Lincoln College Sports Grounds	These are key green spaces with woodland providing biodiversity and landscape value.	The draft site allocation policies note these features and require significant retention of green infrastructure.
026 and 032, 234	Jesus College Sports Ground and Lincoln/Jesus College Sports Grounds	We assume that the reference to site 234 is an error as this site is not allocated in the Adopted Local Plan 2036. We appreciate that sites 026 and 032 are allocated in the existing Adopted Local Plan but we think that these allocations should be reconsidered because of the potential impacts of housing development on land that is now covered by green infrastructure policy G1. The arguments are very similar to those presented for Oriel College Sports Ground above, especially in relation to effects on the setting of the Conservation Area, visual prominence and loss of habitat connectivity. If, contrary to our preference, allocations here are confirmed, the City Council should ensure strong developer contributions, for example for provision of public outdoor space and biodiversity net gain. Affordable housing for NHS and university staff at the nearby Old Road Area of Focus (Warneford, Churchill, Old Road Campus) should be prioritised.	The sites do need to be developed carefully, reflecting the sensitivity of the conservation area. The raft site allocation policies are drafted to ensure this happens.
026	Jesus and Lincoln	Do not support the inclusion of a policy.	

Site no.	Site name	Summary	Response
2622	College Sports Grounds	Cowley is the most green-space-deprived suburb in Oxford. According to a study undertaken in 2006 it had only 1.14HA per 1000 residents in 2006 of a city-wide 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 data presented by the respondent was taken from a City Council study from 2006. The figures presented (both for Cowley and the city-wide average), relate to "publicly accessible green space". While reference was made to the city-wide average of 5.75ha per 1,000 population within the Oxford Core Strategy 2026, *that* Plan sought to maintain an overall average of 5.75ha of publicly accessible green space per 1,000 population and set out clearly that, while it was desirable that this standard was maintained, it should not necessarily be applied as a requirement within all new developments and was, at that time, used as a basis to support onsite open space provision within larger developments.

Site no.	Site name	Summary	Response
			The desire to maintain 5.75ha of publicly accessible green space per 1,000 population was not carried forward into OLP2036. Regardless, Jesus and Lincoln College sports grounds are both private open-air sports facilities/ private open space. LP2042 proposes that both sites are wholly "supporting GI". Site allocation policy wording will be drafted to ensure appropriate reprovision of sports pitches.
026	Jesus and Lincoln College Sports Grounds	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	Noted.
032	Lincoln College Sports Ground	Sports grounds are important to university culture and should be preserved. Already a very large student block	The policy does require that sports provision is retained or reprovided.

Site no.	Site name	Summary	Response
		nearby so concerned about adding to the high concentration.	
032	Lincoln College Sports Ground	Lincoln College support proposed site allocations in the Plan drawn primarily from previously allocated sites in the Oxford Local Plan 2036 and sites that were being considered in the (now withdrawn) Oxford Local Plan 2040. It is, however, important to note that the sites owned by Lincoln and Jesus Colleges are separate and therefore it is vital that each College is able to deliver each site individually and separately.	The Jesus and Lincoln Sports Grounds are proposed as separate allocations in the draft site allocation policies.

2624

27 - John Radcliffe Hospital

Site no.	Site name	Summary	Response
027	John Radcliffe Hospital	The SA form says the site is within the setting of a conservation area, but part of it is within a conservation area, so this needs correcting. Surface water flooding has been a serious issue recently, particularly in car park T.	SA form updated. Policies require that development proposals consider and mitigate for surface water flooding.

027	John Radcliffe Hospital	Key issues for this site are as follows: • Onsite Parking	It is agreed that surface-level parking is not an efficient use of land. New buildings and hard standing better manage surface

Site no.	**Site name**	**Summary**	**Response**

2625

		• Creating increased demand for housing • Huge basements which remove water retention capacity of land The hospital has a total of 2600 parking spaces compared to a total of 2270 across whole of city centre. 4646 car parking spaces exist across the three hospitals with 70% allocated to staff. The football fields of parking lead to: • • Environmental and health issues due to traffic generated • Flooding in Marston and Northway due to vast surface level parking • Prime housing land wasted, which in turn would reduce the need to travel *(Policy references are to LP2040 policy)* Policy includes no targets to reduce parking provision	water runoff, and policy approaches require this. Parking should be rationalised to reduce unnecessary circulating and queuing around the site, and to reduce the amount of space it takes up. The level of parking will have to be strongly justified, with mitigations to avoid worsening wider impacts.

2626

Site no.	Site name	Summary	Response

		There are long-standing surface water flooding issues in Northway relating to the John Radcliffe Hospital site. Future policy needs to be stronger and require a reduction of surface water flooding issues rather than seeking appropriate mitigation measures. Old Headington Conservation Area Appraisal does not discuss the John Radcliffe Hospital - it ignores it! Modifications proposed *(reference is to LP2040 policy)* • remove justification for retention of car parking based on need, instead it should reduce queueing, • parking should be replaced by development • "issues including parking are considered in a comprehensive way to make the most efficient use of land." Amend to: "in a comprehensive way to make the most efficient use of land, address the climate crisis and realise essential health, social and environmental benefits." • Protection and mapping of JR Green as Core Green Space	
Site no.	**Site name**	**Summary**	**Response**

2627

		• Protection of Cuckoo Lane, Listed Walls, Treelines, significant view lines • Removal of confusion around reduction and mitigation of flood risk in favour of reduction or "net-zero" • Enforce use of SuDS and other systems with policy specifying that civil action will be taken if runoff continues • " • Ostler Road and Ostler Way" is Osler Road, "Sandford Way" is Sandford Road. • Clear parameters for the protection of Cuckoo Lane, Listed walls and original John Radcliffe building and heritage barn near Osler Road/St Andrews junction • " • There is a helipad on the parkland grounds behind Headington Manor House" – No - This was temporary and removed. • Update wording that JR is partly inside the OHCA.	

2628

28a, 28c - Kassam Stadium, Ozone Leisure Complex and Minchery Farmhouse and 28b - Overflow carpark at Kassam Stadium site

Site no.	Site name	Summary	Response
028a	Kassam Stadium	Don't want a new football stadium in the north- refurbish the existing.	Planning permission is granted for a new stadium in Cherwell District, so the policy should respond to this and the potential for the stadium moving. Even if it does not move, there is some potential for intensification around the stadium.
028a	Kassam Stadium	There needs to be provision of leisure facilities proportional to the increasing number of houses. Building on the additional parking area for the Kassam Stadium site will just make it that much harder to get to; it's not acceptable that it's 800m away from the nearest bus stop, as that is far too far to walk.	The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected alongside the allocation of new homes. Site #028a (Kassam Stadium) has good bus connections to Oxford city centre. Site #028b (Overflow Car Park) is 600m from a bus stop to Littlemore (5A every 30 mins). It is just over 800m to Pegasus Road stop with buses every 5-6mins to the city centre.

2629

Site no.	Site name	Summary	Response
028a, 028b, 028c	Kassam Stadium and Ozone Leisure Park	The promoter (who also owns the land) seeks permission for the following: Complete demolition of existing commercial (Class E)/ leisure (Sui Generis) buildings to allow for the phased redevelopment of the site. Redevelopment to include: 1) Construction of mixed use R&D laboratories (Class E(g)) with active ancillary uses (Class E(a),(b),(c),(d),(e),(f)); 2) Restoration of Grade II* Listed Minchery Priory public house (sui generis); 3) Construction of community leisure building (sui generis); 4) Construction of Cowley Branch Line mobility hub; 5) Construction of electrical substation; 6) Comprehensive hard and soft amenity and biodiversity landscape and public realm, and, 7) Other supporting or ancillary works and infrastructure including access and servicing.	Noted.

		Firoka supports the vision for Oxford 2042 that balances the provision of access to housing together	

2631

Site no.	Site name	Summary	Response
		with nature, employment and social and leisure opportunities. To this end, we support the retained and refined allocation for the Firoka sites allowing for a mix of uses and confirm they are available and achievable. Firoka will be undertaking capacity studies ahead of the Regulation 19 stage of the Oxford Local Plan 2042, exploring densification potential appropriate to its potential future context of the reinstated Cowley Branch Line.	
028a, 028c	Kassam Stadium and Ozone Leisure Park	The policy SP14 was written before the proposed move by Oxford United Football Club to the Triangle at Kidlington. The move is very much at the planning stage and clearly there should be no consideration of any redevelopment of the Kassam Football stadium until the necessary planning permissions are in place and construction started as well as the required infrastructure such as foul water sewage and water supplies being ready. Policy SP14 needs updating to take this into account. As there is an existing playing field, this must be replaced before the site can be redeveloped.	The draft allocation policy does require reprovision of the sports provision before the stadium is developed for other uses.
Site no.	**Site name**	**Summary**	**Response**

2632

028a, 028c	Kassam Stadium and Ozone Leisure Park	Littlemore Priory was approximately at the location of Minchery (Nuns') Farm policy must be updated to address this. Roman kilns have been found nearby Source_ RPS 1996 OHER 16787 Kiln site Sewage overflow due concerns to proximity to Oxford STW	Comments noted.

31 - Manor Place

2633

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #31 Manor Place	Site assessment published for proposed allocation Manor Place does not appear to acknowledge proximity to a Grade I Registered Park and Garden.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

32 – Lincoln College Sports Ground

Site no.	Site name	Summary	Response

032	Lincoln College Sports Ground	Sports grounds are important to university culture and should be preserved. Already a very large student block nearby so concerned about adding to the high concentration.	The policy does require that sports provision is retained or re-provided.
032	Lincoln College Sports Ground	Lincoln College support proposed site allocations in the Plan drawn primarily from previously allocated sites in the Oxford Local Plan 2036 and sites that were being considered in the (now withdrawn) Oxford Local Plan 2040. It is, however, important to note that the sites owned by Lincoln and Jesus Colleges are separate and therefore it is vital that each College is able to deliver each site individually and separately.	The Jesus and Lincoln Sports Grounds are proposed as separate allocations in the draft site allocation policies.

2634

33 - Littlemore Mental Health Centre, Sandford Road

Site no.	Site name	Summary	Response
033	Littlemore Mental Health Centre	We welcome the recognition of the site's development potential. The Trust has now undertaken initial planning feasibility work in this regard, based on the following objectives: - Maintain and enhance the existing operational functions, but explore the potential for 'transformational growth' including additional operational facilities such	Comments noted and reflected in the draft policy drafting.
Site no.	**Site name**	**Summary**	**Response**

		as additional inpatient capacity and accommodation for our expanding outpatient services; - Potentially provide facilities for other healthcare services ie primary care, community services, third sector etc; - Enhance existing areas of green space / biodiversity and their contribution to therapeutic treatments; - Provide better car parking management and improved accessibility. It would like these objectives to be recognised by the Plan.	

2635

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #33 Littlemore Mental Health Centre	Consideration should be given to the relationship with nearby assets, including any impacts on the character and appearance of Littlemore Conservation Area	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome
033 – Littlemore Mental Health Centre	**Landscape and Nature Recovery – Biodiversity** This site is considered likely to have a significant negative impact on scrub by Heyford Hill Roundabout as well as Littlemore Railway Cutting SSSI and therefore likely contrary to policy G6.	Ecological impacts on all site allocations are assessed by the City Council inhouse ecologist. Where sites impact SSSIs or other ecological areas, mitigation measures within the policy wording will be proposed. We can consider how the allocation can seek to reduce the impact on scrub at a roundabout. Littlemore Railway Cutting is a Geological SSSI so unlikely to	Oxford City Action: Consider ecological impacts of development and where negative impacts are likely, propose suitable policy wording to mitigate.

2636

Site no. and name	Summary of comment	Response	Outcome
		be impacted by development nearby.	

038a Thornhill Park (phase 2)

Site no.	Site name	Summary	Response
038a2	Thornhill Park	No need to include a site allocation policy – planning application already approved	While granting planning permission is generally considered a strong indication that development will go ahead, sites generally remain as allocations until development commences on site. As development has not yet commenced on *this* site, the site allocation will be retained in the plan.
038a2	Thornhill Park	Strongly disagree with the proposed development of phase 2.	Unclear if this refers to the grated planning permission, or if not, what aspect of the allocation.
038a2	Thornhill Park	The Shotover site provides a once-in-a-lifetime exceptional opportunity for Oxford and Oxfordshire to look forward and build upon its existing cluster of hospitals and life science	Noted. This is in reference to the adjacent site.

Site no.	Site name	Summary	Response

2638

		research to curate a bespoke biomedical healthcare research and development cluster on one site and at the boundary with Oxford City. This would enable deliver of better health outcomes for society and improved skills and educational attainment for the local population. This would be derived from establishing a sustainable, low carbon, accessible, world class biomedical research campus on land at Shotover, grounded within an abundant green landscape and deliver biodiversity net gain. The exceptional circumstances that justify the site's release from the green belt is the ability of a biomedical healthcare and research and development cluster to improve health outcomes on a local and global scale. This is bespoke to the Shotover site, given its sustainable location and its prime geographical positioning, being excellently connected to existing hospital locations in Oxford and the University of Oxford's Old Road Campus. The ability to unlock and realise the plan objectives rests with the role that employment land in the right location plays as vital infrastructure. Thus, the identification of employment land in the right location is critical.	
Site no.	**Site name**	**Summary**	**Response**

2639

038a2	Thornhill Park	Local resident – claims they were not consulted. Strongly disagrees that high rises would be in-keeping with the character of the neighbourhood. If the area needs to be developed, then 2-3 storeys would be acceptable. Expresses general disagreement with national policy for housebuilding.	All residents were posted leaflets about the consultation and advertisement of held events. Height and density policies in the plan address concerns about heights. National policy is out of the council's control.

42 - Nuffield Orthopaedic Centre (NOC)

Site no.	Site name	Summary	Response
042	Nuffield Orthopaedic Centre	Would support general residential development at this site. Not clear why employer-linked AH is supported (H6). Modifications requested: Policy needs to address the key issues linked to this site (summarised as follows): • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing	We will consider all of these issues when drafting any allocation policy for the site. Where necessary, site allocation can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.
Site no.	**Site name**	**Summary**	**Response**

2640

		• Huge basements which remove water retention capacity of land 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.	
042	Nuffield Orthopaedic Centre	BBOWT - Any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have the most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water flows. This matter is well dealt with in the detailed study in the evidence library on the Lye Valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.	The site allocation policy in the draft Regulation 19 plan identifies that the site falls within the impact risk zone for the Lye Valley SSSI. Any proposals for development on the site would need to demonstrate that there would be no impact upon the Lye Valley SSSI.

2641

43 - Old Road Campus

Site no.	Site name	Summary	Response
043	Old Road Campus	Local Plan must include a site allocation policy for this site. Given the site's proximity to the Churchill Hospital Site (SHLAA Ref: 012), the issues affecting the site will be the same and can be summarised as follows: • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing Huge basements which remove water retention capacity of land	This site is no longer being taken forward as a site allocation. There are no vacant plots and any future redevelopment proposals at the site can be assessed against the wider suite of policies in the plan.

2642

043	Old Road Campus	BBOWT - Any development on this site is of the utmost concern with respect to the Lye Valley. Any development on existing urbanised surfaces will still need a whole suite of measures to ensure there is no impact on the SSSI and LWS. It is on surfaces that are currently green and free draining that any development would have the most impact on the hydrology of the meadow through reducing the evening out effect that such green surfaces have on the amount of water flowing into the fen, which is particularly vulnerable to severe and permanent damage from short-term very high water	This site is no longer being taken forward as a site allocation. There are no vacant plots and any future redevelopment proposals at the site can be assessed against the wider suite of policies in the plan.
Site no.	**Site name**	**Summary**	**Response**
		flows. This matter is well dealt with in the detailed study in the evidence library on the Lye Valley and there is no need for us to expand on it here. Development on green surfaces also may well lead to less water flow during dry periods causing the fen to dry out, and impacts on water quality which also can have a highly negative impact on the fen. In our opinion therefore no development on currently green surfaces should take place on this site.	

2643

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome

043 – Old Road Campus	**Landscape and Nature Recovery – Biodiversity** This site is considered likely to have a negative impact on Boundary Brook OxCityWS and therefore contrary to policy G6.	We will consider how to reflect this in the allocation policy.	Oxford City Action: Consider ecological impacts of development and where negative impacts are likely, propose
Site no. and name	**Summary of comment**	**Response**	**Outcome**
			suitable policy wording to mitigate.

2644

49 - Oxford University Press Sports Ground, Jordan Hill

Site no.	Site name	Summary	Response

049	OUP Sports Ground	Do not allocate due to lack of green space and proximity to the river. Sports pitches are used by the community.	The draft policy requires reprovision of pitches, which is most likely to be by significant retention on site.
049	OUP Sports Ground	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	It is agreed that the green space does have important functions, but it is not agreed that these justify full protection of the site because there is a reasonable prospect a solution can be found to ensure reprovision of the green infrastructure functions of the site, which may well be reprovision within the site itself, with enhancements of quality.

2645

54 - Ruskin College Campus

Site no.	Site name	Summary	Response
054	Ruskin College Campus	The site should remain restricted to college-only uses. The Old Headington Roads are already overloaded and could not cope with other types of development. More on-site residential accommodation for the college reduces pressure elsewhere.	The site is expected to remain as a college campus, with student accommodation and the allocation policy in the draft Regulation 19 plan reflects that.

054	Ruskin College Campus	BBOWT object to site allocation.	Noted

61 - Union Street Car Park and 159–161 Cowley Road (formerly Union Street Car Park)

Site no.	Site name	Summary	Response
061	Union Street Car Park	We are concerned about the loss of the car park as it is an important amenity for local businesses and its loss would put further pressure for parking on streets leading off Cowley	It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers

2646

Site no.	Site name	Summary	Response
		Road, including obstructive pavement parking. However, in its favour, it is clearly brownfield land.	in the City Council - to support the district centre.
061	Union Street Car Park	This provides an important open space between developments. Building on it would create a more claustrophobic area. The existing buildings should be redeveloped instead.	Surface level parking is not an efficient use of land. General policies in the plan ensure high quality design that is not overbearing to its neighbours.

061	Union St Car Park	*(refers to LP2040 Policy)* There aren't any trees on the southern boundary. Policy is ineffective and is unjustified. There is no data to support the allocation. The reduction of car parking seems difficult to achieve without a severe economic impact on the Cowley Road District Centre. Car park is often at or near capacity. The allocation of this site would therefore be contrary to Policy C2, Maintaining Vibrant Centres. There is no rationale given for the allocation of this site. Modification requested:	The site is being considered for inclusion in the plan as an allocation because of developer interest in delivering residential units, and the sustainable location in the district centre. It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers in the City Council - to support the district centre.
Site no.	**Site name**	**Summary**	**Response**
		A study should be undertaken to determine best use of site before the site is allocated/ prior to new policy being developed.	

2647

62 - University of Oxford Science Area & Keble Road Triangle No comments.

63 - Warneford Hospital

Site no.	Site name	Summary	Response
063	Warneford Hospital	Site allocation policy must be drafted in a way that addresses the following key issues: • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing • Huge basements which remove water retention capacity of land	Site allocations can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.
Site no.	**Site name**	**Summary**	**Response**
063	Warneford Hospital		Comment noted.

2648

		Warneford Hospital is currently allocated within the Oxford Local Plan 2036 as Policy SP22. The Trust submitted a hybrid planning application for the development at Warneford Park in July 2025, and the planning application has been submitted in accordance with the adopted policy. The Trust continue to support the allocation of Warneford Hospital as it is expressed in the current Local Plan and request that it is carried through into the 2042 Regulation 19 Local Plan. We agreed a Statement of Common Ground with you in March 2024 substantially to that effect. The Trust look forward to engaging further with OCC at the next stage of the Local Plan consultation.	
063	Warneford Hospital	Object if paring for cars is not strongly restricted in line with other transport and environmental policies.	Development of all sites must be in line with the general policies of the plan.
063	Warneford Hospital	This site contains a playing field that may be needed for the community.	The playing field has never been used by the community, and would not be expected to be suitable for general community use, being in a residential mental health hospital.

2649

65 - West Wellington Square

Site no.	Site name	Summary	Response
065	West Wellington Square	This site was not included in the site assessment.	A Sustainability Appraisal and Site Capacity Assessment have been carried out for this site.

70 - Island Site (Park End Street/Hythe Bridge Street) No

comments.

2650

75a, 75b - Oxford Railway Station and Becket Street Car Park

Site no.	Site name	Summary	Response

075 (a and b)	Oxford Railway Station and Becket Street Car Park	Whilst we understand that the site allocation policies are being developed ready for the next stage of consultation, we note that the OLP2042 proposed site allocations map includes the 2.56 acre 'Oxford Railway Station and Becket Street Car Park' site (Ref: 075a/075b). The map identifies the site as being 'Suitable for a mix of uses, including retail, residential, community and commercial uses'. Network Rail welcome the proposed mix of acceptable uses but would advocate for hotel, education and student accommodation uses to be added to the list of	Given the site's location within the city centre, a range of uses are appropriate, including hotel, and student accommodation uses. The plan contains specific policies supporting both uses within the city centre. The site allocation policies should be read alongside the rest of the plan. The Western Entrance area at
Site no.	**Site name**	**Summary**	**Response**
		permissible uses during the next round of planmaking. Network Rail would also support the inclusion of the proposed Western Entrance area at Oxford Railway Station to be included within the boundary of any future Site Allocation.	Oxford Railway Station is currently under construction. As planning permission has been granted for the current scheme (which is not yet complete) rather than include the Western Entrance area within a site allocation, we will look to make a small alteration to the city centre boundary to include the Western Entrance area within it. We will also look to make a corresponding amendment to the West End Area of Focus boundary to include the Western Entrance area within it.

2651

075 (a and b)	Oxford Railway Station and Becket Street Car Park	Oxford must have a combined bus and coach station, and it would ideally located here.	Masterplanning work on the station will look at optimising oportunities for seamless interchange.

76 – Oxpens

No comments.

81 - Worcester Street Car Park

Site no.	Site name	Summary	Response
81	Worcester Street Car Park	Canal basin should be recreated, perhaps with a small amount of residential accommodation.	There is no longer an operational need for the canal basin in this location.
81	Worcester Street Car Park (Nuffield sites)	This should not be housing, but a hotel or public building around a restored canal basin.	A mix of uses is across the three Nuffield sites in the West End (which are one site allocation policy), including housing.

2652

104 - Former Iffley Mead Playing Field

Site no.	Site name	Summary	Response
104	Former Iffley Mead Playing Field	Do not allocate. Site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Also, site is in close proximity to SSSI. Heritage and amenity must be preserved.	The site is private and not in public use. The site allocation policy acknowledges the site's proximity to the Iffley Meadow's SSSI and the Iffley Conservation Area. It also identifies that there is archaeological potential on the site

2653

Site no.	Site name	Summary	Response
			and potential for the site to impact views from the Rose Hill View Cone. Development of the site would include a requirement for the provision of public open space.
104	Former Iffley Mead Playing Field	Agree because it's a brownfield site and outside the conservation area, but this and Court Place Gardens is bringing significant numbers of new homes to a small area that couldn't then support any more (e.g. Land at Meadow Lane- which should not be developed).	Comments noted.

104	Former Iffley Mead Playing Field	This is an existing playing field.	The site is a disused playing field. At Examination of the Oxford Local Plan 2036, the Inspector concluded that the site was surplus to requirements as it had only even been attached to the school, which had moved and not used it for many years.
104	Former Iffley Mead Playing Field	Much previous opposition to LP 2042 development advocated re-allocating the homes designated for the Oxford CC-owned LP 2042 to Oxfordshire CC-owned field Iffley Mead, just outside the Conservation Area. This 2 Ha site is designated in the *OCC Local Plan to 2036* for 90 homes at an even higher density, and with much more problematic	Policy SP38 of the adopted Local Plan 2036 seeks a minimum of 84 homes for this site. The site allocation policy in the Local Plan 2045 also seeks a minimum of 84 homes. There are no proposals to
Site no.	**Site name**	**Summary**	**Response**
		vehicle access, than LP 2042, so increasing the number of homes on Iffley Mead by 36% would be both administratively impractical and permanently impair amenity for both its new residents and those of adjoining streets, including the recently enlarged Iffley Academy Special School. Displacing a 'problem' onto a neighbourhood less able or willing to protest effectively cannot be conducive to social cohesion.	reallocate any homes from elsewhere onto this site.

111 - Oxford Stadium (former Greyhound Stadium)

Site no.	Site name	Summary	Response
111	Oxford Stadium	Strongly support the inclusion of the stadium for a comprehensive redevelopment.	Because the site is currently in use for uses important for the community, and redevelopment could not feasibly take place alongside this, the site is not taken forward in the draft Regulation 19 Plan.

113 - Redbridge Paddock (land east of Redbridge Park and Ride)

Site no.	Site name	Summary	Response
113	Redbridge Paddock	Do not allocate. Site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Heritage and amenity must be preserved.	General policies of the plan guide all of these topics. Development of the site would include a requirement for provision of public open space, biodiversity considerations such as the Local Nature Recovery Strategy, as well as heritage.
113	Redbridge Paddock	Support for allocation.	Noted.

113	Redbridge Paddock	Development on the site is a good idea, but the river frontage should be kept open and buildings should not be too tall.	General policies of the plan guide design decisions about building heights. the site allocation policy also includes a requirement for a green buffer along the river bank.
113	Redbridge Paddock	The site was a special place to visit- where have the horses gone?	The site does not officially have public access, although it can be viewed from the surrounding roads. Uses for grazing horses is a matter beyond the local plan.
113	Redbridge Paddock	The site is important for biodiversity and as a wildlife corridor and the green space should be protected.	The requirement for biodiversity net gain means that there should not be a loss of biodiversity overall. The general policies of the draft plan and

2656

Site no.	Site name	Summary	Response
			the site allocation policy require high quality green features to be designed into the development.

113	Redbridge Paddock	BBOWT – strongly object to site allocation. BBOWT have commented on this site before. It forms part of the Oxford Green Infrastructure Network. Whilst the proposed allocation site is not subject to a nature conservation designation it has considerable conservation interest (e.g. orchids, otter, kingfisher). It is also located adjacent to the nationally designated Iffley Meadows SSSI, which BBOWT manages. The SSSI is a fragile site comprising lowland grassland, which suffers under increased pressure from visitors. This site allocation raises concerns with regard to indirect impacts on the SSSI by affecting hydrological flows, increased disturbance, and nutrient enrichment etc. BBOWT use grazing animals to manage the SSSI, which is essential to maintain this important habitat, however, there is a real risk that increased disturbance and indirect recreational pressure might make the management of this site untenable over time, resulting in the decline of the site. We oppose this allocation as it does not adequately protect the SSSI.	The local plan evidence base includes reviewing Green Infrastructure network and protected sites, including SSSI. The SSSI is separated from the site by a watercourse, which reduces the potential for direct and indirect impacts, including visitor pressure. The SSSI site is not directly or easily accessed from the development site. Nonetheless the site allocation does highlight that the site is within the identified impact risk zone for the SSSI and any proposals must demonstrate no adverse impacts, including considering surface water and groundwater flows. The latest GI assessment identifies the site as Supporting GI, so
Site no.	**Site name**	**Summary**	**Response**
			enhancement will be required to mitigate any losses.

2657

117 - Land surrounding St Clement's Church

Site no.	Site name	Summary	Response
117	Land surrounding St Clement's Church	This should deliver strong public benefit in terms of increased access and retaining elements of the existing rural character.	Agreed, and the draft site allocation policy attempts to ensure these things.
117	Land surrounding St Clement's Church	At present, I look out from the back of my house directly on to the church. Concerns include invasion of privacy for my home as well as disruption to diverse wildlife currently dwelling on that land behind the church and leading down to the river such as voles, badgers, bats, foxes. It is also part of the floodplain that reaches over Angel and Greyhound Meadow. Any construction will have a detrimental effect on this, including the drainage infrastructure. The church will become virtually an island in the middle of a housing estate if these plans go ahead. This is one of the few remaining ancient parts and protected sites of Oxford. My haven of a garden would, like the church, be swallowed up in a housing estate.	Policies of the plan aim to ensure sufficient privacy of new and existing occupiers, and the site allocation policy acknowledges the closeness of existing dwellings to the site in this location. The site allocation policy is clear that there are potential wildlife impacts that would need to be investigated, relatively low densities are likely to be necessary, and green areas will need to be retained and enhanced
Site no.	**Site name**	**Summary**	**Response**
			on the site, including between the church and the river.
117			

2658

	Land surrounding St Clement's Church	No mention is made of foxes, deer and squirrels that visit the site. Nuthatch, magpies, green and greater spotted woodpeckers, great, blue and long tailed tits also visit the site. Therefore, the biodiveristy should be improved, rather than habitats destroyed. Marston Road floods when it rains.	These are not protected species and will be able to find habitats all along the river corridor. Full biodiversity surveys will be required as part of any detailed planning application.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #117 Land at St Clements	Site assessment for proposed allocation St. Clement's Church does not appear to acknowledge proximity to a Grade I Registered Park and Garden.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

2659

120 – Unipart

Site no.	Site name	Summary	Response

120	Unipart	The policy SP 8 reserving this site solely for employment use was written in 2016 and since then nothing has changed in any meaningful way - most of the site is either used for vehicle parking or open-air storage. It has been like that since the Pressed Steel Plant closed 40 years ago. It represents a failure to redevelop what is effectively a Brownfield site and a large one. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.	The land owner has stated a clear intent to develop the site during the plan period.

2660

124 - Slade House

Site no.	Site name	Summary	Response
124	Slade House	It is envisaged that the Trust will continue to provide statutory healthcare services from this site subject to the outcome of our estates strategy review referenced above. In turn, the Trust also welcomes the housing allocation; however, it may also seek to develop an element of private residential accommodation in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health	Comments noted and reflected in the wording of the draft site allocation policy.

Site no.	Site name	Summary	Response
		care facilities, associated administrative functions and extra care or student accommodation.	

2661

124	Slade House	This site has too much surface level parking on-site. It includes an important green space that should be preserved. Policy needs to address the key issues linked to this site (summarised as follows): • Sensitivity as in the catchment of the Lye Valley and South Fen, LNRs and LWSs • Onsite Parking • Creating increased demand for housing • Huge basements which remove water retention capacity of land. A footpath used to run from Horspath Driftway to the current ring-road and is still present for much of its length, although it seems householders have blocked this off, this should be reopened. *(refers to LP2040 Policy)*	Site allocations can feature specific thematic issues that covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.
Site no.	**Site name**	**Summary**	**Response**

2662

		No statement regarding how extra staff will be managed. Greenfield runoff rates must be achieved. Green spaces must be marked on Policy Map and preserved.	

144e Marston Paddock extension

Site no.	Site name	Summary	Response
144e	Marston Paddock extension Green Belt assessment	The full 2023 Green Belt assessment has not been made available for comment under the Evidence Base and Supporting Documents section of the consultation website or anywhere else on the Council's website. It has therefore not been possible to review the full 2023 assessment against the new requirements of the December 2024 NPPF (with reference to site 114e).	An updated Green Belt assessment, with methodology reflecting the NPPF, was published at Regulation 18, alongside the 2015 and 2017 assessment.

2663

173 - Bayards Hill Primary School Part Playing Fields

Site no.	Site name	Summary	Response
173	Bayards Hill Primary	Do not allocate this site as Barton:	This site is no longer being taken forward.
Site no.	**Site name**	**Summary**	**Response**

	School Part Playing Fields	• Is the most green-space-deprived suburb in Oxford, Barton Park even worse • Will be surrounded by Land North of Bayswater Brook development (1500 houses) • • Will lose green space and add residents via the Sandhills Field Development (150 houses) Inclusion of this policy would be ineffective as • this site is too close to the A40 for health • There is nowhere to provide re-provision of this green space in Oxford	

2664

204 - East Oxford Bowls Club and 665 Oriel College Sports Ground and adjoining land (comprising of 263 and 639)

Site no.	Site name	Summary	Response
204	Former East Oxford Bowls Club	• As a sports facility, this should be protected from development.	This is a small site previously used as a bowling green but it has been out of use for many years.
204	Former East Oxford Bowls Club	DRARA would like to see this run down empty site restored to beneficial use, but not necessarily for	The site is undoubtedly sensitive in terms of the potential impact

Site no.	Site name	Summary	Response

2665

		housing. The site is not identified as green infrastructure but perhaps it should be. The site is in the ownership of Oriel College and in recent years has become run down and affected by scrub regeneration, fly-tipping and anti-social behaviour. Despite these factors it still makes a positive contribution to the Bartlemas Conservation Area by helping to maintain the rural character and seclusion of the Area, acting as a green buffer along its Cowley Road edge, effectively marking the limit of Victorian Oxford. If intensively developed these benefits to the Conservation Area would be lost. In addition we note that the site is covered by policy HD9 View Cones so it is sensitive to any tall development. In our view a relatively low key community use for this site would be best – perhaps returning the site to use as community sports facilities, a community garden or play area, or even an extension to the very popular allotment site next door. If it is to be allocated for development, high density development in our view would be inappropriate. A use such as low rise specialist accommodation for the elderly with a generous amount of green space might possibly be accommodated, given very sensitive design.	of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that.
Site no.	**Site name**	**Summary**	**Response**

2666

		Any change of use or development should retain the strong hedgerow cover next to Cowley Road so that the sense of a green oasis survives. The tests set out in Policy HD1 need to be applied very carefully to protect and enhance the character of the Conservation Area, including the quiet rural, hedged character of Bartlemas Lane, views to and from the historic hamlet and its Listed Buildings, dark skies, and the privacy and visual amenity of the neighbouring allotment site.	
204 and 655	Oriel College Sports Ground, Bartlemas and former Bowling Green	Great care needs to be taken with regard to the proposed development of these sites and the potential impacts on the setting of the Bartlemas Conservation Area. Should the adjoining sports grounds be allocated for development, detailing guidance should be provided within any relevant policies to ensure that the unique historic character of the Conservation Area is unharmed and unaffected. It should also be made clear that no intensification of traffic along Bartlemas Lane would be acceptable due to the proximity of sensitive historic buildings. A buffer should be left to the Bartlemas access lane to avoid affecting its character.	The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that.

2667

Historic England

Site no. and name	Summary of comment	Response	Outcome

Site #665 inc #663 and #204 Oriel College Sports Ground, Bartlemas and former Bowling Green	Needs very careful consideration, including heritage impact assessment (HIA). Careful consideration is needed of the potential impacts of all associated development, including access to the site.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

289 - Sandy Lane Recreation Ground

Site no.	Site name	Summary	Response
289	Sandy Lane Recreation Ground	Objection: Do not progress this site as next to Cowley and East Oxford (areas of the city with the lowest amount of green space per inhabitant in the city). This land is needed for an increasing population (in the city) and any replacement sport facilities from Cowley/Littlemore.	Reprovision of sports facilities would be required.
289	Sandy Lane Recreation Ground	The Sandy Lane campaign objects to the inclusion of any recreation grounds on the local plan without paying proper heed to the requirements of the NPPF. The campaign will challenge the inclusion of Sandy Lane Recreation Ground as a development site when this plan goes to inspection.	Reprovision of sports facilities would be required, in accordance with the NPPF.
Site no.	**Site name**	**Summary**	**Response**

2668

289	Sandy Lane Recreation Ground	BBOWT disagree with the site allocation as it is in the Oxford Green Infrastructure Network. Whilst it has been defined as a Supporting rather than Core part of the network, we nevertheless consider that their contribution as green spaces is important and that they should be protected.	It is agreed that the green space does have important functions, but it is not agreed that these justify full protection of the site because there is a reasonable prospect a solution can be found to ensure reprovision of the green infrastructure functions of the site.

389 - Land at Meadow Lane

2669

Site no.	Site name	Summary	Response
389	Land at Meadow Lane - Weight of objections	The weight of opposition from public and other stakeholders means the site should not be allocated. There are objections from: Environment Agency Oxford Preservation Trust BBOWT Cyclox	What needs to be considered for the local plan is whether there is potential for a scheme to come forward that is acceptable in the context of national policy and of the Plan's proposed strategy and detailed policies. Moreover, what is relevant with objections is not the sheer number of objections, but whether a material issue is raised that informs the detailed drafting of

Site no.	Site name	Summary	Response
		As well as from over 1,000 respondees in the OxPlace January 2023 consultation and 50 comments to the OLP2042 Early Engagement Survey/ These responses highlight cross-cutting themes and many and varied reasons the site should not be developed. The community should be listened to and to override them would be an abuse of power, especially as the council has asked the public for input and has said they will listen to them. Suitable and compatible uses, such as a 'Meadow School' for outdoor education should then be discussed with local schools and communities	the policy or that shows this is not possible. The objections to the planning application relate to that application. The application is not yet determined, but even if it is turned down as not suitable, that does not necessarily mean that there is not potential for a suitable scheme to come forward.
389	Land at Meadow Lane - Heritage	Harm to the Iffley Conservation area. The sites lie within the Iffley Conservation area. Because of this the National Planning Policy Framework confirms that it is a heritage asset and places a large number of obligations on Local Planning Authorities. Policy HD1 Conservation Areas states that 'substantial harm to ….a conservation area should be wholly exceptional.' This is not addressed. Also, this ancient meadow, fully within the Iffley Conservation Area is bordered by an ancient drover's route. There are Two Grade II Listed Buildings (Tudor Cottage and Townsend Close) and a Grade II Listed Wall (Wall and Gate of Townsend Close) nearby. Road improvements and urbanization along Meadow Lane and Church Way will affect	The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets, and should respond carefully to that. The policy is clear on this requirement. Many sites in Oxford have archaeological potential. That does not preclude development, but

2670

Site no.	Site name	Summary	Response
		the setting of these heritage assets. Not addressed by the Council. There is archaeological potential The site is within the view cone There are unevidenced changes in the description of Iffley Village, whereas the 2009 Conservation Area Appraisal was subject to thorough consultation	policies do require care, similarly to the View Cone.
389	Land at Meadow Lane - biodiversity	It is unsuitable according to the assessments of OCC and OxPlace themselves in respect of damage to current high biodiversity. It should be designated as an OCWS adhering to the Council's own biodiversity assessment. Local Nature Recovery Strategy (LNRS highlights this site for nature recovery) There are badgers present on the site.	The identification of a site as having potential for nature recovery does not preclude the site from development. General policies of the Local Plan do require that the mitigation hierarchy is followed, and Biodiversity Net Gain is also required.
389	Land at	Damage identified in the Flooding Risk Assessment.	

2671

	Meadow Lane - flood risk	Conflicts with national policy by not applying the sequential test (to compare with other potential sites with lower flood risk). NPPF (para 172) and the PPG. Disturbance to the drainage of the site and the risk of problems as a result of building on the edge of the floodplain.	The FRA referred to relates specifically to the proposed development in the planning application. A Level 2 SFRA has been carried out to support allocation of the site in the Local Plan. That assesses whether it is likely a development that passes the

Site no.	Site name	Summary	Response
			exceptions test could come forward. The Level 2 SFRA did not suggest this wasn't possible. The flood risk sequential test will be published alongside the Local Plan for the Regulation 19 consultation.
389	Land at Meadow Lane - sewage	Problems of ensuring adequate sewage disposal. The Environment Agency has had to put a stay on all Oxford development because of the failures of its sewage disposal routes. This is still not rectified. Piling more pressure onto it will make it worse.	Adequate sewage disposal is important, but there is no reason to think this is not achievable on this site. Thames Water have adequate proposals for the upgrade to the sewage treatment works and there is not a blanket restriction on development.
389	Land at		

2672

	Meadow land -access and transport	It will harm the Principal Quiet Route for Active Travel. The site will add substantial traffic onto a designated Quiet Route that is much used for journeys to and from Oxford. This is crazy and unsafe. Parking is frequent flashpoint for confrontation and competition between established and new residents for street parking, now regulated by the recently imposed CPZ, which may lead to disputes. LP 2042 development must include sufficient parking for all its residents. It's a pity the planners succumbed to pressure to delete from the 2021 scheme the pairs of purpose-built parking places on the SW side of Meadow Lane.	The change in the details of the planning application in relation to parking spaces relate to the details of the proposals, and not the inprincipal suitability of the site for parking. It is considered that the site can be accessed safely within minimal negative transport requirements. Meadow Lane is identified as an onroad quiet route in the LCWIP, but so are many other routes in Oxford that have significantly more

2673

Site no.	Site name	Summary	Response
		hazard along the Meadow Lane site will be caused by severely increased two-way traffic. This will urbanise the route and harm the Conservation Area	development alongside than Meadow Lane, even if development takes place on this site.
389		SA	

2674	Land at Meadow Lane-SA	The grading system used to indicate positive, negative or neutral impact, has been manipulated and upgraded when addressing many aspects of the proposed development – to less negative, more positive or neutral. Size: The total size is incorrectly shown as 0.99ha when it should be 1.5ha; Use: it has not been a 'pony paddock' for many years Objective 1 - Building on this greenfield site WOULD have high carbon costs, both from actual building work and from loss of carbon storage in the earth of this hitherto uncultivated meadow. Objective 2 - Regarding flood zones, the SA OMITS information from the LP2036 which states that 7% of the site is in Flood Zone 3b with additional land within FZ2. The flood testing has not been carried out correctly, by not applying the sequential test as required by government policy. Objective 3 - Reference to the site as 'unprotected open space' omits the fact that is it UNDEVELOPED open space. Further, this greenfield site has great biodiversity value and qualifies as an Oxford City Wildlife Site. No explanation as to why it is graded orange or what efforts to avoid its use has been made. Should be red.	The SA Framework ("grading system"), was developed in consultation with Natural England, the Environment Agency and Historic England. It provides a standardised approach for assessing the development potential for all sites. Each site has been considered in relation to the each of the SA Objectives and scored according to the SA Framework, taking into account additional information, where appropriate. Size: the correct site size is 0.99ha and this will be corrected on the SA form for the Regulation 19 consultation. Objective 1 The assessment is applied in the standard way. Objective 2 The flood zone information uses the most recent (2025) mapping from the

Site no.	Site name	Summary	Response

		Objective 4 – Numbers: not a material number. AH: There is no definition of 'affordable' housing; nor evidence given as to why this site is 'likely' to be policy compliant. Doubt it will be affordable housing. Objective 7 Public Open Space, the site is NOT in private ownership!! The Council bought it with taxpayers' money. It is public land. PUBLIC SPACE: The site is owned by the City Council and therefore not in private ownership as they state. It is not used for animal grazing. Such references indicate no renewed assessment but reliance on the outdated and flawed LP2036 assessment. The community access the land for scything to manage biodiversity as the Council have failed to mow the meadow despite their obligation as landowner to do so. Objective 8 No mention of the key Quiet Route of Meadow Lane which is well used every day for Active Travel. Under Objective 8, there are several errors. The bus stop, railway station, post office and schools are all further than is stated. Bust stop should not be green. The services are only 3, 3A, ST1. That is misleading. Under 'Post Office' it contains repeated information about the GP surgery. Objective 9 – Water. Incorrect information given. There IS a watercourse adjoining the site, which flows into the Thames and will be impacted by sewage and wastewater discharges.	Environment Agency. The flood risk sequential test is not part of the SA process, but a key part of planmaking has been carried out to inform the next stage of the plan. Objective 3 The orange grading aligns with the scoring system. The site is not a designated Oxford City Wildlife Site. The SA simply reports this. Objective 4 There is nothing to suggest the site could not or would not deliver the standard required amount of affordable housing. Objective 7 There is no public access to the site, so it is private and not public open space. The site was last used as a horse paddock, but the description will be updated. Objective 8: These measurements on the form have been reviewed and updated for the next stage of consultation.

2675

Site no.	Site name	Summary	Response

2676

		Objective 10 The site is rich in biodiversity and would be hugely negatively impacted by development. It lies along three of Oxford's wildlife corridors (see Oxford City Green Infrastructure Study). It is also notable that the Council's regular Biodiversity Net Gain offsite partner has withdrawn support re this site, because of the biodiversity value cited by several Statutory Consultee wildlife organisations. Objective 11 – It is in the Iffley Conservation Area and should never have been allocated: Policy HD1 Conservation Areas states that "substantial harm … to a conservation area should be wholly exceptional.." Regarding the designation of a 'Historic Core Area.' The Council states "Not within a historic core area." Which contradicts what they say under archaeology, where the site is (correctly) stated to be "located within the historic core of the medieval Village. There ARE listed building implications, especially for the wall and gate of Grade II listed Townsend Close. Road improvements and urbanisation along Meadow Lane and Church Way will affect the setting of these assets. Objective 12- diversifying the economy and employment opportunities. Fails to identify the importance of Iffley as contributing to culture/leisure/visitor sector (e.g. circular walk on Quiet Route). Should be orange. Access constraints. Council assessment says access via Church Way. Development proposals give the main access off Meadow Lane. Says surrounding uses are residential but to the west they are not.	Objective 9: This has been reviewed and updated for the next stage of consultation. Objective 10: The SA scoring undertaken at Reg. 18 has regard to the findings of the ecological assessments (undertaken to support planning application), while reflecting the position that no formal ecological designations are present. Given the ecological considerations present at the site, a suite of mitigation measures are proposed for the site. Objective 11: Location within a conservation area does not mean that development cannot happen. A conservation area is not an area where no new development can occur such that it remains exactly as it was when it was designated. Each conservation area has special characteristics that should not be harmed and that proposals should be informed by and respond to to preserve that special character. It is considered that development on this site can achieve that. The Historic

Site no.	Site name	Summary	Response
		The Stage 2 Conclusion is erroneous: for example, badgers and invertebrates cannot simply be dealt with 'in the policy and at the application stage'. That sounds as if it is possible to make this totally unsuitable site suitable simply by careful policy wording. It is not a robust or evidence-led approach to carry forward an allocation simply because it was allocated in LP2036.	Core Area is a specifically designated area of the city, which is where the 'dreaming spires' are found and which has a policy applying specifically to that area. Objective 12: There is no reason that potential development of the site would have a negative impact on the economy or employment. It is considered that the site can be suitable with careful proposals that respond to the sensitivities of the site.
389	Land at Meadow Lane	Support for site allocation – site is suitable for affordable housing; the development of the site would benefit the village and conservation area creating greater social and economic diversity. Do not believe site should be designated an Urban Wildlife site or Local Green Space - there are many other sites locally that provide for this.	Support noted.
389	Land at Meadow Lane	Protests land being used for a small amount of residential housing but would support a school at Meadow Lane.	Noted

2678

Site no.	Site name	Summary	Response
389	Land at Meadow Lane	Support (in the context of preference of this site over Iffley Mead) I regret the loss of farmland to urban development as much as anyone but understand that housing is urgently required and this site, with easy access to transport and employment, has much to offer. The Land at Meadow Lane LP 2042 has been closed to the public and leased for horse or sheep grazing for many decades and is mostly concealed behind hedges, so is inconspicuous to passers-by. At under 1 Ha, it represents only a tiny fraction of the large area of minimally cultivated land	Comments noted.

2679

428 - Rectory Centre

Site no.	Site name	Summary	Response
428	Rectory Centre	We welcome the intention to allocate the site for residential purposes, and we consider it is suitable for at least 21 dwellings. We do not consider redevelopment of the site should be restricted to the existing building height, and that there is scope to	Support noted.

Site no.	Site name	Summary	Response
		increase height to match surrounding building heights along the Cowley Road. However, we recognise that the proposed height should respect the View Cone from Crescent Road. Health uses currently on the site would be provided, as necessary, elsewhere on other Trust sites in Oxford.	
438	Former Blanchford's Building Merchants	Surprised that the former Blanchford's building supplies depot in Headington is not listed. It should be investigated. It seems a prime site for development.	The site is included within the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base for the Local Plan.

2680

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #428 Rectory Centre	Highlight the importance of ensuring any policy for this site's redevelopment embeds a realistic expectation of what would be delivered without significantly increasing the building height. Site falls directly within a view cone.	Thanks for comment we will update where needed and where the allocation is carrying forward.	Update relevant info where applicable.

438 Former Blanchford's Building Merchants

Site no.	Site name	Summary	Response
438	Former Blanchford's Building Merchants	Surprised that the former Blanchford's building supplies depot in Headington is not listed. It should be investigated. It seems a prime site for development.	The site is included within the Strategic Housing Land Availability Assessment (SHLAA), which forms part of the evidence base for the Local Plan.

439 - Marston Road Campus No

comments.

2681

440 - 1 Pullens Lane

Site no.	Site name	Summary	Response
440	Pullens Lane	Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park. Modification requested:	More detailed capacity assessment work can't give enough certainty that the site may have a capacity more than 10, so no site allocation policy has been included in the draft plan.
Site no.	**Site name**	**Summary**	**Response**

		Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible. 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.	

2682

463 - Ruskin Field

Site no.	Site name	Summary	Response
463	Ruskin Fields	The Site extends to c. 3.62ha and is entirely owned by Ruskin College (University of West London) with Welbeck Land in place as strategic land promoter and master developer (the Promoter). The Site has been identified as surplus to requirements by Ruskin College with disposal linked to generating capital for upgrading the college's facilities. The Site has been the subject of a comprehensive technical evidence base and consultation with OCC officers, which	Noted.

Site no.	Site name	Summary	Response
		has demonstrated there are no overriding constraints to the development of c. 130 homes with associated public open space, landscaping, infrastructure and access from Foxwell Drive. The Promoter can therefore confirm that Ruskin Fields is available, deliverable, and capable of providing c. 130 homes in the first five years of the new local plan period. The Site and proposals for residential development align with the Regulation 18 Local Plan Objectives and would support Oxford in the delivery of much needed homes in the first five years of the local plan. The Promoter intends to engage comprehensively with OCC and wider stakeholders as the Local Plan progresses to ensure opportunities for the Site are achieved alongside sensitive design and mitigation.	
463	Ruskin Fields	It is a supporting green space and has particular importance as part of the continuous green corridor from Dunstan Park in the west to Barton Triangle in the east. Loss of a green corridor can't easily be mitigated. The likelihood of peat deposits is extremely high. In addition, there are heritage impacts the green fields in this location provide the rural setting of the village.	The Regulation 19 plan puts forward the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The landowner has said the site is available and did not note legal

2683

Site no.	Site name	Summary	Response
		If they are taken forward despite our concerns then we consider that a minimum of 50% of the land must be retained as green space (in addition to gardens within the urban development) including a variety of habitats including trees, and wetlands, which will benefit both wildlife and people. Land Registry title ON269207 records covenants restricting building on the fields.	issues. It is their responsibility to ensure there are no legal issues.
463	Ruskin Fields	The site (463) is incorrectly defined, as the southernmost field is already allocated under SP56 of Local Plan 2036.	Local Plan 2045 will supersede Local Plan 2036.
463	Ruskin Fields – harms do not outweigh benefits and site previously dismissed	Site is undeliverable and unjustified (its allocation does not meet S1 as the adverse impacts significantly and demonstrably outweigh the benefits). Any building here will destroy the value of Ruskin Fields. This development is unjustified. 2300+ houses have been consented for Land North of Bayswater Brook, meaning there is reduced need, and increased need for the amenity of the very short Stoke Place Lane to Headington. In 2012, the Ruskin Fields site (HELAA 463) was wholly rejected by the Planning Inspector as part of the Core Strategy and Barton AAP, the Site DPD 2012, Sustainability Appraisal and all parties (Labour/LibDem) in the Council. Remove the site from the Local Plan.	Without a detailed proposal it is not possible to understand either the benefits or harms or to weigh them up. However, it is considered that there is potential for a scheme where the benefits outweigh the harms. A different part of the field is allocated in the Oxford Local Plan 2036. The Inspector's comments quoted in the full response pre-date that.

Site no.	Site name	Summary	Response
463	Ruskin Fields – provides views	Provides views in and out of the Conservation Area, especially from the Land North of Bayswater Brook development at Elsfield, and from Stoke Place to Elsfield.	These views are noted in the site assessment.
463	Ruskin Fields – green belt	It is effectively a green belt around Old Headington.	The site does not represent a belt around old Headington.
463	Ruskin Fields – traffic levels	Unacceptable traffic caused by development - Stoke Place is the last green lane in Old Headington. Usage as a cycleway or entrance to the development will destroy its charm and inflict substantial harm on the Old Headington Conservation Area. Traffic to and from the estate will not be sustainable Old Headington is already a major hospital rat-run. The proposed road access here would exacerbate severe traffic around the John Radcliffe Hospital.	It is agreed that Stoke Place is not suitable for vehicle access. It is not considered that the amount of pedestrian or cycle use that would be generated from this site has potential to destroy the character of the lane.

2685

463	Ruskin Fields – flooding and SuDS	(Re G7) Downstream flooding off Headington Hill from the John Radcliffe and TW sewers down Osler Road to Barton Park below is already an issue and any development here will increase flood risk. (Re G8) The groundwater level is too high at the base of the development for a SuDS system to be effective so drainage will need to be via Bayswater Brook which	The potential for SuDS will need to be explored as part of any proposals, but it is not considered there are potential unmitigable flood risk, surface or groundwater concerns from potential development on this site.
Site no.	**Site name**	**Summary**	**Response**
		already has LNBB and Barton Park and other developments	
463	Ruskin Fields – carbon capture	(Re R2) Large peat deposits on adjacent fields perform a valuable carbon capture role and permit an ecology identical to that of the Lye Valley SSSI.	The potential for peat will need to be explored as part of this development.
463	Ruskin Fields – housing need unjustified, will cause harm to local residents	Housing need does not outweigh substantial loss of heritage, conservation, and amenity value. It is used by residents of green space deprived areas in Barton (soon to be surrounded by Land North of Bayswater Brook dev).	The Regulation 19 plan puts forward the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The site is not accessible to the public.

2686

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #463 Ruskin Field	Welcome direction of travel to undertake further investigation that informs next steps and help to understand the impact of the proposed development on the historic environment.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

Oxfordshire County Council

Site no. and name	Summary of comment	Response	Outcome

2687

463 – Ruskin Field	**Landscape and Nature Recovery – Biodiversity** This site is located within close proximity to Dunstan Park OxCityWS. Impacts to Dunstan Park OxCityWS should therefore be considered when assessing this site allocation against SA objective 10 and policy G6.	We will consider how to reflect this in the allocation policy.	Oxford City Action: Consider ecological impacts of development and where negative impacts are likely, propose suitable policy wording to mitigate.

2688

467 - Edge of Playing Fields, Oxford Academy No

comments.

497 - MINI Plant Oxford

Site no.	Site name	Summary	Response
497	MINI Plant Oxford	A more robust policy is required to reduce surface water runoff from the very large number of hard surfaces at this site. Particularly as the complex is close to the Oxford STW. Modification proposed: Reduction in surface runoff with SUDS etc.	There is a general policy relating to SuDS, and it does not need to be repeated into each site allocation policy.

2689

516 - 474 Cowley Road (Former Powell's Timber Yard) No comments.

574 - Manzil Way Resource Centre

Site no.	Site name	Summary	Response

574	Manzil Way Resource Centre	This allocation should ensure sufficient consideration is given to the impact on adjoining housing. Any development should be small-scale.	Development would have to be appropriate to the scale and nature of the site and surrounding development.
574	Manzil Way Resource Centre	It is envisaged that the [Oxford Health NHS Foundation] Trust will continue to provide statutory healthcare services from this site subject to the outcome of our estates strategy review referenced above. In turn, the Trust also welcomes the housing allocation however, it may also seek to develop an element of private residential accommodation in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health care facilities, associated administrative functions and extra care or student accommodation.	Comment noted.
574	Manzil Way Resource Centre	*(Local Plan 2040 policy is discussed in this response)* The phrase "*could be car-free*" should be strengthened to "*must be*" Modification requested:	The Regulation 19 draft plan policy wording is "any additional residential development should be low car".
Site no.	**Site name**	**Summary**	**Response**

		Make a single statement that actually means anything or constrains anybody in any way. The “policy” is almost meaningless.	

579 - ROQ Site

No comments.

2691

586 - Osney Mead (whole site)

Site no.	Site name	Summary	Response
586	Osney Mead	It needs to include residential use, even if it is just graduate accommodation.	The site allocation includes residential use.

587 - ARC Oxford

Site no.	Site name	Summary	Response

587	ARC Oxford	Although some of this site has been built on there are areas which remain vacant and has done so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely, and the vacant sites are very much as they were in 2016 when Policy SP10 was written. The Council provides no explanation as to why this is. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.	We maintain a regular dialogue with various stakeholders, including landowners. The landowner for this site has been working towards a planning application, which has recently been submitted (October 2025). This planning application covers the remaining vacant plots that do not already have planning consent.
587	ARC Oxford	Do not build on Green Infrastructure. Use contributions to make the site usable by the community from Cowley in particular.	Other policies in the plan specifically address the city's green infrastructure. These policies create a hierarchical evidence-based approach for the protection of the city's green infrastructure network. Developer contributions are often needed to fund a range of infrastructure requirements, including community infrastructure. Developer contributions must also meet specific
Site no.	**Site name**	**Summary**	**Response**

2692

			legal tests which govern their application.

588 - Oxford Science Park (whole site)

Site no.	Site name	Summary	Response
588	Oxford Science Park	The Local Plan recognises the importance of the 'Area of Focus' and Oxford Science Park in particular for employment purposes. The Local Plan Preferred Options consultation document recognises that there are significant regeneration opportunities throughout this area, with the ability to intensify and modernise the key employment sites. It also recognises the role that the opening of the Cowley Branch Line can play in improving connectivity to and from this area. EIT support the general approach advocated by the Local Plan for this area. The Oxford Science Park, and the Area of Focus more widely, has seen growth in recent years, but it is agreed that there is significant potential for development in this area. The masterplan work being undertaken by EIT is in general conformity with the approach advocated by	Support noted. We keep an ongoing dialogue with various stakeholders, including landowners. As part of our Reg. 19 Plan preparation, we have subsequently met EIT representatives to discuss various aspects of the plan.
Site no.	**Site name**	**Summary**	**Response**

2693

		the Local Plan consultation, but EIT would welcome further discussions on the specific policy requirements as the Local Plan progresses to the next stage.	

613, 614, 615 – Botley Road sites around Cripley Road including River Hotel and Westgate Hotel

Site no.	Site name	Summary	Response
613-615	Botley Road sites around Cripley Road including River Hotel and Westgate Hotel	Given the committed site allocations in the adopted Local Plan that include retail floorspace (Churchill Hospital / Diamond Place and Ewert House / Island Site / Oxpens / Osney Mead / Oxford Railway Station / Kassam Stadium) together with the planning permission at the Clarendon Centre, the potential new allocation inclusive of retail floorspace at the Botley Road sites around Cripley Road is questioned given the evidence of over-supply of floorspace for purposes within class E within the city centre, endorsed by lack of capacity for new retail and leisure floorspace evidenced by the Retail and Leisure Study.	The Reg. 18 consultation document sets out the land uses proposed by the landowner (rather than setting out a policy for the site). There is already an existing retail use at the site. The main use proposed at the site is residential. Any additional retail proposed through a planning application would need to demonstrate compliance with other policies in the plan, given the site's location, just outside the city centre boundary.
613-615	Botley Road sites around Cripley Road	The River Hotel is a much-loved historic building bringing a beautiful garden and green space to Botley	Consultation with the local community is required early in the

Site no.	Site name	Summary	Response
	including River Hotel and Westgate Hotel	Road. Much of the character of the area would be lost by demolishing these buildings. Consultation with the strong community of west Oxford is essential.	planning application stage. The buildings are not considered to be of the kind of significance that means that new development would or could not be preferable.
613- 615	Support	ChCh supports the future allocation of the following sites in its ownership: SHLAA Sites 613-615: Various buildings on Botley Road, Abbey Road, Cripley Road, Mill Street and Barrett Street; SHLAA Site 616: St Thomas School House and Osney Warehouse, Osney Lane.	Support noted.

2695

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #613-615 Botley Road sites around Cripley Road	No site appraisal form published? There are heritage sensitivities that need to be considered, including impacts on the approach to Osney Town conservation area, and potentially wider views.	It appears this was erroneously missed off the published list.	We will ensure this is available for the next consultation.

616 – St Thomas School and Osney Warehouse

Site no.	Site name	Summary	Response
616	St Thomas School and Osney Warehouse	We have no in principle objections to the allocation of this site. However, the former St Thomas School building is Grade II listed and sufficient weight needs to be given to its retention and preservation within any forthcoming policy text. Built around 1870 the building is a good example of a late 18thcentury school building, whilst also providing a remnant of the historical evolution of the evolution of the St Thomas's parish and those who lived there. A respondent asked us to contact them as they have detailed information on the history.	The site is undoubtedly sensitive in terms of the potential impact of development on heritage assets. Development will need to be carefully designed with an understanding of the significance of the heritage assets and should respond carefully to that.

2696

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #616 St Thomas School and Osney Warehouse	Concur with comment on page 181 that the site possesses "heritage interest that needs further investigation". This includes any impacts on character and appearance of the Central conservation area.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

624 - Land south of Frideswide Square

Site no.	Site name	Summary	Response
624	South of Frideswide Square	The gateway from the west must be improved not destroyed and assume the historic Jam Factory is to be preserved. Wary of too much retail. City centre needs support. Failed retail in Frideswide Square. Buildings provide a distinctive and visibly C19th character to the station area.	The Jam Factory is a listed building and policies relating to design and heritage will ensure high quality development that conserves the Jam Factory. Active ground floor level frontage is important in this central location near the station, but there is not requirement for retail specifically.

2697

657 - Clarendon Centre

Historic England

Site no. and name	Summary of comment	Response	Outcome

Site #657 Clarendon Centre	Clearly this an important site in the Central conservation area and close to numerous historic buildings, not least Carfax Tower, an important local landmark. Its central position means that it has significant potential to impact on the Oxford skyline, reflected in our comments on the proposed development that secured	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.
Site no. and name	**Summary of comment**	**Response**	**Outcome**
	planning permission last year. We would expect to see reference to these sensitivities in any associated allocation policy.		

2698

658 - Barton 3b (Land to the rear of Harolde Close, previously included in the Barton Area Action Plan area and outline application)

Site no.	Site name	Summary	Response

658	Barton 3B (Land to the rear of Harolde Close)	When Barton Park was built, the land was raised due to the extreme flood risk of building on a flood plain in the middle of a climate crisis. This had the effect of causing back-pressure on Bayswater Brook which means that the part of Barton Village Road as marked below along the stream is now flooded regularly. The stream going along the west side of the Site is partially culverted and has existed as a natural stream before as shown on early OS Maps, this floods in storm conditions and flows rapidly due to the steep slope to Bayswater Brook.	No longer being taken forward as a site allocation
Site no.	**Site name**	**Summary**	**Response**
		Further, the site is now very overgrown with mature trees, and is a haven for wildlife, this would be contrary to all policies in the OLP2042 relating to green space, ecology and environment.	

2699

658	Land off Harolde Close	Opposition to the plan to build on the green belt north of Bayswater Brook. I do not see this development as justified when other brownfield and city sites could be found for affordable housing. The wrecking of this prime green belt land is indefensible and is motivated by landowner and developer greed.	No longer being taken forward as a site allocation

660 - 2 Harberton Mead

Site no.	Site name	Summary	Response
660	2 Harberton Mead	Possible green space loss and increase in run off must be addressed.	No longer being taken forward as a site allocation.

2700

Historic England

Site no. and name	Summary of comment	Response	Outcome
2 Harberton Mead	Clearly this needs consideration with respect to any impacts on the character and appearance of Headington Hill conservation area.	Thanks for comments we will update relevant assessments where needed and where the allocation is carrying forward.	Update relevant info where applicable.

664 - Jowett Walk (South)

Site no.	Site name	Summary	Response
664	2 Jowett Walk (South)	Concern over allocating even more land for student accommodation than already and therefore displacing other Oxford residents.	The site was put forward by the landowner as part of the Call for Site process.

Historic England

Site no. and name	Summary of comment	Response	Outcome
Site #664 Jowett Walk (South)	Clearly this lies within the central conservation area and close to multiple listed buildings, so care is needed to respond sensitively.	Thanks for comment we will update where needed and	Update relevant info where applicable.

Site no. and name	Summary of comment	Response	Outcome
	Site assessment published for the proposed allocation on Jowett Walk states that the site contains “no identified historic building constraint”; while it does not contain listed buildings, it is adjacent to numerous such designated heritage assets.	where the allocation is carrying forward.	

2701

Comments on All Site Allocations

This section contains all comments received regarding all site allocations, including public and statutory responses.

Policy	Topic	Summary	Response
General comment on site allocations	Recreation grounds, green spaces	It is wrong in principle/law to build on recreation grounds/playgrounds/pitches without alternative adequate provision being made. 'Alterative provision' will be manifestly inadequate. More houses=more people=more need for civic provision, so there should not be any houses on these needed spaces. Loss of them=degradation of quality of life. Green spaces are particularly important in dense areas and where they act as wildlife corridors. Everyone should have areas of beauty, tranquillity and wildlife within reach. Developing on these spaces will harm fragile local infrastructure, particularly water supply, drainage and sewage disposal. Many brownfield sites and underused properties should be used first and the local plan should bear down on these, not green spaces. Shouldn't be developing new sites for future needs- should only worry about present local residents' needs.	The Local Plan protects and network of green spaces, including a core network which it is important to retain in situ, and a supporting network. Within the supporting network, there may be potential for reprovision of the green space functions of the site, so development may be possible if that can be achieved. It is not assumed from the outset that alternative provision that is adequate cannot be made. The majority of the supporting network is not allocated, and even on the supporting network it may be difficult to find solutions for re-providing the green infrastructure functions. However, where there is interest in developing the site and potential means of reprovision of its functions seem to be attainable, then an allocation can be made.

2702

Policy	Topic	Summary	Response
General comment on site allocation policies	Accessibility to Oxford rail station	I notice that a lot of the Interim Regulation 18 stage site assessment forms note that a high number of proposed developments are a significant distance away from Oxford railway station. It is therefore very clear that the Cowley Branch line needs to happen ASAP, not least to fulfil the government's Oxford-Cambridge Arc – the hightech developments are in southeast Oxford, and it's just so difficult to get there from the railway station. This is a fault of geography, but needs to be factored in.	Comment noted.
General comment on site allocations	Transport connections	Proper north-south, east-west links are needed to support developments- cycle highways or even trams.	As Highways Authorities, Oxfordshire County Council has worked with us on the Infrastructure Development Plan, and needs in each quadrant of the city are listed within Chapter 8.
General comment on site allocations	Wrong to have these policies	The City Council should not be making such decisions about property. Just let them build.	Positively managing development is the purpose of the planning system.
General comment on site allocations	Too few	There are too few site allocations.	Oxford does have a shortage of available and suitable sites, due to the tightly drawn boundaries. To be allocated, there has to be some certainty a site will come

Policy	Topic	Summary	Response
			forward. However, other sites may well come forward as windfall.
General comment on site allocations	Community uses are also important	Some sites should be for community use, not just housing and there must be access to facilities and services such as community centres, entertainment, medical services.	Chapter 7 of the draft plan includes a suite of policies to ensure good access to a range of facilities important to local communities.
General comment on site allocations	BBOWT	We have also looked at the individual PDFs for the site allocations we have commented on. These however provide little detail making it difficult to assess the potential impact of development on the surrounding natural environment. For example, no information regarding the proposed development quantum is given in the site policies despite this information being essential for assessing potential impacts – e.g. it makes a big difference whether a site is proposed to deliver 10 units or 50 units. Whilst it might be beneficial for policies not to be too descriptive (e.g. if insufficient masterplanning and capacity work has been done to determine a feasible quantum) we believe that at this stage in the LP process policies should provide at least an approximate or 'up to' estimate together with a clear set of criteria against	Capacity assessment forms have been produced to inform the site allocation policies. These will be published as part of the evidence base at the next consultation stage (Reg. 19). Whereas the site assessment forms published to support the Reg. 18 consultation were produced as part of the Sustainability Appraisal. The interactive map published at Reg. 18 included a layer which showed the locations of the proposed sites in the city as well as various other layers such as green infrastructure, ecological designations,

Policy	Topic	Summary	Response
		which the development will be considered. An indication of housing numbers for residential allocations should be included at the next stage of consultation. We have not been able to find any detailed maps showing which parts of the allocated sites are considered appropriate for development, which areas are for wildlife-rich green space etc. Such maps should be provided at the next stage of consultation. to accompany the individual site allocation policies although this information is essential to help locate the site on the policies map and to provide clarity on the boundaries. We ask the Council to address this shortcoming and to provide more information and a map with its policies.	heritage considerations and flood mapping for the city. We will publish maps showing the locations of each site in the chapter and the policies map will also show their location, alongside a variety of other policy considerations that have a spatial dimension.

2705

Natural England

Topic	Summary	Response	Outcome

Site allocations	The plan should allocate land with the least environmental or amenity value (NPPF para 171). Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected. Land 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. *General advice is provided as part of the annex to submitted comments.*	The process for determining site allocations will be discussed across the Sustainability Appraisal and a separate background paper on site selection. We are also regularly discussing the preparation of our HRA with you and will continue to do so.	Sustainability Appraisal and site selection background paper to be published at Reg 19 along with HRA. Discussions to continue with Natural England as and when needed.
Site allocations	Natural England note that a number of site allocations are within close proximity to designated sites. Where this is the case, it will be necessary to ensure a robust assessment of impacts is undertaken and appropriate mitigation can be provided and secured. It is Natural England's advice that sites which would result in unavoidable impacts	As noted earlier, we are undertaking a Source Pathway Receptor Analysis for the SSSIs as well as Habitats Regulations Assessment for the SAC and this will help identify all the relevant sites that might impact on	Source Pathway Receptor Analysis and HRA work to be published alongside Reg 19 consultation. Key findings will be reflected in relevant allocations including sitespecific mitigation
Topic	**Summary**	**Response**	**Outcome**

2706

	and/or where mitigation cannot be secured, should not be pursued.	these designations, in line with your comment. We will ensure any recommendations from that work, including sitespecific mitigation requirements, are reflected in the relevant allocation policies.	requirements where necessary.

National Highways

Topic	Summary	Response	Outcome
Chapter 8 – site allocations	Three residential sites border the SRN. These are sites 113, 1e and 463. No employment sites border the SRN. These sites will need to pay close attention to the impact on the SRN during planning application stage and National Highways would expect to be consulted further on these sites when proposals come forward. Whilst a traffic impact assessment has yet to be performed there is an expectation for a potential	Traffic Modelling has been undertaken that looks at the impact of all development sites proposed to support the city's growth over the plan period as part of HRA work. This work shows that the impact of Oxford city's growth on the SRN (i.e., the A34), is less than 1,000AADT.	At the meeting, the City Council and National Highways agreed that the issues raised within National Highways response to the Reg. 18 Plan consultation had been satisfactorily resolved.
Topic	**Summary**	**Response**	**Outcome**

	impact on the strategic road network due to the number and proximity of sites to our network.		

Oxfordshire County Council

Topic	Summary	Response	Outcome
Proposed New Site Allocations	**Strategic Planning** The County Council has an interest in how the City proposes to address housing need as any new allocations are likely to have implications in respect of the County's statutory functions. The Local Plan will need to address the identification, provision, funding and overall deliverability of the infrastructure and County Council services needed to support sustainable development. As such, we will continue to encourage regular communication between relevant parties. For sites to be allocated outside of the City for Oxford's unmet need, the County Council's main concern is that they are well connected to Oxford and provide the best opportunities for making use of existing and proposed transport infrastructure, including enhancing and	Noted. We will continue our dialogue with the County as the site allocation process move forward.	Oxford City Action: Continue working with the County Council to draft site allocation policies
Topic	**Summary**	**Response**	**Outcome**

	making better use of sustainable public transport and active travel links into Oxford. At this stage, the proposed additional sites do not provide details regarding capacity therefore the County Council cannot comment on potential infrastructure requirements.		

Topic	Summary	Response	Outcome
Site allocations	The information contained within the new Local Plan will be of significant value to Thames Water in future infrastructure planning, but the draft allocations do not have housing numbers at this stage. Would welcome more details on the proposed developments when they become available and also an early contact from the developers.	See earlier response re: recommending developers undertake early engagement with Thames Water. Full site allocations with minimum housing numbers will be published as part of the Reg 19 consultation and we would welcome additional engagement with yourselves on them through that process or separately.	No further action – additional engagement to be undertaken in due course.

2709

Thames Water

Site Allocations from LP2036 or LP2040

This section contains queries regarding the site allocations from the previous local plan LP2036 or LP2040 which was withdrawn (see the Introduction and Local Plan Timeline sections of this report for more context).

Local Plan	Topic or location	Summary	Response
LP2040	Development sites	The OLP2040 had complete site allocation policies, now these seem to have simply disappeared without updates as already allocated, but whether already allocated or not, there are always policy updates required as circumstances change.	The Regulation 19 draft LP2045 will include detailed site allocation policies.
LP2040	Policy SPS10: Knights Road	Headington Heritage: This policy is longer included within the Reg. 18 Plan. Site should be not allocated as site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford). Cumulative impact of other developments on green space. Surface flooding will lead to sewage discharge at Oxford Sewage Treatment Works.	LP2045 does not propose a site allocation for this policy.
LP2040	Policy SPS17: Edge of Playing Fields, Oxford Academy	Headington Heritage: This policy is longer included within the Reg. 18 Plan. Site should be not allocated as site is next to Cowley and East Oxford (lowest amount of green space per inhabitant in Oxford).	LP2045 does not propose a site allocation for this policy.
LP2040	SPE3 – Headington Hill	Headington Heritage: Policy now removed – previously in LP2040.	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response

	Hall and Clive Booth	Very substantial damage has been done to Headington Hill Conservation Area by thoughtless insensitive development by OBU. Cuckoo Lane, in particular has been damaged by a "welcome glade" and expansive views of ugly buildings. Much of this site boundary is in the most sensitive part of Cuckoo Lane yet this is not even mentioned. Modification Requested: Deep foundations or hard surfaces can affect ground and surface water flows. Greenfield run off be required. "...supporting the setting of the conservation areas" should be changed to "not harming" this, is IN the Conservation Area. Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park.	

2712

Local Plan	Topic or location	Summary	Response
		Modification requested: Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.	
LP2040	SPE4 – OBU Marston Campus (LP2040)	Headington Heritage: Policy now removed – previously in LP2040. No indication as to why SUDS are required here and not elsewhere, the Marston SSSI impact zone is a very wide area. Headington Hill has calcareous springs or surface water as map per below, showing TUFA, Fen and probable peat reserves in and around Headington Hill Park. Modification requested: Site allocation policies should include a requirement to undertake hydrological and fen survey, and recovery where possible.	Site is included as an allocation in the 2045 plan. The allocation policy will include requirements to mitigate the potential impacts on the New Marston SSSI.
LP2036	329 - Valentia Road	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that	LP2045 does not propose a site allocation for this policy.

Local Plan	Topic or location	Summary	Response
		policy will not be carried forward as capacity is potentially less that 10 dwellings. Modification requested. Include a policy for this site backed with evidence and clear policies re groundwater catchment.	
LP2036	622 - Coolridge Close	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that policy will not be carried forward as capacity is potentially less that 10 dwellings. NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye. Modification requested. Include a policy for this site backed with evidence and clear policies re groundwater catchment.	LP2045 does not propose a site allocation for this policy.

LP2036	629 - Wood Farm Health Centre	OLP2036 included a policy that allocated this site for housing (10 dwellings). The site does not feature on the list of potential policies in the new local plan. Concerned that	LP2045 does not propose a site allocation for this policy.

Local Plan	**Topic or location**	**Summary**	**Response**
		policy will not be carried forward as capacity is potentially less that 10 dwellings. NO further development should be permitted in the Lye Valley this is in the groundwater catchment of the Lye. Modification requested. Include a policy for this site backed with evidence and clear policies re groundwater catchment.	
LP2036	SPE10 - Hill View Farm	*(LP2040 Policy Reference)* Do not include policy as a site allocation as planning application has been approved	LP2045 does not propose a site allocation for this policy.
LP2036	SPE11 - Land West of Mill Lane	*(LP2040 Policy Reference)* Do not include policy as a site allocation as planning application has been approved	LP2045 does not propose a site allocation for this policy.

LP2036	SPE12 - Marston Paddock	*(LP2040 Policy Reference)* Do not include policy as a site allocation as planning application has been approved	LP2045 does not propose a site allocation for this policy.

Additional Site Suggestions

This section contains public queries or suggestions for site allocations.

Location	**Summary**	**Response**
Telephone exchanges across Oxford	There are at least four telephone exchanges in Oxford: Speedwell Street, Oakthorpe Road in Summertown, Headington and Cowley. Conventional landlines are being phased out. As a result, some or all of these may be decommissioned during the lifetime of the plan and may become available for development	At the current time these sites are not available, and there has been no indication from the landowners or leaseholder that they will be available in the plan period.
Butts Lane, Marston	Previously submitted in Call for Sites and previously assessed as part of wider Green Belt parcel 114a in 2023 GB assessment. Request a thorough Grey Belt and Green Belt assessment of the land in isolation from the rest of 114a. The site is Grey Belt and offers a sustainable, previously-developed site for up to 20 homes.	The majority of this site (114e) has been put forward as a site allocation policy in the draft plan and included in the SHLAA.

Pullens Lane, Headington	Carter Jonas is instructed by the Morrell Family Trust ("the Trust"). The Trust owns the Pullens Lane Allotments ("the Allotments"), which are located adjacent to Oxford Brookes University's Clive Booth Student Village in Headington. The allotments are in fact surrounded on all four sides by existing development, as shown on the plan appended	The Strategic Housing Land Availability Assessment (SHLAA) will be published as part of the Regulation 19 consultation. There is not a surplus of allotments in the city and allotments are part of the Core Green Infrastructure Network because they are important to protect in situ.

Location	**Summary**	**Response**

2717

	to this letter. The Trust (via Carter Jonas) has submitted the Allotments for the Council's consideration during "Call for Sites" exercises in 2021 and 2024. We look forward to understanding the Council's assessment of the site in the next update of the HELAA when it is published. It is disappointing that there is not an up-to-date HELAA to support the current consultation. The Trust's land interests at Pullens Lane have strong potential for future development in Oxford City Council's new Local Plan 2042. The Trust considers that the Allotments would be suitable for new residential (use class C3) or student accommodation. The Pullens Lane Allotments are far from well utilised and have only been partially used for some years. The Allotments could be made available for development within the next 5 years. The site is well located within Oxford City and benefits from being within walking and cycling distance of a range of services and facilities. Furthermore, it is within a reasonable walking distance to several bus routes, including key bus routes serving Oxford City Centre, and beyond.	

2718

Location	Summary	Response
	The Trust has access rights to the site via John Garne Way to the west, and while it is accepted that Pullens Lane might be an alternative access route and is a single lane carriageway, it is maintained to a high standard. Moreover, there is the potential in this location to consider a reduced vehicle type development like those which the Council is promoting elsewhere in the city. Therefore, in short, there is ample access to the site. Development in this location would constitute sustainable development in accordance with the presumption in favour of sustainable development, as set out in national policy. The Trust is very concerned that the Council has taken a very broad approach to managing allotments in the draft Local Plan. It states in the Local Plan, in the preamble to draft Policy G1 – Protection of Green Infrastructure that the disposal of allotments requires application to the Secretary of State and is only consented in exceptional circumstances. This is not	

2719

Location	Summary	Response
	the case in every circumstance: The Allotment Act 1925 generally does not apply to private allotments. The Act primarily focuses on allotments provided by local authorities and those created under specific statutory provisions, not privately owned or managed plots. The Trust strongly objects to the proposed 'protection' of its land for allotments through policy G1 - as shown on the consultation policies map. There is no clear justification for this approach, and as a private allotment site it is not subject to the same controls as other allotments which are owned by the Council. The Trust would urgently like to discuss the Council's proposed and currently unjustified approach to its land in the emerging Local Plan.	
Oxford Golf Club, Hill Top Road	This should be allocated- it is private lan not accessible to the public. The site is huge and sustainable. The parts of it of less landscape value should be developed.	Currently, the site is on a long lease to the golf club, with no current interest from the landowners in developing the site.

2720

Blanchfords, Headington	Surprised that the former Blanchfords building supplies depot in Headington is not listed as it seems a prime site for development.	Every effort has been made to ellicit a response from the landowner, but without any apparent interest from the landowner in bringing forward the site for development, for now we have to assume it will remain as a timber yard.

Location	**Summary**	**Response**
		The general policy approach of the plan would allow development of the site for housing, should it come forward, without an allocation being needed.
South Parade, Summertown	This could be added to the list as it is an area in need of rejuvenation, with the opportunity for land assembly and development, including improvements to the public realm.	There is no clear opportunity here at the current time, with a wide range of landowners and mix of well occupied buildings.
Ultimate Picture Palace, Cowley	Would like there to be protection for this.	General policies protect cultural uses, with some flexibility to respond to changing needs. Protecting each facility individually is not needed or appropriate.
Ellison Institute, Littlemore	Something should be said about this, restricting too much building on the site.	It is not considered appropriate to have a policy restricting development of this site.

Oxford North	Oxford plays an important role in national economy. There is significant potential for employment and housing to meet local and Oxford's needs at Science North, the area between Oxford Parkway, Oxford North and London Oxford Airport.	The Local Plan can only cover the City Council's administrative boundaries. There is a dedicated site allocation policy for Oxford North which indicates that planning permission will be granted for mixed-use development including residential and knowledge-economy employment.

All Public Responses to the Whole of Chapter 8

Draft policy	Topic	Summary of comments	Response

2722

Chapter 8	Infrastructure with new development	In the site allocations there are many mentions of new housing, but no specific mentions of schools or GP surgeries. Are current facilities expected to absorb the increase in the residential population?	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	Culture	The section on "city of culture" contained no questions on culture. What community facilities do you think contribute to Oxford's	These facilities fall under use class F2 which are considered community facilities.

2723

Draft policy	Topic	Summary of comments	Response
		mission? What is the position on concert halls, galleries, museums?	

Chapter 8	Food growing spaces	More edible plants in community areas	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.
Chapter 8	Support for golf course	Keep the golf course if you are serious about local recreational amnesties, green spaces, flood control and biodiversity. Golf keeps people fit and healthy!	The policy approach is to require re-provision of the community facilities.
Chapter 8	Sports facilities	Infrastructure for open space, sport and recreation must be informed by evidence (see paragraph 103). The Council needs to complete the review of its Playing Pitch Strategy and undertake to update its built sports facilities strategy. The new infrastructure needs identified should then be added to the Council's infrastructure development plan.	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with

2724

Draft policy	**Topic**	**Summary of comments**	**Response**

			infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	NHS dental practices	More NHS dental practices.	Policy S3 and the accompanying evidence (the Infrastructure Deliver Plan (IDP)), set out the infrastructure needed to support development in the plan. The IDP sets out a list of specific projects identified to mitigate the impacts of planned development. As part of the plan-making process, we work with infrastructure delivery partners to identify and deliver the necessary infrastructure to support growth proposed in the Local Plan.
Chapter 8	Canal improvements	The remaining sections of canal towpath beyond the existing improved area should be considered for improvement to provide a	Areas within Cherwell District boundary are outside of OCCs control.

Draft policy	Topic	Summary of comments	Response
		suitable standard throughout and to join to other improvements within Cherwell district which may be forthcoming as a result of housing allocations.	
Chapter 8	Proposal for an Air Cable Transport system	An Air Cable Transport system running from Redbridge Park and Ride to Westgate shopping centre. Run by bus companies, this would provide a quicker, more reliable route for tourists and commuters into the city. By providing parking for tourist coaches at Redbridge and an attractive alternative, that is a tourist attraction in its own right, we could greatly reduce the number of tourist coaches entering the city.	Noted.
Chapter 8	Park & Ride for Cowley	One thing that would really help is a Park & Ride for Cowley. It could be on the Unipart site or the Oxford Stadium site; this would provide excellent transport links to both Cowley Road (whose businesses are dying, coincidental to not being on a Park & Ride bus route) and the surrounding business/innovation areas. It's also needed for those people who have essential but low-paid jobs and who can't	Reasons for permitted uses in Unipart policy are set out in site allocation form.

Draft policy	Topic	Summary of comments	Response
		afford to live closer and have to get to work at non-peak hours (for example, a nurse who lives in Brize Norton, for example, has to drive to the JR rather than get the bus).	
Chapter 8	Transport	Transport. We desperately need the park and rides to be further enlarged and ideally for the service to be free. In addition, smaller buses on new routes between different parts of the city, rather than as currently having to go into the centre and then out. The LTNs need to be revised - e.g. the barrier in Crowell Road should go! And proposals for bus gates or congestion charges should be scrapped.	Noted. The County Council as Highways Authority does take a lead in overall transport strategy.

Chapter 8	Safeguarding of land	EWR Co considers that the local plan could also better inform stakeholders and users of the document by providing information about the EWR route safeguarding in the local plan and on the local plan policies map. EWR Co has issued guidance for local authorities and developers on the implications of the safeguarding directions for both the determination of planning applications and the preparation of local plans. Paragraphs 24 to 29	A new Policy on safeguarding is now included in Chapter 8 of the Plan- Policy I2, which includes reference to EWR.

Draft policy	**Topic**	**Summary of comments**	**Response**

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		of the guidance deal with the implications for local plans and advise that: • The area safeguarded should be represented on the policies map (in accordance with regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) • Local Planning Authorities (LPAs) should not include proposals in the local plan that conflict with the safeguarding directions • Local Plans should state that the safeguarding directions have been made by the Secretary of State for Transport, they are not proposals of the LPA and the route of EWR will not be determined through the local plan process; it will instead be subject to an application for development consent under the Planning Act 2008. As it stands EWR Co considers that the plan is deficient in that it makes no reference to the safeguarding of the EWR route, either within the local plan itself, or on the interactive policies map. This should be rectified in the submission	

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Draft policy	Topic	Summary of comments	Response
		version of the local plan so that all who may have an interest in the future development of sites in the city can take the potential impact of EWR into account in designing their development proposals and can take appropriate steps to avoid and/or mitigate any potential impacts which might otherwise prejudice the delivery of parts of the EWR route.	
Chapter 8	Consult with NESO (electricity)	National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET. Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will	Comment noted and database updated.

Draft policy	Topic	Summary of comments	Response
		be replaced with sources of low-carbon electricity, such as offshore wind farms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South.	

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General Comments Collected During Consultation

Topic	Summary	Response
15-minute cities	Support for the 15-minute cities concept – it was not publicised well, but it has worked in other cities.	Noted.
Recreation grounds	These sites are used by residents, football teams and clubs from all ages and all walks of life. To lose these would be at the detriment of the area and locals, especially young people.	The detailed site allocation policies seek reprovision of sports facilities.

Clarity over how housing figures have been reached	There should be greater clarity regarding: • the capacity for housing within the city's administrative boundaries; • why the plan period start date of 2022 has been chosen; • how the housing figures from the existing OLP and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period; and • the approach to be taken to meeting residual unmet need.	Since the Reg 18 consultation the plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
More deference to national policy	Re-stating the NPPF's contaminated-land rules, the Environment Act's 10 % biodiversity-net-gain requirement or the Future Homes Standard's net-zeroready fabric provisions does not enhance protection; it merely piles extra reports onto applicants.	The city has a local net zero target of 2040 and the national requirement is 2050. Many policies are bespoke to ensure we meet this target.
Council tax is too high	The excessive regulation enforced by the Council means Council Tax is too high. People can't afford to buy houses because they are having to subsidise social housing.	This is beyond the remit of Planning.
Transport issues	• Please could you find ways to stop cars and traffic dominating our city? • Please could you make park and ride work?	The City Council will continue to work with the County Council to identify potential solutions to these issues, with the aim of enhancing
Topic	**Summary**	**Response**

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	• Please could you stop stationary traffic where queues of drivers try to get into the Westgate Centre? If that continues to be the reality once the Botley Road is open again, it will be very bad. • Please could you find ways for cyclists to be able to use the roads without confronting potholes and drain covers with large gaps around them? • Please could you find a way for cyclists to go east west without having to dismount from their bikes? • Please could you stop buses driving up Queen Street? • Traffic congestion is significantly caused by private school drop-offs. • Proper cycle highways and trams needed to connect the city. • Move the coach station to the Becker street carpark next to the main station to save public transport network and pedestrian accessibility.	public realm. 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.

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Supporting Documents and General/Other Responses

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Headlines:

- General responses look at the overall consultation process
- Other general responses mentioned various transport issues
- There are sections looking at general comments about supporting documents for the Local Plan, such as the Sustainability Appraisal, Health Impact Assessment, Background Papers, and Evidence Base.

Supporting Documents

Sustainability Appraisal

All Public Responses

Topic	Summary	Response
Don't deter housing development	Care needed not to make things too bureaucratic when it comes to housing development. The crisis is acute and builders should not be deterred from delivering.	The Sustainability Appraisal process is a tool that helps to inform the development of the Local Plan. It does not, in of itself, create any additional burden for developers when they come to making an application.
General	It seems quite thorough	Comment noted.
More focus on environmental improvements	Needs more focus on Oxford to be green, blue, clean air, low car, big on public transport, litter free, with penalties for cars parked on curbs. Other similar comments including need for more community gardens with edible plants and food forests, as well as even greener developments (more trees for shade) and more solar panels on buildings.	The Sustainability Appraisal framework addresses these various considerations across several of its objectives (e.g. Objective 7 Green Infrastructure; Objective 8 Traffic and Air Pollution). As set out above, the SA's role is to help inform the development of the Local Plan, which in of itself has various policies across Chapter 4 and 7 which address different aspects of this comment where appropriate.
More focus on educational inputs	The sustainability appraisal has taken consideration on environmental conservation and health but is lacking educational inputs. These should cover diversity and inclusion, British culture, political systems, institutions, laws, community concepts, religions, ethnicities and local history regardless of where residents are from.	We will look to draw these considerations into the relevant underlying background papers where they are not already mentioned and where this would be of relevance to the Local Plan.

Public transport	Sustainability appraisal is lacking proposals for making public transport viable and attractive.	The Sustainability Appraisal helps to inform the development of the Local Plan. The Local Plan
		includes a range of policies intended to support access to public transport.
Sustainability issues not taken seriously	A couple of comments flagging concern that report does not take sustainability seriously and that there is too much focus on growth without due concern for climate change, protecting environment, the health/needs of local residents.	A key role of the Local Plan, which the Sustainability Appraisal helps inform, is about guiding growth to happen in the right way for the city. Nevertheless, the Sustainability Appraisal framework which is used throughout the report includes objectives that address all three pillars of sustainability (the environmental, social and economic).
Site specific scoring	Comments on sustainability appraisal scores for particular sites in their interim site assessment forms.	The Council will be reviewing the sustainability appraisal scores for all the sites being taken forward to Regulation 19 and updated forms will be published alongside this report. Scores will be updated where appropriate.

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Topic	Summary	Response	Outcome

SA	While the Sustainability Appraisal (SA) purports to test three housing options, the assigned SA scores, especially for the City Council's preferred Option B, lack clear and transparent justification. It is not evident why Option B consistently receives more positive scores than Options A or C in numerous instances. This appears to be based on an incomplete assessment. The SA commentary itself indicates that judgements are made without considering the full sustainability impacts of unmet housing need being accommodated outside the City's administrative boundary. Crucially,	While the assessment of cross boundary impacts does represent a part of the SA/ SEA process, when assessing the sustainability impacts of the plan, it is important that the core assessment focuses on the impacts of the strategy within the	We will take steps to ensure that the SA is legally compliant

Statutory Consultee Responses

South Oxfordshire District Council and Vale of White Horse District Council

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Topic	Summary	Response	Outcome

	the sustainability impacts of cross-boundary housing provision do not disappear at the border; they are displaced. These distributed impacts, particularly those associated with Option B's reliance on external provision, could be worse than those of Options A or C. For example, accommodating development across more dispersed areas, potentially distant from Oxford's public transport routes, is highly likely to lead to increased car dependency and significantly higher carbon emissions due to longer commuting distances. SA Objective 3: The testing under SA Objective 3 focuses primarily on judgements related to densities and the loss of green space. However, it fails to explicitly evaluate the impact of the options on the Green Belt, despite the Green Belt being directly mentioned within the scope of SA Objective 3 itself. This is a significant omission. SA Objective 7: SA Objective 7's conclusions are based on the identical impacts of density and green spaces already assessed under SA Objective 3. This is unnecessary duplication of testing and analysis, which raises questions about the thoroughness and efficiency of the SA process. A robust and unbiased re-evaluation of the housing options should be undertaken. Oxford Wastewater Treatment Work is mentioned in the Sustainability Appraisal as important infrastructure to upgrade to enable growth in and around Oxford (page 47). This is located within South Oxfordshire and facilitated by the adopted and emerging Plans of South Oxfordshire, but South Oxfordshire District	local authority administrative area. Any assessment of the crossboundary implications of delivering homes outside of Oxford's administrative boundary would depend on where these homes would be delivered – this is not something that is within the City Council's procedural jurisdiction. The location of the new homes delivered outside city boundary (including those to meet Oxford's unmet housing need), is a matter for each partner authority to engage with in the production of their own plans. The City Council is aware that homes previously allocated in neighbouring districts Local Plans to meet Oxford's unmet housing need were done	

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Topic	Summary	Response	Outcome
	Council isn't mentioned as a partner to work with on the delivery of the necessary upgrades.	so as close to the city as possible. SA Objective 3: we will look to ensure that the findings of the Green Belt assessment are incorporated into the SA report for transparency. SA Objective 7: the SA Framework provides the key SA indicators that are considered for each SA objective. Noted – Thames Water are leading on this project and they will be involving partners as appropriate.	

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Health Impact Assessment

All Public Responses

Topic	Summary of Comments
Future health implications	The HIA should ensure future health of Oxford and provide estimated cost for any damaging scenario to avoid future implications.
Physical and mental wellbeing benefits of open spaces	More emphasis should be given to the benefits of all open spaces and closed spaces should be open to everyone.
HIA should go further	The HIA and plan should go further to address the major known issues in Oxford.

Statutory Consultee Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
Evidence Base – HIA Screening Report	**Public Health** This document provides a useful guide and incudes some of the essential criteria for measuring the health of a population, such as life expectancy. However, it also needs to include reference to 'healthy life expectancy', which is a crucial indicator of local health inequalities and helps the assessor to uncover potential mitigative action to promote healthier lives and reduced pressure on health services. The document makes reference to Oxfordshire's HIA toolkit but with no clear link or indication of where the user can access this guidance. Please include a link to the Oxfordshire Leader's Joint Committee website where appropriate. It is useful that the document signposts the user to the JSNA, however this has now been replaced by the Oxfordshire Data Hub – Welcome to the Oxfordshire Data Hub. There needs to be a reference to this as a key data source, along with others such as Census and ONS.	Noted. Thank you for the update. We will seek to review and ensure that correct references are included.	No Action Required Oxford CIty Action Consider including reference to OLJC Website and note that the JSNA has been replaced by the Oxfordshire

			Data Hub

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Background Papers

All Public Responses

Topic	Summary of Comments
Background Paper 001	• Urges to set a housing requirement above the Standard Methodology • Criticises the lack of reference to the PPG • Prefers option C
Permanent Residential Moorings	• Very few suitable sites for mooring but strong demand • Include better power hook-ups, conservation areas must have no moorings.

Statutory Consultee Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome
009 BGP Natural Resources	**Minerals & Waste** Delete reference that states "Work is underway on a new Minerals & Waste Plan which would cover the period to 2042." It should be included that Oxfordshire County Council are the Waste Planning Authority and responsible for planning for the management and disposal of Wastewater and Sewage sludge (Policy W10)	We can delete this reference to reflect the information on the County website when we update the Background Papers. Will consider which document is best suited to include this information.	Oxford City Action: delete reference from BGP9 Oxford City Action: Consider inclusion of suggested text.
BGP 010 Health and Wellbeing	**Public Health** The Health and Wellbeing chapter of the Sustainability Appraisal is welcomed. Draft Policy HD10: Health Impact Assessments needs to be specific on the threshold for triggering the need for a developer to conduct an HIA. For example, requiring all developments which include 50 or more residential units, or over	Noted. Already covered in Policy HD10 HIA.	No Action Required

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	1,000sq.m if commercial, to do an HIA, as is the case in Birmingham's Local Plan. This helps to remove any ambiguity over whether or not a development requires an HIA and should actually remove some of the extra burden that has been outlined as a potential negative consequence of this approach in the SA. As such, Option A is my preferred approach for this policy, on the basis that formal thresholds are included.		

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Evidence Base

All Public Responses

Evidence base	The HBF note that the Council has not included a housing trajectory within the draft regulation 18 local plan, nor could we find one within the evidence base. Given that the NPPF states in paragraph 74 that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period we would expect to see such a trajectory in the submitted local plan. The Council should also provide an annualised trajectory setting out when each site contributing to the city's housing supply will come forward and the rate at which it will deliver. Previously the HEELA provided an indication of supply rates within five-year tranches, however this lacks the detail necessary for effective scrutiny of the deliverability of the submitted plan. Only an annualised trajectory will allow interested parties to effectively scrutinise land supply over the whole plan period and by extension the level of unmet needs arising over the plan period.	A trajectory is included in the Draft Submission Local Plan. It is not realistic for the SHLAA to provide an annual breakdown against sites for those delivering in the later stages of the plan period as there are too many uncertainties.
Evidence base	Hallam considers that the evidence based studies being undertaken to support the preparation of the plan should not be simply restricted geographically to Oxford and be broadened to joint strategic studies with the neighbouring authorities, none more so than to undertake a strategic review of the Oxfordshire Green Belt. Whilst the evidence base includes Oxford Green Belt Additional Site Assessments, this will only serve to clarify the limited and constrained opportunities for the city to accommodate additional housing. A strategic Green Belt review is necessary if the city's	Although an update has been made to the Green Belt assessment following changes to the NPPF, it still broadly follows the methodology developed jointly through the Oxfordshire Growth Board. The City Council cannot make decisions on how neighbouring authorities consider Green Belt within their areas.

	unmet need is to be met whilst promoting sustainable patterns of development.	
Evidence base – Green Belt	Strongly oppose going ahead with this grey belt designation for Cutteslowe park- it is obviously inappropriate - green and	Cutteslowe Park is not being removed from the Green Belt

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Assessment of Additional Sites	biodiverse park (including all the sports fields hay meadow and planted trees and the allotments). Do not want to see any of the sites on the list for possible designation as grey belt to go forward in the final plan as this makes them easier in future to release for building. Would be total abdication of responsibility for the biodiversity on these sites by the council and for the experience/well-being of visitors.	designation through the Local Plan process. Grey belt is not a formal designation.

Evidence base – Lye Valley SSSI Hydrogeological Impact Assessment Report	Range of criticisms and detailed comments received in relation to the accompanying Lye Valley Hydrogeological Impact Assessment report including: • The general methodology including in relation to the range and quality of data used to inform the analysis including that it is considered to be incomplete, omitting key data points, relying on flawed assumptions – e.g. study appears to only consider SSSI and not wider LWS/habitats; • The findings and recommendations including that these are not informed by all the relevant considerations (such as climate change, the work of volunteers) or are based on flawed inputs or assumptions (e.g. monitoring years were wetter on average recently and misses drier years in past), or that they differ from or ignore findings from previous studies (e.g. Lamberth); • That the findings and recommended tests do not fully address key factors impacting the Lye Valley (e.g. groundwater protection zones), or that they are ineffective without further actions to tackle issues such as permitted development rights e.g. Article 4 direction needed; • That the report has been formulated on the basis of supporting more development or as a way to excuse previous development being permitted within the	Whilst the Lye Valley study is focused on impacts on the SSSI, as this is afforded the highest level of protection, the findings and analysis help to inform the approach to protecting the wider area including other associated designations and interconnected habitats. The study provides an additional level of analysis and understanding about the hydrogeological functioning of the areas and its key sensitivites which was not available previously. As with any study, there might be additional benefits in longer term monitoring and analysis in helping to expand evidence, however, this is not always practical within existing time constraints and resources. Whilst there may be some disagreement as to the methodologies and conclusions, the study is a considered to be a useful piece of additional evidence

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	• catchment. Report actually appears to support more small developments in the calculated fen catchment; That the findings should not supersede the Lamberth report which should be maintained as important baseline.	supporting the approach to handling applications that might affect the Lye Valley. It supports the ongoing protection of the wider Lye Valley but highlights that 'protection' varies in how it should be undertaken depending on the location and particular impact pathway mechanisms, which should help applicants/decision makers in meeting their responsibilities set out in national and local policy. Where practical, we will seek to explore how these additional comments can be responded to through the accompanying Technical Advice Note.

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Statutory Body Responses

Oxfordshire County Council

Topic	Summary	Response	Outcome

Evidence Base – HIA Screening Report	**<u>Public Health</u>** This document provides a useful guide and incudes some of the essential criteria for measuring the health of a population, such as life expectancy. However, it also needs to include reference to 'healthy life expectancy', which is a crucial indicator of local health inequalities and helps the assessor to uncover potential mitigative action to promote healthier lives and reduced pressure on health services. The document makes reference to Oxfordshire's HIA toolkit but with no clear link or indication of where the user can access this guidance. Please include a link to the Oxfordshire Leader's Joint Committee website where appropriate. It is useful that the document signposts the user to the JSNA, however this has now been replaced by the Oxfordshire Data Hub – Welcome to the Oxfordshire Data Hub. There needs to be a reference to this as a key data source, along with others such as Census and ONS.	Noted. Thank you for the update. We will seek to review and ensure that correct references are included.	No Action Required Oxford City Action Consider including reference to OLJC Website and note that the JSNA has been replaced by the Oxfordshire Data Hub
Topic	**Summary**	**Response**	**Outcome**

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Evidence Base – HRA	**<u>Landscape and Nature Recovery – Biodiversity</u>** It is noted that atmospheric/air pollution has not been identified as a potential impact pathway with Little Wittenham SAC. Further justification for this decision would be requested as it is considered atmospheric pollution could still impact this site and its designated features. The HRA identifies that likely significant effects on Oxford Meadows SAC in the absence of mitigation have not been ruled out. If these impacts cannot be ruled out through Appropriate Assessment then it is recommended that these sites are removed from the Local Plan.	Natural England do not consider this an issue. NE guidance considers for air pollution associated with a plan to have an impact on a designated site, that site needs to be within 200m of a road. The Little Wittenham SAC (designated for Great Crested Newt breeding ponds), is located more than 200m from any likely source of air pollution. JNCC does not consider air quality to be an issue. Noted. A dialogue with NE is on-going. The HRA will be updated to support the forthcoming Reg. 19 consultation.	No Action Required No Action Required

Topic	Summary	Response	Outcome

ELNA	The principle of a county-wide FEMA is supported. The ELNA needs to be updated at paragraph 2.42 in respect of Cherwell's employment land needs, to align with the information found the Cherwell Local Plan 2042 submission documents. The pattern of employees travelling from neighbouring authorities will be exacerbated unless residential development is prioritised in city above providing additional employment floorspace. The ELNA suggests that industrial/warehousing space is accommodated outside the city and refers to locations within Cherwell District. There has been no formal request or agreement for	Support noted. The ELNA has been updated in respect of Cherwell's latest employment land needs position. The city's strategy is to prioritise new sites for housing. However, intensification of existing employment sites is needed in order to meet the city's identified employment needs. The ELNA describes the current situation regarding warehousing, i.e., limited demand within the city as it is not a good location for such uses. There is no request for unmet warehousing need to be taken.	
Topic	**Summary**	**Response**	**Outcome**

	unmet warehousing need. Clarity on this point would be welcomed.		

South Oxfordshire District Council and Vale of White Horse District Council

Topic	Summary	Response	Outcome
ELNA	1.We are concerned that the interim ELNA does not adequately define the city's employment needs, which means effective and informed consultation is impossible. 2.We do not recognise the collaborative Oxfordshire-wide study on the need and supply of logistics (2.17-2.19) and the assertion that past practice is for logistics need to be met outside the city is made without supporting evidence. This has potential to significantly and negatively impact the planning and development within districts. 3.Concur with the definition of Oxford's FEMA being Oxfordshire, but we strongly object to the inappropriate critique of other established local FEMA designations. The study conflates	1. The Interim ELNA did not include the city's employment land needs. This will be available as part of the Reg. 19 evidence. 2.There is no reference to an Oxfordshire-wide study on need and supply of logistics in para 2.17-2.19. 3. A review of existing FEMAs was considered a useful exercise by our ELNA consultants as it provided a useful context	No Further Action.

Topic	Summary	Response	Outcome
	the OGNA and AECOM's ELNA for S&V only and so wrongly suggests AECOM were establishing the FEMA for Oxford or Oxfordshire. 4.Reference to a HMA in para 3.36 is factually incorrect. 5.We note the intention to use 2021 Census data, but this is generally considered to have significant limitations for commuting pattern analysis. It leads to inconsistencies with evidence bases of neighbouring authorities, and this poses a risk to future collaborative planning efforts and could undermine the efficacy of joining strategic approaches across the wider Oxfordshire area if required.	for establishing Oxford city's FEMA. 4. The S&V ELNA considers that the HMA is "the majority of" Oxfordshire (para.4.28) 5. Limitations of the 2021 Census are noted however it does represent the most recent Census data.	

2756

Evidence base - Specialist housing needs assessment	1. It is a significant omission to not include households climbing out of need as part of stage 4 of the methodology, and Table 4.5. 2. The Housing Needs Assessment (HNA) needs to consider the impact of in and out migration. 3. The Housing Need Assessment HNA should provide links within the footnotes to any data used, such as Office for National Statistics (ONS) modelled income estimates and data from the English Housing Survey	1. Table 4.5 shows simply projected housing need arising per annum. Whether existing affordable homes may become available is considered in the supply section. 2. The impacts of in and out migration are considered in the demographic analysis that forms the basis of much of the assessment.	

Topic	**Summary**	**Response**	**Outcome**

2757

	(EHS) or Annual Survey of Hours and Earnings (ASHE). 4. We suggest that the HNA consider using housing benefit eligibility criteria to inform need. The current use of an income multiplier does not take account of different household circumstances and the 35% multiplier currently chosen has no justification. 5. There needs to be a reliable data source for the number of households living in unsuitable housing. 6. Paragraph 4.15 identifies that 'current need is estimated to be 2,446 households'. There should be a description provided about how this figure is arrived at. It also bears no relation to figures in table 4.3, so this should be explained. 7. Table 4.4 estimates current affordable housing need by affordability. There needs to be a reliable data source provided for this estimate. 8. Paragraph 4.19 estimates that 1,160 new households would form annually and twothirds will be unable to afford market housing, equating to 708 newly forming households of need per annum on average. The assumptions made to inform these figures needs to be explained. 9. Paragraph 4.20 should identify the period considered, and it should provide any	3. Links can become out of date. As long as it is clear what the source is, this should be adequate. 4. Using a percentage of household income to estimate affordability is a common and standard approach. Previous MHCLG guidance has recommended the use of a % of gross household income in assessing affordability and ONS continues to use this approach. 5. Table 4.3 is a collation of different types of unsuitable housing (e.g. overcrowding), compiled by Iceni from the preceding parts of the analysis, which are all sourced individually. 6. The households in unsuitable housing in Table 4.3 is a starting point, but not itself indication of the level of need- there are exclusions of those who are likely to be able to afford market housing and those already in affordable housing. Once excluded, the figure of 2,446 is	

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	data that has informed this section, such as the		

Topic	Summary	Response	Outcome
	additions per year to register, if that's what is used. 10. Paragraph 4.22 cites the sources used and the time period to identify supply through relets. As this is not stated for elements of need it's not possible to determine if the time periods align. The choice of a 3-year period should also be justified because the oldest figure of the 3 years has the lowest number of relets, which may inadvertently assume a lower supply. 11. Paragraph 2.45 requires a data source for the 251 homes sold below the lower quartile price. 12. Paragraph 4.33 to 4.34 indicates the need of those who can't afford to rent on the market could be meet through affordable rents. However, Policy H2, part b only requires social rents. This requires justification, particularly as the delivery of more social rents impacts viability and the thresholds for the Policy. 13. The analysis on shared ownership, first homes and rent to buy is a simplistic comparison of likely affordability of different products and it should link to data on incomes, savings, and identify the number of households able to afford.	derived. This is clearly explained in paragraph 4.15 7. This 2,446 number is derived as explained in response to point 6. 8. The second element of newly arising need is existing households falling into need. To assess this, information about existing households who have been housed in social/affordable rented sector housing over the last three years has been used to represent the expected annual flow of existing households falling into need. The analysis excludes transfers. 9. Paragraph 4.20 gives annual figures. The plan period is used for all the demographic data behind calculations. The paragraph is clear that information about households entering the social/affordable rented sector has been used to represent the expected flow of households onto the housing register over the plan period.	

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		10. Equally, selecting only two years, that avoids the lower year,	

Topic	Summary	Response	Outcome

		could over-estimate supply. Three years is considered a robust enough time period to give a good idea, whilst remaining recent enough to be relevant. It is in line with the PPG, which makes reference to consideration of recent trends. 11. The number is derived using Land Registry data 12. It is not correct that Policy H2 only requires social rents. Part of the tenure split includes intermediate forms of affordable housing. However, it is also the case that social rent is prioritised because it meets the needs of those in greatest housing need. Also, standard affordable rent discounts are not considered affordable in Oxford, so a greater degree of discount would be required for it to be considered affordable housing in Oxford. 13. the analysis is considered fit for purpose.	

General/Other Responses

Topic	Summary	Response
15-minute cities	Support for the 15-minute cities concept – it was not publicised well, but it has worked in other cities.	Noted.
Recreation grounds	These sites are used by residents, football teams and clubs from all ages and all walks of life. To lose these would be at the detriment of the area and locals, especially young people.	The detailed site allocation policies seek reprovision of sports facilities.
Clarity over how housing figures have been reached	There should be greater clarity regarding: • the capacity for housing within the city's administrative boundaries; • why the plan period start date of 2022 has been chosen; • how the housing figures from the existing OLP and the extant Local Plans for neighbouring local authorities relate to the housing requirement over the new plan period; and • the approach to be taken to meeting residual unmet need.	Since the Reg 18 consultation the plan period has been adjusted to 2025 – 2045. Policy H1 calculates housing need using the Standard Method, and latest government affordability data.
More deference to national policy	Re-stating the NPPF's contaminated-land rules, the Environment Act's 10 % biodiversity-net-gain requirement or the Future Homes Standard's net-zero-ready fabric provisions does not enhance protection; it merely piles extra reports onto applicants.	The city has a local net zero target of 2040 and the national requirement is 2050. Many policies are bespoke to ensure we meet this target.

Council tax is too high	The excessive regulation enforced by the Council means Council Tax is too high. People can't afford to buy houses because they are having to subsidise social housing.	This is beyond the remit of Planning.
Transport issues	• Please could you find ways to stop cars and traffic dominating our city? • Please could you make park and ride work? • Please could you stop stationary traffic where queues of drivers try to get into the Westgate Centre? If	The City Council will continue to work with the County Council to identify potential solutions to these issues, with the aim of enhancing public realm. However, the details of this work, and

Topic	**Summary**	**Response**

	that continues to be the reality once the Botley Road is open again, it will be very bad. • Please could you find ways for cyclists to be able to use the roads without confronting potholes and drain covers with large gaps around them? • Please could you find a way for cyclists to go east west without having to dismount from their bikes? • Please could you stop buses driving up Queen Street? • Traffic congestion is significantly caused by private school drop-offs. • Proper cycle highways and trams needed to connect the city. • Move the coach station to the Becker street carpark next to the main station to save public transport network and pedestrian accessibility.	implementation of schemes, will be led by the County Council as Highways Authority and are outside the realm of the Local Plan.

Appendix 1 – Statutory Consultees
Appendix 2 – Additional Local Groups and Organisations Contacted Directly
Appendix 3 – Leaflet Sample

Appendix 1: Statutory Consultees and Duty to Cooperate Bodies

Blackbird Leys Parish Council	Canal & River Trust
Cherwell District Council	EE
Environment Agency	Highways England
Historic England	Homes England
Homes England (SW Consultations)	National Grid UK
Natural England	Network Rail
NHS England	NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board
Office of Rail and Road	OxLEP Oxfordshire Local Enterprise Partnership
Oxfordshire County Council (Strategic Planning Team)	Thames Valley Police
Thames Water	The Office of the Police and Crime Commissioner for Thames Valley
Active Travel England	Vale of White Horse District Council
South Oxfordshire District Council	West Oxfordshire District Council
Littlemore Parish Council	Risinghurst and Sandhills Parish Council
Old Marston Parish Council	Avison Young (on behalf of National Gas Transmission)
The Coal Authority	Three
Vodafone and 02	The Theatres Trust

Appendix 2: Additional Local Groups and Organisations contacted directly

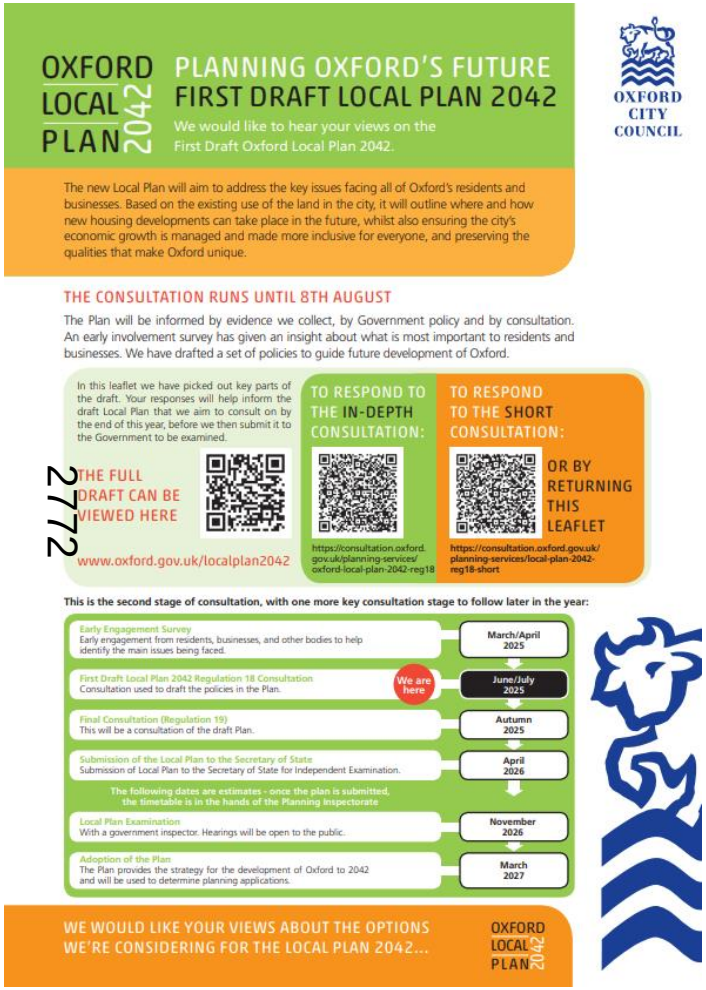
St Ebbes New Development Residents Association	Advisory Council For the Education of Romany and Other Travellers
Age UK Oxfordshire	Apsley Road Residents Association
Apsley Road Residents Association	Barns Court Allotment Association
Barns Court Allotment Association	Barracks Lane Allotment Association
Bartholomew Road Allotments Association	Bartlemas Close Allotment Association
Barton Community Association	Barton Fields Allotment Association

Binsey Village Residents Association	Blackbird Leys Community Association
BOAT Boaters of Oxford Action Team	Build a Dream Self Build Association
Bullingdon Community Association	Co-ordinating Committee of Headington Residents' Associations (CCOHRA)
Cordrey Green Residents Association	CPRE Oxfordshire
Cripley Meadow Allotment Association	Cunliffe Close Residents Association
Cutteslowe Allotment Association	Cutteslowe Community Association
Deaf Direct Oxford	Design Council Cabe
Divinity Road Area Residents Association (DRARA) Planning Action Group	Donnington Residents Association
East Oxford Community Association	East Oxford Residents Association Forum
East Ward Allotment Association	Essex Street Residents Association
Fairacres Road Allotment Association	Fairview Allotment Association
Falcon Close Resident's Association	Feilden Grove Residents Association
Florence Park Community Association	FOXCAN (Friends of Oxford Canal)
Friends of Aristotle Recreation Ground	Friends of Aston's Eyot
Friends of Bury Knowle Park	Friends of Cutteslowe and Sunnymead Park
Friends of Florence Park	Friends of Headington Hill Park
Friends of Holy Trinity Church	Friends of Iffley Fields
Friends Of Iffley Village	Friends of Lye Valley
Friends Of Quarry	Friends of Oxpens Meadow
Friends of Raleigh Park	Friends of South Park
Friends of the Trap Grounds	Friends Of Warneford Meadow
Friends, Families & Travellers Community Base	Gurdwara Sri Guru Singh Sabha Oxford
Harefields and Marriott Residents Association	Harefields Residents Association
Headington Action	Headington And St Clements Residents' Associations
Headington Community Association	Headington Heritage
Headington Neighbourhood Forum	Highfield Residents' Association
Hill Top Road Residents' Association	Hobson Road Group
Hurst Street Residents Association	Iffley Fields Community Nature Plan Group
Iffley Fields Residents Association	Iffley Road Area Residents Association
Iffley History Society	Ingle Close Allotments
Jack Straw's Lane Residents Association	Jericho Community Association
Jericho Wharf Trust	Jeune Street Residents Association
Kestrel Crescent Allotment Association	Littlemore Community Association
Littlemore Local Historical Society	London Place Residents Association
Lower Wolvercote Allotment Association	Marston Ferry and Blackhall Allotment Association
Marston Ferry and Blackhall Allotment Association	Marston Street Residents Association
Middle Cowley Action Group	Mileway Gardens Residents Association
Mill Lane Allotment Association	Moreton Road Residents' Association

Morrell Avenue Area Residents' Association (MAARA)	Morrell Avenue Area Residents' Association (MAARA)
New Headington Residents Association	New Marston South Residents Association
Norham Manor Residents Association	North Oxford Association
North Parade Residents Association	Northway Action Group
Northway Community Association	Northway Tenants and Residents Association
Old Marston Residents Association	Osney Island Residents Association
Osney, St Thomas & New Botley Allotment Association	Oxford and District Federation of Allotment Associations
Oxford and District Federation of Allotment Associations	Oxford Archaeology South
Oxford Asian Cultural Association	Oxford Civic Society
Oxford Cohousing	Oxford Community Land Trust
Oxford Green Belt Network	Oxford Hindu Temple & Community Centre Project
Oxford Historical Society	Oxford Irish Society
Oxford Muslim Community Initiative	Oxford Pegasus Residents Association
Oxford Preservation Trust	Oxford Quakers
Oxford Waterside Residents Association	Oxfordshire Architectural and Historical Society
Oxfordshire Association for the Blind	Oxfordshire Buildings Record
Oxfordshire City and County Archaeological Forum	Oxfordshire Gardens Trust
Oxfordshire Youth Support Services	Park Town Trust
Polstead Road Residents' Association	Ramsey Road Allotment Association
Regal Area Community Association	Residential Boat Owners' Association
Risinghurst Allotment Association	Rose Hill (Lenthall Road) Allotment Association
Rose Hill Community Association	Save Port Meadow
Showman's Guild of Great Britain (London and Home Counties)	Sorrel Road Allotment Association
South Jericho RA	South Oxford Community Association
South Ward Allotment Association	Spragglesea Mead and Deans Ham Allotment Association
St Aldate's Parish Church and Centre	St Clement's Allotment Association
St John Street Area Residents' Association	St John Street Area Residents' Association
St Margaret’s Church	St Margaret's Area Society
St Mary's Road Residents Association	Summertown Riverside Group
Summertown St Margaret's Neighbourhood Forum	Templars Square Residents Association
Thames Valley Gypsy and Traveller Association	The Ancient Monuments Society
The Georgian Group	The Gypsy Council

The Oxford Buddha Vihara	The Society for the Protection of Ancient Buildings
The Travellers Movement	The Twentieth Century Society
Thrangu House Oxford	Town Furze Allotment Association
Trap Grounds Allotment Association	Upper Wolvercote Allotment Association
Van Diemans Lane Allotment Association	Victoria Road Group
Waterways Residents Association	West Oxford Community Association
Wingfield Residents	Wolvercote Commoners Committee
Wolvercote Local History Society	Wolvercote Neighbourhood Forum
York Place Residents' Association	

Appendix 3: Leaflet Sample



OXFORD LOCAL PLAN 2042

PLANNING OXFORD'S FUTURE FIRST DRAFT LOCAL PLAN 2042

We would like to hear your views on the First Draft Oxford Local Plan 2042.

OXFORD CITY COUNCIL

The new Local Plan will aim to address the key issues facing all of Oxford's residents and businesses. Based on the existing use of the land in the city, it will outline where and how new housing developments can take place in the future, whilst also ensuring the city's economic growth is managed and made more inclusive for everyone, and preserving the qualities that make Oxford unique.

THE CONSULTATION RUNS UNTIL 8TH AUGUST

The Plan will be informed by evidence we collect, by Government policy and by consultation. An early involvement survey has given an insight about what is most important to residents and businesses. We have drafted a set of policies to guide future development of Oxford.

In this leaflet we have picked out key parts of the draft. Your responses will help inform the draft Local Plan that we aim to consult on by the end of this year, before we then submit it to the Government to be examined.

THE FULL DRAFT CAN BE VIEWED HERE

www.oxford.gov.uk/localplan2042

TO RESPOND TO THE IN-DEPTH CONSULTATION:

https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2042-reg18

TO RESPOND TO THE SHORT CONSULTATION:

https://consultation.oxford.gov.uk/planning-services/local-plan-2042-reg18-short

OR BY RETURNING THIS LEAFLET

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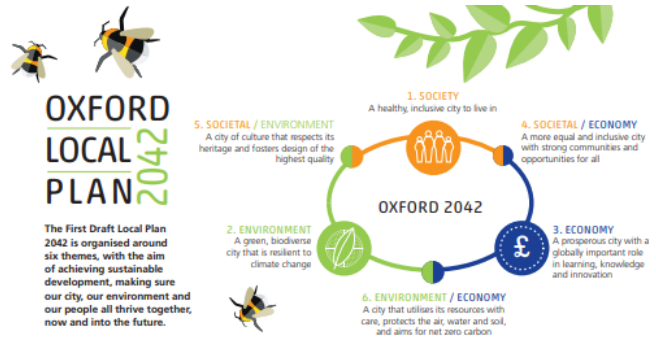
This is the second stage of consultation, with one more key consultation stage to follow later in the year:

Early Engagement Survey Early engagement from residents, businesses, and other bodies to help identify the main issues being faced.	March/April 2025
First Draft Local Plan 2042 Regulation 18 Consultation (We are here) Consultation used to draft the policies in the Plan.	June/July 2025
Final Consultation (Regulation 19) This will be a consultation of the draft Plan.	Autumn 2025
Submission of the Local Plan to the Secretary of State Submission of Local Plan to the Secretary of State for Independent Examination.	April 2026
The following dates are estimates - once the plan is submitted, the timetable is in the hands of the Planning Inspectorate	
Local Plan Examination With a government inspector. Hearings will be open to the public.	November 2026
Adoption of the Plan The Plan provides the strategy for the development of Oxford to 2042 and will be used to determine planning applications.	March 2027

WE WOULD LIKE YOUR VIEWS ABOUT THE OPTIONS WE'RE CONSIDERING FOR THE LOCAL PLAN 2042...

OXFORD LOCAL PLAN 2042



OXFORD LOCAL PLAN 2042

The First Draft Local Plan 2042 is organised around six themes, with the aim of achieving sustainable development, making sure our city, our environment and our people all thrive together, now and into the future.

1. SOCIETY
A healthy, inclusive city to live in

2. ENVIRONMENT
A green, biodiverse city that is resilient to climate change

3. ECONOMY
A prosperous city with a globally important role in learning, knowledge and innovation

4. SOCIETAL / ECONOMY
A more equal and inclusive city with strong communities and opportunities for all

5. SOCIETAL / ENVIRONMENT
A city of culture that respects its heritage and fosters design of the highest quality

6. ENVIRONMENT / ECONOMY
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon

OXFORD 2042

WHAT IS OUR HOUSING NEED AND WHAT CAN WE DO TO TRY AND MEET IT?

There is a great need for new, affordable homes in Oxford. Our housing need is 1,087 dwellings per year. Oxford is one of the least affordable cities to live in the UK.

1 We have used up-to-date evidence of costs and profits in new developments to set an affordable housing requirement- we are proposing that 40% of new developments with more than 10 homes should be affordable, and 80% of those affordable homes should be social rented housing as this is the most affordable type to best meet needs. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

ALLOCATING SITES FOR DEVELOPMENT

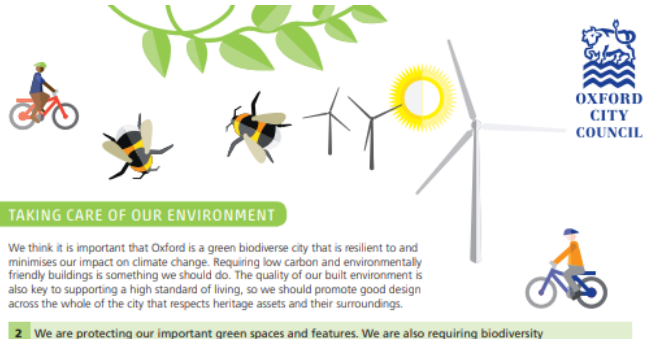
We don't have space to meet our full need in the city, certainly not without compromising other needs like open space. But we must still try to deliver as much housing need as possible. Our policies prioritise housing and we have worked hard to identify sites - contacting landowners, running a call for sites and carrying out desk-based exercises. We are also looking at the Green Belt.

We have identified sites that we are investigating to allocate for development. Nearly all of these are on previously developed land. We will continue to talk to landowners and assess impacts for example in terms of access, heritage and green infrastructure. We would welcome comments on key things to consider as we go on to draft the detailed site allocation policies. Maps of the sites can be found online by scanning the QR code.

GREEN BELT

Having unmet housing need means that the Government tells us we have to see if areas of the Green Belt could be developed for housing. At this stage, we have ruled out much of the Green Belt as not being suitable for development, for example because it is functional flood plain or because of its wildlife value. The rest of the Green Belt we have assessed against the purposes of Green Belt, and we now need to investigate landowner interest, biodiversity interest, whether there is access and whether there are any other constraints. Maps that show the area of Green Belt, the areas ruled out and the areas in scope for further investigation are available by scanning this QR code.

Maps showing the sites we're investigating are available on our website.
If wish to see them but can't view these please contact us using the details below.



OXFORD CITY COUNCIL

TAKING CARE OF OUR ENVIRONMENT

We think it is important that Oxford is a green biodiverse city that is resilient to and minimises our impact on climate change. Requiring low carbon and environmentally friendly buildings is something we should do. The quality of our built environment is also key to supporting a high standard of living, so we should promote good design across the whole of the city that respects heritage assets and their surroundings.

2 We are protecting our important green spaces and features. We are also requiring biodiversity enhancements and new green features on sites. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

3 We have drafted a policy that requires all new buildings are net zero carbon in operation from adoption of the plan. In a few exceptional cases, payment to offset carbon impacts will be allowed (for example for hospitals, which need to use more energy than it is likely can be generated onsite). To what extent to you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

4 Good design is about ensuring development functions positively for the people who live and work there and that it makes best use of land and respects heritage. We have also drafted a policy that requires high density development and efficient use of land first and foremost, alongside policies to ensure design respects heritage including views of the renowned skyline. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

SUPPORTING OXFORD'S SUCCESSFUL ECONOMY AND REDUCING INEQUALITIES

Oxford is a prosperous city, with a globally important role in learning, knowledge and education. However, there are inequalities across the city. Reducing these means there needs to be access to employment opportunities for all, as well as access to decent, affordable homes.

5 We have identified what we think are key employment sites in the city that we should protect. These are sites that support Oxford's internationally important role in education, research and health, and also those that support a diverse and strong economy. We are not protecting any employment sites in the city centre or district centres, to give full flexibility in those areas, for example to allow for offices to change use to housing. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

6 We propose requiring community employment plans so that work and training opportunities are given to local people. To what extent do you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

7 Affordable workspace is proposed as a new policy approach- the largest key employment sites will be expected to deliver an affordable workspace strategy, to ensure a range of employment types and businesses. To what extent to you agree with this approach?

☐ AGREE ☐ STRONGLY AGREE ☐ NEUTRAL ☐ DISAGREE ☐ STRONGLY DISAGREE ☐ DO NOT KNOW

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ANY FURTHER COMMENTS?

Scan the QR code to sign up to receive our weekly e-newsletter to stay up-to-date with the latest consultations, news and events from Oxford City Council.

OXFORD CITY COUNCIL

YOUR DETAILS

We will accept anonymous responses, but please let us know your name and contact details. This will mean we can contact you when we next consult on the Local Plan 2042. Your comments will be considered by the Planning Policy team at Oxford City Council.

Your Name:

Organisation (if applicable):

Address:

Email:

Gender: ☐ Female ☐ Male ☐ Prefer not to say

Prefer to self-describe:

Age Group: ☐ Under 16 ☐ 16-19 ☐ 20-24 ☐ 25-34 ☐ 35-44 ☐ 45-54 ☐ 55-59 ☐ 60-64 ☐ 65-74 ☐ 75+ ☐ prefer not to say

Date:

Do you agree to us using your data to analyse responses? ☐ YES ☐ NO

Do you agree to us using your data to contact you about future engagement events relating to the Local Plan 2042? ☐ YES ☐ NO

DATA PROTECTION Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for Oxford Local Plan 2042 consultations only, and we will only store your data until the Plan is adopted.

PLEASE POST BACK TO US IN AN ENVELOPE MARKED 'FREEPOST Oxford City Council' (no stamp required)

FREEPOST Oxford City Council

OXFORD LOCAL PLAN 2042

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Appendix 7 - Reg. 19 Summary of Responses

Chapter 1

General Comments relating to Chapter 1

POLICY	General comments			
All respondents **supporting** policy	43.5	86.1	98.1	161.01

COMMENT SUMMARY	OFFICER RESPONSE
The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges. The overarching threads of the Plan are acknowledged.	Comments noted.
National Highways has made a comment welcoming aspects of the Plan's Vision, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	General comments				
All respondents **raising objections** on this policy/chapter	30.5	56.4	58.3	59.3	60.3
	69.5	101.1	139.1	157.1	159.1
	159.2				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

The Plan needs to recognise that there are spatial and wellbeing limitations to growth, and that striving for investment and growth in tech and science labs as a 'trickle down' panacea for the City's challenges and ills will end up harming the environmental and heritage characteristics that actually make Oxford an attractive place to live, work and invest. There are reasons why Luton or Swindon do not punch at the same weight as Oxford, and they are not solely due to the University/s and the academic melting pot here. If the Plan does not re-balance and prioritise housing the City's residents and meeting its basic service and well-being requirements over bending over backwards for the University and Science/Tech sectors, the thin thread holding these two parts of the City together will break to the impoverishment and economic detriment of all.	The Plan, and specifically Policy S1, is explicit in its aims to prioritise new homes and support the health and wellbeing of local communities. A modification is proposed in response to West Oxfordshire that also addresses this point, refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
South Oxfordshire and Vale of White Horse District Councils have made a representation relating to the vision and strategy, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Vision for Oxford is generally supported and in particular the support for research and development in the life science and health sectors. However, this is a fairly narrow focus and the Vision for the plan should look to broaden out this to include the expected investment in AI and other innovation areas. The Objectives of the Plan (under “a fair and	The remit of the local plan is to set out policies pertaining to land use, placemaking and spatial development. A broad economic strategy with detailed treatment of specific sectors relevant to the Oxford area would be beyond the scope of the local plan as a development management document.	None

prosperous city with a globally important role in learning, knowledge and innovation" theme) pick this up, but the Vision should set this out in a clearer manner. In addition, there is currently only a cursory mention of enabling businesses to prosper and no mention at all of the strength of the local economy or more direct references to the need for housing to help sustain and encourage further investment.		
The lack of housing supply in Oxford leads to a restricted labour supply to meet the expansion of employment uses and to sustain the foundational economy. A joined-up approach with neighbouring districts to accommodate housing is essential, thus allowing Oxford's key employment areas to focus on maximising the economic benefit they can delivery.	Engagement and joint working with neighbouring districts and statutory bodies has been extensive and ongoing since the previously submitted plan, culminating in the development of statements of common ground.	None.
[T]he concerns raised through these and previous representations relate to the ability of the Local Plan, as drafted, to deliver on the Vision and Plan objectives, particularly in respect to addressing the housing and employment needs of the City – affordable housing being a central element of need that remains unmet and is growing. Lack of affordability undermines economic growth and prosperity and works against the Vision and objectives in respect to healthy and inclusive communities and equal opportunities for access to all basic needs to include homes,	The Plan does extensively identify land for housing development and economic growth as shown through the site allocation policies and various designations of employment sites. Engagement and joint working with neighbouring districts and statutory bodies has been extensive and ongoing since the previously submitted plan, culminating in the development of statements of common ground.	None.

health, employment, nature and community infrastructure. A Plan that does not deliver sufficient homes nor land for employment, 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. The Vision must be underpinned by clear strategy and policies to deliver growth to match needs – what can be achieved in Oxford and how it will continue to collaborate with neighbouring authorities to deal with unmet needs, particularly housing in a way that works spatially for Oxford to meet the Vision. The Vision is ambitious, however the Plan fails to provide an effective strategy to deliver this.		
The Vision for Oxford does not address two key aspects, namely the important role that the two Universities play in Oxford; and the acute housing need in the City. The Universities and Colleges play a fundamental role in the social, educational, tourism, and local economy of Oxford, and indeed wider Oxfordshire, as is noted in Page 1 (second paragraph), Page 15 (first bullet point) and Chapter 4 (page 1, first paragraph) of the LP45. In addition the Universities and Colleges require a functioning ecosystem. Good schools	The Plan does acknowledge the role of the Universities and Colleges within the City and more widely. Additionally, Policy C4 (Protection, Alteration and Provision of Learning and Non-residential Institutions) specifically seeks to protect and provide provision of learning institutions, including schools. Planning for the provision of schools and ensuring there are adequate school places currently falls under the remit of Oxfordshire County Council.	None.

are part of this and access to schools for children of visiting academics is important. The Local Plan must encourage and support schools to expand and enhance their facilities as needed. These points should be recognised in the Vision. It is noted the NPPF Paragraph 22 encourages Local Plans to have a Vision which looks over a longer term period (at least 30 years). In particular, where larger scale development is proposed and to take account of likely timescales for delivery. Whilst this is not a requirement for this Local Plan given the lack of large scale development proposals, having a longer term Vision for Oxford (which envisages how Oxford's housing and employment needs will be delivered over the longer term) is important given its inability to meet its identified housing need. This longer term, joined up, approach was being taken in the, now abandoned, Oxfordshire 2050 Spatial Strategy and one that the City is encouraged to take in its LP45.	The reference to paragraph 22 of the NPPF is noted but, as mentioned, the 30 year vision is intended to apply to large scale developments such as new settlements, which would not apply to Oxford City. Notwithstanding this the Plan covers the period 2025-2045 which will deliver a long term strategic vision for the City.	
Whilst the LP45 makes reference to there being a "chronic undersupply of housing" (Page 1, third paragraph), the Vision does not acknowledge this (only referring to 'access to housing') or set out any meaningful approach to addressing it. This should be a fundamental element of this Local Plan. Our response to Policy H1 makes reference to the use of the standard method and it providing a minimum figure that can be uplifted in order to recognise	The Vision sets out in broad terms the strategic objectives of the plan as a whole. It covers a wide range of topic areas which are expanded upon in the strategic policies and explored in greater detail in the individual policies of the plan. They are sufficiently descriptive as written and repetition is not considered to be necessary.	None.

additional housing need arising from an uplift in planned economic growth, in calculating the City's housing requirement in the new Local Plan.		
Suggestions made to amend Vision (P 4) to include the words 'and reducing inequalities' and to request more explicit mention of and emphasis on safety.	None of the suggestions are considered necessary to make the plan sound, instead they provide alternative versions of the existing text.	None.
Suggestions made to amend text in Objectives and Strategy table section "A liveable city with strong communities and opportunities for all."	None of the suggestions are considered necessary to make the plan sound, instead they provide alternative versions of the existing text.	None.
The plan does not deliver on the overarching threads. The overall strategy of meeting all identified employment needs arising within the city while exporting its unmet housing needs to greenfield sites in neighbouring districts does not meet the aims of the overarching threads. Reducing inequality - the plan includes a great deal more employment space than housing. Drastically increasing the number of jobs in the city will increase the demand for housing and drive up the cost of housing. Higher housing costs in oxford will increase inequality. Addressing climate change - The jobs housing imbalance will encourage car use, worsen traffic congestion, road safety and pollution. Enabling a liveable city - It will not be possible for most of the employees on the new employment sites to live within a 15 min walk of their workplace. The strategy is not consistent with NPPF, para 111 a) as it fails to support an	The plan does not include allocations for new employment sites, and there are locational restrictions on where employment generating uses will be permitted – as set out in Policy E1. The emphasis of the plan as contained in E1 is on intensification and modernization of existing employment uses, and there are provisions to allow the loss of employment floorspace to housing on meeting set policy criteria.	None.

appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. The plan is not consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations. The ratio of the number of jobs created to the number of homes provided must be reduced.		
In their previous/current Local Plan, Oxford City Council designated most development land within Oxford City for employment not housing. They 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 their 'duty to co-operate' surrounding district councils made provision of housing to meet Oxford's 'unmet' need in the Green Belt all around in Oxford. [The plan] discusses providing homes for all without assessing housing need and failed to use approved Government methodology previously. It now claims that the correct methodology has been used, but the figures are very similar to previous ones and cannot be scrutinised. Development land for employment takes priority and the assessed need is not evidence based and evidence apparently used is not available to the public.	Refer to officer responses to policy H1 representations.	Refer to officer responses to policy H1 representations.

CPRE has carried out research on the previous iteration of the Plan 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.		
Oxford City Council has not solved the problem of how the current commuters can travel into Oxford City to work, yet wants to exacerbate the problem but creating 14,000 additional jobs within Oxford City while exporting more housing outside Oxford for people to fill these jobs. The transport problem, resulting pollution etc. will be greatly exacerbated by this and the County Council's proposed 'Traffic Filter' scheme which offers no alternative public transport or new cycleways for those commuting into Oxford from villages with no or little public transport. It would be preferable to create new jobs outside the City centre. There are still a number of sites for employment that have not been fully developed on the edge of the City, which are more accessible. e.g. Oxford Business Park has been in development for over 20 years and is still not fully developed, yet is not available for housing. The Botley Road should be mixed developments of housing and commercial, but the south side is primarily commercial.	The emerging approach towards employment sites differs from the current plan in a number of ways. The emerging plan limits the development of new employment generating uses through the inclusion of locational criteria, and promotes the intensification and modernisation of existing employment sites. It also makes allowances for the conversion of some categories for employment floorspace into housing use. The process for allocating a site for housing in the plan takes into consideration various factors including the size of the site, the intentions of the landowner, the likelihood for delivery on the site within the timescale of the plan, physical and policy constraints on development (e.g. flood risk, ecological designations), and the number of units that can be realistically delivered on the site. Several sites have been assessed as potential allocations which ultimately did not meet the inclusion criteria.	None.

The environment is identified as one of the six themes underpinning the Council's vision for Oxford in 2045. Figure [1.1] sets out the underlying objectives associated with each of the six themes and there is no mention of Oxford's broader landscape setting. The protection of the characteristic landscape setting of the city essential to its semi-rural identity should feature more prominently within the objectives associated with Oxford's landscape. We recommend these objectives are amended to highlight and reflect the significance of Oxford's wider landscape setting to ensure a sound and consistent approach in relation to the wider policies within the Local Plan.	The themes setting out the vision of the plan are in line with the Council's wider objectives and priorities. They are broad and cover a wide range of topic areas which are expanded upon in the strategic policies and explored in greater detail in the individual policies of the plan. We consider that the objectives are sufficiently descriptive at this point in the plan text.	None.
There are important strategic matters, for which there is no evidence of a shared approach between the local authorities in Oxfordshire. The most pressing of these is housing need. On some more detailed matters – including the conservation and enhancement of important views of the city, the City Council has missed opportunities to work effectively with its neighbours, such as with the Vale of White Horse and South Oxfordshire District Councils. We ask that the Inspector be satisfied that these matters have been effectively considered by all parties within the city and county. In particular, we ask that there is an agreed joint strategy to meet the City and County's housing needs, including the critically important requirement for affordable key worker housing.	Engagement and joint working with neighbouring districts and statutory bodies has been extensive and ongoing since the previously submitted plan, culminating in the development of statements of common ground with several bodies. A key area of joint working has been housing need, however other areas have been covered and these are referenced in various parts of the consultation statement. The agreed statements will form part of the supporting documentation in the local plan submission.	None.

Policy S1

POLICY	S1
All respondents **supporting** policy	30.1

COMMENT SUMMARY	OFFICER RESPONSE
None received.	N/A

POLICY	S1				
All respondents **raising objections** on this policy/chapter	1.1	50.1	57.1	59.1	69.1
	43.1	52.1	58.1	60.1	88.1
	107.2	113.1	118.1	131.2	157.2
	139.2	101.2	133.1	159.3	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Such policies need to wait until a decision is made on Local Government Reorganisation.	The requirement for LPAs to have an up to date local plan is not impacted by Local Government Reorganisation.	None.
Policy S1 replicates the NPPF presumption in favour of sustainable development; however, repetition of national policy should be avoided and the policy should instead relate to the local context.	The West Oxfordshire District Council SoCG for Policy S1, also addresses this issue. Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The transport strategy fails to give sufficient priority to sustainable transport modes as required by NPPF paras 115 and 117.	Criterion d) of Policy S1 is explicit in supporting sustainable transport modes. Sustainable transport is also required in numerous policies	None.

The transport policies should be more forward thinking and consistent with national guidance.	throughout the Plan including Chapter 7 and as part of site-specific allocation policies in Chapter 8.	
This plan does not sufficiently demonstrate exceptional circumstances to justify the imposition of additional housing need on neighbouring councils which will result in further removal of land from the Green Belt.	Policy H1 outlines the housing requirement and unmet housing need. There is an expectation in the NPPF that local authorities collaborate across their boundaries to address unmet housing need. A formal request has been made of our neighbouring authorities for helping meeting unmet need, and the LPA is maintaining effective co-operation. Background Paper 006 (Green Belt Review) sets out the approach to Green Belt in greater detail.	None.
As it stands, the Council's approach fails to properly acknowledge the relationship and interaction between housing and economic growth. Policy S1 is contradictory to Policy E1 The wording " prioritising housing elsewhere" must be excluded from this policy if Policy E1 is to be effective. The Spatial Strategy policy should explain how the Plan will deliver the Vison and Overarching Threads outlined in the early pages of the Plan, as well as how development will be delivered over the Plan period.	The West Oxfordshire District Council SoCG for Policy S1, also addresses this issue. Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Criterion g) in the Vision sets out an absolute – preventing new development in locations where it would have a negative impact on important blue and green infrastructure	Criterion g) relates to the protection of neighbouring amenity. Criterion h) directs new development away from locations where it would have a negative impact on important blue	None.

networks, public open space, and flood plain. There should be a caveat added to say…." unless mitigated".	and green infrastructure networks, public open space, and result in loss of flood plain, also ensuring efficient use of land, helping to maximise opportunities on brownfield sites first. The detailed approach to protecting GI is set out in Policy G1.	
New employment development should be developed with housing to reduce commuting. Prioritising housing elsewhere will cause traffic congestion, pollution and prolonged travel time. This must include Green Belt countryside both within Oxford City and the surrounding districts. Without the duty to co-operate this Plan falls flat with deliberately insufficient provision for housing need ,preferring to increase jobs in the centre of Oxford, without houses nearly for people to walk or cycle to work. It deliberately ignores climate change and will not increase biodiversity and will further deplete nature significantly in the country that is already the most nature depleted in the world. The Plan will deliberately destroy Green Belt countryside both within Oxford City and the surrounding districts and the communities that live in it.	We are unable to meet the full extent of the identified housing need within the city. Whereas, we are able to meet our identified employment land needs, through a strategy of intensification and modernisation of existing employment sites. National planning policy requires us to meet both. We recognise that the current wording of Policy S1 could be regarding the plan's focus on housing delivery. Accordingly, a modification to clarify this has been suggested in the SoCG with West Oxfordshire DC. Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1. Policy H1 establishes the housing requirement and takes a capacity-based approach. There is an expectation in the NPPF that local authorities collaborate across their boundaries to address any unmet housing need. We are in the process of agreeing, with the neighbouring District Councils, how any unmet housing need will be addressed. The LPA is maintaining effective co-operation. Background Paper 006 (Green Belt Review) sets out the approach to Green Belt in greater detail.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

	The plan includes numerous policies specifically relating to biodiversity and climate change in Chapters 4 and 5 respectively.	
The Council is failing to follow its own intentions by failing to include prime brownfield sites such as the Oxford Stadium in the Plan despite knowing that it is available, achievable and deliverable within the Plan period. This failing is further exacerbated and highlighted by the fact that the draft Plan also makes a greenfield allocation at Sandy Lane Recreation Ground, just a short walk from the Stadium site. It is difficult to understand how this Plan would release the Recreation Ground for development ahead of the Stadium site. This is a prime example of how the proposed strategy is both severely lacking in ambition and is not consistent with national policy.	The Oxford Stadium is not an allocated site because since May 2022 (and after the site was previously allocated in the Local Plan 2036) the site is operating as a greyhound/racing/speedway stadium so community uses would need to cease operations if the site were to be redeveloped.	None.
Network Rail has made a representation relating to Policy S1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
South Oxfordshire and Vale of White Horse District Councils have made a representation relating to Policy S1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

West Oxfordshire has made a representation relating to Policy S1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
We support this policy in principle but we would like to see this policy specify the Council's stance in favour of applications for the change of use from commercial to residential within city and district centres, referenced elsewhere within the Local Plan (Policy C2: Maintaining Vibrant Centres). Promoting development of this type would achieve a number of the aims as well as helping to meet Oxford's unmet housing need. We would also support a policy sanctioning vacant units, both residential and commercial, within city and district centres. The repopulation of urban centres will have a significant impact on housing need, preventing the further development of Oxford's green setting.	The plan already addresses this point in Policies E1 and C2 so it's not considered necessary to amend S1 as suggested. A policy sanctioning vacant units would fall outside of the remit of planning. The City Council already endeavours to address this issue through the work of the of its Economic Development, Regeneration and Housing teams.	None.
Policy S1 (Spatial Strategy) should set out a spatial strategy which: - Meets the vision and objectives of the Local Plan - Refers to the need to maximise housing delivery in Oxford - Sets out how proposed development is to be delivered over the plan period and beyond; and	The plan's strategy seeks to be the articulation (through policy) of the plan's Vision. Policy S1 is therefore an overarching strategic policy for the city. The Oxford Local Plan 2045 includes policies which provide details of the housing target being planned for. The evidence base studies including the SHLAA and SA include a robust methodology to demonstrate the city's capacity and document	A modification to Policy S1 has been proposed to address issues raised by other respondents, which also relates to some of the issues raised.

- Follows the approach in the extant Local Plan, i.e. maximising growth in the City, including the Areas of Focus, and then adopt a hub and spokes approach, with the City being the focus for education, tourism and employment but having good infrastructure links into the surrounding Districts where housing is more readily deliverable.	how the plan's strategy was arrived at, and why it is appropriate. The City Council has fulfilled its obligations in maintaining effective cooperation (formerly Duty to Cooperate) through regular discussions with adjacent Local Planning Authorities. This work has all been documented within signed Statements of Common Ground. Policy S1 sets a locational strategy which meets the vision and objectives of the Local Plan 2045. The other policies in the Plan have been drafted to deliver the thematic objectives and align with Policy S1. There is also no need to refer to the need to "maximise housing delivery", when the plan's locational strategy is to focus on housing by supporting its delivery across the city and only allocating new sites housing. There is no need to set out how proposed development is delivered beyond the end of the plan period. Other policies in the plan are more area specific (e.g., Areas of Focus, and site allocations). Oxford City Council LPA has no administrative jurisdiction beyond the administrative boundary of the city. The IDP provides a suite of infrastructure projects needed to support the delivery of the Plan and has been produced in consultation with key infrastructure providers.	

	The spatial strategy is sound.	

Policy S2

POLICY	S2				
All respondents **supporting** policy	30.2	43.2	81.1	157.16	159.18

COMMENT SUMMARY	OFFICER RESPONSE
As set out in the Statement of Common Ground, Historic England support reference to the role of heritage in the Council's strategic approach to high quality design.	Support noted and welcomed.
Christ Church supports high quality design in the City. This should be proportionate to the location and setting of the proposed development, and also viability considerations. The Design Checklist at Appendix 1.1 sets out criteria from relevant policies. Should any policies change during the Examination then the checklist will be updated accordingly.	Comments noted.

POLICY	S2			
All respondents **raising objections** on this policy/chapter	1.2	69.2	120.4	139.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Time and money wasted by an authority, which will not exist after local government reorganisation.	When a new authority is vested, there will be a period of time before spatial plans for the area within the new administrative boundaries can	None.

	be developed. However this will require collating a new evidence base that is up to date and relevant, with the overall process potentially taking several years. Adopted plans will continue to apply to the geographic area until a spatial plan for the new authority area is developed, and this will ensure that there will continue to be an up to date framework for key policies to be delivered in a way that is as locally relevant as possible without having to revert to national policy only.	
The local housing need is not served by the design code nor is reducing carbon emissions to reduce climate change.	Local authorities are required to set out clear expectations and visions for design, in line with the principles for achieving well designed places contained in the NPPF. The local plan includes specific policies that address housing need and adaptations to climate change, and is to be taken as a holistic document that does not apply individual policies in isolation.	None.
It is questioned whether the checklist needs to form part of the Local Plan itself, and whether it would be more user friendly as a standalone guidance document to support the Local Plan. If the checklist is to remain in the Local Plan, it is necessary that any amendments to draft policy wording is also updated in the Appendix for consistency.	The checklist sets out the criteria by which applications are assessed, and their inclusion in the plan ensures their statutory weight. Where required guidance documents that go into more detail about the application of specific policies may be produced, although they are supporting documents to the plan and will not have statutory weight in of themselves.	None.
The policy and the supporting text should include definitions of what is meant by 'high quality design' and, in particular, 'high quality architecture'. It should also refer to the city's wider green setting and highlight the	The policy sets out the considerations and principles that form the strategic approach to design of the plan as a whole. It encourages a holistic reading of the plan which comprises of individual policies that address the natural	None.

importance of the historic views both from looking out of the city but also looking in (as highlighted in the Assessment of the Oxford Views Cones 2015).	environment, the green setting, important views and high-quality design. Specific definitions and criteria will be expanded in each policy and would not require repeating in detail here.	

Policy S3

POLICY	S3		
All respondents **supporting** policy	43.3	118.2	157.17

COMMENT SUMMARY	OFFICER RESPONSE
No comment	Support noted
West Oxfordshire District Council has made a representation relating to Policy S3, which is summarised in the Statement of Common Ground.	Support noted.
We support necessary infrastructure to address the impacts of any development but delivered on an appropriately phased timescale which will be development specific.	Support noted

POLICY	S3				
All respondents **raising objections** on this policy/chapter	30.3	47.2	51.1	52.2	58.2
	60.2	69.3	88.2	89.XX	138.5
	159.19				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Suggest the following wording is added to paragraph 3 on p16: *The expectation will be that the necessary infrastructure will be completed before occupancy of the site for the purpose for which permission is given.*	We consider that the wording of para. 3 of Policy S3 (n page 13, (rather than page 16, as suggested by the respondent), is appropriate and enables critical infrastructure (as defined in chapter 8 of the IDP), to be delivered in a reasonable timeframe. The Infrastructure Delivery Schedule categorises each infrastructure project into one of four	None.

The reason is that too often the infrastructure to accompany development is not built in a timely manner or in some cases at all.	categories. This paragraph only relates to critical infrastructure, of which there are a limited number of schemes identified in the IDP.	
Dependence on Cowley Branch Line (CBL) and Oxford Railway Station upgrades could affect soundness. This is because the plan identifies Oxford Railway Station and the CBL schemes as transformational infrastructure, with an expectation that certain sites will contribute towards their delivery. The Plan also sets out that development proposals "which rely on the delivery of critical infrastructure projects" will only be permitted prior to completion where the Council is content that the infrastructure "will be in place within a reasonable timetable". Given that both CBL and some station works depend on external funding and decisions, this creates a potential soundness risk under NPPF's tests of effectiveness and deliverability. This is because the plan relies on infrastructure it does not control. As such Policy S3 could be used to delay, what otherwise would be sustainable development if the Council is not satisfied abut timing. This causes a potential tension with the presumption in favour of sustainable development and with the NPPF emphasis on flexibility where infrastructure phasing is uncertain. The term "reasonable timetable" is undefined. This creates uncertainty and a possible internal	Infrastructure projects are usually grouped into one of three categories, critical, essential and important. The Infrastructure Delivery Schedule included in the Infrastructure Delivery Plan (IDP) assigns the majority of infrastructure schemes to one of these categories. In Oxford, there are a handful of infrastructure projects, the delivery of which, would bring significant additional social, environmental or economic benefits in addition to the mitigation or wider benefits delivered by the traditional infrastructure categories. These projects have been categorised into a fourth infrastructure category in the IDP, that of transformational infrastructure. Both the re-opening of the Cowley Branch Line to passenger services, and the improvements to Oxford Railway Station, are in the "transformational infrastructure" category. The plan relies on a variety of third-party infrastructure providers to deliver the infrastructure needed to support the plan, Infrastructure providers include (but are not limited to), Oxfordshire County Council, Thames Water, SSE and others such as Network Rail and the East West Rail Company. Each organisation has its own plans and timeframes within which, infrastructure is to be delivered to support	None.

conflict with S1's statement that "applications that accord with the Local Plan will be approved without delay".	development. We do not consider that Policy S3 would be used to delay development. We do not consider that the phrase "reasonable timetable" creates uncertainty, as this relates to the delivery of critical infrastructure schemes only that identified within the IDP. As	
Policy S3 asks for contributions to the Cowley Branch Line project for locations within the 1500m buffer of which BMW MINI Plant is included. While Policy CBLAOF refers to "figures 8.5 and 8.6" these figures were not presented in the current proposed submission document. Due to off-peak shift arrangements, and because many employees live far from the MINI Plant due to the lack of affordable housing supply, employees are highly unlikely to use or rely on the Cowley Branch Line for transport. Unclear from policy whether the contributions towards the Cowley Branch Line will be additional to those derived from CIL, and what constitutes "trip-generating development".	There is an expectation that development sites within the buffer zone, and generate additional trips, should contribute to the Cowley Branch Line, however, the specifics of this will need to be determined at application stage when considering the merits of each individual case. Re: Policy CBLAOF: Figures 8.5 and 8.6 have been omitted in error and will be reinstated.	None.
Policy does not adequately demonstrate that the infrastructure required to support new housing will be delivered in a timely manner. Without clear infrastructure commitments, development risks placing unsustainable pressure on existing communities. Local infrastructure constraints include: - traffic congestion	The Infrastructure Delivery Plan (IDP) provides a comprehensive review of infrastructure schemes to support the Oxford Local Plan 2045. Discussions with relevant providers have taken place throughout the production of the Local Plan. Thames Water is responsible for water provision/wastewater treatment. Oxford City	None

- limited public transport capacity, particularly in rural communities on the outer edge of Oxford - pressure on schools and health & social care services - wastewater network capacity Re: wastewater, Thames Water report on their website that they are 'finalising plans for a major upgrade at Oxford STW, costing more than £435m... We plan to complete this work in early 2032.' It is our understanding that the funding for all of this work has not been secured and there is a very real risk that development will occur without the essential upgrades to protect our rivers and public health. We would like to see: - A clearer infrastructure delivery plan linked to housing phasing. - Development to be contingent on infrastructure delivery rather than assumed.	Council has been in discussions with Thames Water in relation to the amount of growth proposed in the city's Local Plan 2045 and this growth has been factored into the required wastewater treatment upgrades. Oxford's growth has also been considered in relation to water supply in the SWOX area in the Water Cycle Study and the level of growth proposed in the city can be accommodated by Thames Water. Oxfordshire County Council (as highways authority) is responsible for the local road network. The administrative jurisdiction of the Oxford Local Plan only extends as far as the city's boundary. Following on-going discussions with the County Council in their role relating to education, there are no current capacity issues at schools in the city other than those identified in the IDP.	
South Oxfordshire District Council has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Vale of White Horse District Council has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Network Rail has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy S3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The policy is ineffective as the largest developers and infrastructure developers are the Universities, Oxford University Hospital Trust (Churchill, John Radcliffe, Nuffield, Old Road Campus (part), laboratories etc. who pay very little or no CIL contributions due to their charitable status – no effort to alter the CIL tariffs to match the unique mix of Oxford has been undertaken. A statement of intent is not a policy just a fluffy wishlist.	Developer contributions are not just limited to CIL. Section 106/Section 278 contributions also play an important role in delivering much needed infrastructure in the city. The policy sets out the framework for seeking developer contributions towards known infrastructure projects (as set out in the Infrastructure Delivery Plan). It provides the mechanisms for delivery as well as setting out appropriate delivery timeframes.	None.
Request policy wording is clarified to ensure that once the CBL (and public transport enhancements in defined 1,500m buffer zone) are delivered, no further financial contributions will be sought.	All developer contributions need to meet the required tests set out in both policy and legislation. Once infrastructure schemes have been implemented and the costs have been covered, we will not then be seeking further contributions for those schemes.	None.

Policy S4

POLICY	S4
All respondents **supporting** policy	30.4 | 106.3

COMMENT SUMMARY	OFFICER RESPONSE
We welcome the inclusion of draft policy S4 which acknowledges the need for pragmatism in decision making where development of a site is not financially viable. This is particularly pertinent for sites such as the Centre's campus sites on Marston Road which are longstanding allocations. The introduction of additional requirements on sites which have longstanding viability challenges is likely to hinder their development. Clearly it is a poor outcome for sustainable development for well-located sites to remain dormant. Inclusion of the policy is critical to the Local Plan being found sound.	Support is welcomed
Policy is sound, no reason specified	Support is welcomed

POLICY	S4				
All respondents **raising objections** on this policy/chapter	43.4	47.3	56.3	69.4	86.2
	89.2	107.3	112.2	114.2	130.1
	133.6	134.1	138.6	157.3	159.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Oxfordshire County Council has made a representation relating to Policy S4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Linked to comments on C8 Motor Vehicle Design Standards, while sustainable development should encourage less car journeys, the framing of the policy as blanket restrictions will undermine viability (as recognised in S4) and will have negative impacts which outweigh the potential policy benefits	The Viability Assessment includes consideration of the impact on viability of limiting parking provision in new developments, and this has informed the policy requirements.	None.
Conflict between net zero carbon targets and affordable housing viability. Step 1 & 2 of the cascade allow for the reduction of energy offsetting payments and adjustments to parking requirements, but the policy also requires development to remain free of fossil fuel use.	Policy R1 allows for energy offsetting where applicants are unable to match their operational energy demand through sufficient provision of renewable energy generation. This is to be explored only as a last resort once onsite and offsite options (i.e. on land elsewhere in the applicant's control) have been exhausted. It is a separate element to the policy which also requires that fossil fuels are not being directly utilised in the development to meet energy demands (i.e. no gas used for heating and cooking). Maintaining the requirement of no fossil fuels being directly used in the building will as a minimum help to ensure it is net zero carbon ready at least (i.e. as the wider energy grid continues to decarbonise over time).	None.
SPS8 [Land at Meadow Lane] is an example of a site that is not viable to develop without	Policy S4 sets out a cascade to ensure that policy requirements do not undermine deliverability of sites.	None.

offending sustainability and heritage policies. It should be deleted.		
This policy has considered viability only in terms of cost and profitability for the developer. Viability must also include other aspects of any development such as flooding, climate change and much wider aspects of the Plan itself. When considering viability of a development inflation both in materials and market price must be fully considered. There should be more thorough and in-depth scrutiny of the financial viability of the development in the first place and greater provision for increases in cost, reduction in market price etc. There should also be much greater scrutiny in major external factors that affect the viability of a development - flooding - this was not properly considered in the Barton Park development and has caused increased flooding in the neighbouring housing estate. Sewage - another issue affecting viability.	The Viability assessment for LP2045 applies sensitivity tests to the assumed costs, to account for estimated inflation in costs, sales values and other inputs during the plan period, to explore viability of sites both in today's terms and also future. Policy S4 is about the financial implications of policy requirements, but other impacts of development such as flood risk and climate changes, or infrastructure requirements such as waste water treatment, are covered in policies elsewhere in the plan, such as G7 Flood Risk and Flood Risk Assessments, and G9 Resilient Design and Construction.	None.
Agree that developers are expected to have considered the financial implications of policy requirements, including affordable housing and net zero carbon, and local market indicators, when purchasing the land for development. However the cumulative policy cost has not been sufficiently considered and creates unfavourable conditions for future investment in the City.	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested for policies which may have cost implications. The Viability Assessment therefore complies with the requirement in national guidance for a comprehensive assessment of all relevant plan policies. The assessment also includes sensitivity analyses to consider growth and downside scenarios in sales values, as well as costs inflation, to help understand the	None.

Concerned that the cumulative impact of the proposed policy requirements will undermine development viability (for new developments and refurbishments) and add uncertainty to the process. This concern is amplified by the recent increases to the Community Infrastructure Levy (CIL) tariff for R&D uses, which further erode viability headroom at a time when development costs are already elevated. The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability. Rapid economic changes such as the recent pandemic, conflicts in Ukraine, Iran, and the wider Middle East and increases in interest rates can have a significant, volatile and long-lasting market impact. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this. sector specific challenges, including general funding and limitations in Government grants, provide further challenges on the life science and technology sectors. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this. Proposed employment uses would be materially affected by the cumulative cost of proposed	implications of policy requirements both in today's terms and also in the future (section 4 of the Assessment). The Assessment tests the ability of developments to accommodation the emerging policy requirements of LP2045 alongside prevailing rates of CIL, so it takes into account the increased rates (following the Partial Review) in the viability modelling. Overall the inputs and assumptions applied in the modelling are robust and reasonable.	

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policies. This is in addition to amendments to the City's CIL Charging Schedule adopted in mid-August – which resulted in a fivefold increase for R&D uses from £33.74 psm to £172.28 psm. Those increased costs will ultimately be reflected in rents charged to occupiers. Increasing the cost of occupation for these companies, on top of tax rises including National Insurance and Business Rates, will reduce the funding available for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation. Welcome the mechanism in Policy S4 for net zero and/or affordable housing contributions to be reduced or removed entirely from employment-generating uses via a viability cascade, this very process adds further cost and uncertainty to the planning process. Request that the viability assessment prepared by BNP Paribas is robustly reviewed and the Council robustly considers the cumulative policy cost to ensure Oxford remains a favourable and attractive place to invest, without operating in the margins of viability.		
On a brownfield site like the Oxford Stadium, it is likely that viability will be an issue that affects any future planning application, and viability	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested. The	None.

assessments will need to be undertaken under S4. This approach may discourage investment in the city as it would place a burden on applicants early in the application process. The requirement to "front load" viability work will add a significant amount of financial cost and uncertainty. If schemes do proceed, then a final position on where the City Council will land will only be after significant up front cost on the application, and land agreements as well as adding further cost to this process in the preparation of the viability assessment and in paying for the Council's assessor to review the submitted information. The effect will be an even higher development cost and greater impact on what can be delivered. The viability process will slow up the decision making process and delivery of development contrary to the overall aim of the NPPF to speed up delivery. Overall, the approach is inconsistent with Paragraph 35 of the NPPF "Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure... Such policies should not undermine the deliverability of the plan."	requirements, particularly for affordable housing contributions, are based on a 'maximum reasonable proportion' basis, to maximise community benefits without undermining the plan and accepting that this will not be universally achievable on all developments. The assessment was informed by a range of likely development and site typologies, based on real examples of recent developments across Oxford, with multiple brownfield site scenarios – to reflect that the majority of sites in Oxford are brownfield. The inputs and assumptions applied in the modelling are robust and reasonable.	
House builders are facing increasingly challenging market conditions with the costs of materials and labour increasingly rapidly, the Building Safety Levy, Biodiversity Net Gains and	The Viability Assessment uses proportionate and reasonable assumptions for the appropriate level of assessment to support a local plan. The build costs from the RICS	None

Land Fill Tax increasing the regulatory burden and higher standard required by building regulations all adding to the burden even before local plan policies are taken into account. Welcome the inclusion of policies in local plans that provide decision makers with the flexibility to consider the viability of development. However, if, as is stated in the opening paragraph of S4, it is to be assumed that development that complies with the policies in this local plan are viable then the full costs of the national and local policies within the local plan must be accurate. Concerned that not all the costs facing house builders have either been included or accurately assessed in the Council's Viability Assessment: - No allowance appears to have been made for the Building Safety Levy. For Oxford this will place an additional £23.62 per sqm on Previously Development land (PDL) and £47.24 per sqm on non-PDL1 which will need to be included in the VA. - The cost relating to BNG are based on the DEFRA Impact Assessment from 2019. The 0.7 % cost increase used is based on the Central Estimate where 25% is delivered offsite at a cost of £11,000 per biodiversity unit. This is considerably lower than the costs being experienced by the development	Building Cost Information Service (BCIS). The local circumstances adjustment is applied to reflect the Oxford context (most development types an extra 10-15% costs has been added into the modelling), and furthermore in response to feedback from stakeholders, the 'upper quartile costs' have been applied on developments in the City Centre, where proximity to heritage assets and conservation areas requires the use of high quality materials.	

	industry. The latest pricing report by Biodiversity UK from February 20262 indicates costs range from £25,000 to £30,000 per unit for the medium distinctiveness habitats with higher distinctiveness habits costs in excess of £50,000. Therefore, where there is a need to deliver more BNG offsite the cost assumed in the VA will be significantly lower than would be experienced by a developer. The cost of BNG will vary significantly from site to site. For example, an urban site may be defined as open mosaic habitat that is difficult to recreate on site and could require 100% offsite delivery at over £50,000 per biodiversity unit. Therefore, it is essential that there is significant headroom in all development to ensure that BNG requirements will not be a barrier to development in future. It ii also noted that BNG and Urban Greening Factor have been costed together. The Council will need to provide justification for this approach. - The combined impacts of Policies R1 and R2 are a concern, and the costs relating to policies R1 and R2 to have been under estimated. The Viability Appraisal estimates that the reduction in residual land values is typically 8% for operational Net Zero Carbon, whilst		

2808	achieving both embodied and operational Net Zero Carbon would reduce residual land values by approximately 23–43%. These figures represent a substantial viability burden, especially for research and development (R&D) schemes, which typically face higher construction costs and tighter operational performance specifications. The cost of achieving net zero is likely to be higher. Work undertaken by the Future Homes Hub and published in 'Ready for Zero' indicates that the costs of achieving space heating standards being proposed by the Council are likely to be 15% to 19% above those of current building regulations. These costs are based on detailed assessment made by house builders as to what it will cost and as such should be given significant weight when compared to the broad assumptions used in the Council's evidence. An additional uplift of has then been given for achieving net zero embodied carbon meaning the cost included is 15% for both R1 and R2. However, based on evidence from the Future Homes Hub this is likely to only address R1 at best and an additional uplift will be required to address costs relating to policy R2.		

The policy is not effective as the viability evidence supporting the local plan does not reflect the cost of developing new homes in Oxford. Must be amended to reflect the higher costs facing development compared to the assumptions made in the VS.		
There is a lack of alignment between this position and the conclusions of the Viability Appraisal. The Appraisal acknowledges that the cumulative impact on viability is hugely variable, and that it would be difficult to set a suite of policies that are viable for all potential developments coming forward without reducing them to a 'lowest common denominator', so instead opts for ambitious targets which may not be fully achieved in all cases to optimise delivery of policy objectives, although this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage. This contradicts the assertion in Policy S4 that compliance with the full policy suite should generally be assumed to be viable. The Council's own evidence indicates that viability outcomes will vary significantly between schemes and that a greater reliance on site-specific viability assessments is anticipated. There is a significant strategic risk that imposing an excessive viability burden on R&D development could constrain future investment in Oxford's knowledge-based economy. This	A high reliance on site-specific viability assessments at planning application stage is not desirable for either the Council nor applicants nor communities. As such there is always a careful balance between optimising delivery of policy objectives whilst setting the policy 'asks' at a level which the majority of site typologies expected during the plan period would be able to deliver. The extensive modelling tables in the appendix to the Viability Assessment help to illustrate the tipping points, but this is not an exact science to be able to identify the exact levels of contributions which should be sought. The levels of contributions sought are reasonable and based on the evidence base. Then Policy S4 complements these policies to ensure flexibility in the event that a site cannot viably delivery the policy requirements.	None.

outcome would run counter to the ambitions of the UK's Modern Industrial Strategy (2025), which identifies science, innovation, and high-value R&D as central to national economic growth and international competitiveness. Ensuring that Oxford remains an attractive location for R&D investment is therefore critical not only for the city's economic success but also for meeting wider national priorities.		
The LP45 has set out an ambitious set of policies that if combined will lead to developers increasingly needing to engage with the City Council and undertake viability assessments under Policy S4. This will dissuade investment in the City as it is not until late in the planning application process that any certainty will be gained on where the viability of a scheme will land (as per paragraph 59 of the NPPF). This applies more to sites that have already been purchased than new proposals that can take account of the requirements and decide whether to proceed or not. The City needs to balance ambitious policies whilst also making the City an attractive location to invest. If schemes do proceed, then a final position on where the City Council will land will only be after significant up-front cost on the application, and land agreements as well as adding further cost to this process in the preparation of the viability assessment and in paying for the Council's assessor to review the submitted information.	The policies in LP2045 seek to maximise community benefits by setting ambitious targets, which the maximum reasonable proportion of sites should be able to viably deliver. This means there is an assumption that a reasonable proportion of sites can proceed on a policy-compliant basis, and would not be subject to site-specific viability negotiations (or the uncertainty or delays to decisions referred to in the comments). It is best practice to discuss key issues (which for some sites would include viability) at the earliest stage, and the NPPF also encourages pre-app discussion. As such this does not need to be re-stated in policy.	None

The effect will be an even higher development cost and greater impact on what can be delivered. It will also slow up the decision-making process and delivery of development contrary to the overall aim of the NPPF to speed up delivery. Policy S4 process should be undertaken at the pre-application stage at a high level and then refined once a planning application has been submitted. The overall ambition of policies in the plan should be re-assessed to encourage development to take place and ensure that paragraph 35 of the NPPF is met, namely that the policies as a whole do not undermine the deliverability of the plan – as is alluded to in the Viability Assessment. Amend Policy S4 to include the ability to undertake a high-level viability assessment at the pre-application stage and then refine it once an application is submitted.		
There are various emerging policies in the Plan which when combined, or indeed in some instances applied in isolation, do not support deliverable urban development and redevelopment. It cannot be said at this stage, that if all policies are complied with in the emerging Plan, this would result in deliverable development for the City.	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested.	None.

This is unjustified as the overall goal must be to increase the number of houses, it is extraordinary that to maintain viability, car provision, and consequent loss of space for housing, is increased first and then affordable housing provision, which is nonsensical as car provision consumes, for example, one driveway and a potential downstairs room. It is clearly better to have 10 homes with two affordable, than 6 houses, 3 affordable, with space wasted for parking and car infrastructure. This is ineffective as there is no definition of viability, which would be considerably more than breakeven for a developer to proceed with the development.	Policy S4 seeks to prioritise delivery of affordable housing over and above other policy requirements, because of the significant unaffordability of homes to many people in Oxford. So the intention of the cascade approach is that if a site is not viable to deliver the full contributions, that other elements be adjusted in the first instance, only compromising on affordable housing delivery as a last resort.	None.
Concerned that the plan introduces an ambitious set of policies that, if confirmed, will lead to developers increasingly needing to engage with the Council and undertake viability assessments under Policy S4. The following modifications/ changes are sought: - The overall ambition of policies in the plan should be re-assessed to encourage development to take place and ensure that paragraph 35 of the NPPF is met, namely that the policies as a whole do not undermine the deliverability of the plan – as is alluded to in the Viability Assessment. Amend Policy S4 to include the following text:	The policies in the plan have been appraised and tested in the Viability Study. There is no need to "re-appraise the policies". Policy S4 includes a viability cascade which is aligned with the Council's priorities. The policies in the plan do not undermine its viability. We see no need to introduce a requirement for a high-level viability assessment to be undertaken at the pre-app stage. The Plan is sound and is underpinned by credible and defensible viability evidence.	None.

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To include the ability to undertake a high-level viability assessment at the pre-application stage and then refine it once an application is submitted.		

Chapter 2

General comments relating to Chapter 2

POLICY	General comments
All respondents **supporting** policy	43.6

COMMENT SUMMARY	OFFICER RESPONSE
No comment added.	Support welcomed.

POLICY	General comments		
All respondents **raising objections** on this policy/chapter	2.1	58.6	60.6

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Chapter 2: I do not see any reference to Oxford as a City of Sanctuary. How do you intend to incorporate this commitment into your plan? All the measures in the plan need to be evaluated against the intention to make Oxford a City of Sanctuary.	Being a Local Authority of Sanctuary means that the Council has made a formal commitment to support all vulnerable individuals, particularly those fleeing conflict or persecution. This has its own separate action plan developed by the Council, which is different to the Local Plan which guides decisions about planning applications.	None

Vale of White Horse District Council has made a representation relating to Chapter 2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
South Oxfordshire District Council has made a representation relating to Chapter 2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy H1

POLICY	H1				
All respondents **supporting** policy	58.4	60.4	98.2	120.1	130.2

COMMENT SUMMARY	OFFICER RESPONSE
The emphasis on additional housing is appropriate to meet the affordable housing need in Oxford.	The support is welcomed.

POLICY	H1				
All respondents **raising objections** on this policy/chapter	47.4	52.3	59.4	67.1	69.6
	84.1	92.1	107.4	113.3	112.3
	89.3	101.3	118.3	120.1	131.3
	133.2	136.1	139.4	157.4	94.1
	159.5	138.7			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to Policy H1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Cherwell District Council has made a representation relating to Policy H1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
West Oxfordshire District Council has made a representation relating to Policy H1, which is	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

summarised and responded to in the Statement of Common Ground.		
The estimated capacity fails to account for house extensions and subdivisions that occur in their 1000s ever year, adding bedrooms and increasing capacity. Oxford does not record development made under PD rights, so the substantial contribution made to housing need of conversions from 2-3 bedrooms is not recorded. The contribution of sites with less than 10 houses should be included. The PPG says sites of 5 units or more should be included, but the City Council only includes 10 or more.	Additions of bedrooms are not additions of housing units. Overall housing need is calculated and expressed in terms of the need for new housing units. The contribution of sites with less than 10 homes is not overlooked. There is a small sites windfall calculation to ensure an assumption about likely delivery of small sites is included in the capacity. Generally, small sites come forward quickly and often more spontaneously than larger sites, and there is a far broader range of landowners with different likely prompts to delivery, so many small sites that will deliver of the plan period to 2045 will not at this point be possible to identify. This applies to sites of 5-9 units, as well as up to 5 units. In the case of Oxford, a windfall figure for sites up to 10 is considered the best way to reflect true capacity.	None.
The Oxford housing market area extends well beyond the city boundaries. It is therefore not justified to destroy the small remaining pockets of green space.	A balance must be struck between protecting the important features and characteristics of Oxford and making the most efficient use of land within the city in order to meet needs within the city as far as possible first, before exporting them. A 'no stone left unturned' approach has been followed in identifying housing sites, but this is balanced against a need to consider whether sites are deliverable whilst being able to mitigate or compensate for any	None.

	harms, and according to the plan's overall strategy.	
The plan's economic strategy is at odds with its housing delivery capabilities. Capacity is 463 per annum, but the employment need is 412,460sqm of floorspace, which the plan admits is 'likely to draw additional workers into the city'. By aggressively supporting economic expansion the Plan may exacerbate issues with high land values and property prices and a lack of affordable homes.	The starting point for the Local Plan is that it should try to meet all needs. This is challenging within the city with many demands and many constraints. A balance must be struck. It is also important and expected that Oxford continues to play its leading economic role. However, housing supports this and is also a priority in terms of overcoming inequalities. The plan in Policy E1 does allow for housing on employment sites, and new employment sites are not permitted in many parts of the city. There are many sites in Oxford in existing commercial use where the landowner has no intention of converting to housing. By intensifying on existing employment sites, there is enough forecast capacity to meet demand. As a constrained but economically successful city, Oxford will be expected to draw people in to jobs.	None.
Reference should be made to encourage the conversion of vacant employment uses (offices, retail) into residential use where they will not compromise active street frontages within the city centre and district centres.	Policy E1 allows for residential use on employment sites. Policies C2 says: Planning permission will be granted for development of upper storeys of the Active Frontages for housing, student accommodation and other uses appropriate to a town centre, as long as the functioning of the ground floor unit(s) in the active frontage is not undermined.	None.
The plan proposes housing targets significantly above the city's deliverable capacity and relies heavily on development pressure on the urban	The housing need is above the identified capacity, but the Standard Method is used to understand the Local Housing Need. The city's	None.

edge. Lower impact growth scenarios need to be properly considered. The absence of agreed statements of common ground suggests the plan again fails to demonstrate full compliance with the Duty to Cooperate.	capacity is very constrained, and delivery of some of its needs outside the city has been something that has been necessary over time. An interim joint statement of common ground between all the Oxfordshire local planning authorities was available at the time the submission draft local plan was published. The intention is that an updated document will be provided on submission of the plan.	
The plan fails to acknowledge the interaction between housing and economic growth and that housing needs in Oxford may be higher than that established by the standard method. Housing supply is a key barrier to economic growth. Oxford's housing need should be derived from the SM LHN with a further uplift to reflect growth aspirations. There is an exceptionally strong case for a higher level of growth than is being provided for, whilst recognising Oxford itself has limited capacity. It will therefore require cross-boundary working with neighbouring Local Authorities.	The housing need is assessed by the standard method. The NPPF does make it clear that a housing requirement may be set above or below the housing need, if that can be justified. In the case of Oxford, a housing requirement below the housing need is considered to be justified because of the limited capacity.	None.
Concern is raised about how the Council has reached conclusions regarding the capacity of sites, anticipated delivery of sites, and therefore whether the proposed housing requirement is justified.	The SHLAA, Background Paper 015: Developing Site Allocations, and Background Paper 016: Efficient use of land, set out how sites have been identified, assessed and capacity identified. Dealing with unmet housing need in adjoining areas is set out in a series of Statements of Common Ground with the relevant planning authorities.	None.

The new housing needs figure covers 2025-2045. Therefore, the previously agreed figures also include homes that deal with un-met need for 2021-2025. Current provisions to meet unmet housing need have not delivered as expected, and, if relied upon, are unlikely to meet the full scale of Oxford's unmet housing need, either as arising from the standard method, or linked to the economic growth ambitions envisaged by the Oxford Growth Commission. Given nothing has been delivered so far, consideration should be given to the deliverability of the existing unmet need sites. Combining the confirmed figures (not including West oxfordshire because its figure is unknown) gives a total of 11,180. This is a shortfall of 1,293 from the unmet need of 12,473.	Dealing with unmet housing need in adjoining areas is set out in a series of Statements of Common Ground with the relevant planning authorities.	None
Oxford must clarify where the un-med need is to be met and how. Through the plan and Joint Interim SoCG it is not clear how this will be done.	The intention is to submit more information about this in a Memorandum of Understanding/final joint Statement of Common Ground with the other Oxfordshire local planning authorities.	None.
The Plan puts forward a reduced housing need figure from that in the withdrawn Oxford Local Plan 2040 and it also uses SHLAA findings to justify a capacity-based requirement. These two choices will lead to delivery of fewer homes, in contrast to the plan's aims. The approach lacks ambition and is likely to	At the time of the Oxford Local Plan 2040 (now withdrawn), the Standard Method was not framed as the only way to calculate housing need. The Standard Method was also very different to the current standard method. It was not considered that the previous standard method was a good representation of housing need in Oxford. Whilst Local Plans can set a	None.

exacerbate the existing housing supply problems in the city. The city can only demonstrate a 2.88 year housing land supply, which is proof that the Council is failing to address the housing crisis. There is no explanation of why the City Council has changed its growth ambitions in the LP45 but not changed its objectives or core themes.	housing requirement that differs from the Standard Method, the Standard Method is representative of the Local Housing Need. The current Standard Method gives a better approximation of housing need in Oxford.	
In the previous version of this Plan [withdrawn 2040 plan] Oxford City Council did not use the standard method to calculate housing need as it did not give a sufficiently large figure. This time they claim to have used the standard method, but come up with a very similar figure to the last iteration of the Plan and still claim they cannot meet it from within the City Of Oxford. So they again want to export it to surrounding Districts to develop more Green Belt countryside on the edge of Oxford and harm local communities, including those in our parish. The Plan carefully does not reveal how the figures were calculated or what background figures were used so it must be assumed they used the same ones as before. Comments are made in the representation about the HELA that supported the 2040 plan, which are not included her.	The starting point when assessing need is not to think of a figure, but to consider an appropriate methodology for assessing need. The NPPF from December 2024 (post the 2040 plan) says that 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.' The supporting text to Policy H1 is very clear that the Government's Standard Method was used to assess housing need: 'The minimum housing need figure for Oxford has been calculated by using the Government's Standard Method as set out in National Planning Policy and guidance.'	None.
Paragraph 5.11 of BP001 refers to the 14,300 homes previously apportioned to neighbouring authorities. This is the provision from 2011, agreed in the adopted OLP2036.	The interim joint Statement of Common ground set out how each district is dealing with unmet need, and an updated in a final SoCG or a Memorandum of Understanding.	None.

The Interim Joint Statement of Common Ground is not amongst the papers supporting the current consultation, and therefore the situation is opaque as to how housing provision in adopted Local Plans contributes towards meeting unmet needs over the plan period.	The interim Statement of Common Ground was available at the time the Regulation 19 plan was published.	None
The Interim Statement of Common Ground provides details on the commitments towards Oxford's unmet housing need in the adopted and emerging plans of neighbouring districts (as of January 2026). However, as these emerging plans are not adopted, it remains unconfirmed whether the City Council's unmet need will be fully met.	The level of commitment in local plans of neighbouring authorities depends on the timing and progress of those local plans, which is out of the control of the city council. However, what can be ensured is that each district has agreed and committed to taking the full amount of Oxford's unmet need. This agreement will be set out in an update to the interim statement of common ground, or in a memorandum of understanding.	None.
The policy only refers to the capacity of the city, without mentioning the housing need figure as calculated by the Standard Method, or 21,740 dwellings. It also does not set out a strategy for how the Council will be delivering the remaining 12,473 homes and there is no clear spatial strategy for this. As such, the policy is contrary to paragraph 61 of the NPPF in that it fails to meet the area's identified housing need. The Oxford Growth Commission's Interim Report refers to the lack of such a strategy stating: "Delivering on the strategic vision requires a spatial investment and land use strategy across the County that joins up economic growth with investment in transport, new housing including new	The supporting text to policy H1 does set out the level of need as calculated by the Standard Method. There is agreement with the neighbouring Oxford districts about Oxford's unmet need. It is for each district to set it own spatial strategy and determine how they deal with unmet need within their area.	None.

affordable housing, achieving net zero, nature recovery and the environment, and skills and employability. A vital element in such a strategy is aligning economic growth with requirements for new housing to improve affordability and reduce commuting pressures [...]"		

Policy H2

POLICY	H2			
All respondents **supporting** policy	30.6	43.6	57.2	124.2

COMMENT SUMMARY	OFFICER RESPONSE
Policy is sound	Support is welcomed
Support seeking to deliver affordable housing in line with local need. Also need to consider need for affordable housing for NHS staff and other health and care providers. Recommend: engaging with NHS partners (ICB, Trusts, and ICS partners); factoring need for NHS staff into housing needs assessments and other evidence base; consider site allocations for NHS staff especially sites near large healthcare providers.	Support is welcomed. The suggested measures have all been addressed through the plan preparation: there has been regular engagement with the Health Trusts and Statements of Common Ground are also being prepared to summarise key issues; housing need assessment is now replaced by Standard Method (as prescribed in national policy); there are multiple site allocations for residential close and even onsite at the large healthcare sites, some of which are also identified as suitable for employer-linked affordable housing which would prioritise homes for healthcare workers.
Support the alterations made to this Policy since the reg 18 stage, in particular the exclusion of the wording "provisional requirement, subject to further viability testing".	Support is welcomed

POLICY	H2				
All respondents **raising objections** on this policy/chapter	47.5	57 .2	58.5	59.5	60.5
	69.7	89.5	112.4	118.4	134.13
	136.3	157.5	159.6		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

South Oxfordshire District Council has made a representation relating to Policy H2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Vale of White Horse District Council has made a representation relating to Policy H2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The prioritisation in the cascade (in S4) of first allowing reduction of net zero offset payments, and relaxation of parking standards, and only lastly allowing reduction in affordable housing (and even then staged to protect social rent as far as possible,) may make sense in Oxford but it risks making schemes that could viably deliver a lower affordable housing % non-viable or forcing repeated viability disputes, which is exactly what NPPF and PPG seek to avoid. Ie the cascade of policy relaxation is not in practice consistent with NPPF para 35 and viability guidance.	The viability evidence base for the plan has tested individual policies and the cumulative plan requirements, and the level of contributions sought have been set accordingly so that they do not undermine the deliverability of sites. The prioritisation in the stepped approach in S4 reflects the urgent need for affordable housing in Oxford, and in particular social rent tenures. The approach in policies H2 and S4 are consistent with the NPPF.	None
Should increase the proportion of new homes for social rent to the absolute possible maximum. Bringing down the housing waiting list should be prioritised over opportunities for people hoping to get on the housing ladder. In policy H2, replace “at least 80%” (of affordable units on the site should be provided as onsite social rented dwellings) to “90%”. See discussion in question 38 for why this would make the plan sound.	The tenure split in H2 is driven by priorities of the plan (to address housing needs of those in greatest need) but must also not undermine viability. Social rent is in great demand in Oxford but is also the most expensive to build (due to the larger discounts on returns). So to raise the requirement to 90% would likely have knock-on viability impacts on sites, for example it may result in the overall target of 40% across the site not being viable and could result in fewer affordable homes overall.	None

The proposed split of 80% social rent/20% intermediate disincentivises build to rent investors due to the scale of their operations needed for viability. As many sites in the city are small to medium size, the total number of private and intermediate units to be delivered per site is lower than many investors and developers require. A more flexible position or a cascade should be included in the policy. This will result in more housing overall and therefore more affordable housing being delivered in the City. Encouraging intermediate tenures will also help to address affordability pressures in Oxford and the need to support talent retention of graduates. Amend bullet a) as follows: "At least 80% of the affordable units on the site should be provided as onsite social rented dwellings unless an alternative has been agreed with the Council, taking into account demand for all housing types in the City. The remaining element of the affordable housing may be provided as intermediate forms of housing onsite provided that they are affordable in the Oxford market".	The 80/20 tenure split reflects the priority to deliver social rent affordable housing for those in greatest housing need. The policies already allow for some flexibility to take site by site circumstances into account where applicable, but this should be only a minority of schemes, in order to not add unnecessary complexity or delays to the development management process, or uncertainty to developers and communities, and there is a cascade approach set out in Policy S4 if a site cannot viably deliver the policy requirements.	None
Oxford City policies of zoning development land specifically for employment has increased the price of land for housing and made houses even more unaffordable. The questionable assessment of development land will also result in an increase in land prices and thus housing. Make the policy allowing housing on	The plan supports the conversion of employment sites to residential in Policy E1 where the landowner is interested in doing so. Many employment sites in Oxford also qualify for permitted development rights for conversion of office to residential.	None

employment land effective by making the assessment for housing suitability fair and transparent with an aim of increasing housing on land zoned for employment.	The assessment of suitability for residential is published in the Strategic Housing Land Availability Assessment. A particular challenge in recent years is that retaining employment uses often provides a higher return to the landowner.	
Not all development typologies can meet the 40% AH target, so the opening sentence of S4 is untrue – decision makers cannot assume development that meet the policies in this local plan are viable. Amend wording to “where viable a minimum of 40% of units ...” to ensure policy is consistent with the evidence. The draft policy should recognise that affordable housing requirements will be determined through a site-specific approach.	The policies already allow flexibility to take site by site circumstances into account where applicable. It does not need to specify “where viable” or that affordable housing requirements should be determined “through a site-specific approach” because that is already addressed in Policy S4 Plan Viability, which sets out a stepped cascade in the event that policies in the plan result in a site being unable to deliver a viable development.	None
The stronger wording and definition of "truly affordable in the context of the Oxford housing market" must remain unaltered. We would seek that the word " should" would be better replaced with " Will or Must", to further strengthen this policy.	It is the intention to retain the wording about “truly affordable”. This is an important principle in the Plan to deliver affordable housing that meets needs of local people, recognising that some models of affordable housing are not actually affordable in the Oxford context. “Should” is used to allow flexibility to respond to site specific circumstances, such as viability. It is the expectation but there may be exceptions.	None
West Oxfordshire District Council has made a representation relating to Policy H2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Oxfordshire County Council has made a representation relating to Policy H1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Residential development currently faces significant delivery challenges because of reduced building efficiencies following regulatory changes, increased build costs, increasing developer contributions, falling capital values in real terms, and complex infrastructure requirements to transform large-scale brownfield sites. Templars Square is not immune to these realities and the likelihood of a scheme at the site meeting H2 requirements, as drafted, is limited. Given the Viability Assessment evidence base document refers to a 40% target (due to the significant variations on a site-by-site basis) whereas Policy H2 refers to a 'minimum' 40% and does not acknowledge the site-specificity highlighted in the evidence base document. We consider that draft Policy H2 is not adequately "justified".	The Plan allows flexibility to take site by site circumstances into account where applicable. Policy S4 Plan Viability sets out a stepped cascade in the event that policies in the plan result in a site being unable to deliver a viable development.	None
Object to this policy requirement being related to the gross number of dwellings in a development. If a gross requirement is applied to the redevelopment of sites, it will significantly affect the viability of schemes and discourage the regeneration of parts of the City. Instead, this requirement should relate solely to the net number of new homes to be provided.	The policy requirement in Policy H2 applies to all dwellings within the red line of a planning proposal. This is the same approach that has been applied and demonstrated in the current adopted and previous local plans in Oxford. If there are existing dwellings included within a red line it is usually because they are being materially altered, so the policy would apply. If	None

Amend Policy H2 to read: “On self-contained residential developments (including Use Classes C3 and C4 but excluding self-contained student accommodation, older persons accommodation and employer-linked housing) where sites* have a capacity for 10 or more homes (gross), a minimum of 40% of the *net increase in* units on the site should be provided as homes that are truly affordable in the context of the Oxford housing market. On sites in the Green Belt or released from the Green Belt, this should be a minimum of 50% *of the net increase in units on the site.*”	a property is not being altered as part of a development it would usually be outside of the red line, so would not be counted in the calculation of the gross number of units.	

Policy H3

POLICY	H3		
All respondents **supporting** policy	30.7	102.2	106.4

COMMENT SUMMARY	OFFICER RESPONSE
Policy is sound [reason not specified]	Support noted
Welcome the exemption for developments within existing and proposed university or college campus sites, including the Marston Road site (SPE3).	Support noted
Assuming that contributions towards affordable housing provision from new student accommodation will not be sought where the proposal is within an existing or proposed university or college campus site, as defined in the glossary to the Local Plan, consider H3 to be sound.	Support noted

POLICY	H3				
All respondents **raising objections** on this policy/chapter	40.1	47.6	86.3	87.1	102
	105.1	112.5	114.3	129.4	130.3
	133.3	134.2	138.8	157.6	159.7

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
There is internal and NPPF viability tension because of multiple overlapping contributions (H2, H3, H4, H12). Individually, each policy may be justified, but taken together they impose high onsite affordable ratios on general housing,	The policy requirements in LP2045 have been informed by the Viability Assessment and the cumulative impacts have also been tested for policies which may have cost implications. The Viability Assessment therefore complies with	None

and contributions from employment and student accommodation even where those uses may compete for the same constrained sites. NPPF requires the cumulative impact of all policies "does not undermine the deliverability of the plan". The Plan acknowledges parking policy C8, net zero (R1) and affordable housing policies as the main viability risks but then adds strong affordable obligations on non C3 uses (H3) without clear evidence. The Reg 19 plan does not set out how this requirement meets Paragraph 58 of the NPPF. It is therefore not clear what identified harm or impact is being mitigated through the sought contributions such that the policy is not justified nor consistent with national policy, particularly on mixed use sites where the delivery of affordable housing is not prevented by the inclusion of employment generating uses. The NPPF and NPPG only make reference to seeking affordable housing from major residential developments. There are no references to such contributions or provision being sought from commercial development.	the requirement in national guidance for a comprehensive assessment of all relevant plan policies.	
Object to Policy H3 (Parts (e) and (f)) seeking affordable housing financial contributions from new commercial development (i.e. 'proposals for major employment-generating uses (defined in Glossary), or flexible E-Class uses which could be used for employment-generating use,	Commercial developments have the potential to generate demand for affordable housing. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of	None

delivering a net gain in floorspace of 1000sqm GIA or more'). Parts e) and f) of Policy H3 should be removed. Major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line, in addition to Community Infrastructure Levy which has increased fivefold since August 2025. The requirement for a further financial contribution towards affordable housing would render investing in the City unfavourable and unviable and undermine the deliverability of the plan's economic objectives, particularly in a competitive global marketplace where economic investment in the R&D sector can be uprooted and taken elsewhere with more favourable planning and market conditions. The policy relies on a high-level assumption that employment development will generate a need for affordable housing with no evidence that it will create this need and no reference to market housing need. The level of contribution is an arbitrary figure and has not been sufficiently demonstrated to be at a level to mitigate any identified need or impact. It also assumes that employees will live in Oxford, rather than more	affordable housing. Therefore, there is a clear justification for the introduction in Policy H3 for a requirement for contributions from employment development to affordable housing. The intention when setting the level for these contributions is informed by the Viability Assessment evidence, so that it is set at a level that is easily affordable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.	

affordable locations in the surrounding Districts or further afield. The policy also assumes that all new commercial development will generate entirely new jobs for the City (which is rarely the case in major commercial developments) and fails to take into account companies moving from one part of Oxford to another and where the old premises are no longer fit for purpose or are being redeveloped for alternative uses, such as housing – where no additional need will be generated. Policy H3 should be amended to take account of the following changes: First Paragraph: Delete references to "and new employment-generating uses". Parts (e) and (f): Delete these requirements.		
The Inspector's Report for the Westminster City Plan (March 2021) provides a directly relevant precedent. The Inspector recommended deleting Policy 10, which - like Policy H3 - sought affordable housing contributions from commercial developments of 1,000sqm or more. The Inspector concluded that the NPPF and PPG only anticipate affordable housing requirements being applied to major residential development and make no provision for securing such contributions from commercial or any other form of non-residential development. The Inspector also found that the policy would fail	The local circumstances in Oxford mean that seeking the contribution is justified for LP2045. The level of contributions has been set at a minimal level so that it is deliverable across the majority of (major) commercial sites, as indicated in the Viability Assessment modelling.	None

the statutory tests for planning obligations because it lacked a direct relationship to the development, provided no guarantee that funds would be spent near the contributing site, and relied on standardised tariffs that bore no relation to the actual cost of delivering affordable homes. Moreover, the proposed tariff was considered fundamentally flawed because it applied uniformly across all commercial uses despite clear evidence of differing viability profiles. The Inspector ultimately concluded that there was insufficient justification to demonstrate that the contributions would be fairly and reasonably related in scale and kind. The parallels with Oxford's proposed Policy H3 are clear, and the Westminster highlight the policy and legal concerns with requiring affordable housing contributions from commercial development. A similar Policy was proposed in the Westminster City Plan 2019-2040 (examined in 2020). Policy 10 of the Submission Draft included a requirement for contributions from commercial developments. The Inspectors recommended that the Policy be removed, noting that the policy requirement "would simply require financial contributions to the City-wide Affordable Housing Fund. It would not achieve the key objective of the submitted Policy 10" (paragraph 85) to ensure mixed, inclusive and cohesive communities.		

Oxford University Developments has made a representation relating to Policy H3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Seeking such a contribution would not meet the three tests for planning obligations set out under Regulation 122 of the CIL Regulations and Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. Employment development would be supported by other policies in the Plan and such a contribution is not needed to make the development acceptable in planning terms. Affordable housing contributions from major commercial developments do not meet the legal tests of Reg 122 of the CIL Regs 2010. Oxford has a pressing need for new commercial and employment space to support local businesses, universities and research institutions. Introducing new financial obligations on commercial schemes for residential development risks constraining delivery and pushing employment space out of the city. The first paragraph should be amended to the following: "The City Council will seek financial contributions towards the delivery of affordable housing from proposals for new purpose-built student accommodation, and new older people's accommodation."	The contribution towards affordable housing is necessary to make the development acceptable and directly related to the development in that it increases jobs and thus increases pressure on housing in the city.	None

The level of contribution is an arbitrary figure and has not been demonstrated to be at a level to mitigate any identified need or impact, and is not related in scale or kind to the proposed development. In addition, as the contribution would need to be implemented through planning obligations the requirement would fail the Regulation 122 tests. Employment development would be supported by other policies in LP45 and such a contribution is not needed to make the development acceptable in planning terms. There is no direct relationship to the proposed development and the scale of payment is no related to the actual cost of delivering affordable housing. Seeking such a contribution would not meet the three tests for planning obligations set out under Regulation 122 of the CIL Regulations and Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. Employment development would be supported by other policies in the Plan and such a contribution is not needed to make the development acceptable in planning terms.		
The new CIL rates (Aug 2025) include a 400% increase in the levy charges for Class E, B2 and B8 uses. The new CIL rates and the proposed Policy H3, could adversely impact the deliverability of Osney Mead. In turn, this raises risk that the deliverability of the Local Plan (as	Commercial developments have the potential to generate demand for affordable housing. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of	None

well as the current adopted West End and Osney Mead SPD) will be undermined. Although the viability assessment notes that it will have a modest impact on development, it needs to demonstrate specifically that the site allocations, particularly those of strategic scale, have been tested fully and account has been made of such sites incurring abnormal and extraordinary costs. Without this it is not possible to consider the soundness of the proposed policy. Seeking affordable housing contributions from commercial development, particularly in light of the revised CIL rate for Class E offices and R&D which has increased from £33.74 to £168.74 per square meter GIA (non-indexed), would render schemes undeliverable, especially working within constraints of complex urban development and within the sensitive heritage constraints that pertain in the city with regard to quantum of acceptable development. Major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line, including some support already taking place outside of planning conditions/obligations attached to specific developments. The requirement for a further	affordable housing. Therefore, there is a clear justification for the introduction in Policy H3 for a requirement for contributions from employment development to affordable housing. The intention when setting the level for these contributions is that it is guided very much by the viability report, so that it is set at a level that is easily affordable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing. The viability for the site allocations has been tested through a typologies approach in the Viability Assessment, which tests a range of typologies to represent the types of sites anticipated to be developed during the plan period.	

financial contribution towards affordable housing would further increase the cumulative policy cost and create an unfavourable environment for economic investment in the City. This would undermine the deliverability of the plan's economic objectives through rendering investing in the City unfavourable and unviable, particularly in a competitive global marketplace where economic investment in the R&D sector can be uprooted and taken elsewhere with more favourable planning and market conditions.		
Policy does not give due consideration to ensuring the viability of essential employment uses, particularly where these are delivered as part of mixed-use schemes where the residential element is already subject to an affordable housing requirement. Propose a modification to Policy H3 to ensure that a more nuanced approach to securing affordable contributions from mixed use sites will be considered at the application stage.	If a mixed-use site includes both residential and commercial elements, then the affordable housing contributions would be calculated apply a pro-rata approach according to those different elements (set out in second paragraph of H3). So that the site is treated on a comparable basis to other sites bringing forward similar uses.	None
Object to Policy H3 (Parts (e) and (f)) in relation to seeking affordable housing financial contributions from new commercial development. The City Council included such a policy requirement in a previous adopted Local Plan. However, this was dropped in the extant Local Plan. There is no clear reason to re-introduce such a policy now.	Viability evidence at the time of preparing LP2036 indicated that seeking contributions was not viable, however the latest Viability evidence for LP2045 indicates that viability of commercial developments has shifted in recent years and that it is now viable.	None

The housing requirement takes into account the need for housing generally in the local area and also the level of affordable housing. There is no evidence that employment development will create an additional affordable housing need. The policy relies on a high-level assumption that employment development will generate a need for affordable housing. If this policy is taken forward this assumption should be assessed on a case by case basis. It also assumes that employees will live in Oxford, rather than more affordable locations in the surrounding Districts or further afield. The Policy fails to take account of a company moving from one part of Oxford to another and where the old premises are changed to housing – where no additional need will be generated. It assumes all jobs will be newly created which is rarely the case. In addition, chapter 3 of LP45 recognises that people will often commute to jobs within the City and that it is “easier to strengthen public and active transport systems to take people to jobs in the city rather than scatter employment to less sustainable locations." It makes no assumption for market housing need.	Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing, which is often referenced as a constraint to major employers in Oxford and to economic growth.	None

There is no certainty that planning obligations under this policy will actually deliver affordable housing in the City. There is no ability to ring fence the obligations to the identified workers being generated from commercial developments, or even if those workers would qualify for affordable housing. Background paper on affordable housing (reference BGP-002 Affordable Housing Reg 19) prepared by the Council states that: "Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing". The policy relies on a high-level assumption that employment development will generate a need for affordable housing with no evidence that it will create this need and no reference to market housing need. It also assumes that employees will live in Oxford, rather than more affordable locations in the surrounding Districts or further afield. The policy also assumes that all new commercial development will generate entirely new jobs for the City and fails to take into account companies moving from one part of Oxford to another and where the old premises are no longer fit for purpose or are being redeveloped for alternative uses, such as housing – where no additional need will be generated. For instance,		

Novo Nordisk is relocating from the Innovation Building in Headington to the Iversen Building at TOSP. The policy assumes all jobs will be newly created which is rarely the case in major commercial developments and evidenced by this specific example at TOSP. Policy H3 should be amended: First Paragraph: Delete references to "…and new employment-generating uses". Parts (e) and (f): Delete these requirements.		
The policy is unjustified as the economic gain or loss will be the same for existing or new campuses or institutions, further provision of student housing of itself removes students from the housing market. Student accommodation can be provided by non-University institutions (Boarding schools, Language schools). Remove applicant specific text, make effective as above, and apply contributions to all developments equitably. At each Local Plan, Oxford City Council has tried, under pressure, to give existing Universities preferential treatment, each and every time the Inspector throws it out as a policy cannot be dependent on applicant identity.	For new student accommodation, the policy does not apply to development within university campus sites or redevelopment of existing purpose-built student accommodation that is currently and will continue to be owned and/or managed by the universities. The reason for exemption is because when student accommodation developments are off-campus, then they are typically on sites that could equally be suitable for non-student homes, from which affordable housing would normally be sought. However where student accommodation is developed within existing university campuses, market housing would not usually be provided within those sites, so those sites would not be providing affordable housing.	None
Disagree with the requirement for older persons housing to provide contribution towards affordable housing, because the evidence indicates that 40% is not achievable and that	H3 does not require onsite provision of affordable housing from older persons accommodation. Section (c) indicates that financial contributions will be sought towards	None

only in the highest value areas would any affordable housing contribution be achievable. Policy should be amended to remove the requirement for specialist forms of accommodation such as older persons housing to provide affordable housing onsite.	the delivery of affordable housing as the default policy, or as an alternative the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate. The Viability evidence indicates that 40% is viable in many cases, and where it is not then there are provisions in S4 which sets out a cascade of adjustments for proposals to work through. Financial contributions are required on a comparable basis [to the 40% required in H2] so that the development of sites for residential is not disadvantaged in the market or viability terms.	
The Universities do not support the inclusion of purpose-built student accommodation within Policy H3. Purpose-built student accommodation already functions as an affordable form of housing relative to the open market and plays a crucial role in reducing pressure on the wider housing stock. In addition, the number of sites suitable for new student accommodation is inherently limited. Opportunities for speculative privately-led student schemes have notably declined in recent years, reflecting both land supply constraints and the increasingly stringent location controls in Policy H8. We expect this trend to continue, and the restricted pipeline raises questions about whether the proposed contributions policy is proportionate or justified. By attempting to align the affordable housing	Many sites for student accommodation could equally be suitable for non-student homes, from which an affordable housing contribution would normally be sought. The exception to this, is where student accommodation is developed within existing university campuses, because market housing would not usually be provided within those sites. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from new purpose-built student accommodation. Purpose-built student accommodation is not an affordable type of housing. It is a specific type of housing that meets one type of need in Oxford. This has to be balanced so that all types of housing can be delivered within the city.	None

expectations for brownfield commercial-to-residential schemes with those for brownfield student accommodation schemes, the policy risks making new student developments financially unviable. Inevitably, any additional financial burden would translate into higher rents for students, undermining affordability and potentially reducing the availability of purpose-built stock. The City Council has not, to our knowledge, published any assessment of the policy's likely impacts on student accommodation rents or the future demand and supply balance for purpose-built student housing. A detailed impact analysis is therefore required to demonstrate that the policy is deliverable, justified, and aligned with the Council's wider objectives for affordability and housing choice.	The local circumstances in Oxford mean that seeking the contribution is justified for LP2045. The level of contributions has been set at a level so that it is deliverable across the majority of (major) commercial sites, as indicated in the Viability Assessment modelling.	

Policy H4

POLICY	H4		
All respondents **supporting** policy	87.2	89.6	120.3

COMMENT SUMMARY	OFFICER RESPONSE
Oxford University Developments has made a representation relating to Policy H4, which is summarised and responded to in the Statement of Common Ground.	Support is welcomed.
Oxfordshire County Council has made a representation relating to Policy H4, which is summarised and responded to in the Statement of Common Ground.	Support is welcomed.
Support the inclusion of Ruskin Field (SPE14) being included in the list of sites suitable for employer-linked housing (and the corresponding cross reference in the site allocation policy for the site).	Support is welcomed.

POLICY	H4				
All respondents **raising objections** on this policy/chapter	47.7	69.8	106.5	111.3	138.9

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Employer linked housing (H4) may undermine mixed, balanced communities and long term flexibility. Tying occupancy to employment can	There has been a similar employer-linked policy in the adopted Local Plan 2036 in place since 2020, and there is no evidence that applying	None

lead to mono tenure, employer dominated enclaves, which may not align with NPPF's objective of creating "mixed and balanced communities" and avoiding undue segregation by tenure or occupation. By exempting these sites from the usual H2 obligations, the Plan may allow large quantities of affordable provision that is not open to the wider local housing need, thereby partly frustrating the broader objective of meeting general affordable housing needs in Oxford, not only institutional staff needs. The fallback that 40% must be transferred to a RP if employer demand ceases could also be criticised as weak: it implies up to 60% of the stock could remain in a limbo or be sold on the open market, which would effectively reduce the level of affordable housing stock, which is inconsistent with the strong affordable housing priority in the overall Plan.	the similar policy has given rise to these sorts of issues. Meanwhile this period has seen development of staff accommodation on the JR and Churchill Hospital sites, which have helped to address staff accommodation and recruitment concerns. The fallback position of transferring 40% to an RP, would effectively be the same amount of affordable housing as if the site had been developed as a mainstream housing site (ie applying Policy H2 requirements).	
Oxfordshire Health NHS Foundation Trust has made a representation relating to Policy H3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
This policy does not seem to take into account the fact that for couples living together both partners will have careers/jobs with different employers in different locations.	Policy H3 requires that an affordable housing approach will need to be agreed with the Council for each proposal, setting out how the proposed affordable homes will be developed and managed by the employers (or by development partners on their behalf) to meet the housing needs of their employees.	None

Policy which allows for homes which are affordable to be provided by key employers is positive and can help stimulate essential development, particularly on sites with a longstanding allocation which has not progressed. Government Buildings and Harcourt House site SPE3 should also be included as a suitable site for employer-linked. This will improve the likelihood of delivery of development on the site, benefitting effectiveness of the Plan, and so soundness. The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration, or other essential, on-site support services. The city's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents.	The policy is designed to enable delivery of on-site affordable housing on sites that would not be suitable for delivering housing to the usual requirements of Policy H2. It is not intended as an alternative to H2, it is a supplementary approach to be used only in specific circumstances. Site SPE3 is judged as suitable for coming forwards under the normal H2 Affordable housing requirements. That does not preclude the landowner bringing forward a proposal for 100% affordable housing should they wish to provide affordable staff accommodation, but the usual H2 requirements would still apply.	None
Ever increasing expansion of the main employers – Oxford University, OUHT and Brookes, BMW, are the root cause of housing need in the city. The Headington hospitals in particular (JR, Churchill and NOC) have capacity for 1000s of homes in highly sustainable locations, using their football fields of car parks which would reduce the need to travel and provide homes and save surrounding countryside and the few remaining green spaces in the city. Either employers provide	The policy is designed to enable delivery of on-site affordable housing on sites that would not be suitable for delivering housing to the usual requirements of Policy H2. It is not intended as an alternative to H2. Each proposal will need to have agreed with the council an affordable housing approach to set out issues such as eligibility, rent policy and rent levels, which will address queries raised in	None

housing, or pay heavy contributions to build housing based on increased staff numbers. They cannot simply create housing need, traffic problems and dump the consequences onto the taxpayer and ordinary citizen. Employment status is difficult to determine, as many may be Inside IR35 contractors, working for subcontractors and companies (eg: cleaning, catering, retail), placements, students on work experience and training, may require short term accommodation of specific projects or tasks. Vacancy periods are not covered which may provide short term accommodation for tourists etc. The policy is too complex, restrictive, and provides no incentives or penalties for nondelivery and therefore unjustified and ineffective. This is therefore not positively prepared. Better solutions such as allowing market housing or straight sale of land would provide more homes. Mandatory contributions to housing related to staff numbers, with discounts where on-site housing is provided, and further discounts where destination parking space is used. Allow market component as incentive to delivery. Some general housing should be allowed. A contribution to housing stock is valuable however delivered, and should be determined in part by the developer.	these comments about discounts, eligibility of staff, and other implementation issues. Sites which fall within the criteria of a campus site of the colleges (bullet point 1 of H4) are not individually listed but is specified in the individual site allocation policies.	

Sites should not be listed as this is not effective as the list given is not the same as the Site Policies, Headington Hall and Ruskin are both absent.		

Policy H5

POLICY	H5
All respondents **supporting** policy	111.4

COMMENT SUMMARY	OFFICER RESPONSE
Recognition that mixes of dwellings sizes provides a balanced community, meeting specific housing needs at a particular time. Pleased that policy does not apply to employer-linked affordable homes. Support higher density developments in District Centres.	Support welcomed

POLICY	H5
All respondents **raising objections** on this policy/chapter	138.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified - not clear whether a one bedroom apartment would be a “home” or not.	Any self-contained residential dwelling is classed as a home. The policy applies to all homes or dwellings (flats or houses).	None

Policy H6

POLICY	H6
All respondents **supporting** policy	139.5

COMMENT SUMMARY	OFFICER RESPONSE
Support policy and the contribution it will make towards retaining the existing housing stock.	Support welcomed.

POLICY	H6	
All respondents **raising objections** on this policy/chapter	30.8	128.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Suggest some limitation on the conversion of dwellings to being used for short-term let (i.e. those which are for regular letting to a succession of short-term visitors)	Policy generally resists the new loss of dwellings, including for short term lets.	None.
Unsound as not justified - believe current drafting of Policy H6 fails to provide any flexibility for highly site-specific circumstances/ truly exceptional scenerios which may make a property less well suited to retention as a private dwellinghouse. The list of exemptions within the policy would benefit from the	The housing need is much greater than any need for short term lets. Oxford cannot meet its full housing need and therefore it is important that the existing stock is protected.	None.

inclusion of an additional criterion to reflect such circumstances. Shark House cited as example of where such a policy approach could be applied successfully.		

Policy H7

POLICY	H7
All respondents **supporting** policy	30.9

COMMENT SUMMARY	OFFICER RESPONSE
Support, no reasons given.	N/A

POLICY	H7		
All respondents **raising objections** on this policy/chapter	47.8	111.5	138.11

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not effective or consistent with national policy - Potential conflict between restricted HMO supply and affordable options for key workers. Plan recognises that HMOs "offer the only available and affordable solution for many people" but seeks to prevent "over-concentration". NPPF requires plans to meet the needs of different groups. The internal logical tension is: HMOs used as an acknowledged safety valve for affordability, but Policy H7 restricts further supply in areas where there are existing high concentrations. At the same time, Policy H8	There are negative impacts of HMOs being too highly concentrated. With no thresholds in place, areas could become dominated by HMOs which would affect ability to meet other housing needs e.g. family homes. 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.	None

constrains PBSA supply, and Policy H2's high affordable/ social rent requirement may reduce delivery of new low cost C3 stock. In combination, this risks under provision of low cost rented accommodation, weakening the Plan's ability to meet the NPPF requirement to address housing needs of those who rely on the private rented sector.		
Oxford Health NHS Trust has made a representation relating to Policy H7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Not justified - Policy is ineffective as the term HMO is not defined. The statement that new build HMOs are undesirable due to social housing need is unjustified and unexplained. This could be ineffective as it may have a negative effect on student housing provision, discouraging families from renting bedrooms.	The Glossary includes a definition of HMO. The supporting text to the policy indicates the policy does not allow new **purpose-built** HMO as this type of accommodation reduces potential for delivering housing that meets greater needs (e.g. social rented housing). Further explanation on HMO is set out in BGP.3 Specialist Housing. The Plan does not discourage families from renting bedrooms. An owner occupier can have up to 2 lodgers living in the property, for the purposes of the Housing Act 2004, the property would not be considered an HMO. Owner occupier includes the registered owner and any member of their household. Any subletting in a rented family home where there are 3 or more people from 2 or more households would likely result in an HMO being formed. In most	None

	cases, summer school students who are hosted by a family are unlikely to be deemed as occupying the property as their main or only home, they are essentially guests. Further guidance is provided in Appendix 2.2 which states that buildings NOT counted as HMO include a homeowner together with up to two lodgers.	

Policy H8

POLICY	H8
All respondents **supporting** policy	102.3

COMMENT SUMMARY	OFFICER RESPONSE
The College considers the locational criteria set out in Policy H8 to be "sound" overall.	Support welcomed

POLICY	H8				
All respondents **raising objections** on this policy/chapter	15.1	47.9	93.3	105.2	138.12
	160.1				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The city centre is not defined by reference to a plan. This amounts to a blanket presumption in favour of student accommodation without protection on suitability of uses for residents within the city centre streets.	The city and district centres have been identified as one of the areas where student accommodation is most suitable. These are generally busier areas with a higher level of amenities within walking distance, and which are frequently served by public transport. Delivering student accommodation in only the most suitable locations can help to ensure that quieter residential streets are not subject to unacceptable changes in character or increased activity.	None

There is a contradictory stance on the benefits of purpose-built student accommodation (PBSA). On one hand, the Policy Context acknowledges that PBSA can provide "low-cost housing that takes the pressure off the private rented sector", yet also argues that PBSA could "lead to a dominance of student accommodation" that would "undermine the desire to deliver mixed and balanced communities" because there would be a high proportion of transient occupants. This, coupled with the restrictions in Policy H9 will result in the knowledge economy facing a growth ceiling not shared by other employment sectors. In combination, policies H7 (HMO cap at 20% within 100m), H8 (strong locational limits), H9 (academic thresholds) and H3 (PBSA contributions) may be internally inconsistent with the strategic intent stated earlier in the chapter – to use PBSA positively to relieve pressure on the general housing stock where more can be released to the general community due to the higher density of PBSA.	The policy seeks to strike a balance. The Policy Context section does acknowledge that student accommodation should continue to be provided to meet the needs of both universities. However, whilst provision of PBSA can free up market housing, it can also compete for sites with market housing that delivers on-site affordable housing. The policy approach is about managing the impacts of student accommodation by ensuring it is in suitable locations. For the reasons given above, the strategic intent is not to use PBSA to relieve pressure on the general housing stock. The Local Plan approach is to limit the over-concentration of HMOs (Policy H7), only allow student accommodation in the most suitable locations (Policy H8) and encourage universities to provide accommodation (in these locations) through the thresholds policy (Policy H9).	None
Additional wording should be included to address the impact of additional student accommodation on the overall mix and balance of small communities such as New Marston (where there are three site allocations that might involve student housing).	The policy seeks to ensure that new student accommodation is located within the most suitable locations and the criteria within Policy H8 should help to ensure that any potential impact of additional student accommodation to the community is minimised. For example, criterion b of the policy states that for developments which contain 25 or more	None

	student bedrooms, community amenity space will need to be included within the design, which will allow students to gather and socialise.	
Generally supportive of policy, however it is too restrictive to both universities and the delivery of student accommodation by third party providers, given its interaction with Policy H9. The wording could be adjusted to confirm that if the criteria are unable to be met, then there is a requirement to demonstrate that there are no reasonable alternatives available. Greater flexibility should be taken on windfall locations to help both universities meet the requirements of the threshold in Policy H9. Suitable locations should also include along arterial routes and those sites within a 15-minute walking distance of a campus/college. It is considered that the arterial routes in/out of Oxford present a logical and suitable option for locating new student accommodation given the frequency of public transport services along these routes and ease of access to/from both educational and social facilities and the reduced sensitivity of the residential environment. There are other policies in the Plan which address concerns relating to unacceptable changes in character to residential streets and ensuring that new development does not lead to adverse amenity impacts. With the exception of students with accessibility requirements, it would be	The policy sets out what are considered to be suitable locations, of which there are sufficient to meet anticipated needs within the thresholds set in Policy H9. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. Allowing student accommodation along the whole length of arterial routes, many of which vary in character significantly along their length and may be very suburban and residential in character, has the potential to significantly change their character which could have a negative impact on the local community.	None

reasonable to expect that PBSA along arterial routes should also be car free.		
The draft National Planning Policy Framework (December 2025) is also relevant. Policy HO9 introduces a new location test for Purpose-Built Student Accommodation, focusing on whether residents can access their educational facilities by “walking, wheeling or public transport.” This indicates that a site served by a sustainable transport corridor can be acceptable in principle, rather than being assessed solely on its immediate adjacency to the institution. We would encourage Oxford City Council to adopt a similar approach.	The final framework has not been published to date. Furthermore, whilst provision of student accommodation can free up market housing, it can also compete for sites with market housing that delivers on-site affordable housing. The policy therefore aims to strike a balance so that all types of housing can be delivered within the city.	None
The policy is dependent on the identity of the applicant, which favours existing institutions and is an attempt to limit competition. There are not two but three universities in Oxford as University of West London owns the Ruskin Campus. Boarding/language schools are not included, neither are any institutions that don’t have a campus.	The policy is not dependent on the identity of the applicant. It refers to student accommodation throughout, including in the policy heading, and at no point makes any reference to a particular university.	None

Policy H9

POLICY	H9
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H9			
All respondents **raising objections** on this policy/chapter	47.1	160.2	102.4	138.13

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Potential contradiction between policies H8 and H9 and the stated aim of taking pressure off the private rented sector. Policy H8 constrains new student accommodation to a narrow set of locations or on allocated sites. Policy H9 then restricts new academic development unless the universities are within thresholds for students living outside university accommodation, effectively using academic floorspace policy as a lever to control student numbers.	The intention of the policy is to encourage educational institutions to ensure there is sufficient accommodation for their students, and therefore to limit the numbers of students living in general market housing in the city. For institutions other than Oxford Brookes or the University of Oxford, and for those institutions if the thresholds are exceeded, the policy requires that there is a plan in place for managing the accommodation needs of additional students. It does not limit the number of students and it does not prevent academic facilities coming forward, it simply ensures that there is management of any potential growth of students needing to rely on	None

	the general housing market. Background Paper 003 explains further how this longstanding policy approach is intended to attempt to manage and minimise the pressures of students on the housing market and balance the needs of the student population as well as residents.	
Support policy overall and agree with the need to balance enhancements with the provision for student accommodation. However, whilst individual colleges are a constituent of the University of Oxford, they are a separate legal entity. On this basis, it would not be reasonable for the College to have facility restrictions placed upon them whilst they cannot fully control other institutions. To address this, additional wording such as; "Unless demonstrated that facilities associated with constituent colleges will have no impact on existing accommodation requirements for the relevant college" should be added to the policy.	This approach has applied to the University as a whole for decades, and the University is able to supply necessary monitoring each year across the colleges. The needs as a whole, and the expected growth in student numbers of the university, have been considered when setting the policy.	None
Cannot understand why the threshold figure for the number of full-time taught course students living in Oxford requiring accommodation outside University of Oxford-owned or managed accommodation has increased from 2,500 to 3,100, when the Council's Annual Monitoring Report (AMR) 2025 indicates that only 552 students were living outside of university-provided accommodation in Oxford.	The threshold levels for each institution have been reconsidered and have been based on the latest forecasting needs for each university, whilst ensuring they are still effective. They are set at a level that allows for the anticipated growth in students, alongside the understanding of supply and pipeline supply of student accommodation. The Council's AMR is a snapshot in time and reports on the effectiveness of policies using the latest and	None

	historic data, but it does not look ahead nor forecast growth.	
Fully approve of the intent, but unjustified as it depends on the identity of the applicant and excludes University of West London at Ruskin, and boarding and other institutions such as language colleges. Unclear if this applies to hospital students, postgraduates and trainees.	The policy is not dependent on the identity of the applicant, but applies to any higher education institution (that does not include all education facilities). The policy requires that, where there are proposals for new, redeveloped or refurbished academic, research or administrative facilities for higher education institutions, these will be acceptable either where there is a) the proposals would not facilitate an increase in students, or b) there is a plan in place for managing the accommodation needs of the additional students. In the case of Oxford Brookes and the University of Oxford, criterion b is clear that the application of the thresholds then set out in the policy will be used as a measure and to demonstrate whether this requirement is met. For other institutions, this will need to be demonstrated by the institution, rather than by the use of thresholds. Oxford Student Needs Assessment (Iceni, 2025) found no significant need for additional student accommodation for students at institutions other than the universities over the plan period, therefore thresholds can't be set and there may well be capacity within existing provision for any increases - but that will be for individual institutions to demonstrate. Further explanation can be found in Background Paper 003. Appendix 2.3 of the Plan contains more	None

	detail on how compliance with the thresholds will be calculated and which groups of students it applies to.	

Policy H10

POLICY	H10
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H10
All respondents **raising objections** on this policy/chapter	No representations were made objecting to this policy.

Policy H11

POLICY	H11
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H11
All respondents **raising objections** on this policy/chapter	49.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
In the 'Policy Context' section of the supporting text, reference should be made to Oxford Canal as well as main rivers as the need to maintain safe navigation is also relevant to the canal.	Agree that this should be referenced.	Propose to add a Main Modification to the fourth bullet to the 'Policy Context' section of the supporting text as follows: • There is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and Oxford canal and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Policy H12

POLICY	H12
All respondents **supporting** policy	30.1

COMMENT SUMMARY	OFFICER RESPONSE
Support the policy (although it could have a more positive statement to encourage more older persons accommodation).	The support is welcomed.

POLICY	H12
All respondents **raising objections** on this policy/chapter	No representations were made objecting to this policy.

Policy H13

POLICY	H13
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	H13
All respondents **raising objections** on this policy/chapter	No representations were made objecting to this policy.

Policy H14

POLICY	H14
All respondents **supporting** policy	159.2

COMMENT SUMMARY	OFFICER RESPONSE
Support.	N/A

POLICY	H14	
All respondents **raising objections** on this policy/chapter	110.1	138.14

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
1. Supporting text misrepresents boarding accommodation and fails to recognise the social, cultural, and economic benefits of boarding schools to the community and focuses on alleged negative impacts with little evidence/assessment as they are not included in housing assessment need 2. Supporting docs (background paper 003 and specialist housing bp) fail to evaluate the demand for boarding accommodation, its role in private	1. Not job of the plan 2. Evidence came from applications/DM - need to meet other housing types not boarding schools accommodation and can conflict with housing need 3. Application have been approved and conflicted with other land uses coming forward, where residential was expected to come forward to meet housing need	None

education and its broader significance, partly due to insufficient engagement with schools 3. Recent planning approvals show boarding accommodation can be successfully delivered under existing policies, suggesting a separate restrictive policy is unnecessary and the restrictive policy wording is unjustified and impractical 4. The policy does not adequately explain why alternative locations are unsuitable, despite examples of successful off-campus provision 5. Background paper 003 states that there is no local or national policy which is technically correct but doesn't account for paras. 20,27,100 of the NPPF.	4. The policy aims to keep accommodation near the school to reduce children being housed away from the school, which may reduce supervision and safety and increase the need to travel to lessons. 5. National policy is addressing schools, this policy is addressing boarding accommodation which are different things. Para 100 refers to collaboration and working with providers and pre-app advice – both reg.18 and 19 consultations welcomed any comments and representations 6. Worked with County Council to show we have enough supply for school provision	
States the policy is unjustified. The justification for accommodation to be adjacent is not justified.	The supporting text of the policy highlights that keeping accommodation near the school aims to reduce children being housed away from the school, which may reduce supervision and safety and increase the need to travel to lessons.	None

2868

Chapter 3

General comments relating to Chapter 3

POLICY	Chapter 3 (whole chapter)
All respondents **supporting** policy	No representations were made in support of this policy

POLICY	Chapter 3 (whole chapter)
All respondents **raising objections** on this policy/chapter	98.4

2869

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This is overall sound, however, the following changes are suggested: *Care shall be taken so that the concentration on Oxford's globally important role does not inadvertently damage the wider aspects of life within the crowded city, such as the loss of entertainment venues and retail facilities, particularly such shops – specialising in supplying white-goods, electronic goods, furniture, building and DIY materials, car-and-bike accessories - as are currently only to be found within the city on the Botley Road.*	The Plan should be read as a whole and includes policies protecting cultural and community facilities, e.g., entertainment venues. The Use Classes Order enables flexibility to change between uses within Use Class E (which contains both retail and office/R&D uses). We do not consider that the suggested text is required.	None.

Balance is required, recognising the needs of the community as a whole, and not requiring journeys to be made outside the city to supply basic needs.		

Policy E1

POLICY	**E1**				
All respondents **supporting** policy	58.7	60.7	86.4	117.1	*118.5*
	130.4	133.4	134.3	157.7	

COMMENT SUMMARY	**OFFICER RESPONSE**
South Oxfordshire District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Vale of White Horse District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Principles behind policy are supported, especially the focus on making efficient use of employment land and protecting key employment sites. The protection and intensification of existing employment sites aligns with the NPPF and will make the best use of existing developed/ brownfield sites. The flexible approach to potentially allow the development of housing on Key Employment Sites and non-designated employment sites is also considered reasonable and appropriate given the pressures on the city to provide for both economic and residential development.	Support welcomed

West Oxfordshire District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Continued support for aspects of emerging Policy E1, which considers new employment generating uses within the city centre as an acceptable location for delivering new, modernised and intensified employment floorspace.	Support welcomed
Support simplification of previous categorisation of employment sites to include only Key Employment Sites and all other employment sites. Support the identification of Oxford North within the list of Key Employment Sites.	Support welcomed
Support approach to meet Oxford's employment needs No plans at this time to deliver housing on-site. Recognise housing is a key locational consideration for companies. Also recognise and support scope for allowing some housing on employment sites provided it supports their economic function as part of Policy E1.	Support welcomed
Supports flexibility of Policy E1, which protects the most important 'key' employment sites, whilst also allowing for their intensification including complementary housing to create mixed use sites. Given the scale of the city's housing requirement, it is right that all options should be considered, including employment sites.	Support welcomed

POLICY	**E1**				
All respondents **raising objections** on this policy/chapter	40.2	47.11	57.3	59.6	69.9
	81.2	82.1	89.7	92.2	101.4
	114.1	129.5	134.14	138.15	159.8

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Suggest amending the initial paragraph of this policy as follows: *'All new development ~~on employment sites~~ for employment purposes …'* The effect of this change would be to make the paragraph in question applicable to employment development more broadly rather than only being applicable to allocated/existing employment sites. This clarification and amendment would ensure the policy is effective.	This phrase of Policy E1 is very carefully and deliberately worded to refer to "employment sites" rather than for "*employment purposes*". Both Key Employment Sites and existing employment sites not designated as Key Employment sites are defined in the glossary. These sites together make up what is meant by "employment sites" which are suitable locations for "employment-generating uses", as defined in the glossary (i.e., Office/R&D/Industrial/ Storage and Distribution uses). However, the city's Key Employment Sites cover a wider range of sectors providing jobs in the city than the traditional employment sectors for land-use planning purposes, which, as set out above, are defined in the plan as "employment-generating uses". Oxford's Key Employment sites include hospitals and educational institutional sites as well as traditional sites for employment generating uses. Health and education jobs in Oxford account for around half of all jobs in the city. As such, this part of the policy, ensures that development proposals across all the city's employment sites, make the best and most efficient use of land and premises, positively promote sustainable development and do not cause unacceptable environmental impacts.	None.
Identified floorspace need not in the policy. Neither is the strong pipeline of R&D reflected in policy wording. These are only identified in the supporting text.	The Employment Land Needs Assessment (Rapleys, January 2026) sets out the employment land supply position. This sets out that Oxford's pipeline supply of R&D uses exceeds the identified need for this	None.

The policy is not positively prepared. It does not provide a clear strategy for meeting employment needs in the plan period. The Council should focus on meeting all identified employment land needs within Oxford's boundary, as it is essential to sustaining the city's economic vitality and supporting its key sectors, particularly R&D, life sciences, and advanced manufacturing. We recognise the acute need for housing in Oxford. However, this should not come at the expense of employment land. By actively investigating ways to meet employment land needs within the city, including the identification of new, appropriately located sites, it ensures that Oxford can continue to support high-value job creation, attract investment, and retain its competitive edge. A higher level of protection should be afforded to existing employment sites to prevent change of use unless there is robust evidence provided to demonstrate that it is poorly performing in employment use. Wording should also be included which allows for the redevelopment of employment sites for suitable employment uses.	employment use class. The modest identified office, industrial and storage/distribution needs can be comfortably met within the existing employment land portfolio. There is no need to set out the employment land supply position in policy as this is contextual and continuously evolving. The employment strategy results in no unmet employment need for the plan period. There is currently sufficient space and opportunity on Oxford's existing employment sites to meet the identified needs for the city. Accordingly, no new land for employment-generating uses has been allocated. Conversely, Oxford is unable to meet its housing standard method housing need (NPPF, December 2024). Accordingly, the plan's employment strategy supports housing delivery while at the same time ensuring that Oxford can attract investment and retain its competitive edge. All employment sites were assessed (see background paper 4A – Key Employment Site methodology. Those sites that performed well were designated as "Key Employment Sites". The other "existing employment sites not designated as Key Employment Sites" were poorly performing. Given the identified employment land needs for Oxford can be met through development/ redevelopment of the city's Key Employment Sites, there is no need to	

	introduce a policy requirement to prevent their change of use. Wording already exists in the policy in relation to the redevelopment of employment sites for suitable employment uses.	
The Plan's employment strategy promotes high value economic growth in R&D and knowledge sectors, but by setting an industrial floorspace need of "0 sqm" and only 46,086 sqm for storage and distribution, it offers very limited support for sectors such as manufacturing, small scale industrial services, warehousing and logistics, all of which provide a broader spread of job types and skill levels. It is not apparent from the Plan how the evidence base has: - assessed long term demand for urban industrial and logistics land within Oxford; - evaluated the implications of allowing the "complete loss" of some existing employment sites to housing, as explicitly envisaged by the strategy; and - considered the need to retain a diverse stock of employment sites, including those suitable for manufacturing, servicing, small workshops and last mile logistics.	The Plan's employment strategy is underpinned by evidence. The Oxford Employment Land Needs Assessment (Rapleys, January 2026) (hereafter "ELNA") provides a robust, PPG compliant assessment of Oxford's employment land floorspace needs for the plan period. A number of existing site allocations specifically include B2 (Industrial) and B8 (Storage/ Distribution) uses as named potential primary uses. The employment forecasts in the ELNA are for the twenty-year plan period. The "complete loss" of some of the city's employment sites to other uses, including housing only applies to "existing employment sites not designated as Key Employment Sites". These sites are generally smaller, poorly performing, employment sites that are not well-located. Given the plan's focus is to deliver new homes (for which Oxford has an identified unmet need (Standard Method, NPPF, December 2024)), it is important that the employment strategy supports the delivery of new homes in the city.	None

Without this clarity, it is difficult to conclude that the quantum and distribution of floorspace by sector are fully justified in line with NPPF para 31. If urban industrial and "last mile logistics" land is displaced out of Oxford: - service and delivery trips may need to originate from farther afield, increasing travel distances, vehicle kilometres and associated emissions; - construction, maintenance and repair industries may face longer journeys to jobs in the city; - local SMEs may struggle to find appropriately priced and located premises, ultimately leading to a loss of services and facilities in the city, and requiring residents to make longer journeys to reach the facilities and services they need. This could undermine both economic resilience and transport sustainability, given the important role of well located industrial and logistics land in supporting shorter supply chains and more efficient urban servicing, and is not fully addressed within the Plan's employment or transport strategy. By identifying 345,004 sqm of additional R&D floorspace need, 46,086 sqm of	The Key Employment Sites (i.e., those protected and retained in an employment-generating use), include a range of sites (not just R&D). A range of Key Employment Sites in the south of the city have been designated, in the vicinity of MINI Plant Oxford. These represent a diverse stock of employment sites and include small workshops, light industrial units, manufacturing, and small-scale storage and distribution uses. All of the issues discussed by this respondent are addressed in the plan's supporting evidence base (ELNA, Background papers, etc.). There is no need for the Plan to simply repeat the PPG compliant assessment of employment floorspace need which is eloquently articulated in the ELNA. As set out above, the plan protects a wide range of Key Employment Sites across a broad range of sectors to support economic diversity in the city.	

storage/distribution need and 0 sqm of industrial floorspace need, and by tightly constraining new B8 uses and allowing the complete loss of some existing employment sites, the Plan risks: - reducing the diversity of employment land within the city; - limiting the availability of sites suitable for industrial, servicing and logistics activities; and - narrowing the range of employment opportunities available locally, particularly for those not employed in high skill knowledge sectors. To better accord with the NPPF's requirements for evidence based, balanced and resilient economic planning, it is suggested that the Plan should: - more clearly demonstrate, with reference in the Plan text to the evidence base, how industrial and logistics needs have been assessed and why a 0 sqm industrial need is appropriate; - identify how sufficient land and policy support will be maintained for urban industrial, servicing and last mile logistics uses, including smaller sites and SMEs; and		

- explain how the substantial R&D pipeline and proposed additional R&D floorspace have been balanced against the needs of other sectors and the objective of providing a wide range of accessible employment opportunities for local residents.		
Fundamental concerns about significant imbalance between jobs (high) and economically active residents (much lower). This imbalanced has led to many problems, including high levels of commuting, traffic congestion, a shortage of housing and very high housing costs which exacerbate inequalities. The local plan strategy of *meeting all identified employment needs arising within the city while exporting its unmet housing needs to greenfield sites in neighbouring districts* is not sustainable and is not an appropriate strategy. The plan claims to have a flexible approach to supporting housing delivery on employment sites however it appears very reluctant and is highly constrained. It is likely that the current jobs: housing imbalance will increase over the plan period, encouraging car use, worsening traffic congestion, road safety and environmental problems. It will store up problems for the future with no effective ways of solving them. The strategy is	National Planning Policy (para. 11a) sets out that for plan-making, the application of the presumption in favour of sustainable development means that plans should promote a sustainable pattern of development that seeks to meet the development needs of their area. This is backed by Para.20 of the Framework which sets out that strategic policies (i.e., Policy E1 – as set out in Appendix 1.2 of the Oxford Local Plan 2045 Proposed Submission Document), should make sufficient provision (i.e., to meet the identified needs for), a range of uses, including employment. Given that one of the tests of soundness is "consistency with national policy", the plan should at the very least attempt to meet the identified needs for all the NPPF Para. 20 uses, within Oxford's tightly drawn administrative boundary. The plan's strategy does not identify new land as site allocations for employment uses but instead focuses new employment-generating uses towards existing employment sites. This enables both investment and the delivery of	None

not consistent with NPPF, para 111 a) as it fails to support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Neither is it consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations. We consider the local plan is skewed towards encouraging employment and fails to give sufficient priority to providing housing, particularly much needed social housing for rent. It should be modified to give greater priority to providing housing, for example, by i. removing the objective to provide the conditions for Oxford to meet all identified employment needs arising within the city to 2045 - an additional 412,460m2 of employment generating floorspace. This is not necessary or appropriate given the potential for very significant job increases on land in and close to the city. The Oxford Growth Commission's Interim Report, for example, gives an indicative job potential of 25,000 in Oxford Central and West End, 15,000 around the Cowley branch line, 8,000 around Oxford, Kidlington and Parkway Station ii. reducing the number of key employment sites in Appendix 3	active travel and public transport infrastructure improvements to be realised. The additional combination of the County Council's "Core Transport schemes" - a suite of demand management measures and the Local Plan 2045's firm non-residential car parking standards (the starting point of which is to seek no increase in car parking at non-residential sites, and which seek a reduction in car parking where non-residential sites are located in accessible locations), means that the plan's strategy is consistent with paragraph 111a). A detailed analysis of the possible strategies for the Oxford Local Plan 2045 is set out in the Sustainability Appraisal. The Plan's focus is on housing delivery. The Plan proposes new sites for housing, and in the highly accessible locations of the city and district centres, the plan proposes a minimum density of 100dph. Addressing each of the numbered points in turn: i. The plan's employment is primarily focused on brownfield and existing mixed-use site allocations which include both housing and employment-generating uses. We are unable to "remove the objective" to seek to meet the identified employment needs for the city as this would be inconsistent with national policy. ii. The Key Employment Sites in the plan (which include four of the main hospitals in the city)	

iii. making some site-specific allocations for housing on all or part of current employment sites – this could include, for example, land at the ARC site, the Science Park, and in Oxford's West End, Osney Mead and Botley Road areas iv. Amending policy E1 which appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate v. similarly, for other (i.e. non key) employment sites, E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted vi. amending policy S1e) which indicates that housing is only a priority away from current employment sies vii. removing employment as an acceptable use at Slade House (NHS) and part of Thornhill Park as there are no business uses on the sites and they do not meet the criteria for new employment development viii. naming residential as an acceptable use on the Ozone Leisure Park (SPS13) and the Unipart site (SPS17) particularly if redeveloped in association with the Northfield strategic housing allocation in SODC's local plan ix. increasing the minimum number of homes to be provided; on some sites it seems very low –	have all been assessed using the methodology outlined in Background Paper 4a. These sites are all important to the city. iii. Where landowners have expressed an immediate interest in delivering housing on their sites, housing numbers have been included in the respective site allocation policies, i.e., Osney Mead and site allocations within Oxford's West End. The Strategic Housing Land Availability Assessment (SHLAA) provides further details. iv. We consider that the approach to protecting existing jobs on the city's Key Employment Sites, and ensuring the employment use is maintained at those sites is appropriate and supports the plan's focus on housing. The permissive approach to residential on Key Employment Sites therefore enables new homes to come forward, without jeopardising, amongst other things, the continued operation of existing businesses. v. Criteria E1f) does not apply to existing employment sites not designated as Key Employment Sites. There is a typo in the policy. The final sentence of the second paragraph under the heading "*Loss of employment floorspace and the use of employment sites to support housing delivery",* should refer to criteria h) to m). This typo has been picked up and a modification has been proposed to refer to the correct policy criteria.	

for example Ruskin Field has a minimum of 28 homes on 3.5 ha and is the only use proposed.	vi. A modification has been proposed to Policy S1e) to clarify that the plan's focus is on housing delivery. See Schedule of Main Modifications for further details. vii. Both these site allocations either contain, or previously contained employment uses, as such it is appropriate that employment uses are retained on each site. viii. See response iii) above. ix. Individual site capacities for each site have been assessed and calculated based on the specific circumstances for each site. The numbers are a minimum, so more can be provided by landowners/ developers, subject to meeting other policy requirements in the plan.	
The policy, as drafted, is ineffective and too restrictive. Criteria f and g of this policy need to be deleted. Respondent has repeatedly called for some development on various sites listed as Key Employment Sites, many of which have sat empty for decades. The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others. For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively brownfield sites. If there is no real expectation that these sites will be actively developed then protecting them as Employment sites makes no sense. The City	We consider that the approach to protecting existing jobs on the city's Key Employment Sites, and ensuring the employment use is maintained at those sites is appropriate and supports the plan's focus on housing. The permissive approach to residential on Key Employment Sites therefore enables new homes to come forward, without jeopardising, amongst other things, the continued operation of existing businesses. It is worth clarifying that, while there are some vacant buildings at Osney Mead (e.g., Alden Press, it is an active industrial estate which is home to a variety of existing businesses, as well as an EA depot and some academic institutional buildings. Similarly, a number of businesses	None

Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full, ignoring Osney Mead and the many other vacant sites in Oxford. Policy E1 should state that: "if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller developments (formerly Category 3 sites) the suggested proposals should not apply." Further owners should pay enhanced business rates if they fail to redevelop vacant sites.	operate out of the Unipart site, including offices used by the NHS and the Unipart Group. The other cited example is ARC Oxford. All vacant plots at ARC Oxford either now benefit from planning permission or have a planning application under consideration. We do not agree with the proposed modification to the policy as any proposals would come from the landowners/developers of a site. Local planning policy is not able to alter business rates.	
Policy E1 appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate similarly, for other (i.e. non key) employment sites, E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted.	We consider that the approach to protecting existing jobs on the city's Key Employment Sites and ensuring the employment use is maintained at those sites is appropriate and supports the plan's focus on housing. The permissive approach to residential on Key Employment Sites enables new homes to come forward, without jeopardising the continued operation of existing businesses.	None

This policy excludes housing from many designated employment sites and makes it extremely difficult to include housing in the others. It deliberately creates 'unmet' housing need when there are many empty employment sites which cannot be used for much needed housing. This creates a high job vacancy rate within Oxford and an increase in traffic congestion above its current intolerable level with the increase in commuting into Oxford. Development sites should not be zoned for employment alone. It makes sense to mix housing on employment sites, which is sustainable so people can walk to work. Oxford City Council have been very unfair to local people needing housing within the City and the Districts receiving their alleged 'unmet' housing need that Oxford City has deliberately created, The Oxford Business Park on the site where Morris Motors (now BMW Mini works) used to be, was developed as a business park in approximately 1980s and still has empty plots which have not been developed. These could and should have been used for much needed housing. The site itself is having many business premises demolished and rebuilt. This causes significant and unnecessary carbon emissions	The policy does not exclude housing from designated Key Employment Sites. It allows the loss of *existing employment sites not designated as employment sites* to other uses, while supporting proposals for housing subject to certain criteria being met to ensure that any residential development proposed creates an acceptable living environment for future occupiers. The Plan seeks to meet all identified needs as established through paras 11a, and 20 of the Framework (Dec,2024). The plan's employment strategy enables the city to meet its employment needs at identified Key Employment Sites in the city. At accessible sites in the city and district centres, site allocations include both minimum housing numbers and suitable employment-generating uses (i.e., office/ R&D/etc). Oxford City Council is not able to meet its identified standard method housing need (NPPF, Dec 2024). As such, the City Council continues to work with neighbouring district councils to seek to support and deliver the city's identified housing need to 2045. This is in line with national policy. All vacant plots at the former Cowley Motor Works (ARC Oxford) either now benefit from	None

which contributes to climate change. It is a disgrace and very wasteful.	planning permission or have a planning application under consideration.	
Historic England has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Cherwell District Council has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Do not support proposed employment strategy. It is not positive, justified, and will not be effective, due to its failure to identify clear requirements for employment land and how or where needs will be met. The policy, based on a more positive and effective employment land strategy, is required. It should quantify employment land and floorspace requirements, express the spatial priorities where provision can be made and ensure flexibility for the market and growth in current and emerging sectors. The approach for supporting employment growth must be aspirational and flexible and positively support and encourage the	The Oxford Employment Land Needs Assessment (ELNA) produced by Rapleys includes a comprehensive supply-side assessment which looks at extant permissions and also considers the planning pipeline of current applications being considered at October 2025. This supply-side assessment shows that the identified floorspace needs for office; R&D; industrial; and; warehousing uses, can be comfortably accommodated within the city's current employment land portfolio (focusing new employment-generating uses on the city's Key Employment Sites, and on employment sites within the city and district centres).	None

commitment and future investment into Oxfordshire that will be mobilised through the Oxfordshire Growth Commission. The Local Plan, in looking forward to 2045, must create the conditions to support, not constrain economic growth. As stated in relation to housing requirement – collaborative working across boundaries is critical to securing and supporting this process.	The supporting text to Policy E1 already quantifies the employment floorspace need. Given the plan can meet its employment needs primarily through modernisation and intensification of brownfield land, there is no reason to quantify the employment floorspace need as a land requirement. No "new" land is required to meet the city's employment needs. The policy does express the spatial priorities where provision of employment land can be made. All employment site allocations (and mixed-use site allocations containing employment uses) have been drafted in consultation with landowners/site promoters/developers to ensure a suitable range of uses for each site, has created (and is sustaining) flexibility for the market and growth in both current and emerging sectors.	
Policy E1 is confusing and contradictory. It risks undermining the efficient use of land that the Local Plan otherwise strongly promotes. Re: existing employment sites not designated as Key Employment Sites, the requirement in Policy E1 in relation to redevelopment and intensification is appropriate and aligns with the plan's wider objectives regarding optimisation of land and supporting economic growth. However, no justification is provided for requiring a sequential assessment in circumstances where a proposal is simply seeking to intensify an existing employment site, nor are any exemptions provided for sites	The Plan's employment strategy articulates paragraph 86a) of the Framework (December 2024) and sets a clear economic vision and strategy which positively and proactively encourages economic growth by supporting new employment-generating uses in the city and district centres and across the city's network of Key Employment sites. The city's Key Employment Sites were established using the methodology set out in Background Paper 4a – Key Employment Site Methodology. Accordingly, existing employment sites that are neither located in the city or district centres,	To clarify the position for Policy SPS13 and the following linked site allocation policies (Policy SPS7 and SPS11), we propose the following modifications: **Policy SPS13: Ozone Leisure Park and Minchery Farmhouse** Amend the first paragraph of the Policy SPS13 as follows: *Planning permission will be granted for mixed-use development within existing lawful Use Class E and with replacement community*

that are allocated for employment-related development within the Local Plan. This creates a clear internal conflict. On the one hand, the policy requires intensification of existing employment sites. On the other, it introduces a sequential test that may prevent or delay that very intensification, even in locations expressly allocated for employment use in the Plan. For example, the intensification of employment floorspace at the Ozone Leisure Park, despite being an allocated site, would still trigger the requirement for a sequential test, introducing an unnecessary procedural hurdle that is inconsistent with the Plan's objective of maximising efficient land use. It is therefore strongly encouraged that the wording of this policy be reconsidered to provide greater clarity and a clearer policy direction that is more conducive to the efficient use and optimisation of existing employment sites. Policy E1 states that proposals for employment generating uses outside of designated Key Employment Sites, City and District Centres and existing employment sites not designated as Key Employment Sites will be refused. However, Policies SPS7 and SPS11 both allow employment-related uses on site. This presents an internal inconsistency within the Reg 19 which could prevent the effective implementation of Policies SPS7 and SPS11. This internal inconsistency risks rendering the	nor are Key Employment Sites (some of which benefit from a site allocation), should undertake a sequential test for the introduction of additional employment-generating uses. Policy E1 sets out that the sequential test would apply to new employment-generating uses on sites in lawful use class for the proposed employment use class). Policy E1 also allows the loss of any employment site not designated as a Key Employment site, to other uses. The site in question is currently, as the name suggests, a Leisure Park, which contains a Bowling Alley, Cinema Complex (Sui Gen), and other Use Class E leisure-related uses. Although this site does benefit from a site allocation policy (Policy SPS13 Ozone Leisure Park and Minchery Farm), the site itself is neither a Key Employment site nor located within the city or district centres. The inclusion of the list of "acceptable uses" within the site allocation policy simply reflects the permitted development rights associated with uses within Use Class E. Where site allocations that are not located in the city or district centres, nor are listed as Key Employment Sites highlight that a particular employment-generating use is an acceptable use this needs to be read in conjuction with Policy E1.	*leisure/sui generis uses. Acceptable uses on the site include:* • *Research and development (in accordance with **Policy E1**)* • *Other Use Class E employment uses (in accordance with **Policy E1**)* • *Commercial leisure* • *Community and cultural facilities* • *Replacement hotel* **Policy SPS7: Kassam Stadium** Amend the first paragraph of Policy SPS7 as follows: *Planning permission will be granted for residential-led development and public open space on the Kassam Stadium site. The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected. There is also a precedent for employment-related uses, so these will be acceptable as a secondary use on the site (in accordance with **Policy E1**).* **Policy SPS11: Overflow Car Park at Kassam Stadium** Amend the second sentence of the first paragraph of the policy as follows: *Planning permission will be granted for residential-led development and public open*

allocation policies ineffective. Policy E1 should therefore explicitly recognise that employment uses are acceptable where supported by site specific allocation policies.	Two other sites are linked to site allocation policy SPS13. These are site allocation policies SPS7 and SPS11. The plan takes a flexible approach to the delivery of uses across the sites providing the minimum number of homes is delivered. Ac It is appropriate that Policy E1 ensures that sites regenerated for employment-generating uses, that do not align with the plan's strategy, should ensure that their intensification does not affect the vitality and viability of the city and/or district centres by drawing people away from them, towards less accessible locations. As such it is appropriate that a sequential test be carried out for the intensification of existing employment sites not designated as Key Employment Sites (and sites in lawful use class for the proposed employment use class). We consider that Policy E1 is clear. Policy E1 supports the modernisation and intensification of employment generating uses at Key Employment Sites, and at employment sites located within the city and district centres. As set out above, there are a variety of reasons for this, including that the city's Key Employment Sites and the city and district centres represent the main opportunity within Oxford for meeting Oxford's identified employment needs, which, as set out in the Employment Land Needs	*space on the Overflow Car Park at Kassam Stadium site. The minimum number of new homes to be delivered is 100. Other complementary uses will be considered on their merits. This site is linked to SPS7 and SPS13, and a flexible approach will be taken to how the required uses are spread across the sites (in accordance with **Policy E1** where applicable uses are proposed), but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.*

	Assessment, can be accommodated at these sites. This is the plan's clear economic vision and strategy, are clear and support the plan's overarching strategy to focus on housing delivery. However, to ensure that the approach is	
The policy is unjustified as there is no obligation for extra employment to provide extra housing, only permission to do so. The relentless expansion of the OUHT, the Universities and associated research centres is the primary driver of housing need in the city, but E1 permits expansion with no contribution to housing. If a business wants to downsize and allocate space for housing, this is specifically prohibited, which is unjustified. 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.	Policy E1 establishes a permissive approach to housing delivery across the city's existing employment site network. This both enables an element of housing delivery at the city's Key Employment Sites, while supporting the complete loss of the city's less well located, poorly performing, and often smaller employment sites to housing. The policy also includes specific criteria to ensure good quality residential development comes forward.	None
A mechanism should be provided in the Local Plan to review the categorisation of employment sites on a regular basis and update the list within Appendix 3.1. Policy E1 is unnecessarily restricted in scope regarding the types of employment generating which should be allowed within Key Employment Sites. This restriction comes from the current definition of 'Employment Generating Uses' in the Glossary. For example.	We consider that the most appropriate time to review the employment site categorisation is through the preparation of the Local Plan itself. The "Key Employment Sites" are listed within the Plan (Appendix 3.1) and mapped on the Policies Map. We do not consider that Policy E1 is unnecessarily restricted in scope. Policy E1 sets out the strategy for meeting the city's identified needs for, what are described as, in planning	None

the Glossary definition does not include the following uses which can generate significant numbers of new jobs: retail, financial / professional services, indoor sport / recreation, medical / health services, creches / nurseries (Use Classes E(a), E(c), E(d), E(e) and E(f)); and hotels (Use Class C). Amend Policy E1 as follows: Add wording which includes a mechanism to change the category of employment sites outside of a review of the Local Plan. This review should be undertaken regularly and the list of Key Employment Sites in Appendix 3.1 updated accordingly. Amend the Glossary to include additional employment generating uses that are suitable in a Key Employment Sites: "Employment generating uses are referred to in planning terms as employment floorspace or employment land. Employment generating uses include the sectors that make up the following Use Classes: - Use Class EG(i): Office - Use Class EG(ii): Research and Development (R&D) - Use Class EG(iii): Light Industrial - Use Class B2: General Industrial - Use Class B8: Warehousing, Storage and Distribution - <u>**Use Classes E(a): Retail</u>	terms, "employment" land uses (i.e., Use Classes Eg(i-iii), B2 and B8). The term "employment-generating uses" has been carefully defined in the glossary of the plan to reflect this. The plan includes different spatial approaches for, Hotel and Short Stay accommodation, as well as for Retail and Leisure uses, the identified needs of which have all been assessed and strategies to support the associated delivery of these needs have been addressed in separate policies (e.g., Policy E5 – Hotel and short stay accommodation). Policy E1 enables the loss of floorspace for employment-generating uses at Key Employment Sites providing specific criteria are met.	

- Use Classes E(c): Financial / professional services - Use Classes E(d): Indoor sport / recreation - Use Classes E(e): Medical / health services - Use Classes E(f): Creches / nurseries - Use Class C: Hotels**"		

Policy E2

POLICY	E2				
All respondents **supporting** policy	No representations were made in support of this policy				

POLICY	E2				
All respondents **raising objections** on this policy/chapter	92.3	117.2			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Cherwell District Council has made a representation relating to Policy E2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The draft policy wording within Regulation 18 Consultation Draft restricted new or expanded warehousing and storage uses to circumstances where they were 'essential to support the operational requirements of that Key Employment Site.' The Regulation 19 Submission Draft now seeks to allow Class B8 (Storage or Distribution) uses within existing Key Employment Sites, subject to a set criteria. Despite the amendment, Policy E2 remains restrictive and does not reflect potential for a diverse range of significant employment uses. It is, however, noted that whilst Policy E2 continues to limit Class B8 uses at Key Employment Sites, the 'Unipart Site' (which is dealt with under Policy SPS17) doesn't limit Class B8 uses. Given the nature and scale of available land at the 'Unipart Site' this lack of restriction is welcomed.	Policy E2 is aligned with the overarching employment strategy (Policy E1) which does not seek to identify new land for site allocations for employment-generating uses. As B8 uses have particular requirements, Policy E2 introduces a set of criteria which include requirements to ensure B8 uses are appropriately located in the city. Not all Key Employment Sites benefit from site allocation policies and as such, where B8 uses are required by existing businesses to ensure their continued operation, they would be supported. This is because Key Employment Sites include a wide variety of sites suitable for smaller scale B8 uses. The Employment Land Needs Assessment (ELNA) (Rapleys, January 2026) highlights that the modest warehousing requirements for the plan period can be accommodated within the city's existing employment land portfolio. Accordingly, on site allocations which specifically reference B8 uses, these uses can be brought forward "as part of a wider agreed masterplan". As the city's modest B8 needs can be delivered in this way, we consider Policy E2 to be appropriate.	None.

Policy E3

POLICY	E3		
All respondents **supporting** policy	118.6	159.21	157.8 and 157.18

COMMENT SUMMARY	OFFICER RESPONSE
West Oxfordshire District Council has made a representation relating to Policy E2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
ONV supports approach to CEPP's and has established such Plans at Oxford North with great success. ONV supports the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. ONV is delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas.	Support noted.
The increase in the size of the floorspace limits from 1,000sqm to 5,000sqm is welcomed as it will not unduly impact upon more modest schemes.	Support noted.

POLICY	E3				
All respondents **raising objections** on this policy/chapter	40.3	51.2	59.7	77.1	117.3
	157.8 and 157.18				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Policy is not justified. It applies a blanket requirement for CEPPs without sufficient evidence that such plans are necessary for all qualifying developments. In practice, such obligations are typically secured through planning obligations on a site-by-site basis where they meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010. A more flexible approach that allows the requirement to be considered on a case-by-case basis through Section 106 agreements would ensure that obligations remain proportionate and directly related to the development.	The policy as worded is considered to be suitably flexible. Where CEPPs are expected to be provided, the policy introduces an expectation to demonstrate consideration of all the measures listed. The absence of policy targets enables flexibility to cater for a wide range of development types. The policy supports a flexible approach. The criteria should be considered as an "a la carte" menu of choices, providing a flexible approach to policy compliance through demonstrating consideration of each of the critieria.	None.
Principle supported however policy is vague and difficult to understand what the expectations are. There are no defined targets for the amount of jobs or apprenticeships that would be expected to be delivered. The policy also asks for all criteria to be considered however some will not be able to be covered as it will depend on the context of a planning application.	The policy as worded is considered to be suitably flexible. Where CEPPs are expected to be provided, the policy introduces an expectation to demonstrate consideration of all the measures listed. The absence of policy targets enables flexibility to cater for a wide range of development types. It may well be that not all criteria are applicable for every planning application. It is for the applicant to demonstrate that they	None.

Further, paying all employees the Oxford Living Wage is right as an aspiration but should not be a policy expectation as part of a planning application. Proposed modifications: Amend the first sentence of the first paragraph of the policy as follows: *Planning ~~permission will only be granted for proposals of~~ applications should be supported by CEPP for 50 or more dwellings or 5,000 sqm of GIA…* Amend the final sentence of the first paragraph of the policy as follows: CEPPs should consider the following criteria where applicable: ~~will be expected to demonstrate consideration of all the following measures~~: Delete criteria f) and g) entirely and encourage the Oxford Living Wage rather than making it a requirement.	have considered all the measures outlined below. In relation to criteria f) and g), again the policy expectation is that the applicant demonstrates consideration of paying all employees (f), and using contractors (g), who commit to paying the Oxford Living Wage. The policy supports a flexible approach. The criteria should be considered as an "a la carte" menu of choices, providing a flexible approach to policy compliance through demonstrating consideration of each of the critieria. We do not accept these changes.	
Oxford City Council's Corporate Strategy for 2024-28 commits to "Increase the number of people paid the Oxford Living Wage to improve the minimum standard of living". The Local Plan should therefore require developers to play an important role in ensuring that the Oxford Living Wage is not only paid to workers employed during the construction phase, but	It is the responsibility of business owners to choose to become an Oxford Living Wage Employer. Policy E3 goes as far as it can in relation to ensuring control of elements of a scheme that relate to the granting of a planning permission.	None.

also those in the end user phase (i.e. those who go on to work on the site in available units once they have been constructed). Add new bullet point: "Implementation of a Living Wage Zone, securing payment of the Oxford Living Wage to all directly and indirectly paid workers who work on the site following construction"	As such, we cannot accept the proposed modification.	
It should explicitly state that construction jobs means not just the jobs required for the construction itself but also all the associated consultancy that is required to get a building on site and monitor it for health and safety and build quality. And that the best way to provide apprenticeships and training, as well as the best way to sustain the local economy is to engage local businesses, both construction firms and consultancy firms, who should be there long after the individual construction job has finished. I propose the policy is amended to specifically state: a) Securing construction jobs, including the associated consultancy roles, for local residents and businesses; b) Providing construction and consultancy apprenticeships and/or training opportunities for local residents in local businesses;	Policy E3 goes as far as it can in relation to ensuring control of elements of a scheme that relate to the granting of a planning permission. As such, we cannot accept the proposed modification.	None.

The threshold for non-residential floorspace has increased which is supported, however the policy should allow more flexibility and not make Community Employment and Procurement Plans a policy requirement for all major development proposals, as previously suggested. This will provide flexibility and ensure the policy is practicable for developers and viability. Therefore, it is recommended that the policy is amended to encourage, not mandatory require such Plans. This will provide flexibility and ensure the policy is practicable for developers and viability.	Suggest that the amendment is not required given the flexible nature of the policy which introduces an expectation for CEEPs to demonstrate consideration of the policy measures.	None.
Requiring affordable workspace to be delivered on Key Employment Sites could be counterproductive in that it will impact the overall scheme viability of workspace delivery, exacerbate supply demand imbalance and hence push up rents. Furthermore, the approach in the LP45 to seek affordable workspace on the Key Employment Sites (the most productive and important to the local, regional and national economy) runs counter to the ability to seek more affordable space elsewhere. In other areas, principally London Boroughs, new affordable workspace has been delivered most effectively via low-cost reuse and/or refurbishment of existing buildings to produce workspace at lower rents.	Policy E3 does not prevent the delivery of affordable workspaces on non-key employment sites. These comments also seem to relate to Policy E4: The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies.	None.

This is especially relevant to non-Key Employment sites.	The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	

Policy E4

POLICY	E4	
All respondents **supporting** policy	*87.3*	*157.8*

COMMENT SUMMARY	OFFICER RESPONSE
Oxford University Developments (OUD) has made a representation relating to Policy E1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
ONV supports the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. It is	Support noted.

delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas.	

POLICY	E4				
All respondents **raising objections** on this policy/chapter	40.4	86.5	114.5	117.4	129.6
	130.5	134.4	137.3	138.16	157.18

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is essential that affordable workspace requirements are clearly defined, viable, and do not unduly impact the deliverability of a scheme. The policy should set out that affordable workspace requirements will be subject to viability considerations and applied flexibly where a development is already delivering other significant planning obligations. Without such flexibility, the policy risks undermining the deliverability of employment-led development and therefore fails the test of effectiveness.	The policy itself requires an Affordable Workspace Strategy to be produced. The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study have considered the viability implications of bringing forward different amounts of affordable workspace at a range of rent reductions. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces	None.

	Strategy), to ensure that schemes remain deliverable.	
Plan includes no reference or definition to what these 'alternative' rent models may comprise or what is considered a 'discounted' rent. Not clear what type and level of detail will be considered acceptable in respect to the size, marketing, servicing and management for affordable workspace. In addition, it is unclear which companies would qualify for affordable workspace, particularly at SME level, and what percentage of floorspace would be expected to be delivered as affordable. Clarification on these matters is critical to understand how the policy will operate in practice and the cost of the policy on future developments. Suggested change: Amend the affordable workspace definition contained in the glossary to provide greater clarity on what constitutes start-up and early-stage businesses or introduce a new definition for SMEs to enable greater clarity on who would qualify for affordable workspace.	The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable. We consider that the glossary definition is sufficient.	None.
The Local Plan provides no justification for the selected list of sites in Policy E4, nor does it	The Employment and Inclusive Economy Background Paper published at the Reg. 19	None.

offer a clear definition of what constitutes "affordable workspace". This lack of clarity makes it challenging for developers to understand the potential implications of this policy at the outset of site acquisition or development planning. The Viability Appraisal models several affordable workspace scenarios. It indicates that providing 10% of floorspace at a 25% discount to market rent (in perpetuity) could reduce residual land values by around 4–6%, while a 50% discount could reduce values by 8–11%. The Appraisal further notes that "the impact may be more significant when applied to developments that are only marginally viable and a flexible approach may be required in these cases". In the context of our broader concerns about the cumulative impact of the Local Plan's requirements, as outlined under Policy S4, Pioneer is concerned that the current drafting of Policy E4 introduces substantial uncertainty. Without a clearer indication of the level of discount sought or the proportion of floorspace likely to be required, it is difficult for developers to assess viability accurately. Greater certainty is required regarding the scope, scale, and financial implications of the policy so that development proposals can be planned on an informed basis. Without clearer	consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	

guidance, there is a risk that Policy E4 could undermine deliverability, particularly for schemes with already constrained viability or those facing multiple cumulative policy burdens, including recently increased CIL charges for R&D uses.		
Since the Regulation 18 Consultation Draft the wording of Policy E4 remains mostly unchanged. However, the inclusion of the wording 'Affordable workspace that is brought forward in accordance with an agreed site-wide masterplan is encouraged', is supported as it promotes the delivery of affordable workspace where appropriate. The policy lacks clarity on how the requirements would apply to manufacturing / research units, and logistics units for sites like Unipart. This needs to be addressed still as it is difficult for manufacturing / logistic units to integrate affordable workspaces (unlike other uses such as office space). Policy E4 needs to provide more clarity on specific uses providing affordable workspaces.	The policy is clear that it applies to "employment-generating uses". These are defined in the glossary. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	None.
The policy does not provide a definition of affordable workspace nor a method for establishing the quantum of affordable workspace to be provided. This does not respond the finding in the Reg 19 Viability Assessment that a flexible approach to	The definition of affordable workspaces is set out in the glossary. The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at	None.

the scope of the discount may be required to ensure the viability of some developments. There is also an inconsistency with Policy H3 as E4 does not establish an approach to affordable housing contributions on non-residential uses where a proportion of that use is required to be rented at below market rate. The Council should clarify its requirements regarding affordable workspace provision on mixed use sites such that it can be confirmed this policy is justified. To be found sound and justified by the available evidence base, the policy should confirm that the level and form of provision will be determined through viability testing at application stage.	rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	
Affordable workspace has a significant impact on deliverability and is a core and fundamental consideration in terms of development feasibility and deliverability. It is important for OCC to recognise the cumulative impact of all of the combined policies that would apply to landowners / developers such as Nuffield College who are seeking to bring forward major and large scale	The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies.	None.

employment generating proposals to the City. As stated, when all draft policies are combined, it makes for a highly challenged position to enable deliverable development to come forward. Whilst the NPPF seeks for Plans to be aspirational, it also seeks for them to be prepared positively, in a way that they are deliverable. It is considered that this balance has not yet been struck when considering the draft Plan as a whole. This is apparent when reviewed against further commentary and request for amendments.	The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	
Do not support this draft policy. It is not supported by national policy. No evidence to suggest incorporating an affordable workspace strategy could be viable. No assessment/ consideration of potential cumulative impacts of an affordable workspace strategy alongside CIL liability and other planning obligations on the viability of such schemes. Such an onerous requirement would serve to frustrate schemes from coming forward that would otherwise bring significant economic and social benefits to the local community,	The Employment and Inclusive Economy Background Paper published at the Reg. 19 consultation stage, and the Local Plan Viability Study consider the implications of delivering a range of amounts of affordable workspaces at rent reductions which range from 75% reduction down to peppercorn rent. The Local Plan Viability Study showed that the typologies delivering 5000sqm or more employment-generating uses were viable typologies. The policy itself requires an Affordable Workspace Strategy to be produced. It is for the applicant to produce an Affordable	None.

including the provision of new employment opportunities for local people. It is therefore EIT's position to not support this draft policy unless the Council is able to demonstrate a robust assessment of the impact of an affordable workspace strategy on a scheme's viability and which concludes positively.	Workspace Strategy to support qualifying development proposals. The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	
Waffle. Ineffective, as 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.	The policy enables a flexible approach to delivering affordable workspaces and does not specify an amount to be delivered. As such we consider that there is sufficient scope within the policy (i.e., that the policy is sufficiently flexible), to deliver an amount of affordable workspace (to be determined by the applicant through the production of an Affordable Workspaces Strategy), to ensure that schemes remain deliverable.	None.

Policy E5

POLICY	E5
All respondents **supporting** policy	159.22

COMMENT SUMMARY	OFFICER RESPONSE
Tourism is important to the economy of Oxford, in particular the City Centre. ChCh is a major tourist destination and as such it is important that tourist and short stay accommodation is provided to support this and maximise the length of time visitors stay in Oxford. As such ChCh supports this policy.	Support noted.

POLICY	E5			
All respondents **raising objections** on this policy/chapter	78.7	128.2	134.5	139.6

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
NPPF requires “main town centre uses” to be located in town centres, then in edge of centre locations. Only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. Hotels are identified as ‘main town centre uses’. Policy E5 is not consistent with with national policy. It does not set out a sequential approach. The evidence base has not applied a sequential test to confirm that out-of-centre sites, along the main arterial roads, are required.	The evidence base (Hotels Study) establishes that there are more bedspaces needed over the plan period than are likely to be able to be accommodated within the city and district centres. As such, arterial routes, all of which have very good accessibility to the city centre (where the majority of the tourism attractions are located) and the district centres, are considered to be an acceptable location for new hotel and short stay accommodation. Given Oxford’s long-standing housing issues, and the city’s inability to meet housing need within our administrative boundary, it is	None.

• Delete criterion d) from the policy • Include additional wording to confirm that proposals on out-of-centre sites on Oxford's main arterial roads will be considered favourably only where it has been demonstrated, through a sequential test, that suitable sites are not available within existing centres or edge-of-centre locations • The reasoned justification should confirm that dedicated car parking will be restricted to provision for operational and accessible purposes only.	important that sites for new hotel and short stay accommodation are supported in locations which minimise direct competition for land which could otherwise be delivered as homes. As the plan's focus is to deliver residential dwellings, it supports a locational strategy which enables the delivery of other uses in a variety of bespoke locations across the city. We do not support the proposed modifications. Other policies in the plan address non-residential car parking, and these would apply to all non-residential development in the city.	
The policy as drafted seeks to limit the location of hotel and short stay accommodation to: a) The City Centre; b) District Centres; c) Sites allocated for that purpose; d) Sites on Oxford's main arterial roads where there is frequent and direct public transport. In our view, and having regard to the particular circumstances of our client's site, it would be appropriate to amend criterion (b) to "District Centres or (appropriate) locations within up to 100 metres of the boundary of a District Centre". Amenity policies are capable of protecting neighbours. Policies should not be so rigid as to prevent good development from occurring. NPPF paragraph 86 identifies that policies should not be rigid and should be flexible to	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. Given Oxford's long-standing housing issues, and the city's inability to meet housing need within our administrative boundary, it is important that sites for new hotel and short stay accommodation are supported in locations which minimise direct competition for land which could otherwise be delivered as homes. As the plan's focus is to deliver residential dwellings, it supports a locational strategy which enables the delivery of other uses in a variety of bespoke locations across the city.	None.

account for change. The present policy is insufficiently flexible. There are no allocations for new hotels that we are aware of. The policy framework is not sufficiently addressing needs as expressed by visitors seeking individual experiences as opposed to larger corporate style hotels.	We consider that the policy enables sites for hotel and short stay accommodation to be delivered in accessible locations. The Plan includes a number of site allocations which refer to hotels, including Policy SPE16, SPS13, Policy SPCW2, while a range of site allocations also refer to "main town centre uses", including SPCW9, SPCW10. While Policy SPCW8 refers to complementary culture, arts and leisure uses. The site size threshold for category 2 employment sites in the city and district centres also means that there are improved opportunities to deliver hotel accommodation in the city and district centres.	
The draft Policy should make it evident 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. It is suggested that supporting text is incorporated which supports a flexible approach toward loss of short stay accommodation 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 circumstances where the loss of short stay accommodation is supported.	We consider that the wording of Policy E5 as proposed is sufficient. The policy allows the loss of larger (10+ bedrooms) hotels and short stay accommodation in the city centre (and other specified locations) provided any of the criteria are met. Criteria i) sets out that the loss "should be demonstrated through the submission of robust evidence that it is no longer viable in that use". We don't think that the wording proposed is suitable as it could potentially result in the loss	None.

This additional bullet point could be incorporated / read as follows: ▪ Or forms part of comprehensive, mixed use development scheme.	of hotel uses (for which there is an established need in the city) too easily.	
Tourism is a significant sector of Oxford's economy and brings its own pressures and problems. It is disappointing to see that whilst reference is made 'Accommodating significant numbers of day visitors to Oxford can be challenging…' there is no specific reference in the policy towards addressing these issues. We'd like to see the inclusion – either in this policy or other standalone policies – of measures to: • mitigate the impact of tourism on the city's historic core; • better enable the accommodation of large groups within the public realm; • manage tourist arrival and departure, including coach parking.	City's Economic Strategy 2022-2032 stresses the importance that the visitor economy plays int he 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. 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. We consider that the policy sufficiently addresses issues that can be controlled or influenced through the plan.	None.

Chapter 4

General comments relating to Chapter 4

POLICY	Chapter 4	
All respondents **supporting** policy	43.8	98.5

COMMENT SUMMARY	OFFICER RESPONSE
No comment left.	
Whole chapter is sound	Support welcome.

POLICY	Chapter 4				
All respondents **raising objections** on this policy/chapter	90.5	138.17	139.7		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Natural England has made a representation relating to a potential omission policy, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
We consider it unsound that there is no policy relating to the Oxford Green Belt.	National policy on green belt protection does not need to be repeated at local level. Policy G1 sets out in its supporting text (second bullet	None.

The protection of the Green Belt, not least for its purpose in protecting the setting of Oxford, is consistent with national policy and this should be provided at a local level too. The Green Belt not only forms part of Oxford's wider green setting but also provides protection for a number of 'green fingers' which run into the heart of city itself. The omission of a specific policy to protect this highly sensitive land is highly concerning.	under the policy implementation section), that applications proposed within Green Belt would be determined in accordance with national policy. Policy G1 sets out levels of protection for a network of spaces within the green infrastructure network depending on the local benefits they provide and regardless of whether they are in green belt or not. Core and supporting spaces have been identified across the city as such.	
We ask that these areas of land, including Wolvercote Lakes, Larkins Lane Field, Marston Fields, be included within the areas identified as Green Infrastructure on the proposed policies map, due to the significant contribution they make to the city and its people, in terms of fully accessible green space.	Wolvercote Lakes is already identified as a Core Space under policy G1 on the policies map (site ID 178) and Marston Fields are also included in the network already (site IDs 655 and 656). We have reviewed the other suggested site against the criteria set out in the background paper which determines whether they would be designated as core or supporting spaces under Policy G1. Larkins Lane Field appears to meet the criteria of a supporting space and we propose a mod to policies map to add this.	Mod proposed to the policies map to add Larkins Lane Field as a supporting space within the Policy G1 GI network.
Pleased to see reference to fen habitats but consider that specific reference should also be made to ancient floodplain meadows and MG4 grassland within the policies in this chapter.	We acknowledge that there are a range of important habitats across the city. Policy G6 sets out a hierarchy of protection for designated ecological sites as well as natural and/or semi-natural habitats, or protected species found elsewhere. It sets the framework for protection, including the requirements that applicants will need to fulfil (e.g. applications that could impact them will need to be informed by targeted ecological surveys and	None.

	satisfactorily addressed in accordance with the mitigation hierarchy). We do not consider that it is necessary to explicitly list all potential habitats that could be encountered in the policy.	
Objections to the general approach of green infrastructure protection – including that: • No evidence/methodology as to how each green space type (e.g. Core or Supporting) is determined. • Green Infrastructure is marked incorrectly, both in area, description, and accessibility on Policies Map. If access were clearly marked, it would show much space is in fact wholly unusable. • Green space in allocated sites is often not marked or protected (John Radcliffe) • 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 or how equality objectives will be met. • No allowance for population growth although four times the predicted rate in 2007 or assessment of local need or green deprivation (Equality) • No comprehensive strategy for sports provision when most sites are earmarked for development piecemeal. And playgrounds not marked as green space.	The Green Infrastructure Background Paper (BGP.005a) explains how the Council has classified core and supporting spaces. It also includes a table in the appendix explicitly setting out the reason a space has qualified as 'core'. The protection for green spaces is based on their identified functional benefits and is unaffected by the level of accessibility (which could change), as such it is unnecessary to identify this on the policies map. Maps of accessibility are however included in the GI study 2022. A key challenge in the city is the unequal provision of green space, some areas have access to a lot of green space (e.g. areas in proximity to the SAC), whereas other areas have limited access. The constrained nature of the city also means it is challenging to create large new areas of green space to address existing deficiencies, or population growth. As such, an assessment of green space per person, or per hectare has limited value, as would the setting of policy targets tied to this. This is why the Local Plan focuses on protecting a strong network, and enhancing the spaces within it where possible so it improves in quality and	No further change proposed.

• The 2022 Green Infrastructure Study is fundamentally flawed in methodology and input data.	multi-functionality (though G2 does seek to secure new open space on larger development sites). On sports provision, pitches are protected as part of the GI network, as well as national policy. The Council is in the process of undertaking a new Playing Pitch Strategy which will help to support the delivery of the Local Plan (e.g. it will be a key resource for applicants to consider where they propose applications that impact pitches, and it will also inform the needs for new facilities). *Comments on the Green Infrastructure study are picked up and addressed in detail in the evidence base section of the consultation report.*	
The G1-G9 policies are unsound as no protection is conferred on playgrounds which are generally unmarked and unprotected unless part of a larger green space.	The policies in this chapter deal with a range of topics, from green infrastructure (G1-G3), to biodiversity (G4-G6), flooding (G7 and G8) and climate resilience (G9). National policy already sets out that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces should not be built upon unless the proposal meets particular criteria. Policy G1 provides additional protection to a range of spaces within the GI network that are of particular importance to the city and some of these include play facilities. The policy sets out that applications impacting certain types of open space within that network will need to include additional evidence considering (criterion bi.) *the role of*	No further change proposed.

	the space in supporting people to socialize, take part in informal recreation (particularly where facilities like children/youth play and outdoor gym equipment are present), or as an escape from the urban environment. We are content that there is sufficient and appropriate protection provided for playgrounds.	
Inclusion of Large Developments on Oxford's Boundary Required must be clearly marked to assist in determining the suitability of land allocations and determining the value of green space.	The Local Plan's policies map reflects the spatial extent of the policies and allocations in the plan and these do not extend beyond the city's administrative boundaries. It would not be appropriate to identify proposals outside of the boundary on the policies map.	No further change proposed.

Policy G1

POLICY	G1		
All respondents **supporting** policy	7.1	36.1	90.1

COMMENT SUMMARY	OFFICER RESPONSE
Natural England has made a representation supporting Policy G1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	G1				
All respondents **raising objections** on this policy/chapter	49.2	57.4	59.8	65.1	69.1
	85.3	89.8	138.9	139.21	159.9
	160.4				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxford canal should fall into the Core spaces category - due to its fundamental role in supporting the city-wide network, providing wildlife habitat and corridor functions, flood storage, intensity of use and strength of heritage or other local value. These benefits are typically intrinsic to the canal and cannot be easily re-provided elsewhere without compromising their character and/or function.	The canal and the adjoining land are designated as a city wildlife site and lie predominantly within Flood Zone 3b. There are other regulatory regimes outside of planning that would further restrict development that would impact the canal.	None.

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.	A balance needs to be struck between the many competing priorities for land and meeting the needs of the city. All suitable and available sites with development potential need to be considered as part of our efforts to address the city's housing need. The plan also recognises the importance of open space, and other forms of green infrastructure and protects a strong network of green space across the city (as with the adopted local plan).	None.
Sport England has made a representation relating to Policy G1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy G1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Local Plan should ensure that there will be no net loss of playground space across Oxford unless this would have a significant or adverse impact upon public amenity or ecological interest, in the context of increasing pressures for development.	Specific wording to this effect in this policy is not considered necessary, as this is already carried out through Policy G1, C3 and NPPF provisions.	None.
The allocation for Core and Supporting arbitrarily draws a line between one and the other, without any reasonable balance being provided to a sliding scale of quality both internally within individual Green Infrastructure, or when comparing the lowest quality Core against the highest quality Supporting.	The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate land with the least environmental and amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The proposed hierarchy in the policy is consistent with the approach required by national policy	None.

	and has a framework for how it applies to the Oxford context.	
There were comments objecting to the Core policy wording. For example, that it has no flexibility for the scale of green or blue infrastructure, scale of existing and proposed development, exceptional circumstances, or the possible wider reprovision or enhancement of the infrastructure. Another comment flagged that the assumption that Core 'spaces cannot be moved/re-provided sufficiently without compromising the overall character and function' is subject to each site's individual merits and proposals. For example, Core areas may have lower quality sub-areas within them. This conclusion should not be drawn at this stage and result in a blanket in-principle ban on development within designated areas. The proposed wording conflicts with the aim of the policy, which seeks to protect Green Infrastructure from 'inappropriate development', requiring mitigation where development comes forward.	As set out in the Background Paper (005a), core spaces are designated because they are considered to provide a range of important benefits including some which are tied to their existing location, the loss of which is considered unfeasible to be able to be mitigated through reprovision elsewhere. It is considered important that they are appropriately protected to a degree that reflects their identified value as part of the wider green infrastructure network. However, having further reviewed the approach, we propose a modification to the wording in relation to the approach to protecting core spaces. This would provide some flexibility to allow compatible uses to come forward, whilst still seeking to set a strong level of protection that corresponds with the identified value of these spaces and also retaining particular identified benefits in situ.	Modification proposed to amend wording of policy as follows: *G1A: Core spaces* *Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as part of the Core GI Network unless this would be for complimentary uses that would not negatively impact upon the particular in situ benefit(s) for which these spaces are designated, and if this is accompanied by enhancement of other parts of the core space. These spaces are designated G1A on the policies map.*
Land at Old Marston: We strongly object to the downgrading of the Marston Gap sites from Core to Supporting within the Green Infrastructure Network and consider this unsound. Barton Triangle and Larkins Lane Field: We strongly object to the exclusion of Larkins Lane Field and the Barton Triangle from the Green Infrastructure Network and consider this	Core spaces are designated as such because of fundamental characteristics that make their reprovision impossible or impractical. Supporting spaces may not have the same identified benefits but still play important roles for public amenity and wellbeing, as well as environmental functions. Both Core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum	Modification to policies map to designate Larkins Lane field and Barton Triangle as supporting spaces under Policy G1's Green Infrastructure Network. No further action in redesignating Marston Gap.

unsound. Larkins Lane has a high ecology value and is the subject of an ongoing valley fen restoration project. Barton Triangle is an open green space. Both are visually important elements in the setting of Old Headington Conservation Area.	mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). We have set out in the Background Paper (BGP005a) the criteria used for identifying core space – in some cases the underlying information has been updated since the Reg 18 stage – e.g. new flood risk mapping, which has resulted in some changes to the core spaces with some changing to supporting tier, and some supporting changing to core. We have reviewed the suggested additional sites of Larkins Lane and Barton Triangle against the criteria set out in the background paper which determines whether they would be designated as core or supporting. These spaces appear to meet the criteria of supporting spaces and we propose a mod to add these to the policies map.	
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 term is not explained in the glossary. 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.	'Reprovision' in the policy could entail either quantitative reprovision (e.g. like for like space being created) or qualitative improvements. Where space is constrained, qualitative improvements would mean that green infrastructure benefits of another area of green space could be enhanced through additional planting and other qualitative improvements which would mitigate the loss. Green space protections are not superseded by the requirements for development on residential garden land.	None.

Policy G1 sets up a hierarchy of spaces, but the criteria for classifying sites are neither objectively measured nor measurable: *Intensity of use: There is no indication how intensity of use will be quantified, or criteria for determining whether a site is surplus to requirements. *Local value: It is not clear how adequate and proportionate evidence could be collected to determine whether a site is delivering insufficient local value. *Loss will be resisted: If a local group campaigns to resist loss of a GIC site, will it be re-categorised as GIB? *Multifunctionality: If a site is both small and assessed as multifunctional, will it be placed in GIC because it is small or GIB because it is multifunctional? *Small: How will it be determined whether a site is too small?	The methodology for arriving at the criteria for categorising individual spaces in the Green Infrastructure hierarchy are set out in Background Paper 005. For supporting spaces, functions of a site and the requirements for any mitigation where a loss/harm is likely, will need to be informed by a range of information sources as outlined in the policy. The considerations will vary somewhat depending on each site however. As the policy sets out, the Council will expect applicants to review a range of relevant information such as the green infrastructure study, playing pitch strategy, local contextual info etc.	None.
* Reprovision for category GIB and GIC is to be "sufficient." This would conflict with the requirement for provision to be equivalent or better in quality AND quantity.	The policy wording specifically requires for reprovision to be at the same standard or higher, and ideally onsite.	None.
There is a requirement for applicants applying for permission to build on GIB facilities for Parks, accessible greenspace and amenity greenspaces to provide additional evidence that demonstrates consideration of needs and deficits. Policy G1 e.g. notes a deficit of playgrounds in the city centre," but it is not clear how this was determined. The criteria for	The GI study also provides an overview of areas in the city where there are particular green space deficits and will be useful in determining how these can be addressed through development.	None.

determining whether recreation spaces are surplus and can be downgraded are equally unclear.		
There is little objective assessment of needs for "other uses". "Larger developments are expected to include a proportion of the site as public open space with a mix of uses tailored to the needs of occupants and the local area," but no indication as to how those needs should be determined. There are no access standards for parks and green spaces. There is lots of research into the benefits of G1, but no mechanism for determining a quantum above which GI would be considered surplus.	There are departments within the City Council with the specific remit for the management of green spaces and much of the public realm in Oxford. Any evidence that is submitted in relation to the impacts of development will assessed on their own merits in conjunction with planning officers. This will include assessment of the suitability of approaches to meet local needs as set out in development proposals. The determination on whether or not a green space or other amenity facility is surplus to requirements is not made by planning officers but in conjunction with relevant officers within the Council that have the appropriate remit.	None.
* G1 specifies that reprovision can be delivered "quantitatively (like-for-like replacement) or qualitatively (enhancements that improve the functionality and quality of other areas - demonstrated via the Urban Greening Factor or similar methodology)." It is not clear which "similar methodology" could be used to assess the functionality and quality of recreational space.	The Urban Greening Factor methodology as set out in Policy G3 is endorsed by the Natural England GI Framework and is relatively well known and recognised by practitioners. The highlighted wording (i.e. similar methodology) was included in order not to be unduly exclude other methods that may achieve the same objective, so long as it is evidenced.	None.
It is clear that house building will be at the expense of many "well-designed, beautiful and safe places, with accessible services and open spaces." This will make it more difficult to meet	All suitable and available sites with development potential are considered as part of our efforts to address the city's housing need. The plan also recognises the importance	None.

“current and future needs and support communities’ health, social and cultural well-being.”	of public open space, and other forms of green infrastructure.	

Policy G2

POLICY	G2
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G2				
All respondents **raising objections** on this policy/chapter	12.1	57.5	65.2	85.4	89.1
	90.2	104.14	136.6		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
…although point e) mentions climate change, it does not explicitly include the scope for blue infrastructure to supply renewable energy or improve energy efficiency. Water source heat pumps can potentially supply a large fraction of the city's heat very efficiently, but that potential is restricted to the blue infrastructure, where green belt policy is currently a constraint on the development of a sustainable heat source.	The local plan does not state specific preferences or restrictions on technologies in relation to renewable energy or climate change mitigation.	None.
Policy G2 does not address the needs of children and young adults. The treatment of recreation space as another sort of green infrastructure means that spaces will be more likely to be multifunctional, but recreation may	The local plan's remit is to provide a policy framework that development schemes may be assessed against when coming forward for planning permission. Policy G1 protects a network of green spaces, and sets out different	None.

be a primary function of much GI space in Oxford. In the absence of a local recreation policy, simply requiring spaces to take into account the "Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities and abilities, particularly children and teenagers" is meaningless. If there is no policy, there is no way for an applicant to know what the objectively assessed needs are, and so no way to ensure that those needs are met.	levels of protection depending on if they are core or supporting spaces. It outlines that where loss/harm could occur, there could be a variety of considerations that will need to inform any mitigation, including the current role of the space. Criterion b.i. specifically identifies that some spaces have a role for socialising/recreation and flags that facilities like children/youth play could be present. This is highlighted to ensure applicants consider their impacts on such facilities particularly. Policy G2, meanwhile, sets out the considerations that should inform design of new green infrastructure. We have sought to ensure reference is made to a variety of benefits that could be incorporated into the design process (which will also need to be informed by local context). Criterion b discusses facilitating recreation and play for people of all age groups and abilities, particularly children and teenagers. Box 4.1 in the supporting text talks further about how applicants should approach design of green infrastructure, including tailoring types of open space to meet identified needs or deficiencies and flags incorporating play features for younger people as an example. A range of evidence supports the Local Plan and can help inform an assessment of need, however, this context changes over time and applicants will need to consider the most up-to-date information, which could also include policies/strategies that exist outside of the Local	

	Plan/planning system. The policies of the plan provide the relevant requirements and additional guidance which should ensure the most appropriate considerations inform the application at the time.	
Oxfordshire County Council has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy G2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy G3

POLICY	G3	
All respondents **supporting** policy	107.5	120.8

COMMENT SUMMARY	OFFICER RESPONSE
Broadly supportive of the aim of this policy as it recognises the clear advantages offered by the provision of high-quality green space in new developments	
Principle of urban greening is supported.	

POLICY	G3				
All respondents **raising objections** on this policy/chapter	107.5	120.8	89.11	157.9	136.7
	130.6	159.1	138.2		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
At Oxford Stadium, the car park has very limited green infrastructure, confined mainly to boundary planting. Future enabling development would likely need to be delivered at high density to generate sufficient financial returns to secure the stadium's future. Applying this policy could risk sterilising the site and similar brownfield sites, potentially	It should be noted that Oxford Stadium is no longer a site allocation. The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even	None

undermining wider benefits such as safeguarding the stadium and delivering housing in a highly sustainable location. Additionally, the necessity of this policy is unclear given that national Biodiversity Net Gain (BNG) requirements already exist and are reflected elsewhere in the Plan. Compared to BNG, the proposed approach offers only a simplified output, raising questions about its added value and the justification for introducing an additional layer of calculation.	where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The measures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.	
While urban greening is supported, applying draft Policy G3 universally could create an unnecessary technical burden, particularly for greenfield sites. Natural England guidance indicates the Urban Greening Factor (UGF) should mainly be used in urban or suburban areas, or targeted locations where greening is a key issue, such as brownfield or Green Belt sites. It is therefore suggested that Policy G3 be refined to focus on these specific contexts rather than all development. For Ruskin Field, although the Draft Plan states the site is likely to exceed UGF targets, it is unclear how this conclusion was reached	The thresholds for UGF in the plan are markedly lower than the recommended minimum contained in Natural England's GI Framework which informed this policy, in recognition of the constrained nature of development sites in Oxford. Thresholds for non-residential schemes are lower still than that for residential led proposals. The intention behind the policy is to localise as much as possible the benefits that arise from the presence of natural features in development, which will difficult to achieve if offsetting is allowed. The measures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the	None

without detailed landscape proposals, and whether this assumption relates to the site's proposed minimum capacity of 28 dwellings.	development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.	
Oxfordshire County Council has made a representation relating to Policy G3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Policy G3 introduces the Urban Greening Factor (UGF), requiring developments to achieve a minimum score or at least no reduction from the baseline, based on on-site green infrastructure. While acknowledging constraints on delivering new green space, this requirement may place significant pressure on sites with limited area and competing functional needs. In some cases, such as schemes on former greenfield land (e.g. Oxford North), achieving "no net loss" may be unrealistic, potentially sterilising development and preventing wider benefits such as housing delivery. It is therefore suggested that this requirement be removed.	The required score has been set to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is lower than the recommended minimum in the Natural England Green Infrastructure Framework. The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental and physical health and wellbeing and biodiversity.	None

The policy also duplicates biodiversity net gain (BNG) requirements, offering only a simpler metric, and it is unclear why this additional layer is necessary—particularly as UGF has typically been introduced elsewhere before BNG became mandatory. Furthermore, it overlaps with Policies G1 and G4 but lacks the flexibility of G4, which allows for off-site mitigation, raising concerns about its effectiveness.	As set out in the Regulation 18 Consultation Report, the scores contained in the policy are intended to be a minimum. The required score has been set at the level it has, to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It has been set lower than the recommended minimum in the Natural England Green Infrastructure Framework based upon informal testing on a range of sites across the city to see what was achievable across the Oxford City context, we are comfortable with this approach. Site allocation isn't a conflict, it's flagging that its below the score currently and needs to introduce additional greening to meet the minimum score.	None
Policy G3 seeks to introduce minimum urban greening factor (UGF) scoring that needs to be demonstrated for major development proposals. The NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 188) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 193). 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. It is considered	The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The meaures needed by the policy have been broadly tested on the site allocations and are	None

that the incorporation of policy G3 will result in an unnecessary additional policy hurdle and achieving net gains in biodiversity and enhancing networks of habitats and green infrastructure as required under the NPPF, Policy G4 and Environment Act 2021 can be sufficiently achieved under existing policy requirements, which in turn will result in urban greening. It is requested that this policy be deleted as it is not justified as it will duplicate policy requirements which deliver the same outcomes.	achievable. A whole range of creative options are available that have limited impacts on the development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable	
The requirement to provide new green space is acknowledged as challenging, particularly for sites with limited space and competing functional demands. However, the policy risks placing excessive pressure on applicants and could effectively sterilise development opportunities that might otherwise deliver wider benefits, such as increasing housing supply. The Urban Greening Factor (UGF) duplicates biodiversity net gain (BNG) requirements by offering a simpler metric, raising questions about the need for this additional layer, especially as UGF has typically been introduced in areas like London prior to mandatory BNG. Overall, the policy is considered ineffective, as it largely repeats Policies G1 and G4 but lacks	The required score has been set to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework. The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental	None

the flexibility of G4, particularly in allowing off-site mitigation. It is therefore suggested that Policy G3 be deleted.	and physical health and wellbeing and biodiversity.	
The policy is ineffective as “technically infeasible” is not defined or enforceable.	It has been set lower than the recommended minimum in the Natural England Green Infrastructure Framework based upon informal testing on a range of sites across the city to see what was achievable across the Oxford City context, we are comfortable that the scores are technically feasible. The second bullet point of the policy implementation in supporting text explains what the applicant needs to evidence to demonstrate whether it is feasible or not.	None

Policy G4

POLICY	G4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G4				
All respondents **raising objections** on this policy/chapter	59.9	90.3	112.6	89.12	138.21

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Local Plan policy should have been prepared with a needs assessment that takes into account a range of factors including: that losses in biodiversity in the city have been greater than elsewhere due to urbanisation; that past declines need to be addressed; that biodiversity will continue to be under pressure from development; that BNG would not impact viability/housing supply; that natural capital is important for a range of economic and social benefits as well as environmental; that residents have called for greater access to nature; and that enhanced biodiversity was central to the net zero vision of the 2019 climate emergency declaration.	The Local Plan has been prepared with careful consideration for how we can ensure that new development not only mitigates impacts on biodiversity but also delivers enhancements to improve biodiversity in the city for the range of benefits it provides. The Council is aware of the significant stresses being placed upon biodiversity in the city and the ongoing threats to the range of nationally and locally important species in the city and the bespoke background paper on biodiversity (BGP.005b) details the range of considerations that have gone into drafting the policies.	None.

Policy should be amended so it seeks Biodiversity Net Gain which exceeds 10%-- asking for a minimum of 20% BNG.	Exceeding the statutory 10% target needs to be robustly justified. Additionally, the BNG mechanism is only one way that biodiversity can be supported in the city (the metric ignores the benefit of some types of enhancement that can be particularly helpful for priority species in the city). The Council has instead opted to bring forward other policies tailored to our particular local context alongside the national 10% BNG requirement, for example, requirements to support local species through onsite ecological enhancements in policy G5 and policies encouraging more general greening such as policy G3 that can support biodiversity but also other wider health and wellbeing of residents and the environment.	None.
Natural England has made a representation relating to Policy G4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Delivery of 10% BNG is already a statutory requirement applied post permission and the Local Plan does not need to repeat this. Opening para should be amended or deleted.	It is considered important to embed the requirement in the Local Plan because it enables us to set out some locally-specific considerations about how it is implemented. Whilst it might not be strictly necessary to repeat the percentage, in this case it is considered simpler for applicants than cross-referencing to the national requirement and not mentioning the % specifically, as it would not set the context for the locally-specific criteria.	None.

In relation to the offsite BNG delivery hierarchy. The PPG does not indicate that Councils can specify where offsite gains should be delivered. The metric already includes a spatial risk multiplier which increases the number of units required to deliver net gains the further it is delivered from the site, so there is no need to specify where it should be provided. The main focus should be identifying locations where units can be purchased within or close to Oxford. As such, this paragraph should be deleted.	Whilst it is acknowledged that the metric's spatial risk multiplier incentivises local delivery to some degree, it is important for the Local Plan to clearly communicate the preference for offsite BNG to be delivered as close to the development site as possible. Applicants are directed towards looking for opportunities as close to the development as possible before looking for options further afield, this additional local guidance is considered helpful in guiding proposals to secure the greatest local benefits for habitats and species as well as residents.	None.
Oxfordshire County Council has made a representation relating to Policy G4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The policy is ineffective as it does not address destruction of unique habitat off-site such as the Lye Valley.	The policy is not intended to do this. The policy sets out expectations for delivery of Biodiversity Net Gain as part of new development coming forward in the city.	None
The policy must include provision for where the habitat is NOT swappable, it should not be permitted to be justified.	The requirements for responding to different types of habitat, including where these can and cannot be substituted for other habitat types, as part of calculating Biodiversity Net Gain are set out in the DEFRA guidance which accompanies the Statutory Biodiversity Net Gain Metric, which the policy refers to. Applicants will also need to accord with policy G6, which protects a hierarchy of existing habitats and species in the city and sets out clearly what is expected of an application –	None

	where habitat loss could result, that policy sets out how this should be addressed.	

Policy G5

POLICY	G5
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G5				
All respondents **raising objections** on this policy/chapter	5.1	40.5	46.1	78.5	112.7
	89.13	138.22			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Whilst the principle of the policy is very welcome, the mandatory requirements as listed in Appendix 4.2 need to be amended to align with the requirements for integrated nest boxes as set out in NPPG Natural Environment 2025 paragraph 017. Without this, the requirement for bird boxes as set out currently in supporting Appendix are open to interpretation and could result in less preferable 'external' boxes which do not align	Whilst we do not consider this to be strictly a soundness issue, we are happy to modify as per the suggestions where this would help to clarify things.	Modifications to Appendix 4.2 are proposed as follows: **Under the section in the table *Pot 1: Mandatory requirement - Household/Minor/Major,* amend the text as follows:** *At least one integrated swift brick (preferred)~~box~~ or swift box~~brick~~*

with national guidance. Suggested modifications: • (Pot 1 Mandatory requirement - Householder/ Minor/ Major) - place the word 'bricks' first before the word 'boxes' and state 'preferred' after the word 'bricks' i.e. "at least one swift brick (preferred) or swift box". • (Pot 1 Mandatory requirement - Minor/ Major) - after "building-dependent species" add "such as swift bricks (preferred) or swift boxes".		**Under the section in the table *Pot 1: Mandatory requirement - Minor/Major,* amend the text as follows:** *At least one bird box per dwelling (resi) or per 1000m2 footprint (non-residential), including consideration of building-dependent species (such as integrated swift bricks (preferred) or swift boxes).*
The policy is not justified because it introduces a prescriptive points-based approach without clear evidence that such an approach is necessary to secure biodiversity outcomes beyond those already required through Biodiversity Net Gain legislation in the Environment Act 2021. An appropriate balance between encouraging meaningful ecological improvements and maintaining design flexibility for applicants should be achieved which takes into account varying context/constraints of sites. Policy could introduce unnecessary complexity and administrative burden, particularly for smaller or lower-impact schemes. Alternative wording should be proposed which avoids overregulation while still setting a clear policy expectation for on-site ecological enhancements – i.e. thoughtful, integrated	As is set out in the Biodiversity background paper (BGP.005b), the Statutory BNG metric primarily focuses on delivery of habitat as a way to support species. However, there are other important features that support important wildlife in the city which are not recognised/incentivised by it and relying on the statutory BNG requirement to deliver for them alone would be insufficient. The policy is prescriptive to some degree, in that a certain number of enhancements will be required depending on the scale of a proposal, and there are some limited mandatory features, however, applicants are then left with flexibility to select the most appropriate enhancements for their site in order to meet the required totals otherwise. The proposed list of ecological enhancements presented in the Appendix helps to provide clarity to applicants over the types of features (and how many) they	None.

biodiversity features rather than a checklist approach should be encouraged.	need to implement to meet the asks of the policy and support local species, but it is up to applicants which are selected based upon the context of their particular site and application.	
Requirement to deliver ecological enhancements associated with 'all' new development is onerous and unnecessary. Moreover, it exceeds the statutory requirements. On its face, it would require changes of use and minor works such as shopfront replacements to deliver onsite ecological enhancements, that would be neither reasonable nor practical to provide. Policy should be amended to exclude minor commercial developments.	The requirements do exceed statutory requirements, this is because there are additional provisions that are important to seek to deliver to support local species which cannot be satisfactorily provided for through statutory requirements like BNG. In most instances we would expect that the minimum requirements should be achievable, particularly with the flexibility afforded to which measures are selected beyond any mandatory requirement. We have reviewed the list in the appendix, however, and propose a mod to one part of the mandatory requirements to ensure that the requirement is expected only of sites with outdoor space.	**Mod proposed to Appendix 4.2 as follows:** *Where the site includes areas of outdoor space, c~~C~~hoose two of the following: insect hotel, planting for pollinators, night-flowering species*
Improvements in biodiversity are delivered though statutory Biodiversity Net Gains and as such it is unjustified to require additional ecological enhancements to buildings. It is recommended that the first sentence and third paragraphs of G5 are deleted.	As per the response above, the Statutory BNG metric primarily focuses on delivery of habitat as a way to support species. However, there are other important features that support important wildlife in the city which are not recognised/incentivised by it and relying on the statutory BNG requirement to deliver for them alone would be insufficient.	None.
Oxfordshire County Council has made a representation relating to Policy G6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

It is ineffective as the wording is fluffy "strongly encouraged" means nothing and the outcome is not measurable.	Whilst 'encouraging' applicants to pursue certain elements of the policy may not have the same weight as requiring them, it is still considered important as a clear steer as towards how the Council would wish to see proposals addressing the topic of onsite ecological enhancements. Some aspects of the policy will be dependent upon the type of proposal, site context and other considerations and may not always be of relevance.	None.

Policy G6

POLICY	G6
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G6				
All respondents **raising objections** on this policy/chapter	2.2	90.4	93.1	89.14	85.6
	138.23				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Iffley Fields should be removed from the Local Plan.	See responses under the site allocations section of the Consultation report.	See responses under the site allocations section of the Consultation report.
Natural England has made a representation relating to Policy G6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
It would be beneficial to include reference to the Great Crested Newt District Licence scheme to raise awareness and support sustainable development in your area where there is a risk to great crested newts. Some potential wording that could be incorporated into policy G6 is put forward.	Thank you for the suggestion. We've reviewed the proposed wording included as part of the comments submitted, as we did when submitted at Reg 18 stage. We remain of the view that the level of detail goes beyond the scope of the policy, however this would potentially be helpful to reference in some way through the supporting Technical Advice Note (TAN) we intend to prepare to support the policy. We	None. We will consider further if it is appropriate to include in the Technical Advice Note in due course and how best to do this.

	would be open to further discussion as to how best to incorporate this into the TAN in due course.	
Oxfordshire County Council has made a representation relating to Policy G6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England have made representations against policy G6, these are addressed through the Statement of Common	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Ineffective, with excessive concentration on the Oxford Meadows SAC whilst the Lye Valley SSSI, comprising of a very rare alkaline fen, is scarcely mentioned. Lye Valley and other calcareous locations, such as Headington Hill Park, Ruskin College, Dunstan Park and other adjacent areas are at risk from increasing development leading to reduced groundwater, and increased scouring from surface water via urban drainage. G6 is ineffective as the mapping on the Policy Map is derived from the defective Hydrogeological Impact Assessment Report and incorrect. Further detail is outlined in full rep. Various suggested changes put forward, including: replacing the word “demonstrate” (that they have considered information from various sources) with “addressed”.	The policy is an overarching one that protects the full hierarchy of nationally designated and locally designated ecological sites in the city, as well as protecting other types of habitat and species. Whilst specific sites are referenced, these are mainly as examples to aid the reader, however, in the case of the Oxford Meadows SAC, the additional formal assessment requirements where development could have impacts warrant further guidance than would be included for SSSIs. Comments on the Lye Valley Hydrogeological Assessment report’s impact risk zones, which are included on the policy’s map to help ensure applicant’s appropriately consider the SSSI’s sensitivities to development in the wider area, are responded to in the evidence base section of the consultation summary. Refer there for a more detailed response.	None.

	The word 'demonstrate' is an instruction requiring applicants to evidence in their application how they have considered relevant information from a range of sources in determining the potential for adverse effects. We are unclear on how the suggested amend would improve the effectiveness of this part of the policy.	
In relation to Lye Valley and other calcareous locations, such as Headington Hill Park, Ruskin College, Dunstan Park and other adjacent areas areas, the following modifications are required to make the policies effective: • Removal of permitted development rights via Article 4 Directions in the Lye Valley catchment area and all of OCC and requiring greenfield runoff rates via infiltration; • Formal identification calcareous emergence areas such as Headington Hill and Dunstan Park, Ruskin College and others; • Permitting no further development in groundwater catchment, noting that SUDS are unacceptable as they will fail/require maintenance (see Lamberth report); • Updating all site policies that impact the Lye Valley; • Removing "*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..*"	<u>Article 4</u> The process for implementing an article 4 direction is complex, and must be justified and proportionate. It is also a separate process to the preparation of the Local Plan. Nevertheless, with the Local Plan the Council has sought to include a range of policies for reducing surface water run-off and reducing its water quality impacts (e.g. Policy G8 and R5) as well as generally increasing green surface cover on sites to mitigate impacts of urbanisation (Draft policy G3). <u>Identification of calcareous areas</u> As set out above, Policy G6 sets out a framework of protections for designated ecological sites as well as habitats and species outside of these areas, wherever they occur. Mapping of habitats is available from various national sources and applicants will need to reference the most appropriate sources alongside other information when informing their application. We do not consider it necessary or justified to identify particular types of habitat on the policies map.	Mod proposed to improve clarity of bullet point 1 under the 'policy implementation' section of Policy G6's supporting text as follows: *It is vital that existing biodiversity and features of ecological interest which could be impacted by a development are well understood and that impacts are avoided and/or mitigated. This includes features being directly <u>or indirectly</u> impacted on a site as well as those which could be adversely affected by adjacent development <u>either directly or indirectly</u>.*

from Churchill (SPE6) policy and apply as a general statement to all development sites.	<u>Permitting no further development in groundwater catchment/SuDS not being appropriate</u> Policy G6, alongside national policy, set the framework of protection for the SSSIs, a blanket restriction on all future development in the catchment is not considered to be proportionate or justified. Whilst certain types of SuDS can be inappropriate in some areas, and policy G8 acknowledges this, this is highly dependent on site context and ground conditions which can vary. It is agreed that effective maintenance/management arrangements can be vital to the ongoing functioning of some types of SuDS, but again, this varies with the type and design of SuDS being implemented. We disagree that all SuDS are unacceptable in the catchment. <u>Site allocation wording needing to be updated</u> The wording referencing potential for impacts on the Lye Valley is included in some site allocations where these have been identified as being within the impact risk zones for the SSSI. They are intended as a helpful, additional marker for applicants to ensure that they consider these risks appropriately. The wording cross-refers to Policy G6 and will need to be read alongside this policy. We are comfortable with the wording as it is presented in the allocations.	

	<u>Suggested additional general statement relating to indirect impacts on the flora and fauna</u> Policy G6 seeks to ensure development appropriately mitigates potential impacts on designated sites as well as habitats and species located elsewhere. These impacts could be direct or indirect, and will depend upon the context of the site and the development that is proposed. The additional wording suggested is not considered necessary, although we are happy to propose a mod to amend the supporting text of the policy to highlight this a little clearer.	

Policy G7

POLICY	G7	
All respondents **supporting** policy	104.2	140.1

COMMENT SUMMARY	OFFICER RESPONSE
The Environment Agency has made a representation and would like to highlight that they are pleased with the updated Policy G7.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Thames Water generally supports Policy G7 as it is in general accordance with the NPPF and the PPG and particularly supports the reference to sewer flooding.	Support welcomed.

POLICY	G7			
All respondents **raising objections** on this policy/chapter	40.6	87.4	138.24	140.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Do not support part q) of the policy as where necessary, redevelopment should be allowed to encroach into Flood Zone 3b as it could still result in a decrease in flood risk through careful design, even if the overall building footprint is the same or smaller than the existing built footprint.	The Environment Agency has made it clear that this approach is unacceptable. Careful design can avoid redevelopment of a site encroaching on Flood Zone 3b. If the first floor and higher levels of the building are developed, this does not affect the built	None

Agree that there should be no increase to the building footprint in the functional flood plain at ground floor level, but the footprint should be allowed to be increased at first floor and above at sites such as Osney Mead to ensure schemes such as this are viable. A balanced and pragmatic approach is required from the Environment Agency and the Council on this point and the policy must reflect this position.	footprint of the site, and the intensification of the site may be acceptable providing that all relevant criteria in the policy are met.	
A Sequential Test has been undertaken to support the Sustainability Appraisal, and Osney Mead has been assessed through policy SPCW8. Whilst draft policy G7 is clear, it would be helpful to see sight of Background Paper 9a which deals with brownfield development within FZ3b (which is referenced within the Sequential Test) as it is not on the Council's website.	The Flood Risk Sequential Test of Sites is a piece of evidence and was published for the Regulation 19 consultation under the 'Evidence Base and Supporting Documents'.	None
Note that by their very nature, infrastructure for water and sewage treatment is located close to rivers. It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.	Comments made on water and sewage infrastructure development have been noted.	None
Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as	The policy is clear that applicants need to consider flooding from all sources, which would include sewer flooding. It also sets out that an	None

a result of development where offsite sewerage infrastructure and capacity is not in place ahead of development.	FRA should demonstrate that the proposed development would not increase flood risk offsite.	
Policy is ineffective as development in Flood Zone 1 areas has caused by run-off, repeated flooding in Flood Zones 2 and 3. All development must demonstrate net-zero greenfield runoff rates to stop downstream flooding. Increasing and intensive urbanisation including transport infrastructure is a far greater cause of floods than climate change, yet it is not even acknowledged. Requirement of a proportional FRA for all flood zones including offsite cumulative risk, as well as ensuring that sites in Flood Zone 1, that are surrounded by Flood Zone 2/3 land would still require safe access/ egress during a flood event.	All sources of flooding must be considered for any site including risk of surface water flooding in Flood Zone 1. The Level 1 SFRA considers the cumulative impact of development on flood risk within the catchment. Safe access/egress to the site would be assessed as part of the planning application.	None
No development should be allowed in Flood Zone 3b. Should be a ban on development on low-lying Flood Zone 3 land as flood defences do not protect against groundwater flooding.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing needs, which could come forward designed in a way that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF. All sources of flooding must be considered for any site, including groundwater.	None

Large commercial basements are unacceptable in any location in Oxford as they displace groundwater which floods downstream.	The policy states that proposals for basement accommodation within Flood Zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation.	None

Policy G8

POLICY	G8
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	G8				
All respondents **raising objections** on this policy/chapter	57.6	87.5	89.15	104.15	138.25
	140.2	157.1			

COMMENT SUMMARY	OFFICER RESPONSE	PROPOSED ACTION
Any new development planned must be able to satisfy the council that it will not need to discharge surface water to combined sewers and that there is no risk of this happening, for example, by using overflow lakes/ tanks. The exceptional circumstances in e) need to be set out in detail for this policy to be effective.	Discharging to a combined sewer (and only in exceptional circumstances) is at the bottom of the drainage hierarchy, and it is expected that applicants would need to sufficiently demonstrate why all other options would not be possible.	None
The policy is too rigid. Below ground features such as underground tanks and pipes should be allowed in situations where site constraints exist e.g., groundwater, contamination, land-use efficiency, whilst still enabling SuDS to be used where appropriate. It is not always possible or practical to include swales and ponds in higher density developments. It would	Green SuDS are often considered at too late a stage in a scheme. If they are considered in the conceptual and design stages, they are more likely to be able to be well-designed into the proposal and not result in inefficient use of land. They can provide a multitude of benefits that grey SuDS can't, including providing open space for recreation, habitats to support	None

be helpful to understand why the proposed SuDS features are the ones that are considered acceptable to the Council and for this explanation and rationale to be provided. The first line of the policy should be amended after "All development proposals will be required where feasible" to allow for flexibility and include the following additional wording: *and* to *ensure efficient use of land* manage surface water through Sustainable Drainage Systems (SuDS)." Further flexibility should also be incorporated within the policy - green SuDS should be favoured but only "wherever possible". Development potential should not be restricted by SuDS.	wildlife and adaptation to other climate hazards such as overheating.	
Oxfordshire County Council has made a representation relating to Policy G8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy G8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A Grampian condition for all development in Oxford should be required to ensure Thames Water can manage surface runoff.	It is not practical to do this - each planning application is assessed on its own merits.	None
No further development (including house extensions) should be permitted to connect to the Thames Water sewer network within the	It is not practical to have a blanket ban on development in the Lye Valley. Each planning application is assessed on its own merits.	None

Lye Valley fen catchment. Smaller extensions are only acceptable if they connect to a soakaway but not into the surface water drainage system. SuDS infiltration in Lye Valley is insufficient as a replacement for loss of natural surface cover.	Policy G8 acknowledges that infiltration will not always be the most suitable means of SuDS.	
Vague language used within policy. “Surface water runoff should be managed” does not define the actual target, which should be greenfield. Replace “should” be managed with “must”. Furthermore, “where feasible” and “where required” are not defined.	Whilst encouraging applicants to pursue certain elements of the policy may not have the same weight as requiring them, it is still considered important as a clear steer as towards how the Council would wish to see proposals addressing the topic of surface water runoff. Some aspects of the policy will be dependent upon the type of proposal, site context and other considerations and may not always be of relevance.	None
The policy is ineffective as it does not address chemical composition, a key factor in the flows into the Lye Valley SSSI and the other calcareous fen areas in the city.	This is a general policy for SuDS and is not meant to address individual areas of the city. The policy expresses that details of the SuDS must be submitted as part of a drainage strategy or FRA where required as part of a planning application submission. Furthermore, the ‘Policy implementation’ section of Policy G6 (Protecting Oxford’s Biodiversity including the Ecological Network) states that the City Council has published additional guidance in relation to the Lye Valley that applicants should refer to where applicable.	None
Support policy in principle. Highlight that it is the responsibility of the developer to make proper provision for drainage to ground,	Comment noted – the SuDS policy sets out various requirements which seek to ensure an appropriate drainage strategy is pursued	None

watercourses or surface water sewer in accordance with the drainage hierarchy. 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.	including prioritising green, multifunctional SuDS features where possible before other options.	
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.	Policy R5 (Water resources and Quality) sets out requirements for separating foul and surface water on new development and encourages applicants to take opportunities to separate these on existing development.	None
SuDS not only help to mitigate flooding but also improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.	The second bullet of the 'Policy context' section has included examples of the additional benefits of SuDS.	None

Policy G9

POLICY	G9
All respondents **supporting** policy	140.3

COMMENT SUMMARY	OFFICER RESPONSE
Thames Water support Policy G9 (d) where it refers to water efficiency in line with our comments to Policy R5.	Support is noted, thanks.

POLICY	G9
All respondents **raising objections** on this policy/chapter	No representations were made raising objections to this policy.

Chapter 5

General comments relating to Chapter 5

POLICY	General comments
All respondents **supporting** policy	43.9

COMMENT SUMMARY	OFFICER RESPONSE
No comment left.	

POLICY	General comments
All respondents **raising objections** on this policy/chapter	93.6

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This is regarded as unsound with specific reference to drainage in New Marston and the impact that additional housing development will entail. It is noted in chapter 4 that reference is made to addressing flood risks and managing drainage particularly during wetter winters which are a feature of the changing climate. The current drainage system in New	There are policies in chapter 4 which seek to ensure new development takes into account flood risk from all sources and responds appropriately (Policy G7), incorporates SuDS (Policy G8), and mitigates impacts on water resources and quality (Policy R5).	None.

Marston (South) is not adequate: there is frequent flooding in winter with significant sewage overflow. During the winter of 2025/26 foul water (containing sewage) was a frequent occurrence in Ferry Road in New Marston (South), causing danger to health for those living in the road and those accessing the centre of Oxford via the busy cycle and walking route from Marston and Northway which crosses the bottom of Ferry Road. Additional housing proposed for New Marston will exacerbate local flooding problems and foul sewage will continue to cause ecological damage to New Marston Meadows SSSI, if this is not addressed.		

Policy R1

POLICY	R1
All respondents **supporting** policy	118.7

COMMENT SUMMARY	OFFICER RESPONSE
West Oxfordshire District Council has made a representation relating to policy R1, which is summarised and responded to in the Statement of Common Ground.	Support welcomed.

POLICY	R1				
All respondents **raising objections** on this policy/chapter	12.2	47.12	48.1	51.3	57.7
	86.6	87.6	105.3	112.8	117.6
	124.3	130.7	133.5	137.2	157.11
	159.11				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy proposes an energy hierarchy that is outdated with respect to the City's own policy and the Government's recent Warm Homes Plan, both of which recognise that building heating needs to be very largely decarbonised on the timescales of this plan. This requires that elimination of fossil fuel use is the over-arching priority. The Policy as drafted also fails to recognise that electricity will soon be largely decarbonised and therefore that electrification	The energy hierarchy is a well-known framework for guiding the design of buildings, which seeks to limit energy use through good design before considering how energy is used and sourced. The version set out in the policy follows the recommended structure set out by others such as in the National Design Guide and the LETI. We disagree that it conflicts with the Council's own policies or national ones.	None.

and heat networks will play a key role in dense developments where provision of 100% of energy via onsite renewables is not feasible. And the reference to offsetting is unclear and potentially misleading. Suggested change needed is a formulation of paragraph a) more consistent with 'radical reductions in greenhouse gas emissions' that would read: "*new buildings should be designed to be net zero carbon in operation, by eliminating the direct use of fossil fuels, and ensuring that all energy demands are met by the use of renewable energy (including efficient use of energy from grid electricity and low-carbon heat networks). Developments should use highly efficient fabric and energy service systems, and maximise the use of onsite renewable energy with the remaining energy from low-carbon sources, including the electricity grid and low-carbon heat networks. Net energy imports should be matched by support for offsite local renewable energy projects*."	The policy is clear in criterion d) that fossil fuels should not be used to directly power the building, its position in the list of criteria does not equate to its priority and it is of equal relevance to the other parts of the policy. The policy is technology agnostic, allowing applicants to select the most appropriate technologies to meet their energy needs and the performance targets of the policy in line with the particular context of the site and their proposed development. The supporting text highlights various options that could be taken on, including referencing heat networks of various scales where these would be the most sustainable option. We respond on the topic of offsetting later in this table and refer to that for our response on this issue.	
Policy contains potential logical "escape clause" that could render its targets ineffective, specifically, the EUI targets are allowed to be exceeded if "demonstrated to be technically unfeasible". Given that the plan's primary economic driver is R&D and laboratories—which are noted as having "exceptionally high operational energy demands"—this loophole could apply to a vast majority of the new non-	The policy's targets have been guided by recommended standards being developed across industry (e.g. the Net Zero Buildings Standard) and which are considered to be technically feasible in most instances, as evidenced through the range of feasibility studies conducted by authorities across the country. Nevertheless, the Council acknowledges that the requirement for	None.

residential floorspace proposed. If the most energy-intensive new buildings are exempted from the EUI targets, the city's 2040 net-zero target may be mathematically unsound.	delivering net zero carbon buildings in operation is likely to be challenging in some situations and it is considered to be pragmattic to acknowledge that there may be cases where the targets are not feasible. This is most likely to occur with some non-residential uses, as whilst significant efficiencies can be secured through good design, the energy demands associated with operational needs can be difficult to negate (e.g.specialised equipment associated with labs/research and healthcare). Hence, the policy explicitly allows for applicants to justify higher energy targets where the policy requirements can be shown to be technically unfeasible. This was felt to be the most practical approach to framing the policy, whilst also seeking to ensure that all other elements of the policy have been met, including that efficiency measures have been maximised as far as possible.	
There is an internal tension between the "net zero by 2040" objective and the practical operation of the viability cascade, weakening the Plan's climate ambition in application. S1 and Chapter 5 text treat offsetting and net zero standards as central to strategy, but S4 structurally treats offset contributions as the first thing to be sacrificed when viability is challenging.	Whilst the viability cascade does identify that, where an applicant can demonstrate the development to be unviable, payments towards energy offsetting can be reduced incrementally, it is clear that the development itself must remain free of fossil fuel use to ensure that it is net zero carbon ready and does not conflict with Net Zero Carbon targets for the city and nationally. We feel that this is an appropriate balance between recognising that there can sometimes be exceptional costs that could not have been anticipated in the whole plan	None.

	viability assessment, whilst also ensuring that new development is still held to appropriate minimum standards so as to not conflict with local and national net zero objectives.	
Generally support the policy and welcome the metrics for space heating and energy use intensity listed. These use absolute targets and correlate closely to Passivhaus standard criteria. Flag that working to the Passivhaus standard is the best way of guaranteeing that projects achieve these desired outcomes, without the performance gap, while also delivering good comfort and indoor air quality for occupants. Without the quality assurance provided by standards like Passivhaus, projects are unlikely to deliver these performance outcomes in reality. Would suggest that projects targeting Passivhaus certification could be said to be 'deemed to comply' with the Local Plan requirements and that this could be acknowledged in the document text.	The policy seeks to ensure that proposals are highly energy efficient by meeting the minimum EUI and space heating targets set out in the policy without requiring applicants to pursue any particular wider certification over which the Council has no control/influence. We would be happy to signpost to broader certification standards and best practice such as Passivhaus through the Technical Advice Note which is intended to be published alongside the Local Plan to provide additional guidance to applicants however.	None. We will consider how best to signpost to Passivhaus certification through the Technical Advice Note in due course.
Regarding criteria (a), flag that in relation to requirement for renewables to be ideally onsite, there is not enough space on-site to generate the significant amounts of energy manufacturing requires which will force some uses to utilise offsite solutions. Suggested change to criteria a - meeting all energy needs through renewables sources, ideally generated onsite, or <u>sourcing renewables elsewhere or</u> else offsetting as a last resort.	The policy already includes mechanisms that allow for applicants to pursue offsite solutions where meeting energy demand through renewables onsite is not possible – these are set out in criterion e). The suggested additions are not considered necessary.	None.

Regarding criteria (c) the requirement is for space heating demand to be no more than 20 kwh/m2/yr. This would not be achievable in manufacturing due to the exceptionally high energy demands. Suggested change to criteria c – targets expressed should be clarified as only for non-manufacturing uses.	The review of technical feasibility studies as set out in the net zero carbon literature review indicated that the 20kwh/m2/yr space heating target should be generally achievable across residential and non-residential uses. It is acknowledged that there can be great variaiton in typologies of non-residential development which may not have been fully captured through these studies, of course. We would, however, question the concern here as it is generally expected that higher energy demands associated with an operational use like maufacturing would impact upon the ability to meet particular EUI targets (criterion b)) rather than the space heating target (hence the differing targets allowed for through criterion b). Nevertheless, where exceptional circumstances arise and a particular proposal can evidence that this particular target is not technically feasible, the policy sets out through criteria g) to i) how a case for non-compliance will need to be justified.	None.
Regarding criteria (e), concern flagged that whilst energy storage is possible, it is not always practical or cost effective, and also, maximising available onsite renewable capacity may not be practical or cost effective. Suggested changes to two parts of criteria e as follows: • Criteria e - accompanied by energy storage where possible and cost effective.	The policy does not require proposals to be accompanied by energy storage, only where possible, as such, the additional caveat about cost effectiveness is not considered necessary. On the second bullet point, it is not entirely clear what is being suggested with the additional wording proposed. Whilst the policy allows for applicants to deliver renewables offsite, it is considered important that this land is under the applicant's control and that it	**Modification proposed to bullet point 6 of the 'policy implementation' section of the supporting text to improve clarity as follows:** *There may be circumstances where certain requirements may not be technically feasible onsite. Proposals could include delivery of additional renewable energy generation offsite on land under the applicant's control in order to match any deficit of delivery onsite. As a last*

• Criteria e - applicants should seek to maximise available capacity onsite, before seeking to meet the remaining energy balance through installation or purchasing of sufficient additional renewable generation at a location offsite	would come with some certainty that they would be able to ensure these offsite renewables are delivered. If the Council were to allow for simple purchasing of renewable generation elsewhere e.g. via a separate organisation, there could be challenges with assessing the application and monitoring delivery, potentially reducing effectiveness of the approach. As such, we do not agree with this amend either, though would suggest a mod to the supporting text that could help with clarity on this point.	*resort, an element of offsetting can help deliver on the aims of the policy. Before offsetting will be accepted, the applicant must robustly justify that the earlier steps in the energy hierarchy have been exhausted and onsite/offsite energy generation is not possible to meet the development's EUI figure. Only then, will payment be accepted into the City Council's offsetting fund to mitigate remaining energy use via retrofitting of buildings elsewhere in the city.*
Strongly welcome the move for all new buildings being net zero and fossil fuel free and agree with the energy hierarchy, however, for this policy to be effective and enforceable, it is vital that wording is changed from ''All new buildings SHOULD be net zero carbon in operation'' to ''All new buildings WILL (OR MUST) be net zero carbon in operation''	In the context of the Local Plan's policies the term 'should' is generally taken to mean that applicants must follow the requirements, unless there is strong justification for not doing so, and this is the case for policy R1. The policy is worded in a way that applicants are expected to follow the requirements which would ensure a building is net zero in operation, however, it is acknowledged that that there can be circumstances where this might not be possible and the policy sets out what is expected if they cannot, e.g. where meeting a requirement is technically unfeasible as is the case under criterion b, for example. As such, we would suggest that the wording as it currently stands is most appropriate to ensure an effective policy. However, on further review, we do think that the use of the term 'must' in the following sentence (in relation to Energy Statements)	None in relation to this comment, however, **we propose a mod to the second sentence of the policy to improve consistency and clarity as follows**: *All new buildings should be net zero carbon in operation~~. This must~~and this will need to be demonstrated through submission of an Energy and Carbon Statement that details how all the criteria below have been met:*

	perhaps leads to some confusion, and propose to amend this to ensure better consistency.	
Whilst supporting the policy wording enabling higher EUI target for non-residential uses with exceptionally high energy demands, including R&D/labs/hospitals, object to the wording relating to expectations for how energy needs will need to be met (criterion e)). It is wholly unrealistic for all energy needs for lab buildings to be met on site through renewable energy. Integration of energy storage could conflict with the effective use of land and is arguably incompatible with high quality design and placemaking requirements. With Oxford's land constraints, also wholly unrealistic to deliver additional renewable energy generation at a location offsite, particularly in absence of any site allocations for renewable energy generation. Only option would therefore be payment into offset scheme, however, it continues to remain unclear from the papers available at this stage how the Council will utilise these contributions within the City and no fund, or schemes have been established to ensure that the contributions truly deliver necessary offsetting. Approach conflicts with exiting national policy/PPG, which does not require all energy needs to be met onsite, as well as the draft NPPF, which seeks to limit setting of local standards for energy efficiency due to concerns about proliferation of varying standards across	National targets as set out in the Climate Change Act require the UK to be net zero by 2050, and the city's local target aims for 2040. This means all new development needs to be net zero carbon in operation going forward to save from undergoing potentially costly retro-fitting in future. A net zero carbon building in operation meets all of its energy needs through renewable sources. There are various benefits to seeking to secure those energy needs through generation onsite (including reducing energy bills, reducing peak demands on the grid, boosting energy security), however, the policy does not require this. When coupled with energy storage, onsite generation become more efficient by being able to meet energy demands when the source of that energy generation is not available, but again, the policy does not require this. Whilst the policy is clear that offsetting is to be used as a last resort, we have sought to allow for this as a further option where meeting energy demands is not feasible through other solutions. • *We address comments on the offsetting mechanism further down this table, please refer there to a more detailed response that addressed these comments specifically*.	None.

local authorities. Council should acknowledge the Government's concern and align with the national net zero carbon agenda and timescale, in line with the principles in the proposed Future Homes/Buildings Standard. This will meet the objectives of the plan but does not put further financial obligations on high growth sectors such as life sciences. Suggest that Policy R1 should be amended to require developments to comply with Building Regulations.	• *In relation to alignment of the policy with national policy and the draft NPPF consulted on earlier in 2026, please also refer to separate response further down this table.*	
OUD has made a representation relating to policy R1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Whilst supporting the ambition, the need for flexibility is still required as the policy remains too rigid. A more flexible approach would be supported.	There is an importance balance to be struck between flexibility that can account for the variety of proposals that could come forward in the city and the need for an effective policy which ensures new development is fit for a net zero carbon future. Through the various criteria in the policy we are comfortable that we have incorporated as much flexibility as possible with various mechanisms available for circumstances, for example, where operational energy demands vary across non-residential typologies (e.g. criteria b)), where the ability to meet renewable energy generation onsite is constrained allowing for offsite solutions or payment into the offsetting mechanism (criteria e)).	None.
Linked to above point, a suggested more flexible approach would be focusing on	Omitting unregulated energy loads ignores a significant proportion of a building's total	None.

regulated energy which encourages additional measures for unregulated energy rather than it being a requirement. The alternative option would be to allow developers to focus on regulated energy, avoiding impractical on-site renewable requirements and enabling a more feasible route to net zero.	energy demand, which in turn, introduces greater risk of 'performance gap' issues (whereby the development as built performs significantly worse than predicted in terms of energy efficiency). It is considered important to ensure these are factored into the design process, thereby capturing a more accurate picture of total operational energy demand as would be measured at the meter, as this will help to drive more efficient design, with sufficient renewable energy generation to match all energy demands and thus delivering a truly net zero carbon building in operation. As noted earlier, the policy does not require all renewable energy to be generated onsite if site constraints would prevent this.	
The Council should be able to demonstrate that the Local Plan's aspirations do reflect the Government's policy for national technical standards. Others raised that it was not considered that the approach set out in R1 is consistent with the 2023 WMS, or policy PM13 of the recently consulted on NPPF, nor that the implications of such a policy have been properly assessed in the supporting evidence base. The policy should be deleted.	We are aware of the 2023 WMS and the content of policy PM13 of the draft NPPF, to which the Council submitted a strong objection during the consultation. The Planning and Energy Act currently still enables local authorities to set their own energy efficiency standards for new developments, and we feel that there remain imperative reasons for doing so. Relying on national standards alone, even with the uplift that will be brought in through the Future Homes and Buildings Standard would not deliver truly net zero buildings in operation. The local policy is therefore important for supporting the local net zero target of 2040, as well as the national net zero target.	None.

	Additionally, it will minimise the number of buildings that will require retro-fit in future; as well as reducing exposure of future occupants to risks of fuel poverty and improving local energy resilience. The background paper sets out the wider justification for the policy approach and the whole plan viability testing has ensured that viability impacts are considered alongside other policies in the Local Plan. The concerns set out by government in previous justification for the 2023 WMS as well as the draft policy PM13 in the new NPPF appear to relate to limiting the proliferation of different local standards nationally. However, the approach proposed in policy R1 is consistent with net zero carbon policies that are increasingly being tested and found sound at examination across the country and as is recommended by various national bodies.	
If the Council has the evidence to show that the policy is deliverable, they will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example,	It is acknowledged that the design process will need to adapt to better accommodate performance standards of buildings that are net zero carbon in operation. We have set the policy to be as flexible as possible to enable variations in site context and needs of different proposals whilst still requiring key performance standards to demonstrate net zero in operation. We have also sought to ensure that net zero carbon considerations (as well as other sustainability objectives) are weaved through the design checklist which supports the Local	None.

not being designed in the character of the local area.	Plan's high-quality design policy, this will help to ensure that these considerations are factored in upfront alongside other design considerations. A similar approach is followed in the National Design Code which equally expected carbon reduction and energy efficiency to be a key part of high quality design.	
The policy will be a significant uplift, requiring further surveys and reports to be prepared to accompany planning applications. It will in turn require specialist officers at the Council to review and interpret the reports and the Council must be appropriately resourced for this.	Comments noted, we agree resourcing and training will indeed be important.	None.
Removal of BREEAM is disappointing as many projects are already working towards this, so consideration should be given to a phased transition as significant design changes will be needed.	As noted above, the policy seeks to ensure that proposals are highly energy efficient by meeting the minimum EUI and space heating targets set out in the policy without requiring applicants to pursue any particular wider certification over which the Council has no control/influence. We would be happy to signpost to broader certification standards and best practice such as BREEAM through the Technical Advice Note. The policy will apply for all applications validated after the Local Plan's adoption, however, the examination process takes time and applicants should have a good understanding of the direction of travel well in advance of adoption. It is generally expected	None.

	that if proposals have already begun the process of designing to BREEAM standards, this should not prevent them from being able to achieve the performance standards set out in policy R1.	
Targets set out in Criteria 2 of the Policy are completely unachievable for life science buildings such as those being built at Oxford North. Targets should be evidence based and it is unclear how the current targets have been set. 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. Suggested changes in relation to these points are to either delete the Energy Use Intensity targets or set a range. Also to provide more flexibility in the policy to allow for varying occupier demands.	As detailed in the carbon reduction and net zero background paper (BGP.008), in setting the specific targets for the total energy demand/EUI and space heating requirements, the Council has considered a range of sources. This includes recommendations from national industry best practice from a range of organisations. It also includes a review of technical feasibility studies produced to inform similar adopted or emerging Local Plans from local authorities across the country (as summarised in the separate Net Zero Carbon Technical Feasibility literature review), as well as previous engagement responses on the development of the Local Plan (and the withdrawn Local Plan 2040). The Council considered further breaking down targets by typologies (beyond just residential and non-residential) however this would invariably struggle to capture every potential eventuality. As such, keeping the distinction broader, with a more relaxed target for non-residential which could accommodate the potential range of different typologies of development and their higher energy demands, was considered most pragmatic.	None.

There is a difficulty in how a building is used and how that might change over time and this is a concern with post-occupancy monitoring. If data is collected how will the City Council use this to better inform other projects? Suggestion is to remove the need for post-occupancy monitoring as this is totally dependent on how each building is used by an occupier.	Specifying an approach to post-occupancy monitoring through policy is challenging and will depend upon the specifics of the application and intended future use of the building. The policy's criterion f) allows applicants to propose how this will be undertaken which leaves flexibility for them to propose the most suitable approach that will work for them. Nevertheless, it is important that some system is in place which will allow for post-occupancy monitoring of the performance of the building against the predicted performance at the design stage. This data could then be drawn upon not only to understand compliance with the policy targets, but also to investigate issues around the performance gap, as well as to provide transparency to future occupiers about the performance of the buildings.	None.
Several comments flagging need for further consideration to be given to the requirements of Policy R1 criterion e). The delivery of an on-site solution to meet all energy needs inevitably means designing a system for meeting peak demand. This is grossly inefficient given that the demand profile would rarely match the generation capacity. On most occasions therefore this would require a high proportion of the energy generated on-site to be exported to the grid. However, given the grid constraints that exist in Oxford this would result in most instances with the energy generated going to	Matching energy demand with renewables, ideally onsite, is a key element of net zero carbon buildings in operation. The policy does allow for offsite solutions where matching energy demand through renewables onsite is not fully feasible. Whilst there is invariably additional cost for designing to net zero carbon, the viability considerations have been considered as part of the Whole Plan Viability report (Dec 2025). Whilst area-wide approaches will undoubtedly play a role in supporting the city's transition to net zero carbon, every new development can	None.

waste. Additionally, the cost of implementing such technologies on site is expensive and would further add to existing challenges to financially viability. An area-wide approach, such as through Local Area Energy Plans, is the more appropriate means by which to achieve the objective of the policy.	have an impact and the policy seeks to ensure that negative impacts are mitigated as far as possible and that they are designed in a way that supports the city's transition.	
In relation to requirement for onsite energy generation, of those technologies which are most likely to be applicable (e.g. solar pv, batteries and turbines) only work best when they're sized to cover about 30–40% of a site's energy use. This is because available technologies do not perfectly match / align with a site's energy use profile. Scaling up % of generation would mean most of the energy created would be exported to the grid rather than used on site, and in many cases, that energy goes to waste because Oxfordshire is experiencing a severe lack of grid capacity, which would be needed to absorb this export. Whilst technically feasible to meet the requirement, it would also be very expensive and make some projects unviable. Additionally, trying to meet 100% of energy demand is very difficult due to variation in generating capacity (e.g. different levels of sunlight across year). This is not considered the best approach to address carbon emission reduction.It is suggested that the requirement is reworded to require a minimum of 30% of* all energy needs [(matching the development's total EUI figure)] to be met through onsite renewable energy generating technologies and that where the	As set out above, seeking to match energy demand through equivalent renewable energy production is a key element of net zero carbon building design. This also has other benefits in terms of reducing peak energy demand on the grid, and supporting occupant's bills. When coupled with energy storage this has additional versatility (which is highlighted but not required by the policy). Reducing the target to a minimum of 30% of energy needs would effectively lower the baseline target for all new developments and could result in missed opportunities where the full capacity could be achieved onsite. Of course, whilst the policy sets out that renewable energy provision should ideally be onsite, this is not the only route that is available to applicants. There are also options of exploring offsite solutions, or, as a last resort, making a contribution towards the energy offsetting mechanism.	None.

total energy need cannot be met through onsite renewables, applicants should seek to maximise available capacity onsite before looking offsite. The Energy and Carbon Statement should demonstrate that offsite provision has been fully secured and will be in operation upon completion of the development.		
Concern that costs for meeting the policy requirements alongside various other requirements of the Local Plan – e.g. affordable workspaces, increased CIL, other S106 costs - have been taken into consideration in determining the viability of the development being promoted through the Local Plan, as is required by the NPPF expectations for plan-making.	The development of the policy has been informed by viability testing alongside other policies in the Local Plan. This is detailed in the Oxford City Council: Local Plan Viability Assessment Update (Dec 2025).	None.
Not aware of any precedent for offset payments based on operational energy models.	Previously, the more common approach amongst similar policies elsewhere has been *carbon* offsetting, whereby a price per ton of carbon not mitigated through design is paid into an offsetting scheme. As the policy focuses on energy efficiency and achieving an operational energy balance as part of net zero carbon design (by matching energy demand with equivalent energy generation), the offsetting mechanism is tied to the deficit in energy generation (which in turn impacts the bulk of carbon emissions associated with a building in operation). This was considered to more closely align with the objectives of the policy.	None.

On Criteria (f), there is reference to offset payments being made, however, no evidence is provided or mechanism given for the calculation of offset payments based on operational energy models. The level of off-setting payment needs to be known to fully understand the implications on the viability of projects and more details on where the funds would be spent should be set out. An Appendix should be included in the Local Plan to provide the mechanism for the calculation of offset payments based on operational energy models.	It is expected that the offsetting fee will be published on the website and updated when necessary (e.g. to reflect inflation). This will give applicants clarity on pricing in advance. The draft process for calculating the offsetting contribution is set out in the Reg 19 carbon reduction background paper (BGP008 – pages 18/19) and would ultimately be published as part of a Technical Advice Note. The way the fund will be managed, and the fees utilised for projects, will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself. It will be important to ensure that the funds are utilised as effectively and transparently as possible, and to fund projects which deliver true offsetting within the city.	None.
NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.	Suggestion is noted – as noted above, the way the fund will be managed, and the fees utilised for projects, will be further developed as the Local Plan progresses towards adoption, though this is a separate workstream to the Local Plan's development itself.	None.

Policy R2

POLICY	R2
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	R2				
All respondents **raising objections** on this policy/chapter	15.2	40.7	86.7	87.7	105.4
	112.9	114.6	130.8	139.8	157.12

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
No recognition of the impacts of construction traffic on residents, health and wellbeing, and heritage assets. Policy should reference minimising impacts in respect of air quality, noise and vibration.	Impacts from construction are addressed separately through policy R8, there is no reason to repeat them here.	None.
Various comments raising concerns with criterion a) of the policy including that: A blanket requirement to demonstrate that reuse is unfeasible may discourage the redevelopment and intensification of previously developed land, conflicting with national policy objectives (sometimes a building's retention might be feasible but not in best interests of site's future – e.g. if intensifying uses.) Also that it is unclear what constitutes 'robustly demonstrated to be unfeasible', and that this is	It is considered important for applicants to demonstrate that some consideration has been given to reuse of existing buildings, particularly where there are clear opportunities to retain and extend the lifetime of these assets thus helping to prudently use resources and limit carbon impacts. The Council has sought to frame the policy as pragmatically as possible, indeed the requirement does not force applicants to retain buildings and the third bullet point	A modification to criterion a) as follows: a) *Re-use of any existing buildings on a site has been explored and robustly demonstrated to be ~~unfeasible~~ contrary to the long-term sustainability of the site before resorting to demolition. This should include consideration of the impacts on carbon emissions.*

a potentially open-ended policy test which leaves the final assessment down to the judgement of the decision-maker at the end of the process, and lowers confidence in the planning application process. Suggested changes included that more clarity was needed. Also, that the future TAN should acknowledge that reuse may not always be feasible.	under the policy implementation section provides additional guidance for the kinds of situations where we would accept as justification for demolition. However, we agree that the wording of criterion a) could be tightened up by focusing it more strongly towards considerations of long-term sustainability, as opposed to the broader focus of 'feasibility'. We therefore propose a mod that would help to addres this. Additionally, we would be happy to explore further how we can provide additional guidance through the Technical Advice Note in due course where this would be helpful.	Amendments to the third bullet point under the policy implementation section of the supporting text as follows: *Whilst the policy does not mandate retention of existing buildings, criterion a seeks to ensure that applicants demonstrate that they have considered opportunities ~~whether it is feasible~~ for retention and re-use of buildings on a site, before resorting to demolition. Demolition would only be acceptable where it can be shown that their retention would be contrary to the long-term sustainability of the site. In the context of this policy, this means that r~~R~~eplacing buildings may be justified where the embodied carbon impacts are outweighed by~~, for example~~:*
Another suggestion relating to criterion a) was that this should be revised in relation to efficient use of brownfield land as follows: "Re-use of any existing buildings on a site has been robustly explored and demonstrated to be unfeasible, or where it is not making the most efficient use of brownfield land, before resorting to demolition"	We disagree with the proposed modification, as, in practice, we would expect every application to be making for more efficient use of brownfield land, thus this would effectively negate the requirements of the criterion for all such applications.	None.
Whilst principle of policy is supported, further clarifications are required as it fails to balance the longer-term operational benefits of delivering more sustainable buildings, which may outweigh the carbon impact of demolition. This may impact the ability to drive innovation and deliver a more sustainable built environment in the longer term. It is suggested	It is acknowledged that there could be a range of long term benefits which might outweigh the loss of an existing building. The third bullet point under the policy implementation section expands on the considerations that relate to criterion a) of the policy and sets out a number of reasons that could justify demolition. We feel that these comfortably capture the range	None.

that this could be addressed through minor revision of wording.	of considerations that might outweigh demolition and do not propose to further modify these. However, as noted above, we do propose some refinement of the wording of criterion a) along with bullet point three of the policy implementation section.	
In light of the absence of requirements for assessing embodied carbon in national policy or building regs, the Local Plan policy approach is supported in principle and considered to be proportionate/reasonable to enable flexibility for future development in the city. However, policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings.	Retention/reuse of existing buildings onsite is not a requirement of the policy, it simply asks that, where there are existing buildings, applicants explore and robustly demonstrate that their re-use is unfeasible before resorting to demolition. As such, we don't agree that a further caveat is required in the policy.	None.
Planning policy at a national level does not strictly prohibit demolition, nor does it suggest that carbon saving policies should be prioritised over the growth of the economy and innovation, as does the current Draft Policy.	The policy as drafted does not prohibit demolition, nor does it suggest a priority should be granted towards either objective. The policy simply seeks to ensure applicants consider the embodied carbon impacts of their proposal and actively take actions that can limit these. Additionally, we do not accept that seeking to deliver on one of these objectives (carbon reduction or economic growth) means that the other objective must be sacrificed.	None.
OUD has made a representation relating to policy R2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Whilst the importance of reducing embodied carbon in developments is recognised, there is nothing in NPPF to support policies that require	Whole life Carbon Assessments are increasingly being undertaken across the development industry despite the fact that	None.

developers to undertake whole life carbon assessments. These are onerous assessments and there can be significant inconsistencies in the outcome of any assessment due to the fact that not all products will have Environmental Product Declaration (EPD). This makes it difficult for consistent assessments to be undertaken across the developments which could in turn lead to inconsistent decision making. Suggest that the requirement for a whole life carbon assessment as set out in the second paragraph of this policy is deleted.	guidance and understanding is still emerging. The additional resources it can take to undertake Whole Life Carbon Assessment are acknowledged and this is why the threshold for proposals which would need to undertake them has been set at a level which engages only the largest applications. It is considered important that these larger applications make efforts to quantify embodied carbon and detail the reductions that have been secured through good design as these could have particularly significant embodied carbon impacts due to the size and scale of these proposals. The Council will be publishing additional supporting guidance for applicants to assist in preparing these assessments as part of the Technical Advice Note.	
No issue with principle of policy, the flexibility of not having any targets is welcomed albeit it is questioned how the City Council will assess the feasibility of re-use vs demolition and therefore if the policy will be effective.	Our proposed amendments detailed above should help to more clearly focus the requirements. The considerations in determining whether applicants have satisfactorily demonstrated that building retention would be contrary to the long-term sustainability of the site will naturally vary with each application and will be dependent on the particular site context and the condition of the existing buildings.	None.
Requirement for Whole Life Cycle Carbon Assessment will mean additional documentation to be submitted on application. Council should consider the resource implication for officers and for applicants. There is a risk this conflicts	We have considered and acknowledge that there will be additional resource demands. The threshold for requiring Whole Life Cycle Carbon Assessment is set at a high level so that it priorities the largest developments with	None.

with Government objectives to streamline planning system.	the potential for the biggest embodied carbon impacts. National policy is seeking to streamline the planning system, but it also includes strong objectives for mitigating impacts on climate change, and we believe that the policy as drafted accords with both of these objectives.	
It should be noted that at planning application stage it is not always possible to define the source of materials with any certainty, as this does not happen until a contractor is appointed, usually sometime after planning permission has been granted. As such certain elements of this policy should be conditioned and not required up front. Policy should be amended to acknowledge that information could be supplied either with a planning application or via condition where it is not possible to provide up front.	As much information is needed up front as possible to make an informed judgement about an application. It is not considered 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. Where information cannot be sourced this will need to be explained through the application process.	None.
Support the general aims within Policy R2, but the Council must take a stronger position on sustainable development including embodied carbon in light of the current climate crisis. Whole Life Carbon Assessment should apply to development at all scales. Given national targets and the sustainable development goals within this Plan, it is important to understand the embodied carbon implications of all development.	It is important that policies are proportionate, justified and achievable, which the policy as written is considered to be. This is a new policy for the Council and it takes a significant step forwards on the issue of embodied carbon, intended as a stepping stone to potentially stronger requirements in future as understanding and approaches to dealing with these issues continue to develop nationally. Given the additional resource demand that will be required of applications to undertake Whole Life Carbon Assessment, and of officers in assessing applications, we have sought to	None.

	prioritise it as a requirement for the largest applications with the potential for the largest embodied carbon impacts in this Local Plan. There is, however, nothing preventing smaller schemes from undertaking it, particularly where this could help them to respond to other elements of the policy.	
This policy should explicitly set out that demolition is a last resort, especially when a building has not exceeded its expected useful life.	As other reps have pointed out, there can be good reasons why buildings may need to be demolished. The policy is clear under criterion a) that proposals should explore and robustly demonstrate that re-use is unfeasible before resorting to demolition. We are comfortable that this strikes the right balance between ensuring that buildings are not demolished needlessly before the end of their usable life, whilst accepting that sometimes their replacement can garner wider benefits.	None.

Policy R3

POLICY	R3				
All respondents **supporting** policy	57.8	81.3	139.9	159.23	130.9

COMMENT SUMMARY	OFFICER RESPONSE
As set out in the Statement of Common Ground, Historic England have made representations in support of policy R3, making clear that traditional buildings require a different approach to retrofit measures when compared with adapting modern buildings to improve their carbon and energy efficiency.	Support is welcomed.
Support, policy ensures that heritage assets and historic buildings are adapted sensitively to preserve significance.	Support is welcomed.
Policy aligns with Policy E1 to deliver further R&D floorspace on existing sites. However, concern flagged also in relation to not all buildings being suitable for conversion (*see summary of objections for summary of this issue raised*).	Support is welcomed.

POLICY	R3				
All respondents **raising objections** on this policy/chapter	12.3	86.8	130.9		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Comments were made against policy R2, but related primarily to content of policy R1 (addressing range of issues including approach to energy hierarchy, that national grid will soon be decarbonised, approach to offsetting, and suggesting changes to wording) – these have been captured in Policy R1's summary and responded to there.	See policy R1 summary.	See policy R1 summary.
Not all buildings are suitable for conversion. Policy should be caveated to ensure site redevelopment to make the most of efficient use of land is not constrained by having to retain existing buildings.	It is acknowledged that not all buildings may be suitable for retrofitting. The policy sets out that retrofitting measures will be supported, unless other material considerations would make them unacceptable, taking into account the building's heritage significance, context, use etc. Furthermore, the policy does not require the retention of existing buildings; it aims to encourage the retrofitting of these buildings, where they are to be retained.	None.

Policy R4

POLICY	R4
All respondents **supporting** policy	57.9

COMMENT SUMMARY	OFFICER RESPONSE
Support, no comments.	N/A

POLICY	R4
All respondents **raising objections** on this policy/chapter	138.27

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
No acknowledgement of responsibility to tackle climate change by reducing factors leading to congestion and emissions. Policy and goals are ineffective without reduction of car parking provision at Headington Hospitals (JR, Churchill, NOC). Excessive staff car parking is responsible for air quality, health and environmental issues caused by daily traffic congestion in Headington. Total parking provision is double that of the entire city centre, 70% of which is for staff. Peak shift times correspond to peak traffic	Whilst addressing air quality can have important benefits for mitigating climate change by limiting transport related carbon emissions, this is not the focus of the policy. Parking provision at the hospitals, and addressing congestion more generally, are also not the focus of the policy, although measures taken to reduce air quality impacts are of course potentially related. Other policies address these topics as far as they are able to through the Local Plan (though it should be noted that the Council is not the	None.

congestion, and low-cost staff permits encourage car usage. Suggested changes: inclusion of environmental, social and health benefits of reducing traffic, not just air quality, mandatory reductions in on-site car parking, recognise negative contribution to global warming, no net increases in parking, 'mitigation' replaced by 'reduce' or net zero.	Highways Authority), e.g. policies C6-C8 in chapter 7 which address travel plans, car parking and cycle parking provision as well as site-specific allocation policies in chapter 8.	

Policy R5

POLICY	R5
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	R5				
All respondents **raising objections** on this policy/chapter	57.1	119.1	140.4	138.28	104.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy is too weakly/vaguely worded, fails the tests of soundness, and does not implement strong enough protection to at least maintain the existing state of watercourses in the city (e.g. Northfield Brook and downstream River Thames), of which the Council also has a responsibility.	The Local Plan 2036 does not include a separate water policy, but we have sought to introduce one for this new Local Plan specifically because we have identified the serious and ongoing concerns in relation to both water supplies and water quality. Water resources/quality is impacted by a variety of pressures, including new development (over which the Local Plan has a role) but also other factors e.g. the way land is managed, climate change etc. This means that the Local Plan is one of the tools for protecting watercourses, in that its policies can seek to ensure water is protected and that any potential impacts arising from new development are sufficiently mitigated, however, it is not the only one. The	None.

	responsibility is shared across multiple bodies (e.g. Thames Water, the EA, individuals). We are comfortable that the proposed policy meets the tests of soundness and responds appropriately to the need for protecting the water environment within the limits of what can be required/influenced through planning policy.	
The policy and the SA place a misguided level of trust in Thames Water to deliver on their promises, despite the ongoing uncertainty of delivering upgrades (which won't be complete until 2030) in context of their ongoing financial struggles and replacement of OFWAT. There is no justification set out as to when or how Thames Water will be able to adequately treat the increased sewage from any new development in Oxford. The policy should be based on a realistic appraisal of Thames Water's actual ability to treat sewage at the time any planning application is made and should take into account that little improvement is expected in this regard until 2027 at the earliest with 2032 the more likely completion date under current Thames Water proposals.	The Council has been regularly engaging with both Thames Water and the Environment Agency to resolve ongoing challenges facing the Oxford Sewage Treatment Works (STW), located just outside the city boundary. An announcement, published in 2025 regarding how the upgrades for the Oxford STW scheme had been agreed. The announcement set out that the Environment Agency "*ensured that Thames Water has now presented a clear, fully costed and funded programme of work, providing the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, while allowing projected growth to come forward".* Thames Water publishes regular updates on the progress of the works on their website.	No further action proposed.
The Local Plan should require a Foul and Surface water drainage strategy for proposals of 10 or more dwellings (current threshold of 100 is too high).	The requirement seeks to ensure the largest developments go further to demonstrate how foul and surface water will be managed through a strategy because they could have particularly significant impacts. It is acknowledged smaller scale development can still have an impact and	No further action proposed.

	the policy still sets other requirements which seek to ensure that proposals of smaller scales of development demonstrate how they have mitigated impacts that are within their control.	
Policy R5 should set out that each planning application should be dealt with on its merits so far as the issue of likely discharge of foul water is concerned.	This is already the case for any planning application, irrespective of the policy, it does not need to be set out explicitly for this policy in particular.	No further action proposed.
All new planning applications must address the issue of water shortages which is clearly going to be a real problem during the timeline of the draft plan.	We agree that addressing future water supply is an equally important issue to water quality. The policy seeks to address both issues within the constraints of what can be influenced through the development process. The policy sets water use limits as far as is allowable through national policy restrictions on technical standards (i.e. by imposing the more stringent 110lppd water use limits). The policy also references other important water saving measures that proposals should explore, which will depend on the context of the site and what is proposed.	No further action proposed.
In relation to the improvements at Sandford Treatment works, the stages reached in the promised improvement works and the results from this should be monitored by the Council and the results made available for public inspection as part of the policy.	Whilst the upgrades to the sewage treatment works are an important step in addressing water quality concerns in the city, they are not directly in the control of this policy or the Local Plan and as such this would not be the correct mechanism through which to undertake the monitoring suggested. The Council continues to engage with Thames Water on the progress of the works separately, however.	No further action proposed.
The Policy should be revised to include wording to reflect existing legal means to restrict development where there is a likelihood of	As set out above, a scheme of improvements to the Oxford Sewage Treatment Works is in progress and this is expected to ensure that the	No further action proposed.

increasing the amount of dumping of sewage into our rivers and watercourse (e.g. by imposing suitable planning conditions at the stage where applications are approved by restricting for example the occupation of premises until certain criteria are met). The policy needs to be stronger in wording to link future development to the completion of committed upgrades at Oxford STW by Thames Water. This should include suitably worded Grampian conditions, preventing development above ground (this would allow enactment of the relevant planning permission but only to ground level) for all new planning applications discharging foul water to Oxford STW, until all committed upgrades at the works are completed by Thames Water, with confirmation provided by the Environment Agency. Without such conditions being imposed, OCC will fail to link new developments to necessary increases in sewage treatment capacity in any meaningful way, ensuring the continued decline in quality of local watercourses.	STW is able to accommodate the additional growth associated with the Local Plan. The Local Plan policy sets out that planning permission will only be granted for new development that utilises water supplies prudently and protects water quality. As with many policies in the Local Plan, if there is an impact from a development that could be mitigated through condition, the Council would consider this where appropriate. This is regularly the case with policies in the current Local Plan, such as in relation to dealing with contaminated land, it does not require this to be explicitly stated in each policy.	
Thames Water emphasize it is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. They recommends that developers engage with them at the earliest opportunity to establish the following: The developments demand for water	As set out above, where it is identified that an impact from a development could be mitigated through condition, the Council would consider this where appropriate, this does not need to be explicitly set out in the Local Plan. Equally, Thames Water, as a statutory consultee, is consulted on planning applications and is able to respond with recommended wording on conditions where a particular objection is identified.	No further action proposed.

supply and network infrastructure both on and off site; The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Additional wording (*see full rep from rep ID140*) has been provided as suggested mods to Policy R5 which includes: - setting out that permissions resulting in need for off-site upgrades will be subject to condition to ensure occupation aligned with the infrastructure upgrade, and - Wording to encourage developers to engage with Thames Water early, and also setting out that where capacity constraints are identified, the authority will where appropriate apply phasing conditions to ensure upgrades delivered ahead of occupation.	Following on from feedback at Reg 18 stage, we have incorporated wording into the supporting text of the policy that encourages applicants to engage with Thames Water at the earliest opportunity to establish the requirements for water supply and sewage/wastewater treatment network infrastructure both on and off site and ensure that these are planned for in due course. As such, we do not consider that these mods are necessary.	
Thames Water set out that Local Authorities should consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Additional wording (*see full rep from rep ID140*) has been provided as suggested mod to Policy	We have reviewed the proposed wording and are unclear on what added benefit this would bring. Policy S3, which Policy R5 also cross-refers to in its supporting text, already sets out clearly that *The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan.* This	No further action proposed.

R5 which would set out when development/expansion of water supply/waste water infrastructure would be permitted.	would include infrastructure associated with water supply or treatment of wastewater.	
Thames Water support the 110lppd water use limits referenced in the policy, which will help respond to the water stressed nature of the area. It is understood that this requirement is only applied through the building regulations where there is a planning condition requiring this standard. A condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered and suggest that Policy R5 should be amended to state: *"…..Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met….."*	The second bullet point of the 'Policy Implementation' section already sets out that '*the requirement will be subject to a planning condition*', which addresses this comment.	No further action proposed.
Ineffective as Building Control, not Planning inspect this. A lot of this is in the Building Regulations, so pointless to repeat it here, at least as a policy.	The policy is required in order to ensure that the more stringent water use standards allowed for through Building Regs is enforced on planning applications. The policy also seeks to ensure applications consider wider measures as part of the design process that can support conservation of water resources and mitigates impact on water quality in the wider environment.	No further action proposed.
The Environment Agency have made representations against policy R5, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy R6

POLICY	R6
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	R6		
All respondents **raising objections** on this policy/chapter	120.9	89.16	138.29

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Soils need to be protected in a manner commensurate with their statutory status and identified quality, as such it is not considered justified to request such detail for applications at all sites.	All soils provide some level of benefit to the wider environment. The policy already recognises that quality of soil differs however, and, through criterion b, steers applicants towards avoiding impacts on higher quality soils in particular.	None.
It is questioned what the justification is for the proposed threshold of 10m³ for removal or dewater of peat and how this can be effectively monitored across the habitat.	In the absence of national policy guidance in relation to protection of peat, we previously engaged with our heritage team and Natural England to seek views on an appropriate threshold during the development of the now withdrawn Local Plan 2040. The threshold was set at what is considered to be a reasonable and pragmatic level, bearing in mind the	None.

	capacity of officers and also other requirements on applicants. After further review of the policy, including fresh consultation for the Local Plan 2045 Reg 18, we remain of the view that this is a suitable threshold in the context of these considerations. We will keep the effectiveness of the policy under review throughout the lifetime of the Local Plan	
The requirements of criteria a) to d) are often demonstrated in other parts of an application, rather than the Design and Access Statement or Landscape plans, for example, Geo-Environmental Desktop Studies, Construction Management Plans, levels plans. Amends suggested to change references from these docs to something more broad i.e. 'Application Documentation'.	For clarity and ease of reference, it is considered important that the information responding to the policy requirements can be easily located, ideally in one place. Equally, we acknowledge the concerns raised and do not want to force onerous repetition of information across application documentation. As such, we would propose a modification is made to incorporate an additional bullet point into the 'policy implementation' section of the supporting text that makes it clear that applicants can reference other documentation where the requirements are responded to.	**Mod proposed to incorporate an additional bullet point into the 'policy implementation' section of the supporting text as follows:** • *Whilst the policy seeks to ensure that all of the relevant information that would need to be referenced in order to assess how the requirements have been responded to is included in one place, applicants are welcome to make reference to other documentation in their application, such as Construction Management Plans, where applicable.*
Oxfordshire County Council has made a representation relating to Policy R6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Lye Valley catchment is at risk from same issues that affect other areas of peat. The policy is ineffective as it states within 200m not "where peat reserves on site or downstream can reasonably be suspected". State that there	It is important to note that this is a new policy for the Local Plan, formulated in response to previous consultation feedback identifying this as an important issue for the Council to address. Peat reserves are identified on the	None.

should be identification of Lye Valley, Dunstan Park, Headington Hill north slope (along A40) (Ruskin, Larkin's Lane Field), and other peat reserves as 200m is entirely arbitrary.	policies map, these are informed by British Geological Survey mapping which had previously informed Natural England's own peat maps. This mapping includes areas of the Lye Valley and Dunstan Park. The Council is aware of potential for unrecorded peat reserves elsewhere in the city which could be impacted by development, particularly in proximity to these recorded reserves. In liaison with Natural England previously, and in the absence of best practice, or suitable national guidance, we sought to identify a reasonable precautionary buffer around the recorded peat reserves where applicants would be expected to investigate potential on any undeveloped land (where there is more potential for undisturbed deposits). 200m was determined to be the most suitable size for the context of the city.	
Once a report is written, what are the metrics to permit or not permit the development?	As with other policies in the Local Plan, the policy sets out the requirements and applications will be assessed based upon the information provided in response to these. Some of the criteria will not be of relevance to some applications, depending on the context of the site and the specifics of the proposed development – the policy clearly acknowledges this.	None.

Policy R7

No representations received against this policy.

Policy R8

POLICY	R8
All respondents **supporting** policy	140.5

COMMENT SUMMARY	OFFICER RESPONSE
Support additional text at the end of policy R8. The odour impact study would establish whether new resident amenity will be adversely affected by sewage works, and it would set the evidence to establish an appropriate amenity buffer.	Support is welcomed.

POLICY	R8	
All respondents **raising objections** on this policy/chapter	157.13	85.6

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

General support of policy but concerns over wording which currently make it unsound and inconsistent with NPPF: - Under criterion a), 'protected' should be amended to "maintained but where any impact occurs it is offset by the benefits ... or through appropriate mitigation". - Regarding criterion b), the test set out at paragraph 116 of the NPPF is that development that results in "severe" highway impacts should be prevented; this should be set out clearly in the policy. - The second set of criteria in the policy simply comprise a generic list without any targets or standards. The policy should set out what is considered acceptable or not.	Suggested amendment to criterion a) is considered unnecessary as mitigation is covered under criterion c) where necessary. Suggested amendment to criterion b) is not considered necessary as Paragraph 116 of the NPPF refers to both "unacceptable" and "severe" impacts. Local policy is required to align with, not replicate, national policy. Regarding the second set of criteria, targets, standards, and what is considered acceptable is highly dependent upon the context of the application site, including location and type of development proposed. Each application would be considered on its own merit. Some elements of the criteria have their own specific policies which set out standards in more detail.	None.
Sport England have made a representation relating to Policy R8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Chapter 6

General comments relating to Chapter 6

No general comments received.

Policy HD1

POLICY	HD1	
All respondents **supporting** policy	157.19	159.24

COMMENT SUMMARY	OFFICER RESPONSE
This should be proportionate to the location and setting of the proposed development. Albeit there is overlap with Policy S2 which should be amended.	Comment noted.
This should be proportionate to the location and setting of the proposed development, and also viability considerations.	Comment noted.

POLICY	HD1		
All respondents **raising objections** on this policy/chapter	77.2	78.6	138.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Most of Oxford inside the ring road and outside the historic centre has good transport links and access to amenities and is therefore highly sustainable. This makes large swathes of the city suitable for much higher density development than is there now. And away from the Conservation Areas it is comprised of low density housing of no distinctive character; and should therefore be suitable for redevelopment at higher density which "creates local distinctiveness" rather than having to kowtow to local character. But we have found that planning officers use Policy HD1 and the local Character Assessments to prevent development that is different in style or scale from the (normally banal and profoundly undistinctive) context. So they use HD1 to trump HD2. The result is that the approaches to Oxford and the outer suburbs do not get developed, and if anything is built there it is low density and low quality.	Policies are not considered in isolation and the plan is to be read as a whole. Applications are also assessed on a case-by-case basis on their own merits. In deciding an application, officers consider the details of a proposal, the relevant policy requirements and the specifics of the location and setting. What may be suitable in one location does not necessarily mean it would be appropriate in another.	None.
The categories of development that are excluded from the requirements to be supported by a constraints and opportunities plan with supporting text and/or visuals to explain their design rationale, is too limited. They should be extended to exclude minor commercial developments which will have limited impacts on their context and do not need to be burdened by such requirements.	The excluded categories include householder applications and changes of use without external alterations. The policy as written allows for sufficiently broad flexibility to cover most works that would constitute permitted development for commercial uses. Comparatively, even relatively small-scale commercial development that goes beyond the criteria for permitted development will have a greater impact than householder applications.	None.

Is ineffective, as the vast majority of applications, namely, householder, are excluded from the necessity to provide even a basic rationale for the proposal.	Householder applications are usually at a scale that is small enough not to require assessment using the design checklist or would be within the scope of permitted development rights. A number of the principles are also unlikely to be applicable, e.g. urban design requirements. Making this mandatory for all householders would be an onerous approach that would not have significant value.	None.

Policy HD2

POLICY	HD2
All respondents **supporting** policy	129.7 157.2 159.25

COMMENT SUMMARY	OFFICER RESPONSE
The expectation for high density development on gateway sites is supported, specifically densities over 80dph. It be important that the policy framework allows sufficient flexibility through the masterplanning process to optimise the capacity of these gateway sites, consistent with Policy HD2 and the expectation for efficient use of land.	The support is welcomed and comment noted.
Building at appropriate densities is an important component of sustainable development. Making efficient use of any land in the City is a priority. This	The support is welcomed and comment noted.

policy must be read in relation to the HD6 on building heights and our comments on changing net zero carbon to low carbon designs to align with the NPPF.	
The aims of this Policy are supported, including building at appropriate densities as it is an important component of sustainable development. Making efficient use of any land in the City is a priority.	The support is welcomed.

POLICY	**HD2**			
All respondents **raising objections** on this policy/chapter	15.3	57.11	87.8	138.31
	47.13	77.3	114.7	

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Not effective as insufficient recognition of heritage assets and proportionality. Add to policy: Proportionate design to recognise heritage assets, listed buildings and their settings.	The plan contains numerous policies which require high quality design (HD1) and consideration of heritage assets (HD3-5) which must be considered, where relevant, alongside Policy HD2.	None.
CPRE support this policy and the need to maximise density and the proposed/ suggested density targets stated within it. However, this Policy and these densities do not seem to then translate to the housing numbers on site specific allocations given later in the Plan. An exercise is required to cross reference the density targets in this policy against the	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.

density and home numbers by site allocation , with adjustments made where these are too low.		
Not justified as the policy doesn't go far enough in requiring increased density on sites. The policy should require that outside the Conservation Areas any new development should be a minimum of three storeys and any development along the arterial roads should be a minimum of four storeys.	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.	None.
Not justified as conflicts with Policy HD6 (Views and Buildings Heights) which sets out that planning permission will only be granted for development that will retain the special significance of views of the historic skyline of the Historic Core Area. Comment encourages the Draft Local Plan to recognise that large-scale redevelopment and regeneration projects need to acknowledge existing context but also can create new transformative contexts.	Development proposals can make efficient use of land and comply with Policy HD6 (Building Heights and Views), as such there is no conflict between these policies in principle. Applications will need to be assessed on their own merits and will need to be demonstrate how policies HD2 and DH6 are met in each specific instance.	None.
Not justified and not consistent with national policy as it is not appropriate for the policy to prescribe densities solely on the basis of broad locational categories. The appropriate density of any given site should be determined through a site-specific assessment that takes full account of its spatial context, opportunities, and constraints.	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.	None.
Not effective as the policy fails to recognise the inefficiency of car infrastructure, roads, driveways and garages. Developments in	Car infrastructure is not inherently inefficient and therefore can be considered alongside all other elements of scheme design in terms of	None.

heritage areas, or places valued by the community, must be blocked if they cause significant harm, similarly, such developments must be of scale and form appropriate to their context.	whether it represents an efficient use of land, it does not require specific wording. The plan contains numerous policies which require high quality design (HD1) and consideration of heritage assets (HD3-5) which must be considered, where relevant, alongside Policy HD2.	

Policy HD3

POLICY	HD3	
All respondents **supporting** policy	15.4	139.1

COMMENT SUMMARY	OFFICER RESPONSE
Recognises the importance of heritage assets to Oxford. This policy needs to be accorded greater weight in the context of design and construction.	Noted.
General support – No reasons given.	Noted.

POLICY	HD3			
All respondents **raising objections** on	57.12	81.4	134.6	138.32

this policy/chapter	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Support the intent of the inclusion of point 'e' in the policy but feel that this is not strong and specific enough. Propose the addition of the wording "both outwards from the heritage site and inwards from the surrounding countryside to the heritage site"	Point c) of draft policy HD6 already covers this, requiring proposals to "have a positive impact on important views including both into the historic skyline and out towards Oxford's green setting". It is not considered necessary to repeat this in policy HD3.	None.
Historic England has made a representation relating to Policy HD3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Modifications proposed - Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Note that the draft policy states that 'substantial harm to or loss of significance of a conservation area should be wholly exceptional'. Consider that the word 'wholly' should be removed from the policy drafting as this is not consistent with the wording of paragraph 214 of the NPPF.	The NPPF provides a national context, this wording has been accepted by Historic England. No change required.	None.
In the third paragraph of the policy the statement "Substantial harm to..... of the NPPF can be demonstrated as set out in a heritage statement" is ineffective as it states that the developer's heritage statement is the only input used for determination, not input by the public or any other body, essentially, a developer only has to show it has been through the motions "informed, assessed, responds, explored etc" and that will be sufficient.	This is one required criteria. The draft policy also requires applications affecting a designated heritage asset directly or by affecting its setting to "be considered in line with the approach set out in the NPPF (National Planning Policy Framework) paragraphs 207-221 (or updated equivalent), whereby the level of harm will be assessed and weighed against the public benefits of the	None

Conservation Areas, as Designated Heritage Assets, are not up-to-date and ineffective as many have large sections destroyed, so should be drawn to new boundaries, removing areas that no longer have anything to preserve such as Headington Hill. Almost all development in Conservation Areas will confer substantial benefit, by for example, providing more housing which will always be claimed to be a "substantial public benefit" so Policy HD3 becomes ineffective – there is no recognition that similar benefits may be realised elsewhere for less social, cultural and heritage loss. It is contrary to NPPF Para 201 which states several tests to be met which are omitted in the policy.	proposal, and the relevant test in the NPPF applied in that context". The policy wording requires compliance with the NPPF paragraph 201, stating that: *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.* Appraisals have been written for a number of 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.	

2996

Policy HD4

POLICY	**HD4**	
All respondents **supporting** policy	98.7	139.11

COMMENT SUMMARY	OFFICER RESPONSE
Overall policy is sound in providing a degree of protection given to assets such as the Milham Ford School building, which is on the Oxford Heritage Asset Register, is welcomed. But note with concern that protection may not be sufficient. See our comments on site SPE11 Oxford Brookes Marston Road Campus further in the New Marston (South) Residents Association submission.	Support noted.
General support.	Support noted.

POLICY	HD4			
All respondents **raising objections** on this policy/chapter	81.5	120.5	138.33	159.12

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy HD4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Modifications proposed - Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Draft policy wording states that "A non-designated building or group of buildings, monument or site, place or landscape will be considered a local heritage asset if it has local interest, value, and significance." Further it states that "These assets may be identified in a number of ways such as through the Oxford Heritage Assets Register, conservation area appraisals, or the planning application process."	Details about the Oxford Heritage Asset Register and qualifying criteria are provided on the City Council's website. No change is needed.	None.

Policy would be more effective and assist developers and decision takers alike, if some criteria upon which non-designated heritage assets pertaining to be 'local heritage assets' can be classified. Suggest a similar approach could be taken to that contained at Appendix G of the Cambridge City Local Plan (2018).		
Ineffective, as the goal seems to write a report rather than define the degree of harm that would acceptable – so "due regard, informed by, recording" give NO protection at all to these, this is not justified.	Proposals are to be considered on a case by case basis, and consideration criteria are set out in the policy. No change is needed.	None.
Policy HD4 is not consistent with NPPF paragraph 216, which refers to the "effect of an application on the significance of a non-designated heritage asset … in determining the application". Amend the policy to change references to 'local heritage asset' to 'non-designated heritage asset'. Amend third paragraph of Policy HD4 to read: "In determining whether planning permission should be granted for a development proposal that affects a *non-designated* [local] heritage asset *a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.* [consideration will be given to the significance of the asset the extent of impact on its significance, as well as the scale of any harm or	The references to 'local heritage asset' will be amended to be consistent with terminology used in national policy. The wording for the approach to assessing the impact of development proposals on non designated assets is considered to be in line with national policy and a change is not necessary.	Modification to amend references to 'local heritage asset' to 'non designated heritage asset'. No other action required on wording of policy.

loss to the asset as balanced against the public benefits]".		

Policy HD5

POLICY	HD5
All respondents **supporting** policy	139.12

COMMENT SUMMARY	OFFICER RESPONSE
General support – No reasons given.	Support noted.

POLICY	HD5		
All respondents **raising objections** on this policy/chapter	81.6	120.6	138.34

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy HD5, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A minor administrative point, the draft wording of the policy inaccurately cross references to other policies within the Draft Local Plan. "Proposals which would or may affect	The cross references will be reviewed with the correct policy references.	Minor modification proposed.

archaeological deposits or features that are designated heritage assets will be considered against the relevant policy approach (Draft Policy HD2 Listed Buildings), Draft Policy HD4 Scheduled Monuments)." Suggest deletion of these cross references.		
Reads as if central Oxford is the only place of any importance. Headington is far older as a settlement and manor for example.	The policy does not only refer to central Oxford and the City Centre Archaeological Area. Although the policy is in several parts, it is considered that this is clear. Conservation areas such as Headington are also addressed in policies HD2 and HD3. No change is needed.	None.

Policy HD6

POLICY	HD6
All respondents **supporting** policy	81.7

COMMENT SUMMARY	OFFICER RESPONSE
As captured in the Statement of Common Ground, Historic England made a general comment in support of the policy as worded.	Support is noted and welcomed.

POLICY	HD6				
All respondents **raising**	40.8	114.8	134.7	138.35	139.13
	87.9	105.5	120.7	157.21	159.26

objections on this policy/chapter	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Not effective, justified or consistent with national policy as the policy does not clarify that a view is not a heritage asset and does not carry the same significance as a heritage asset does, as defined in the NPPF.	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.	None.
Not justified or consistent with national policy because the policy treats any level of harm - regardless of scale, context, or mitigation - as automatically unacceptable. This approach conflicts with national policy and established heritage planning principles. This policy wording does not mention whether it can be demonstrated that the substantial harm or total loss to a designated heritage asset is necessary to achieve substantial public benefits that outweigh that harm or loss, as set out in the NPPF (Paragraph 214). Draft Policy HD6 should be amended to reflect the approach in the NPPF by enabling a proportionate assessment of harm and the weighing of that harm against public benefits.	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.

Not justified as the policy make clear which part relates to sites within the Historic Core Area and designated View Cones, and which part of the policy relates to proposed 'tall buildings', or if necessary separate out the policy into 2 different policies.	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...'	None.
Not justified because 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.	The LPA has a licence with VuCity software to view the submitted 3D models. Alternative or generic software may not be compatible with the Council's systems which is why the policy is specific in its requirement for VuCity.	None.
Not justified because we'd like to see a distinction made – either in this policy or its supporting text – between 'views' and historic 'setting'.	Policies HD3 and 4, in particular do carefully consider the setting of heritage assets and may also be of relevance, alongside Policy HD6.	None.
Not effective 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, regardless if listed as view cones or not.	The policy states that all developments will need to address their impact on character and views, not just those within the Central Core. 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...'	None.

Policy HD7

POLICY	HD7

All respondents **supporting** policy	124.4

COMMENT SUMMARY	OFFICER RESPONSE
Support of HIA for major developments with potential for significant health impacts	Support welcomed

POLICY		
All respondents **raising objections** on this policy/chapter	89.17	138.36

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to Policy HD7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
States the assessment is ineffective because it does not set a target for compliance and is not clear how this is implemented for health impacts from increased traffic or loss of green space.	Appendix 6.2 directs to Oxfordshire County Council's HIA Toolkit which explains the process and what is required of a HIA.	None.

Policy HD8

POLICY	HD8
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	HD8
All respondents **raising objections** on this policy/chapter	77.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The final sentence should be removed. The rest of the policy places measurable limits on what is permitted to prevent buildings being overbearing. Then the last sentence gives officers a subjective catch-all if they think something is a bit too big. It is unnecessary and too open to interpretation.	The impact created by a building on its adjoining environment depends on the setting and context, which is not always replicable in all situations. As written the policy makes allowance for the use of planning judgement to determine if a building is appropriate for its location.	None required.

Policy HD9

No comments received.

Policy HD10

No comments received.

Policy HD11

POLICY	HD11
All respondents **supporting** policy	118.8

COMMENT SUMMARY	OFFICER RESPONSE
West Oxfordshire comment in support of the policy and have no soundness concerns. They note the suggestion in the draft new NPPF that local authorities should aim to achieve at least 40% of new housing to Part M4(2) or M4(3) standards. They say the impact on deliverability and viability is minimal so encourage a more ambitious requirement.	The support is welcomed. The policy approach does ensure that at least 55% of dwellings on sites of 10 or more would be M4(2)

3005

POLICY	HD11	
All respondents **raising objections** on this policy/chapter	No representations raised an objection to this policy.	

Policy HD12

No comments received

Chapter 7

General comments relating to Chapter 7

POLICY	General comments and omission policy
All respondents **supporting** chapter 7	161.2

COMMENT SUMMARY	OFFICER RESPONSE
National Highways has made a representation supporting aspects of Chapter 7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	General comments and omission policy				
All respondents **raising objections** on this policy/chapter	124.6	98.8			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
NHS Property Services recommend the inclusion of a comprehensive policy on healthy places with specific policy requirements to build	Having reviewed carefully the details of the requested policy, it is not considered that it adds anything to the plan that isn't already covered by another policy, and which wouldn't	None.

for healthy places, with criteria cross-referenced to other policies with appropriate level of further details in the supporting text. Extensive details of the requested draft policy are included in the representation 124.6	just add another layer of cross-referencing. The HIA policy already tries to bring together health impacts, requiring a submission that considers in the round impacts of proposals on health. The proposed policy would repeat that unecessarily, as well as simply highlighting through cross-referencing policies already in the Plan.	
The Chapter overlooks New Marston, a local centre with over 7,300 residents. New Marston has extremely limited facilities, with a pharmacy and some local shops, but no health centre, supermarket, leisure or community facilities. More housing means more people unable to access opportunities within a 15/20 minute walk. A bus at least twice an hour and within 400m should not be considered sufficient, and the destination of the service considered, as frequent changes to get to destinations are not acceptable. For example, the X3 that services New Marston and goes to the city centre does not serve the district centres of Headington or Summertown-reaching those by bus requires a change.	New Marston Local Centre is defined in Policy C1 and shown on the Policies Map and has a defined active frontage (Policy C2). This is to help protect what is there. Other policies in the chapter protect a variety of local facilities and set out criteria for where new facilities are proposed. Discussions with Oxfordshire County Council helped inform the criteria for a suitable bus service whereby car free developments would be accepted. The X3 from New Marston does serve the city centre, which has a wide array of facilities.	None.

3007

Policy C1

POLICY	C1

All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**C1**				
All respondents **raising objectio**	138.37	89.18	114.9	78.1	47.14
	30.12				

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
The area around the Ozone Leisure Centre/Kassam Stadium should be designated as a local centre as and when likely anticipated developments take place.	This site currently has some commercial leisure and town centre uses, but these are not local facilities that serve people locally and they are not currently well-connected by public transport. The uses are heavily car dependent and attract people to travel by car from a wide area. Other policies do protect leisure and cultural uses generally, but it is not considered appropriate to designate it as a town centre. As the character, accessibility and function of the area changes, this will be reviewed.	None.
Tight sequential and centre policies may constrain necessary non-central economic growth. The sequential approach is applied to all 'town centre uses'. At the same time, Policy E1 channels almost all new employment to key employment sites and city/district centres. This approach could unduly limit beneficial decentralised economic development (e.g.	The approach of focusing on town centres and requiring a sequential test outside of these is important to ensure sustainable patterns of development. If suitable sites are not available within centres, then it may be possible for use outside of the centres to be justified in accordance with Policy C1, assuming criteria a-c are met. Policy E1 does introduce further constraints on	None.

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
uses) in otherwise sustainable, accessible locations, especially if suitable sites in centres are not available.	employment uses in line with the strategy, which is to limit those uses to city and district centres, or existing sites in lawful use for those uses. This is important to ensure housing can be prioritised in other locations.	
Retail impact assessment threshold is relatively low at 350sqm, and significantly below the 2,500sqm threshold in the NPPF. It is understood this maintains the same threshold as the OLP36, but no up-to-date reasoning has been provided. It should be clear it applies only where there is an uplift in retail or leisure floorspace that requires	The overall aim of the plan is to ensure sustainable development. Key to this is ensuring sustainable travel patterns. Location of uses that attract people, such as retail, is key to their accessibility. Any proposals in less accessible locations could be particularly damaging to these aims, so the requirement for retail impact assessments from small out of town units is considered justified.	None.
Provisions should be included for securing contributions from appropriate out-of-centre developments to enhance the robustness of the city centre against out of centre competition more accessible by car.	Criterion b requires that impacts on the road network can be mitigated, and notes that this is likely to include by minimal parking. Criterion a requires good accessibility by walking, cycling and public transport. Development will not be permitted where it will have significant impacts on the road network by generating significant new car use, and therefore it would not be justified to automatically take contributions to enhance the city centre. Instead, potentially harmful developments are prevented.	None.
The criteria should consider the comparative accessibility of out-of-centre locations by non- sustainable modes of transport. Accessibility to the city centre is poor, especially since introduction of the congestion charge. If higher parking is necessary in out-of-centre locations this is a	Criteria a-c are intended to ensure that the accessibility of any out-of-centre location (if it can be justified through the sequential test and is in accordance with other policies) is considered, and that impacts on the road network are mitigated. Policy C8 regarding parking will still apply and good	None

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
locations. Higher public benefits are needed to outweigh the policy conflict. There should be a clearer retail hierarch, with the City Centre differentiated as the top tier. There should be reinforcement of the provisions for resisting out of centre development that would have a comparative trading advantage due to the availability of dedicated and prximal car parking and freedom	accessibility by walking, cycling and public transport is still required. The other centres are not considered out-of-town locations and are able to support a wide range of uses. They are all locations highly accessible by sustainable modes, with limited car parking. Further more, the traffic filters do not only affect the city centre.	
Oxfordshire County Council has made a representation relating to Policy C1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Headington District Centre should not include Bury Knowle Park as most of the uses are clearly inappropriate for Core GI. The primacy of G1 must be stated or a large building could be built in the park and conform with C1 (and remove Bury Knowle Park from the district centre anyway). The centre should include the backstreet behind Windmill Road where	Bury Knowle Park is protected by Policy G1 in line with the rest of the Core GI network. This is not overridden by the district centre boundary. The park was included as it is a key attraction of the local centres and includes community facilities such as the library. The district centre does not need to expand to include any facility or shop within the vicinity of it.	None.

Policy C2

POLICY	C2
All respondents **supporting** policy	139.14

COMMENT SUMMARY	OFFICER RESPONSE
Support reference to increased residential development, including upper floors of commercial premises; it is considered that this should be echoed in other housing-related policies to reinforce the contribution that provision of residential units in city and district centres could make toward the delivery of dwellings in sustainable locations. Support reference to public realm.	Support is welcomed. It's not considered necessary to repeat parts of the plan in multiple places.

POLICY	C2			
All respondents **raising objections** on this policy/chapter	78.2	89.19	134.12	136.5

3011

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It should be confirmed that out of centre developments will be required to contribute to criterion f) through S106 obligations. Out-of-centre developments should contribute to public realm enhancements in the centre.	There is not considered to be justification for requiring developments in other district centres to make contributions to public realm enhancements in the city centre.	None
The threshold for the % of Class E uses in the frontages will need to be clearly justified. Retention of existing threhsolds that are a snapshot of current trading profile and market circumstance may not facilitate the essential and rapid response to dynamic retail and leisure markets and could impact negatively on the prospects of the centres. The ongoing repurposing of class E floorpsace within the city	The thresholds are not set at current levels, but above them, allowing for some change. However, it is considered important to guide uses in frontages, because the type of activity is important. Ensuring there are commercial uses (use class E) that people want to visit is important to the vitality of the centres. Also, these are the locations these uses are directed to, and they should be in these accessible	None

centre demonstrates oversupply. New build retail floorspace will simply compete for existing tenants. Provision of food and drink (Class E(b)) is at saturation point. Further transitioning away from Use Class E should therefore be allowed. The permission granted for the Clarendon Centre is a manifestation of this essential process of change and renewal. Amend the policy to confirm that the development criteria will be applied flexibly and only where justified by the development proposed. It is considered that wording should be inserted into the emerging policy to reflect that, *unless otherwise agreed with the local planning authority on the basis of site specific circumstances, the provisions set out under the active frontages can be considered flexibly*. This would enable the delivery of successful active frontage through positive masterplanning and place making.	locations, with other facilities and services available to ensure vibrancy and to allow linked trips. Use Class E is very wide ranging, and that in itself allows very significant flexibility. There is no evidence that food and drink is at saturation point, because if it was there is a very wide range of other Use Class E uses it could transition to, including some employment use. Also, as the thresholds are exceeded currently, transition away from Use Class E would not be an issue). There is no need to allow free transition away from Use Class E, and this would have a potentially very negative effect on the centres. Furthermore, the active frontages apply to the ground floor only.	
Oxfordshire County Council has made a representation relating to Policy C2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Any use of thresholds is not realistic for residential mixed-use development such as Templars Square, where the ground floor will also need to serve significant residential development on upper floors. Instead, the approach should be design-led, as well as recognising that residential ground floor	Creating frontages that are 'active' from a place making perspective is one aspect of ensuring successful centres. However, it is not the only important consideration, and the mix of uses is also important. Residential entrances may create some activity, but a successful district centre cannot be made from a high proportion of	None

entrances are active. The priority should be focused on maximising active frontages to create a vibrant place through positive place making and not by prescriptive targets, which may have other unintended design consequences.	residential uses- it must have facilities and services that attract people from outside to use the centre. In the specific case of the Cowley Centre, which is to be significantly redeveloped, the areas of frontage will not remain the same, and the Policy SPS16 is clear about this. There is significant and sufficient flexibility to ensure a large amount of additional residential, whilst still protecting the basic function of the centre as a district centre.	

Policy C3

3013

POLICY	**C3**
All respondents **supporting** policy	30.13

COMMENT SUMMARY	**OFFICER RESPONSE**
Strongly support the emphasis on retaining and where possible improving facilities available for public use (would like more emphasis on these being affordable if possible).	Support is welcomed.

POLICY	**C3**		
All respondents **raising objections** on this policy/chapter	134.8	124.5	85.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy seeks to protect small shops that are considered as community assets in the use class order. It should be clearly articulated that this does not apply to city centre sites, or successful redevelopment could be prevented from coming forward, e.g. on the Nuffield sites.	To meet the definition in Use Class F2, a shop needs to be 280sqm or less and at least 1,000 metres from a similar facility. This definition will rarely, if at all, apply in the city centre (or any district centre).	
While it is unclear whether healthcare facilities are included within the Local Plan's definition of community facilities; policies aimed at preventing the loss or change of use of these facilities may have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility within its estate.	Most health care facilities are Use Class E or C2 (hospitals). The supporting text to this policy is clear that it relates to Use Class F2. There is enough flexibility in the plan to give flexibility to the NHS in the way its estate is managed. The important matter is that needs continue to be met and key services delivered.	None.
Sport England has made a representation relating to Policy C3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy C4

POLICY	C4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	C4

All respondents **raising objections** on this policy/chapter	89.2	160.3	85.2	138.38

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy and criteria is supported in principle, however academic institutions exclusively for 18+ are excluded from the policy whilst there is no alternative policy allowing objective assessment of the need for new facilities. The caveat should be removed, or a university-specific policy proposed.	Policy C4 is intended to apply to, and is only appropriate to, educational establishments that include students up to 18+. The Policy would not apply well to the universities. The types of development the universities bring are wide ranging, and often on campus sites. They include student accommodation and research and development facilities of various types, not just purely academic facilities that are self-contained. Furthermore, it is the case that the universities have a global reach as seats of learning, not just a local one. They cannot be assessed against criteria including local need and requirement. A very wide range of policies in the plan may apply to university developments, and the nature of each individual proposal will need to be considered against the relevant generic policies or site allocations. University developments often have complex and wide-ranging impacts and also very significant benefits, beyond just the local, which cannot be summed up in one policy. The Oxford Local Plan 2036 does include a policy for health and education (Policy E2), but Policy E2 is generally supportive, says that proposals should show how the wider policies of the Plan	None.

	are met, and links to the student accommodation policy. It was not considered necessary to take this forward into the Oxford Local Plan 2045.	
The City Council has, at every single local plan, attempted to block any rivals to oxford University or other institutions trading on the Oxford moniker. This exception is unjustified as essentially the universities can do whatever they want, without giving access or use to the citizens of Oxford. Remove the unjustified phrase 'the proposal will meet local needs or an existing deficiency in provision or access', a backdoor method of banning new institutions, and the exception that the universities do not have to provide benefit to Oxford.	There is no attempt in the plan to block any rivals to the University of Oxford or other institutions. The policy does not apply to educational establishments for those only 18+, as these do not meet local needs. Therefore, all institutions for those 18+ are on the same footing. There is no reason for all those for students under 18 not to meet criterion b- which refers to local needs, or a deficiency, or supporting regeneration.	None.
Oxfordshire County Council has made a representation in relation to Policy C4, which is summarised and responded to in their Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation in relation to Policy C4, which is summarised and responded to in their Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy C5

POLICY	C5	
All respondents **supporting** policy	63.1	159.27

COMMENT SUMMARY	OFFICER RESPONSE
No comment made.	Support is welcomed.
Support that new visitor and cultural attractions within the city permitted if comply with these policy requirements.	Support is welcomed.

POLICY	C5
All respondents **raising objections** on this policy/chapter	134.9

3017

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Enough flexibility is needed. Supporting text should be incorporated that is flexible towards 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 as a reason loss would be supported.	The site allocations comply with the plan strategy and detailed policies of the plan- they are not considered reasons for exceptions. That a site is mixed-use and comprehensive redevelopment is expected is not a reason that cultural venues become less important to retain. Mixed-use redevelopment is likely to give many opportunities for reprovision, potentially in a different way.	None.

Policy C6

POLICY	C6
All respondents **supporting** policy	30.14

COMMENT SUMMARY	OFFICER RESPONSE
Overall there should be more emphasis on encouraging the provision of improved cycle lanes especially those solely for walkers/cyclists, and not for vehicular traffic.	Noted. Policy C6 requires Transport Assessments to prioritise pedestrian and cycle movements, both within the scheme and within neighbouring areas.

POLICY	C6			
All respondents **raising objections** on this policy/chapter	12.3	59.1	89.21	138.39

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The NPPF (para 161) requires that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions….and support renewable and low carbon energy and associated infrastructure". As written, the policy does not adequately recognise the importance of transport emissions to the radical reductions required by the NPPF, the national targets in the Climate Change Act and the City's own targets. These	The spatial strategy in policy S1 addresses the reduction of transport emissions, and is not considered necessary to repeat in this policy.	None.

will require almost complete elimination of direct use of fossil fuels in transport within the city on the timescales of the plan.		
Policy should be made more robust - - at the end of the first sentence add 'as soon as possible as the development proceeds and measures have been taken to ensure the need to travel by car is minimised' - references to pedestrian and cycle movements and public transport should be higher up the list of factors to be considered - they should be a) and b) not c) and d) - in existing d) after 'access to high quality public transport is facilitated 'add 'and, where appropriate, funded for a specified period'	This list is not hierarchical and all factors should be considered.	None.
Oxfordshire County Council has made a representation relating to Policy C6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A typical bureaucratic view of the world, plan=delivered. b) "…residual .. impact" means what? N.B. no specific change so put all in general section c) "and within neighbouring areas" is ineffective as it is outside of the developer's control. Ineffective, as none of above actually reduces anything and implies an increase in traffic is acceptable which it is not as roads are already 100% bandwidth utilised.	Policy C6 seeks to ensure that any traffic impacts from development proposals are appropriately addressed and mitigated where appropriate. The policy has been drafted to align with the wording in NPPF. The draft policy does not make any direct reference to the AQMA. The whole of the city was declared an AQMA in 2010 so the comment about the City Centre is not considered to be appropriate.	None.

Ineffective as it muddles planning with delivery of the objectives, the policy must state this must be done, not planned for. Ineffective as it states “is likely to” which is meaningless, and only applies to the City Centre AQMA not the whole city. Ineffective as no metrics given.		

Policy C7

POLICY	C7
All respondents **supporting** policy	159.28

COMMENT SUMMARY	OFFICER RESPONSE
Cycle parking provision is imperative, including parking for E-Bikes and associated charging. The policy allows for lower parking standards where this is justified. This is important as cycle parking standards can result in excessive provision, leading to inefficient use of land, a proliferation of unsightly cycle stands and adverse impact on heritage assets, particularly in the City Centre. The policy sets out a sensible and pragmatic approach to deal with the issue.	General comments and support noted.

POLICY	C7

All respondents **raising objections** on this policy/chapter	89.22

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to Policy C7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy C8

POLICY	C8
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	C8				
All respondents **raising objections** on this policy/chapter	43.11 / 43.10	47.15	59.11	78.3	89.23
	138.4				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Unsound as not justified or effective, also not legally compliant - Policy overly restricts car parking in new developments, which would have negative impacts on car access for certain groups not allowed for in the policy- e.g. older people, or families with young children. Policy also too prescriptive in its criteria, which does not account for differences in transport access requirements from the development - e.g. in relation to the routing of bus services, the variable conditions such as weather on active travel routes to shops and the use of car clubs. Restricting car parking could impact development viability and have detrimental impacts elsewhere- e.g. overflow parking and impact on house prices. Policy can be made sound by deleting the first two paragraphs under *"Residential Developments".*	The Plan aims to promote and achieve a shift towards more sustainable modes of travel. Policy C8 helps to achieve this aim and is not considered unnecessarily prescriptive. The standards align with Oxfordshire County Council's Parking Standards for New Developments. 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. It is not considered appropriate to remove the first two paragraphs under *"Residential Developments".*	None

Unsound as not effective, and not consistent with national policy, also not legally compliant - Policy is inflexible and not inclusive when considered against the NPPF particularly in relation to balanced sustainable development, parking standards and realistic transport choices - given its impact on those who may need access to a car - e.g. tradespeople, older people, families with children, carers. Policy is not flexible enough to account for differences in local circumstances, e.g. car ownership patterns, needs of specific groups or other circumstances where a site specific assessment may be needed to assess car parking need. Not legally compliant – unclear whether the policy can successfully manage network impacts – e.g. if the low car approach proves undeliverable, leading to displaced on street parking and enforcement problems. Policy can be made sound if it is refined to introduce explicit scope for site specific justification of limited additional parking where necessary to address accessibility needs or demonstrable risks of displacement, and better articulate how CPZ roll out, enforcement and wider transport improvements will be coordinated with the phasing of low car developments.	Comments noted and suggested amendments are not considered necessary. The County Council is ultimately responsible for the introduction/ delivery of controlled parking zones. Enforcement is beyond the scope of the Local Plan.	None
Unsound as not justified - Policy should also refer to the provision and maintenance of car	Policy encourages and allows for car clubs. These operate independently and therefore their provision or	None

clubs, should encourage low traffic neighbourhoods and car-free developments (as well as low car developments). The council should be proactive and identify sites for car-free development.	maintenance cannot be controlled. Low traffic neighbourhoods are beyond the remit of the local plan.	
Unsound as not positively prepared, justified or effective - To be consistent with the objective to sustain and enhance the vitality and viability of town centres, no dedicated parking should be allowed for out-of-centre developments, as this would give them a comparative advantage, accentuated by freedom from the congestion charge, and it will be considered to be in conflict with Policy C8 if the transport assessment indicates that dedicated parking would be necessary to make the transport impacts of the proposed development acceptable.	Criteria a-c of Policy C1 are intended to ensure that the accessibility of any out-of-centre location (if it can be justified through the sequential test and is in accordance with other policies) is considered, and that impacts on the road network are mitigated. Policy C8 works with this and, for all non-residential development, has a starting point of no additional parking except for blue badge and servicing. Any additional parking must not only be justified and minimised, but also demonstrated to have no unacceptable impacts on the transport network. It must be justified in the context of the objective of the Plan to promote a shift towards sustainable travel.	None
Oxfordshire County Council has made a representation in relation to Policy C8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Unsound as not effective - “scheme” ("will only be granted for residential schemes* that are low car") and “frequency” are not defined. “Seek a reduction” is ineffective. Essentially policy permits an increase in traffic if the developer can prove it is necessary via its transport assessment. As extra staff or residents will be multimodal, at least some will increase traffic, therefore a net reduction is required to compensate.	The word ‘scheme’ is used in the policy in the context of landscaping. There is no reference within the policy to "will only be granted for residential schemes* that are low car", the reference is *"will only be granted for residential developments that are low car"*. The word frequency is used in the definition of criteria for low car residential developments where it is stated *“.....Where the site is located within a 400m walk to frequent (at least 2 an hour) public transport services”.* The policy wording states *“In the case of all non-residential developments, the starting point is for no*	None

	additional parking except for blue badge and servicing only. The Council will seek a reduction for highly accessible sites". No changes are considered necessary.	

Chapter 8

General comments relating to Chapter 8

POLICY	General comments
All respondents **supporting** policy	No general comments made in support of chapter.

POLICY	General comments			
All respondents **raising objections** on this policy/chapter	78.8	101.5	104.1	115.2
	128.4	140.9	88.8	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
A significant number of the site allocations that are made in the Plan include provision for town centre uses. None of the allocations that include town centre uses specify the floorspace quanta for those uses that it is anticipated will be delivered on the respective sites. Moreover, there is no evidence that the potential impacts, including cumulative impacts, on the city centre and other designated centres, have been assessed, nor has the sequential approach been applied. The current evidence is that there is an over-provision of floorspace in town centre uses within the city, as reflected in current initiatives to reduce it through, for example, the	The site allocation policies set out what type of land use or mix of uses is considered to be suitable on a particular site in accordance with national policy and the local plan's own requirements. It takes into account landowner intentions, deliverability and other physical or policy constraints. The emphasis is on the delivery of housing where this can come forward and where there is scope for potential complementary uses these are highlighted. Town centre uses are legally permissible development and the local plan contains appropriate location policies. There is no reason to add further policy constraints or restrictions on their provision on top what is driven by market forces.	None

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
repurposing of the Clarendon Centre. The process of adjusting to the recent events that are acknowledged in the 2023 needs study and cited above is ongoing. The even more recent events that post-date both the 2023 and 2025 needs studies pose further shocks and threats to the already precarious and volatile market circumstances. The planning policy provisions should therefore respond accordingly with a precautionary approach unless and until there is clear evidence of a positive long term outlook.	Evidence is that there is significant need or demand for town centre commercial uses within Use Class E. The Clarendon shopping centre is within Use Class E and even if there are fewer shops coming forward, the majority of the site will still most likely come forward within the lawful use (Use Class E) for commercial uses that are still town centre uses.	
Early engagement between the developers and Thames Water would be beneficial to understand what drainage requirements are on and off site, what loading/flow from the site is anticipated and water supply requirements on and off site. It can take 18mths-3 yeras for local upgrades and 3-5+ years for more strategic solutions. Thames Water offers a pre-planning services for developers to engage and understand what if any upgrades will be needed.	Following on from feedback at Reg 18 stage, we have incorporated wording into the supporting text of Policy R5 that encourages applicants to engage with Thames Water at the earliest opportunity to establish the requirements for water supply and sewage/wastewater treatment network infrastructure both on and off site and ensure that these are planned for in due course. In terms of drainage requirements, the SuDS policy G8 sets out various requirements which seek to ensure an appropriate drainage strategy is pursued.	None
The draft Plan proposes to co-ordinate development with the delivery of social, community and transport infrastructure across four 'Infrastructure Area' quadrants, within which there are 'Areas of Focus' – areas where changes are anticipated over the plan period resulting from new development at existing and	While there is continued engagement and coordination with adjoining authorities, the local plan is required to address policies, designations and allocations that are within the administrative boundary of Oxford.	None.

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
proposed allocated sites - including development sites outside the city adjacent to the city's boundaries. The plan states that these are where a wider area consideration [through discussions and co-ordination with neighbouring authorities] will be needed to ensure success. [It is considered] that the draft Plan has failed to include similar opportunities that are evident within the East Infrastructure Area at Headington to build on the growth and regeneration benefits arising from development at Barton Park and strategic allocation at Land North of Bayswater Brook (STRAT13). At Headington, there is further growth potential such as through a sustainable extension to Land North of Bayswater Brook to support growth, regeneration and infrastructure delivery.		
The BOB ICB (now NHS Thames Valley) made general comments on the deliverability on a number of sites in relation to flood risk. Detailed comments were made on individual sites, as well as the supporting evidence base.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency made general comments on the deliverability on a number of sites in relation to flood risk. Detailed comments were made on individual sites, as well as the supporting evidence base.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Network Rail has made a representations relating to an Omission Policy, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy I1 Digital Infrastructure to support new development

POLICY	I1
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	I1
All respondents **raising objections** on this policy/chapter	78.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This policy is too narrowly focused on broadband and data centres associated with new developments. The policy framework in the Plan should be broadened to provide support for the full range of contemporary digital infrastructure requirements, including digital screens associated with existing developments, which are essential to sustaining the vitality of contemporary city centres and ensuring inclusivity and equality. As evidenced through recent planning applications in the city centre, there is pressure for the installation of such technology, many in	The policy already includes requirements for minimising the visual and amenity impacts of digital infrastructure. In combination with other policies of the plan, there are sufficient instruments to ensure that installations are not sited in inappropriate locations or have unacceptable impacts.	None required.

inappropriate locations, which is likely to escalate. A policy approach, with identification of opportunities in key locations for the installation of digital screens working collaboratively with key city centre stakeholders, such as WOA, will ensure that such pressures are managed and this essential infrastructure can be delivered in an appropriate and coordinated manner to support the needs of existing investors and key stakeholders.		

Policy I2 Safeguarding Land for Infrastructure

POLICY	**I2**		
All respondents **supporting** policy	89.24	104.17	135.1

COMMENT SUMMARY	**OFFICER RESPONSE**
Support for this policy	Comment noted.
The East West Rail Company has made comments in support of Policy I2, which is summarised and responded to in the Statement of Common Ground.	The City Council welcomes the support of the East West Rail Company in relation to Policy I2, which includes the requirements of the most recent (November 2025) Safeguarding Direction.
The Environment Agency has made a representation in support of Policy I2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	**I2**		
All respondents **raising objections** on this policy/chapter	88.4	88.6	132.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The East West Rail Company has made a representation relating to Policy I2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
...In planning for the area the Council should: • Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations. • Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects. • Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion. • Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations. • Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.	The policy has been developed to safeguard land for specific schemes that have progressed to an advanced stage of consent regimes that are outside of the planning process. These are specified in the policy text as the East West Rail (Oxford) and Oxford Flood Alleviation Scheme (OFAS). It is not the intention for I2 to serve as a general safeguarding policy for existing or routinely delivered infrastructure assets, or to safeguard infrastructure schemes that can be delivered through the local authority planning process.	None required.

• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.		
Network Rail has made a representations relating to Policy I2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy NEOAOF: Northern Edge of Oxford Area of Focus

POLICY	**NEOAOF**	
All respondents **supporting** policy	157.22	157.14

COMMENT SUMMARY	**OFFICER RESPONSE**
Support the policy approach / the NEOAOF policy	Support is welcomed
Support the proposal to identify "infrastructure areas" and 'Areas of Focus', in particular the North Area and Northern Edge of Oxford Area of Focus, which includes the Oxford North/wider Northern Gateway development. This Area of Focus has huge potential to help deliver the housing and economic needs of Oxford, in particular at Oxford North. This was identified in the Oxford Growth Commission's Interim Report. Oxford North is at the heart of the corridors identified and ideally situated to maximise the economic and social returns sought from further investment. Support that higher density development and exemplary buildings can be accommodated in the area of focus to celebrate the area as a gateway and area of innovation. The first phase of buildings at Oxford North, including the Red Hall and workspace buildings along with the central landscaped park have certainly taken this to heart.	Support is welcomed

It is important, as recognised in the supporting text that Oxford City closely aligns with Cherwell District Council to ensure the delivery of key active travel routes through the various allocations in each authority area.	
We support the acknowledgement that this area is adjacent to other urban extension sites in Cherwell District Council. We urge that the Council works proactively to ensure that there is a joined-up approach with neighbouring authorities, particularly in the provision of wider infrastructure.	Support is welcomed.

POLICY	**NEOAOF**				
All respondents **raising objections** on this policy/chapter	81.8	85.7	92.5	115.3	139.15

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Historic England has made a representation relating to Policy NEOAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sports England has made a representation relating to Policy NEOAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Cherwell District Council has made a representation relating to Policy NEOAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (now referred to as NHS Thames Valley) has made a representation relating to Policy NEOAOF,	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

which is summarised and responded to in the Statement of Common Ground.		
Reference should also be made here to the close proximity of the Green Belt to this AOF and the important role it plays in providing a green gap between North Oxford and Kidlington. It should be acknowledged the Green Belt needs to be protected, to ensure that the gap is not further eroded.	Any erosion of the remaining gap would be due to development outside the Local Plan area, and therefore it would not be appropriate for the Oxford Local plan to reference the need to protect the gap north of Oxford's boundary.	None.

Policy SPN1: Diamond Place and Ewert House

POLICY	SPN1
All respondents **supporting** policy	No representations in support of the policy.

POLICY	SPN1	
All respondents **raising objections** on this policy/chapter	105.13	115.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Delete from the policy wording: "minimum number of dwellings to be delivered is 135" and replace with: "The development is expected to deliver around 100 dwellings on Diamond Place and 80 dwellings on Ewert House".	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement, therefore there is opportunity to deliver a higher number if it meets the requirements of	None

	all relevant policies in the Plan. Not splitting the requirements over the two parcels also provides more flexibility in how it can be delivered.	
The Integrated Care Board (now NHS Thames Valley) has made a representation relating to Policy SPN1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPN2: Elsfield Hall, Elsfield Way

No representations received against this policy.

Policy SPN3: Oxford North Remaining Phases

POLICY	SPN3
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPN3			
All respondents **raising objections** on this policy/chapter	47.16	81.9	90.6	157.15

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPN3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Natural England has made a representation relating to Policy SPN3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
SPN3 moves away from the vision set in the NGAAP. The priority for Northern Gateway has always been employment first and foremost. Going back to the Core Strategy the site was allocated as a strategic location to provide "modern employment led development with supporting infrastructure and complementary amenities" (Policy CS6 of the Oxford Core Strategy). Furthermore, the NGAAP Inspector assessed the mix of uses at the site and states that the housing component (500 dwellings) "would remain a complementary use to the employment led development" (paragraph 43 of the Inspector's report on the NGAAP). The report goes on to consider if exceptional circumstances existed to remove the land from the Green Belt. The Inspector concluded that the need to provide employment led development which was critical to the knowledge spine amounted to exceptional circumstances to justify the release from the Green Belt. SPN3 goes against this by saying that the "priority use of this site is to deliver the remaining residential commitment from the	Oxford has a well-known urgent need for more housing and demand continues to outstrip supply. This has many impacts on the city and its residents. The supply of available and affordable housing, is therefore a priority of LP2045. The wider Northern Gateway area within which this site is located, is one of the largest areas for residential and specialised employment growth in Oxford, and a rare opportunity for strategic scale growth. SPN3 references that parts of the Oxford North development have already been delivered in recent years, or are under construction, with reserved matters applications to follow for the remaining phases. SPN3 sets out that a mix of uses is appropriate on the remaining phases, and leaves flexibility on the distribution of those across the plots, but it is essential that the commitment to deliver at least 161 more homes (in addition to the 319 homes already delivered at Canalside, to bring the total to 480 homes as per the outline permission,) is borne out, as part of the remaining phases, because of the huge need for more homes in Oxford. Whilst the NGAAP identified the areas for	None

hybrid Oxford North Permission". LP45 also splits up the remaining areas of the NGAAP Spatial Strategy [see NGAAP diagram in reps]. Delete the text in the policy as below: "…[Given the shortage of housing in the City a The priority use for this site is to deliver the remaining residential commitment from the hybrid Oxford North permission.]"	employment-led development, it was always set out as a mixed use development with the opportunity to deliver a strategic scale of homes (500 homes) alongside employment growth to support the knowledge economy.	
Recreational and traffic pressures from additional housing and employment may increase visitor use of nearby meadows (including dog walking) and add to air quality burdens on sensitive habitats, but SPN3 does not explicitly address recreational pressure on the Oxford Meadows SAC or set out specific mitigation (e.g. on site alternative natural greenspace, dog walking routes, or access management). Policy should strengthen Environmental and SAC/SSSI Safeguards. Require that any further residential or employment development under SPN3 demonstrate, via Habitats Regulations Assessment, that there will be no adverse effect on the integrity of Oxford Meadows SAC and nearby SSSIs, taking account of recreational pressure and traffic related air quality. Require provision of high quality on site green space and walking routes (including dog walking areas) designed to absorb recreational use and	Policy SPN3 has been assessed as part of the Habitat Regulations Assessment (stage 2: appropriate assessment). It has been considered in relation to all the conservation objectives at the site. Criterion b) of policy SPN3 sets out a requirement for an increased level of public open space for the residential component of development at the site (15% as opposed to the standard 10% open space provision). This has been agreed with Natural England as part of the stage 2 appropriate assessment contained within the Habitat Regulations Assessment (HRA). The HRA also includes an air quality assessment (which considers all development in the plan, including Policy SPN3). Natural England has also agreed that there will be no likely significant effects at the Oxford Meadows SAC in relation to air quality. While the Northen Edge of Oxford Area of Focus policy does highlight the proximity of the	Update criteria b) of Policy SPN3 to make it clear that this requirement has been included in Policy SPN3 to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC. Amend criterion b) as follows: *b) Planning permission will only be granted for developments that provide usable, well designed and good-quality publicly accessible green open space. At least 15% of the total site area must be provided as green public open space; this must be distributed so that at least 15% of any parcel proposed for residential development is green public open space. This is to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC.*

thereby reduce pressure on designated meadows.	SAC, we acknowledge however, that policy itself may benefit from some sign-posting to highlight that criterion b) has been specifically included in Policy SPN3 to ensure no adverse effects on the integrity of the Oxford Meadows SAC. *b) Planning permission will only be granted for developments that provide usable, well designed and good-quality publicly accessible green open space. At least 15% of the total site area must be provided as green public open space; this must be distributed so that at least 15% of any parcel proposed for residential development is green public open space. This is to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC.* A Source Pathway Receptor Analysis (SPRA) has been carried out which considers the impacts of the development proposed in the plan on the city's network of Sites of Special Scientific Interest (SSSIs). For Policy SPN3, criterion a) sets out the requirements regarding the Wolvercote Meadow and Pixey Yarnton Meads SSSI,	
The cumulative hard surfacing and ground re profiling across all Oxford North phases may affect local hydrology, including pathways that influence groundwater fed meadows in the SAC/SSSIs. SPN3 does not clearly set out how cross phase drainage, infiltration and groundwater management will be handled to	The SFRA does not highlight any particularly high flood risk concerns for this site, neither has the EA raised any site-specific concerns for this site. So these issues would be covered by the general Policy G7 Flood Risk and Flood Risk Assessments.	None

avoid unintended impacts downstream. Given increasing extreme rainfall, there is a need for robust assurance that development will remain safe over its lifetime without increasing flood risk elsewhere and that SuDS and buffers will be sufficient in practice, not just in principle. To be fully justified and effective, SPN3 should explicitly tie remaining phases into a comprehensive site wide flood risk and drainage framework for Oxford North, demonstrating long term climate resilience and no adverse effects on sensitive hydrological receptors, in line with NPPF guidance on flood risk. Clarify Flood Risk and Drainage Strategy Tie SPN3 explicitly to a site wide FRA and drainage strategy for all Oxford North phases, demonstrating long term climate resilience and no increase in downstream flood risk, especially in relation to groundwater dependent habitats.		
Affordable Housing and Viability: The Plan's general affordable housing policy expects up to 50% affordable housing on qualifying sites, subject to viability, with tenure mixes set out in Policy H2. For a strategic site such as Oxford North, local communities reasonably expect a substantial affordable housing contribution. However: • Stakeholders including Wolvercote and Summertown & St Margaret's Neighbourhood Forums have raised concerns that viability	Policy H2 requires 40% affordable housing provision, unless the site is in the Green Belt – those sites are required to provide 50%. This level of provision has been informed by a Viability Assessment for LP2045. SPN3 does not need to reiterate affordable housing requirements because it is covered in general Policy H2 Delivering Affordable Homes. Reserved matters applications for the latter phases will be assessed against the adopted	None

assessments for later phases may lean heavily on developer profit assumptions (e.g. around 16.5%) and conservative land value benchmarks to justify reductions below policy compliant affordable housing levels. • SPN3 itself does not restate affordable housing expectations or require any specific viability review mechanism; nor does it require transparency or independent scrutiny of viability evidence at reserved matters or later phases. Guarantee and Monitor Affordable Housing Delivery Re state that later phases are expected to deliver up to 50% affordable housing in line with Policy H2, subject only to independently reviewed viability evidence. Require that viability assessments be made publicly available (subject to legitimate confidentiality) and include review mechanism clauses so that uplift in values can trigger additional affordable housing or contributions.	planning framework at that time – whether that is still LP2036 (which has the 50% requirement) or LP2045 when that is adopted (with 40% requirement). If a developer is claiming that policy requirements for affordable housing are not viable, then any negotiations will always be on an 'open book' basis and will be informed by assessment from an independent assessor. These requirements are set out in Policy S4 Plan Viability.	
The Northern Edge of Oxford Area of Focus highlights that Oxford North and adjacent sites will significantly increase demand on the A34, A40 and A44 corridors, and emphasises the need for improved walking, cycling, wheeling and public transport connections, including to Oxford Parkway and Cherwell's PR6 allocations. It also identifies the need for contributions to	General Policy S3 Infrastructure Delivery in New Development references the Infrastructure Development Plan (IDP), so this does not need to be repeated in every individual site allocation policy. is a living document that sits alongside the LP2045	None

primary school expansion and other social infrastructure. Despite this, concerns remain that: • Existing congestion and air quality issues on the A34/A40/A44 corridors could be exacerbated by cumulative development (Oxford North, Cherwell PR6 sites and Pear Tree Farm), especially if modal shift targets are not achieved. • SPN3 does not clearly specify what transport mitigations, active travel links and public transport enhancements are required from the remaining phases, or how these relate to the Infrastructure Delivery Plan and the Area of Focus requirements. • The capacity and funding of schools, healthcare and policing to absorb additional population are not spelled out within SPN3, leaving uncertainty about how essential services will keep pace with growth. Policy needs to: - Cross reference the Infrastructure Delivery Plan and Northern Edge of Oxford AoF to specify key infrastructure to be funded from remaining phases, including school capacity, health provision, active travel links and public transport enhancements to Oxford city centre and Oxford Parkway. - Require transport assessments for each major phase to assess cumulative impacts on A34/A40/A44 and local junctions and to secure	Transport Assessments are addressed in general Policy C6 Transport Assessments, Travel Plans and Service and Delivery Plans, and would include multi-modal assessments.	

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proportionate mitigation and mode shift measures.		
Improve Design Guidance and Community Involvement: Link SPN3 more explicitly to the High Buildings TAN and any site specific design codes, including indicative height/massing ranges and design principles for edges adjoining Wolvercote Conservation Area and nearby neighbourhoods; Encourage structured community engagement (including with neighbourhood forums) on major buildings and public spaces to ensure that future phases better reflect local character and aspirations; Acknowledge in the supporting text that the Oxford North allocation will be kept under review as the Local Plan is updated to address previous Inspectorate findings on housing need and the Duty to Cooperate, ensuring that SPN3 remains consistent with a sound strategic framework.	Policy SNP3 sets out site-specific design requirements, and general Policy HD1 sets out general principles for high quality design. The Wolvercote Conservation Area is also specifically referenced in SPN3 that proposals must take into account. The Statement of Community Involvement encourages early consultation with the local community for major developments, and this is also highlighted in Appendix 1.1 Design Checklist of LP2045. Dialogue with adjoining authorities is ongoing, and the LP2045 has been prepared fulfilling the Duty to Cooperate (since March 2026, replaced by a requirement to demonstrate collaboration).	None

Policy SPN4: Oxford University Press Sports Ground, Jordan Hill

POLICY	**SPN4**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPN4**				
All respondents **raising objections** on this policy/chapter	36.2	105.14	126.1	85.8	138.41

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The redevelopment would result in the loss of an established cricket facility that is actively used. The plan indicates that development could proceed with a higher number of homes if the pitch is not retained, yet there is no clear evidence this facility is surplus, nor an identified replacement option. Therefore the allocation is not justified and it is inconsistent with national policy, which seeks to protect facilities unless they are demonstrably surplus or replaced with better provision.	The allocation is very clear that the sports facilities are not considered surplus. Therefore, they would need to be retained or replaced. As there is no identified option currently for replacement, the minimum housing figure assumes retention of the cricket pitch on the site. It is only if a replacement option is found that a higher number of homes would be expected than the minimum number stated in the policy (which assumes retention of the cricket pitch).	None
The potential loss of these facilities would represent a disproportionate reduction in cricket provision within Oxford, removing a significant proportion of the infrastructure that supports youth development, women's cricket and inclusive participation. There is no clear evidence that replacement cricket facilities of equivalent quality and accessibility could be delivered within the city to offset the potential loss. Any replacement must also be delivered prior to the loss of existing facilities.	Because there is no clear replacement at the current time, the policy assumes retention of the cricket pitch on site. The site is of considerable size and capable of accommodating new development as well as retaining the cricket use. However, it is possible that a replacement will be found, which would enable development of a larger part of the site.	None
In the policy, replace "minimum number of homes to be delivered is" with "development is expected to deliver around…".	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is	None

	suitable for the setting. The policy wording is clear that it is a minimum requirement.	
This site should not be allocated because there is a lack of green space and it is in proximity to the river.	The site is not in close proximity to a river. The site is not publicly accessible open space, but the sports facilities are in use by clubs and important to retain, either within the site, or with reprovision. The policy approach assumes retention within a smaller part of the site, alongside new development.	None
Sport England has made a representation relating to Policy SPN4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPN5: Pear Tree Farm

POLICY	SPN5
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPN5			
All respondents **raising objections** on this policy/chapter	81.1	88.5	123.2	135.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Historic England has made a representation relating to Policy SPN5, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPN5, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
East West Rail has made a representation relating to Policy SPN5, which sought to clarify infrastructure delivery responsibilities. This is summarised and responded to in the Statement of Common Ground.	The Statement of Common Ground with the East West Rail Company (EWR Co) clarifies the position in relation to the EWR Co regarding infrastructure delivery.	None.
Site allocation states suitable for "other complementary uses" to residential-led development; this should be expanded to state "employment uses" alongside residential as part of the allocation to enable a cohesive cross-border development to come forward. Amend wording to: ...the addition of commercial accommodation would deliver co-location benefits, including: • Creation of sustainable communities where people can live and work locally; • Supporting co-location of flexible workspace and housing, ideal for start-ups, spin-outs and entrepreneurs; and • Encouraging active travel and public-transport use through the highly sustainable location of the site, a short distance from Oxford Parkway.	The priority use for this site is for residential development, to help contribute to meeting the city's housing needs, and as part of the vision for the wider Northern Gateway area. Therefore the site allocation policy seeks residential-led development, with complimentary uses to be considered on their merits. The Plan's strategy is to deliver any employment development through modernisation and intensification of existing employment sites, without allocating any additional new sites for employment.	None

Policy SPN6: Red Barn Farm

POLICY	SPN6
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPN6
All respondents **raising objections** on this policy/chapter	123.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
We note that the allocation continues to refer to the site as being occupied by a charity. However, we can confirm that the charity has now completed the purchase of a new site in the locality to which it will relocate to. Its lease at Red Barn Farm is due to expire on 28 June 2026 and will not be renewed. The reference to re-provision within the allocation effectively duplicates requirements	It is noted that a new site is being progressed by the landowner. Once construction of the new facility is completed and it is operational for the users, that is normally the point at which it could be assessed to confirm the reprovision requirement has been met, and if applicable amend the policy accordingly.	None

already addressed through Policy C3. Retaining this wording would therefore result in a double count for the charity's relocation, as the matter is already appropriately covered by Policy C3. The wording within the allocation requiring the reprovision of the charity's facilities should be removed, as it will no longer be relevant to a vacant site.		

Policy CBLAOF: Cowley Branch Line Area of Focus

POLICY	CBLAOF				
All respondents **supporting** policy	30.15	86.9	88.13	129.3	130.1

COMMENT SUMMARY	OFFICER RESPONSE
Support, no comments received.	N/A
Support identification of South Oxford as part of CBLAOF. Significant regeneration opportunities, potential for high-density development, and public transport improvements. Focus on improving public transport is welcomed.	Support is welcomed.
Network Rail have made a representation relating to Policy CBLAOF, and this is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Support the AOF's placemaking objectives for active travel, quality design and environmental improvements. Support requirement for contributions from identified sites.	Support is welcomed.
Support identification of South Oxford as part of CBLAOF. Significant regeneration opportunities, potential for high-density development, and public transport improvements. Focus on improving public transport is welcomed.	Support is welcomed.

POLICY	CBLAOF

All respondents **raising objections** on this policy/chapter	51.4	81.11	107.6	115.5	85.9
	159.13	89.XX			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
BMW Mini Plant support policy in principle but has concerns regarding contributions for locations within 1500m buffer, given that employees are highly unlikely to use or rely on CBL for transport. This should only be necessary where there is a direct link between the development and use of the CBL for accessing employment. Unclear whether the contributions to CBL would be additional to those derived from CIL and what constitutes "trip-generating development" we assume the reference to figures 8.5 and 8.6 refer to the Oxford Local Plan 2040 Submission Draft as these are not available in the current Submission Draft.	There is an expectation that development sites which are within the buffer zone, and generate additional trips, should contribute to the Cowley Branch Line, however, the specifics of this will need to be determined at application stage when considering the merits of each individual case. Figures 8.5 and 8.6 have been omitted in error and will be reinstated.	Mod proposed to insert figures to show the 1500m buffer zone diagram.
Historic England (HE) have made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
General agreement with the policy, but the exclusion of the Oxford Stadium from the AOF is a major oversight; a prime location for high-quality residential development.	The Oxford Stadium is included within the CBL AOF. It is not an allocated site because since May 2022 (and after the site was previously allocated in the Local Plan 2036) the site is operating as a greyhound/racing/speedway	None.

Policy SP51 from OLP2036 should be carried forward as a site allocation and amended to reflect important role of Stadium in this AOF. The Sandy Lane West station is a short walk from the stadium, further highlighting potential. Should the uses within the Oxford Stadium Conservation Area cease or relocate, the significance of the heritage asset would reduce; once the Stadium is redeveloped, the Conservation Area designation should be removed. Once the CBL and public transport improvements are delivered, no further financial contributions should be sought.	stadium so community uses would need to cease operations if the site were to be redeveloped.	
BOBICB (now NHS Thames Valley) have made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England have made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The policy should include wording to confirm presumption in favour of development for a range of uses including employment and residential to maximise growth potential.	This policy presumes that development would be proposed for both employment and residential uses. Reference is made to the anticipated intensification of existing employment use and the delivery of new residential development.	None.
Oxfordshire County Council has made representations on Policy CBLAOF, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS1: 474 Cowley Road

POLICY	SPS1
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS1
All respondents **raising objections** on this policy/chapter	104.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Environment Agency has made representations against Policy SPS1, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS2: ARC Oxford

POLICY	SPS2
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS2			
All respondents **raising objections** on this policy/chapter	57.13	81.12	86.1	138.42

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Errors in site description. No mention of car dealership, hotel, gym and kindergarten on site. Some of this site has been built out, there are still vacant plots which have remained so since the 1990's when the old Rover factory was demolished. The rate of new build has slowed down completely. The vacant plots are very much as they were in 2016 when the previous Policy SP10 was written. As it is proving so difficult to develop this site, the requirement to contribute to the cost of a bridge over the proposed railway nearby will discourage developers from building on the remaining vacant plots. This seems at odds with the policies in the draft Plan encouraging development of Brownfield sites. The Council provides no explanation why so much of this site has been vacant for so long. There surely is a case for some increase in business rates for sites such as this to encourage the owners to progress their redevelopment. It seems pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes.	The description of the site highlights the primary uses of the site. While it is acknowledged that there are some additional complementary uses, including a car dealership, hotel, and gym. The absence of these complementary uses in the policy box does not make it unsound. All remaining plots now either benefit from planning permission (plot 2000) or are the subject of a current planning application (plots 3000, 8200, 8400 and 9200). Given that these remaining plots are all now moving forward, as well as recent applications to modernise and intensify the employment uses at the site (e.g., Plot 2700, Plot 5500, Plot 4200) as well as the recently completed Trinity House scheme, all of which are aligned with the plan's employment strategy and approach of encouraging development of this large brownfield site. Setting business rates is outside the jurisdiction of the Local Plan 2045. See response to policy E1 for further details.	No change proposed

There is an estimated 5ha of vacant land which could be used for homes. Policy E1 must be less restrictive to assist this.		
Historic England has made a representation relating to Policy SPS2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Site is in multiple ownership. Uncertainty about whether the delivery of a comprehensive masterplan covering the whole site will be forthcoming. Also, uncertainty about the status of any such masterplan. At the time, there is no overall strategy which exists for ARC Oxford, therefore, a modification to paragraph b) of the policy is proposed to clarify alignment with an overall strategy should be made 'where one exists.' Paragraph b) of Policy SPS2 should therefore be amended as follows: *b) A site-wide landscaping and public realm strategy for the site is encouraged and proposals for individual plots should then identify how they will align with/ comply with the overall strategy <u>where one exists</u>. Site-specific landscaping schemes should be prepared in accordance with Policies G2, G3, G4 and G5.*	We don't consider the additional text is required in paragraph b) of the policy. Paragraph b) already encourages a site-wide landscaping and public realm strategy to be produced, and then for individual plots to identify how they will comply with it.	No change proposed.

No building on green infrastructure as marked on map, contributions to make it useable by the community from Cowley in particular.	The GI network protections are covered in Policy G1. Development proposals need to accord with these. Contributions sought from developments are often required to mitigate a number of planning-related issues.	No change proposed.

Policy SPS3: Bertie Place Recreation Ground

POLICY	SPS3
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS3					
All respondents **raising objections** on this policy/chapter	47.17	57.14	65.3	85.18	138.43	139.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
SPS3 requires "adequate re provision of the current recreation facilities to meet the needs of those who currently use the facilities and the new residents", stating that the playground must be re provided on site and that replacement of the MUGA may be on or off site provided it still serves teenagers in the neighbourhood. This focuses on like for like facility types but does not address the quantitative and qualitative loss of general open grassed space that currently supports informal play, casual sport, dog walking and social interaction across all age groups.	In addition to the allocation policy requirements, proposals will be assessed against other relevant policies in the plan. Policy G1 has as one of its requirements for applications affecting supporting spaces the provision of evidence that consideration has been taken of the role of existing spaces that support socialization and informal recreation, and where relevant references to up-to-date GI studies with particular attention to local need.	None

The proposed layout significantly reduces the extent of accessible, flexible green space, concentrating provision into a formal MUGA and relatively small play area. This risks undermining wider Plan objectives on promoting health, wellbeing and inclusive, flexible recreation, which rely not only on play equipment but on larger, adaptable open spaces.	This description appears to refer to a planning application on the site that is as yet undetermined. The site allocation policy does not specify a layout or prescriptive design choices. Representations on the detail of live applications can be submitted for consideration through the consultation process for planning applications.	None
The site sits within a constrained street network and Flood Zone 3b; access/egress is already sensitive in flood events, and the policy highlights the importance of safe evacuation and careful surface water management.	The policy includes a requirement for a site specific flood risk assessment that takes into consideration for onsite routes and the infrastructure needs to reach access routes. The level of vulnerability of the access/egress routes are specifically set out in the policy, along with considerations for early warnings, and requirements for designed for and more extreme flooding events.	None.
"Low car" or car free development is likely to be pursued here, but SPS3 does not explicitly address how overspill parking onto surrounding streets will be prevented or managed, or how servicing and visitor access will be handled without harming local safety and amenity. Given the flood, access and amenity context, the Plan should make clear how car free expectations will be enforced and what supporting measures (e.g. CPZs, car club provision, secure cycle links) are required to ensure that housing delivery does not simply displace parking and generate traffic pressures on neighbouring streets, contrary to NPPF	While the plan overall promotes development in sustainable locations and active and sustainable travel modes, there is no requirement for this to be a low car or car free development site.	None.

principles on safe and suitable access for all users.		
The policy does not explicitly acknowledge that building on part of an existing green, permeable and potentially biodiverse site in Flood Zone 3b is an exception to the general approach of steering more vulnerable uses away from high flood risk, and it does not clearly set out why there are no reasonable alternative sites for this scale of affordable housing.	The allocation policy includes site specific requirements for surface/ground water assessments, incorporated sustainable drainage systems and management plans to deal with surface water flooding risks. All suitable and available sites with development potential that are deliverable and sited in suitable/sustainable locations are considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure.	None.
While LNRS alignment and SuDS are required, the Plan does not provide a clear, quantified comparison of existing biodiversity and green cover with what will exist post development, nor how any net loss in functional habitat or green infrastructure will be avoided given the reduced open space footprint.	The policy includes descriptions of key onsite ecological features that are expected to be retained (protected species, wildlife corridors) and the plan includes an urban greening factor policy (policy G3) which includes minimum requirements for green cover for development sites of this scale. The approach taken by the plan with respect to provision of green infrastructure takes into account enhancements in quality of GI as much as the quantity. The LNRS mapping tool sets out suggested measures that could potentially enhance the level of onsite biodiversity. While the details of those measures are not included in the policy for conciseness reasons, the policy clearly	None.

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	signposts the LNRS resource as a source for further site appropriate detail.	
This site is not appropriate and a prime example of where Policy E1 needs to be strengthened to be effective. See our comments on Policy E1. Homes should be built on vacant , brownfield sites currently allocated for employment, and not on sites such as this.	Refer to OCC responses to policy E1 representations.	Refer to OCC responses to policy E1 representations.
The 2005 Green Space Study assessed the quantity, quality, and value of all green space in Oxford. Bertie Park wasn't one of 16 play areas judged to be surplus. The 2022 GI study didn't find Bertie Park to be surplus, citing it as an example of a small, but multifunctional park. Technical Advice Note 9: Green Spaces (TAN9) states "Outdoor sport and recreation facilities shown on the Policies Map as protected by Policy G5 are in use and not surplus … Other open spaces that are not protected on the Policies Map would need to be considered on a case-by-case basis, with strong evidence that they are surplus …. It is likely this case would need to demonstrate a long-term lack of public access and/or use." Bertie Park has been removed from the list of Oxford Parks, but OCC have neither demonstrated lack of access or lack of use.	The Green Space studies are an assessment of existing open spaces, areas of deficiency etc and do not make a judgement on what spaces are surplus. Those kinds of determinations are made by the Parks and Open Spaces department, who are responsible for the management of green spaces in the city and their determination lies outside the remit of planning officers.	None
The draft plan states that the GI network "performs a vital role in supporting the health and wellbeing of our residents and the wider environment. GI sites are particularly important for the 'multi-functional' role many of them provide." Bertie Park is currently considered to be multifunctional. If shrunk to	The allocation policy does not have specific size requirements for the provision of green space, but applicants will have to demonstrate compliance with the requirements of G1 and G3 (Urban Greening Factor). The current application does not in itself indicate that what	None

20% of its current size, it will no longer be 'multi-functional.' There is potential to significantly increase housing provision at this end of Hinksey Park ward. It makes little sense to decrease open space provision at the same time.	has been submitted will be compliant with the emerging plan.	
TAN9 says the capacity of replacement pitches should fully replace what is lost in terms of amount of games that can be played, or pitch capacity and be "easily accessible to the same community." There is no evidence that this is possible because the only existing facility in Fox Crescent is significantly smaller and has no capacity whatsoever for enlargement.	Policy G1 has different requirements for proposals affecting supporting spaces (G1B) in relation to outdoor sports pitches and parks and other amenity/accessible green spaces.	None
The site capacity assessment states: "Based on current and historic uses, land contamination risks on this site are low." There is no evidence for this. It also misleadingly states that there is a live planning application for 31 homes with 're-provided' MUGA and play area on site, implying a precedent whereas this has been advertised as a departure from the local plan policy. This implies that: • Loss of the open space is acceptable, whereas the live planning application also includes mitigation for loss of open space. • Reprovision of the MUGA on site is appropriate, whereas TVP state that the MUGA too close to homes. SPS3 requires "replacement of the MUGA" with "an alternative type of facility or by improvements to the capacity of an existing one."	The site capacity assessment is produced as part of the supporting evidence, and is based on the best available factual knowledge of the site at the time it was produced. Information sources include council owned and other databases, planning records and input from officers in other council departments. The application being referenced had not been determined as at the time of writing of the assessment, and does not in itself indicate compliance with the proposed policy either way. Representations on the detail of live applications can be submitted for consideration through the consultation process for planning applications.	None

We object to the proposed allocation of this site for housing and consider it to be unsound. Whilst we are aware that the site has previously been allocated for housing, this should not come at the expense of a public playground for children and families. Other sites should be explored which does not result in the loss of a well-used community facility which has caused significant local concern.	All suitable and available sites with development potential are being considered as part of our efforts to address the city's housing need. The plan also recognises the importance of public open space, and other forms of green infrastructure. The allocation policy seeks to balance between providing housing on a suitable site and ensuring that the key function of the site as a public open air recreation ground is retained.	None.
Sports England has made a representation relating to Policy SPS3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Refusal as next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford. Heritage and amenity must be preserved.	Representations on the detail of live applications can be submitted for consideration through the consultation process for planning applications.	None.
Natural England has made a representation relating to Policy SPS3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS4: Cowley Marsh Depot

POLICY	**SPS4**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPS4**

All respondents **raising objections** on this policy/chapter	85.1	104.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Sports England has made a representation relating to Policy SPS4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPS4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS5: Crescent Hall

POLICY	SPS5
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPS5	
All respondents **raising objections** on this policy/chapter	105.15	138.52

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

In the policy, replace “minimum number of dwellings to be delivered on the site is” with “development is expected to deliver around”. Delete criterion c) of policy which notes that the potential presence of priority species/ habitats on the site should be investigated and any impacts addressed accordingly.	The requirement for a minimum number of dwellings should be replaced with “expected to be delivered” is “around”. This criterion is necessary as it has been discovered that there is the potential for protected species to be present on site, therefore the requirements of Policy G6 will need to be met.	None
Substantial Roman pottery activity has been identified in the general area.	The Council’s archaeologist has confirmed the potential for the site to contain archaeological remains is low to moderate. (The site is within a very large zone of general potential for Roman kilns).	None

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Policy SPS6: Former Iffley Mead Playing Field

POLICY	**SPS6**
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPS6**				
All respondents **raising objections** on this policy/chapter	27.1	59.12	81.13	85.11	138.51
	151.1				

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Unsound as not justified – Site unsuitable for cramped housing. Green space is more valuable here, proximity to SSSI. Heritage and amenity must be preserved. Allocation removes a playing field that could help to serve this need for pitch space.	The site is an existing allocation in the Oxford Local Plan 2036 and it is still the landowners intention to develop it.	None
Historic England has made a representation relating to Policy SPS6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation relating to Policy SPS6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Unsound as not positively prepared, justified or effective – comments made in relation to the outline planning application for the site. These include comments relating to flood risk, access (including for deliveries, refuge and emergency vehicles), number of dwellings, parking and a cycle route on adjacent land.	Representations appear to relate to evidence submitted in support of a live planning application that has not yet been determined, not in relation to the proposed site allocation policy.	None

3061

Policy SPS7: Kassam Stadium

POLICY	**SPS7**
All respondents **supporting** policy	81.14

COMMENT SUMMARY	OFFICER RESPONSE
Historic England support this policy.	The support is welcomed.

POLICY	SPS7				
All respondents **raising objections** on this policy/chapter	1.3	30.16	47.18	57.15	129.1
	140.8	89.25	85.12	138.44	104.7

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
There should be a more strategic vision for linked sites across this area the developments proposed for south of Grenoble Road.	The draft policy CBLAOF of the Oxford Local Plan does look to steer development across this area, setting out a number of criteria to guide development to meet the needs of the area, even when it is taking place on different sites, with different landowners and timescales. Furthermore, the Cowley Branch Line Densification Study looks across the whole area around the Cowley Branch Line. Download Cowley Branch Line Densification Study Stage 2 | Oxford City Council	None.
There should be a more strategic vision for linked sites across this area the developments proposed for south of Grenoble Road.	There should be a more strategic vision for linked sites across this area the developments proposed for south of Grenoble Road.	None.
Firoka recognise that the primary objective of Policy SPS7 is the delivery of the minimum housing requirement of 290 homes and understand that, once this is achieved, employment-related and complementary uses are acceptable on site. Firoka has concerns this	The intention of the allocation of this site is that it comes forward as a housing-led development. Housing is to be the primary use of the site and other uses are secondary to that. The approach of the plan, captured in the employment strategy in Policy E1, is to protect	None.

is not strictly justified but accept it as long as employment-related uses would not be capped if following a design-led approach. Supporting text should therefore be added to recognise that 'secondary' in terms of this policy refers only to the primary requirement to deliver the minimum number of homes and other uses being secondary to that.	only key employment sites and to allow new employment on these sites and in the city and district centres. This also follows a sequential approach for these town centre uses. In addition, there are sites in lawful use for employment uses, and these could also be intensified in employment use if justified by the sequential approach. Given the lawful use of this site and the flexible approach across linked sites SPS11 and SPS13, the policy allows for employment-use on this site. But housing use is intended as the primary use of the site.	
Redevelopment of the Kassam Stadium and Overflow Car Park sites will be a large-scale multi-phase development interdependent with the stadium replacement scheme. As a result, it is possible that certain new uses will be developed across the sites before the stadium use is relocated. The ensure effective and deliverable implementation of the allocations, it is requested that the supporting text clarifies that allocated uses may be developed across the sites prior to the removal of the existing stadium, where this forms part of a masterplan strategy.	Clarification cannot be added to the supporting text, but it is agreed it would be helpful to add clarity about the stadium to the Policy and a main modification is proposed.	This site is linked to **SPS11** and **SPS13**, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall. Full redevelopment across the sites is interdependent with the stadium replacement scheme, but allocated uses may be developed across the sites prior to the removal of the existing stadium where this forms part of the masterplan strategy.
Redevelopment of the main stadium land for housing or mixed is dependent on Oxford United FC relocating to an alternative, deliverable stadium. Until there is a secure, deliverable relocation scheme with an agreed programme, the availability of the existing stadium land for substantial redevelopment	Oxford United Football Club lease the site from Firoka. This model is not considered by the club to be a sustainable model for them as they are at the whim of the landowner as regards terms and conditions of the lease, including cost, renewal dates and how the site is used. This is why the club itself has been looking for a site	None.

within the plan period is uncertain. Although the club is 'hopeful' work can start at the Triangle this year, necessary funds are needed, and time to build it, and the issues around foul-water drainage are yet to be resolved. It should be a condition of any planning application that OUFC would be able to stay at the Kassam. The replacement of local community facilities should also be a condition of any proposed development. Treating the full SPS7 housing number as available in the early or middle years of the period may therefore introduce risk into the housing trajectory and 5 year supply.	they can bring forward. The Triangle site in Cherwell was identified, plans drawn up and planning permission granted. Regardless of the phasing and delivery of that, the landowner can choose not to renew the lease at the Kassam. The policy could prevent any development of the site until the stadium is replaced, but it can't make sure the lease is renewed. Whilst it might be considered that the landowner would choose to renew the lease rather than have an empty stadium (if the stadium had not been replaced by the time of renewal), given the other uses of the stadium as a conference centre, etc., as well as the opportunity to develop the overflow car park and Ozone Leisure Park, it is almost inconceivable that policy wording preventing any development of the site until the football club has a new home would result in a renewal of their lease if that proved to be what they desired. A large football club is a very specialised use. What the policy does do is ensure reprovision of the local community element of the facilities. Ultimately, the approach taken is considered to be the approach that will make best use of the site, which is important given Oxford's constraints.	
The policy cross-references Policy R5 in relation to contamination, but we (Firoka) believe this should cross-reference Policy R7.	Agreed that there was an error in the cross-referencing and this is correcting with a minor modification.	Minor modification to Policy SPS7 to correct cross-referencing '...and remedial works may be required (**Policy R~~5~~7**).

The Policy sets out a requirement for 10% of the overall site area to be provided as open space. This is not consistent with Policy G2, which requires 10% of the residential area (on mixed-use sites) to be public open space.	The cross-reference is considered useful as the Policy G2 will have some influence over how the site is developed. However, it is agreed that an amendment to the wording of the cross reference to avoid confusion would be useful.	Minor modification to the wording of the cross reference At least 10% of the area of residential use site~~s~~ should be provided ~~used~~ for public open space (**Policy G2**).
Policy SPS11 establishes open space and car parking as suitable uses within Flood Zone 3. For consistency, Firoka requests SPS7 includes specific reference to car parking and open space as suitable uses within Flood Zone3.	The Policy SPS11 is not affecting in any way what is or is not a suitable use in the flood zone. It is not necessary to state all the uses that would be suitable in a flood zone, and that would be impossible because it would depend on the sequential approach and so on. The reason SPS11 refers to the potential uses in the southwest corner is because the high level of flood risk in that corner requires a design response, and the policy acknowledges this, with guidance on a solution. Such guidance is less necessary on SPS7 because the pattern of flood risk does not create a need for a particular design response.	None.
It is important that sufficient parking and access is retained to keep remaining leisure uses viable and accessible for local residents and visitors.	There is a considerable amount of surface level parking around these sites currently. It is expected that this level will reduce as it is not desirable to have such a car-dominated development. Public transport contributions will be required, and the re-opening of the Cowley Branch Line for passengers will also help to ensure easier access to the site by pubic transport. Improvements to cycle and pedestrian access into and across the sites will be more important to ensuring accessibility to local residents than retention of large amounts of car parking.	None.

3065

Oxfordshire County Council has made a representation relating to Policy SPS7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England has made a representation relating to Policy SPS7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPS7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS8: Land at Meadow Lane

POLICY	SPS8
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPS8				
All respondents **raising objections** on this policy/chapter	56.1	2.3	3.1	3.2	7.2
	13.1	14.1	16.1	17.1	23.1
	27.2	31.1	32.1	47.19	53.1
	56.2	57.16	61.1	70.1	80.1
	83.1	95.1	90.11	99.1	96.1
	97.1	116.1	141.1	142.1	143.1
	145.1	144.1	139.17	147.1	148.1
	158.1	153.1	152.1	151.2	125.1

	127.1	100.1	162.1	138.45	56.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Site should not be allocated as the Council now has incontrovertible evidence that the LP2036 allocation of the site was a product of procedural and consultation flaws and that the site is not a suitable development site. An ecological assessment was not carried out before allocation in the OLP2036. The fact the site is in the Iffley Conservation Area was not taken into account. The Council seems determined to retain it as an allocation because of obduracy and sunk costs.	A habitat survey was carried out to inform the allocation in the OLP2036. The horse prevented the surveyor gaining full access to the site, so a best assessment was made from the edges. This was all clear in the supporting evidence for the OLP36. The intention with the surveys at local plan site allocation stage is to identify whether there is likely to be any 'showstopper' habitat interest that would likely prevent development. More detailed ecological assessment would then be needed to support any application. These will often need to include specialist species surveys. Since the allocation of the site, biodiversity assessments have taken place that have given more detailed information and have shown more ecological interest than was known about at the OLP36. The interest is particularly in terms of the specific species (invertebrates, badgers). At this point there is nothing to say conclusively that these species can't be translocated, or remaining habitats enhanced on site to make enhanced provision for them- or a combination of both.	None.
The site has no minimum housing allocation. The Council is therefore accepting that the site is so constrained that it may be unable to	The site is assumed to have a capacity of more than 10 units or it would not have been taken forward for an allocation. No minimum housing	None.

deliver any development in a sustainable and/or policy compliant manner. Allocation of the site is inconsistent with the OCC policy of not allocating sites where assessments show that they do not have the capacity for 10+ dwellings and the treatment of other sites on this basis (1 Pullens Lane, 2 Harberton Mead, Land off Harolde Close).	requirement is given in the policy to recognise the sensitivities of the site. An alternative might be to give a minimum capacity as 10, as the very least number that it is considered the site could deliver. However, there is a risk that this could be seen as harmful to the consideration of the live application, because it may be interpreted as saying that the number in that application is too high, which would be a premature assumption. Instead, no minimum number is given to enable full flexibility to respond to the sensitivities of the site in the most appropriate way should a future alternative application be brought forward.	
There are reasonable alternatives for housing in Oxford on brownfield sites designated for employment, which the draft Policy E1 allows to be brought forward for housing. It would be more effective to redesignate them for housing. There are many former retail sites that could be used for housing. Oxford does not need more hotels- make the sites available for social housing.	Policy E1 only protects Key Employment Sites, and even on these allows some housing. Known employment floorspace in the pipeline, mainly on these protected Key Employment Sites, is sufficient to meet employment needs. The Plan must consider employment land needs as well as housing. When identifying housing capacity, it is essential that this is well evidenced and each site must be considered developable, which means they are in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed for housing. When there are no indications that landowners are interested in reverting commercial sites to residential, and when viability evidence suggests many of these uses are currently of most value, an assumption that these sites will	None.

	come forward for housing can't be made. The commercial Use Class E is very broad and allows change to a lot of uses, which means policy can't simply require that these sites in lawful commercial use change to housing.	
Criteria i) and j) allow for decision-making to be made in a vacuum, enshrining a presumption in favour of development and not requiring applicants to submit adequate supporting information to allow the relevant material considerations to be identified and weighed into the decision-making process.	This comment is in reference to criteria i and j of Policy S1 and how they would impact the Meadow Lane site. These criteria simply repeat the NPPF approach, but to avoid that repetition a main modification has been proposed in response to other comments as well to delete those criteria.	Modifications made in response to comments to Policy S1.
The site is of value to the environment of the village as a whole. It will harm the amenity of existing and neighbouring uses (contrary to criterion f of Policy S1). People (from inside and outside) love the tranquility of Iffley and walk there often- please do not ruin it.	The approach to heritage in the NPPF and local plan is that the level of heritage harm must be balanced with the benefits of development. There is considered to be potential for a scheme that responds appropriately to its context and where any residual harm could be outweighed by benefits.	None.
The site is of biodiversity value. Offset requirements for loss of biodiversity and harm to protected species cannot be realistically met, given the lack of other potential ancient river meadow sites within the city. Thus development will lead to a net loss of biodiversity (contrary to policy G4). The Council now accepts it is of at least City Wildlife Site status, and that's what it should be designated and zoned as if the Council is not to depart from its own policies and objectives of the OLP2045.	The site does have biodiversity value. At the current time there is no reason to assume that it is not possible for proposals to come forward that would mitigate and compensate for any loss as a result of proposals, either onsite or sufficiently locally to preserve the features of interest.	None.
The site is an ancient meadow of local heritage significance important for biodiversity and the	It is not considered the case that a development could not come forward that	None.

conservation area. Contrary to criterion h of S1 it does not take account of local historic context or respond appropriately to heritage significance. Development would be contrary to HD3 as it will negatively affect the Iffley Village Conservation Area, especially the setting and views from Church Way noted in the Conservation Area Appraisal. The site is an extremely rare survival of East Oxford's agricultural history and use and illustrates the life of the working classes in Iffley. Agriculture was the main economy. There is intervisibility with nearby listed buildings.	responds appropriately to the heritage significance of the site. The policy gives guidance on some key considerations to ensure this, such as the need for low density and spaces between buildings, allowing views to and from the wider countryside and integrating green features as appropriate to the semi-rural character of the Iffley Conservation Area.	
The development would have a negative impact on an important blue and green infrastructure network and result in loss of flood plain (contrary to criterion g) of Policy S1. It would also be contrary to Policy G6 and Policy G3 as it would be loss of a high scoring urban greening factor area and would have inevitable negative impact on the Iffley Meadows SSSI.	Development would need to comply with policy G7 in relation to flood risk. The area of flood risk is on the western side of the site alongside the small watercourse, which requires a buffer. The area of functional floodplain cannot be developed.	None.
Reducing the area of the remaining Thames flood plain increases flood risks for existing residents in at risk zones and exposes future residents to flood risk. The site is Flood Zone 3b and will likely become more vulnerable with climate change. It is inconsistent with policy G7. There is an ongoing objection from the Environment Agency.	Sites are always classed as being in the flood zone of the highest risk area within the site. There is only a very tiny amount of Flood Zone 3b however, and this will need to be avoided by development. The policy is clear that a sequential approach should be taken to siting development and that a site-specific Floor Risk Assessment will be required.	None.
Access is difficult, along winding, narrow lanes with poor sight lines, and would endanger users	The site would not be expected to generate any notable amount of traffic, but it is agreed it's important that there is safe access and egress.	None.

of the Principal Quiet Route for Active Travel along Meadow Lane and Church Way.	Potential accesses for all site allocations were discussed with the County Council as Highways Authority and they did not raise concerns with the principle of allocation of this site, and they have not made a representation about this Policy SPS8. It is considered that the site can be accessed safely with minimal negative transport requirements. Meadow Lane is identified as an on-road quiet route in the LCWIP, but so are many other routes in Oxford that have significantly more development alongside than Meadow Lane, even if development takes place on this site.	
The low car concept is a poor solution to road traffic will give very real problems in travel to work, school or hospitals. Public transport does not cover those who work outside the ring road or those who work night shifts. It is bad for the elderly or infirm.	Iffley is well connected, with good walking and cycling routes and access to public transport. Some parking, including disabled parking, will be required.	None.
The area is currently subject to a BBOWT's bid to use Heritage Lottery funding to benefit local schools and communities as part of 'Meadow School Iffley' for outdoor education. Use of this land for housing development would preclude this initiative of significant local benefit, and remove opportunities for outdoor education from future operations. There is interest from local schools to use this biodiverse, tranquil and enclosed site for outdoor education.	The plans and intentions to use this site for a forest school or similar cannot affect a decision on whether or not it should be allocated for housing. The plans may not come to fruition and would rely on landowner agreement. The site is not in use at all by members of the public and its last use was as an enclosed piece of grazing land for horses.	None.
A further complication and limiting factor is potential contamination.	This is noted in criterion n of Policy SPS8. There are not thought to be contamination issues of a	None.

	degree that would affect the ability of housing to come forward on the site.	
Local objection to development of the site is active and well-funded. It is important to distinguish between environmentalism and NIMBYism and to avoid assuming that all Iffley residents share the desire to keep this site as a field. I understand the urgent need for more affordable housing and Iffley should do its duty in enabling development of this land, which has, for many years, been used on for grazing ponies and sheep. The nearby Iffley Mead former school playing field is already designated for 90 homes at higher density, and has much more problematic access than SPS8, so displacing the housing planned for SPS8 to Iffley Mead is unrealistic.	Comment noted. It is agreed that increasing density at the Iffley Mead site can't be considered as an alternative to this site. Each site is considered on its own merits and the minimum housing numbers carefully considered to ensure they are realistic but reflect the strong need to deliver homes. Each site with potential for housing needs to be considered in the 'no stone left unturned approach to housing'.	None.
There is an all-too-familiar policy approach- here is a housing shortage, here is an empty space- let's put the two together. This has done great and lasting damage to Iffley and Oxford. Green open spaces in Oxford need to be valued as an amenity. 15 constraints have been identified [in the SA]- the highest number of any site in the OLP2045.	It is the case that the unmet housing need Oxford has meant that all attempts must be made to identify and allocate sites for housing if they are developable. That does not mean that any open space would be put forward or considered suitable. Each must be considered carefully on its merits. Some sites are more sensitive and have more constraints than others. However, if the landowner discussion suggests the site is likely to be available for housing in the plan period and if it is considered a scheme can come forward that responds to, mitigates or outweighs harms then the site is considered for allocation.	None.

The top end of the site, the memorial Field, was for many years a village amenity, and when the site was purchased for development it was promised that the field would remain undeveloped as a village amenity. It would be particularly useful as a public green space, of which there are few, and for a children's play park. Encroachment on the Memorial Field and blockage of public access should be forbidden i any development approval.	When the site was put forward for housing to the OLP2036 by the previous landowner it included the Memorial Field, but the decision was taken not to take that part of the site forward for allocation. The site is not part of the allocation in the OLP2036 or the draft allocation in the OLP2045. The site SPS8 is not large enough to generate a requirement for public open space itself. The memorial field is designated as part of the supporting Green Infrastructure Network, but not allocated for development.	None.
The proposed development gives the perfect opportunity to build a path through the development and the Memorial Field from Meadow Lane to Church Way to carry cycle and pedestrian traffic safely towards Rose hill and Iffley Lock whilst avoiding narrow and dangerous parts of Church Way. This should be a requirement.	The feasibility of this has not been tested and it does not seem as though it would be a requirement necessary to mitigate impacts of development of site SPS8.	None.
Natural England has made a representation relating to Policy SPS8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

3073

Policy SPS9: Littlemore Mental Health Centre

No representations received against this policy.

Policy SPS10: Mini Plant Oxford

POLICY	SPS10
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPS10		
All respondents **raising objections** on this policy/chapter	51.5	81.15	138.46

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The MINI Plant is a constrained brownfield site. As such, it will be challenging to meet urban greening factor requirements through new development proposals. It should not be mandatory to meet a specific amount but to show how urban greening has been considered in the development of a planning application. We suggest the following modification to bullet point a): *a) Proposals should include additional greening onsite to help meet the Urban Greening Factor target <u>where feasible</u> and maximise the other functional benefits this can provide...*	The targets set as part of policy G3 are more conservative than the recommended standards set by Natural England as the Council recognises that there can be challenges with delivering greening on some constrained sites in the city. Applicants have flexibility in how they meet the targets depending on the context of the site and can utilise a range of greening measures to meet the required score. We do not consider that this modification is justified.	None
Sensitivity around heights is an important element in this location but the MINI Plant requires certain heights of buildings to allow for the effective operation of the site. We suggest the following modification to bullet point e):	The prior criterion to this one in the allocation already sets out that building design and arrangement will need to be guided by operational needs of the site, as such, we do	None

e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar and on the approach, so as to reduce feelings of overbearing and dominating of the adjacent streetscape. <u>However these considerations will also need to be balanced with the operational needs of the site.</u> Variations in materials...	not consider that this needs to be repeated again.	
Historic England has made a representation relating to Policy SPS10, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
A total waffle-fest. Good identification of issues, but no targets are set. A more robust policy is required to reduce surfacewater runoff from the very large number of hard surfaces (Red), particularly as the complex is close to the Oxford Sewage Treatment Works (Thames Water). Policy should be amended to ask for reduction in surface runoff with SUDS etc.	The policies of the Local Plan need to be read as a whole and surface water run off is already addressed through overarching policy G8 (SuDS) and G7 (flood risk). Other policies like those relating to green infrastructure provision are also important for helping to reduce run off.	None

3075

Policy SPS11: Overflow car Park at Kassam Stadium

POLICY	**SPS11**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPS11**

All respondents **raising objections** on this policy/chapter	30.17	57.19	81.16	129.2	89.4

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is positive that the draft policy states that a flexible approach will be taken to how required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall. However, this is important not just in relation to housing numbers, but other considerations such as facilities available for use by members of the public at affordable prices, primary care provision and small retail outlets and ensuring there is suitable land for an integrated transport/mobility hub close to the proposed station on the Cowley Branch Line.	The proposed Cowley Branchline Station is slightly removed from and of the Kassam site allocations, and a transport/mobility hub would not be required on these sites, especially given that the closest site (the overflow car park) would essentially be a dead end for vehicles and would not be a good location for a transport hub. Other considerations are dependent. Wording in the policy says that a flexible approach will be taken to how required uses are considered across the sites, not just housing numbers.	None.
The draft policy states that planning permission will be granted for redevelopment even though Oxford United FC are currently resident at the stadium and have nowhere to move to at the current time. It should be a condition of any planning application that OUFC would be able to stay at the Kassam.	It is agreed that the car park should not be developed if it is required to support the use of the Kassam Stadium. Therefore, a modification is proposed.	Planning permission will be granted for residential-led development and public open space on the Overflow Car Park at Kassam Stadium site, if the car park is no longer needed to support the use of the Kassam Stadium.
The replacement of local community facilities should be a condition of any proposed development.	There are no local community facilities on this site to be replaced.	None.

The landowner, Firoka, supports the flexible approach to how required uses are spread across is sites in the plan, but SPS11 does not explicitly establish this approach and it is therefore requested that Policy SPS11 mirrors the wording of Policy SPS7 in relation to acceptable uses to ensure clarity regarding the distribution of uses across the two linked allocations.	The draft policy already does include the wording: 'This site is linked to SPS7 and SPS13, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall.'	None.
Policy SPS11 identifies the potential for a restrictee access from Priorty Road. The landowner, Firoka, says taht there are many potential design solutions for reducing the dominance of private vehicle circulation and impact and current design work has not been sufficiently progressed to evidence the need for a restricted access on site. Requiring a restricted access at this stage risks pre-empting the outcome of detailed transport strategy and masterplanning.	Priory Road, beyond the eastern branch off to serve the houses to the north of the site, does not accommodate vehicles. The road at that point could not feasibly become suitable and an unrestricted vehicular route. It is extremely narrow, without obvious potential for widening, and even if that were possible outside the site, the very narrow width of the tunnel under the Branch Line would severely restrict the potential for the road to become a general access road to serve the site. Reference is only made. The assumption for main vehicular access to this site has always been that it would need to come over the bridge from the south. The draft policy is not overly restrictive but simply reflects the practical reality. The narrowness of the tunnel may rule out use by servicing vehicles, but the benefits of those mean it should be investigated as firmer proposals are developed.	None.
Historic England has made a representation relating to Policy SPS11, which is summarised	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

and responded to in the Statement of Common Ground.		
Oxfordshire County Council has made a representation relating to Policy SPS11, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS12: Oxford Science Park

POLICY	SPS12
All respondents **supporting** policy	130.11

COMMENT SUMMARY	OFFICER RESPONSE
Support the continued allocation of the site for employment and being appropriate for development or redevelopment that modernises and intensifies the employment provision. Welcomes reference to portions of the allocation suitable for higher buildings, notably the central and eastern part of site, closest to the Kassam Stadium and Leisure Complex, while noting the need to respond to the setting of the Grade II* listed Minchery Farmhouse. There is huge potential for intensification of employment floorspace at the Park with the site uniquely positioned to deliver future employment floorspace situated adjacent to a future train station along the CBL and in close proximity residential-led site allocations able to deliver significant residential units to support local housing needs of those employed by companies based at the Park, such as the Kassam Stadium site and overflow car-park site to the east and South Oxfordshire Science Village to the south.	Support is welcomed.

POLICY	SPS12				
All respondents **raising objections** on this policy/chapter	81.7	89.26	104.8	137.1	138.47
	140.6				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Environment Agency has made a representation relating to Policy SPS12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Historic England has made a representation relating to Policy SPS12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPS12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Residential component must be mandatory or it is unjustified to increase employment without adequate contribution to housing.	Oxford Science Park is designated as a Key Employment Site, which Policy E1 defines as "Include nationally and regionally important employment sites that make a significant contribution to the knowledge economy, are significant employers or provide important local services". As such, the priority use for the site is for development of research and development and office employment uses (Class E) that directly relate to Oxford's key sectors of research-led employment, but Policy SPS12 also allows for an element of residential.	None
Minchery Farm is the location of the infamous medieval Littlemore Nunnery and has very high potential for archaeological remains. This site is adjacent to Oxford Sewage Water Treatment Plant.	SPS12 references the Minchery Farmhouse, and the need to respond to the setting of it. Amenity impacts are addressed in Policy R8, which specifically references developments in proximity to the Sewage Treatment Works.	None

Generally supportive of site allocation but propose the following amendments to facilitate the necessary delivery of new footbridges across the Brook to improve permeability from the Science Park to, for example, Littlemore House: (d) With the exception of new footbridges to improve connectivity, A 10-metre buffer to the Brook should be maintained... (e) Parts of the site are Flood Zone 3b, mainly along the Brook, and, with the exception of new footbridges across the Brook, a sequential approach should be taken to locating development on the site. Also given the nature of EIT's intended use of the Science Park, it would not be appropriate in security terms to have areas of open space which are accessible to the public, propose the following amend: (g) "Proposals should enhance and increase the public realm and landscaping of the Science Park, including, where possible, the creation of new ~~public~~ open spaces	The 10m buffer is a requirement to meet Policy G2 Enhancement and Provision of new Green and Blue Features, which is also relevant to Policy G7 Flood Risk and Flood Risk Assessments and has been supported by the Environment Agency. A footbridge has not been identified as essential by the Environment Agency, but that does not preclude an applicant making a case for a footbridge/bridges as part of a planning application.	None

3080

Policy SPS13: Ozone Leisure Park and Minchery Farmhouse

POLICY	**SPS13**

All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	**SPS13**				
All respondents **raising objections** on this policy/chapter	30.18	57.18	81.18	140.7	138.48
	104.5				

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
There should be a more strategic vision for linked areas and developments proposed for south of Grenoble Road.	The draft policy CBLAOF of the Oxford Local Plan does look to steer development across this area, setting out a number of criteria to guide development to meet the needs of the area, even when it is taking place on different sites, with different landowners and timescales. Furthermore, the Cowley Branch Line Densification Study looks across the whole area around the Cowley Branch Line. Download Cowley Branch Line Densification Study Stage 2 | Oxford City Council	None
The policy should be altered to take into account that there may be unavoidable delays to development of the new stadium for Oxford United.	This site does not affect the functioning of the football stadium and it is not considered that the policy needs to reference potential delays to the replacement stadium.	None
The replacement of local community facilities should be a condition of any proposed development.	The Policy does say: 'In accordance with Policy C5 community commercial leisure uses should be re-provided...'	None
This site is 3ha, which could be allocated for homes. Policy E1 must be less restrictive in order to allow this.	Policy E1 does not prevent this happening. The Ozone Leisure Park is not a key employment site. However, Policy E1 does also reflect that	None

	employment may come forward not only on existing sites and in the centres, but also at sites already in lawful use for the proposed employment use. The Government introduced Use Class E in 2020, which applies to a very broad range of commercial uses. That means that the Ozone Leisure park already includes Use Class E and much of it is in lawful use for many employment uses.	
The site is within close proximity of Oxford Sewage Treatment Works. Therefore, any redevelopment proposals will need to be assessed and mitigated in compliance with Policy R8 in relation to odour from sewage treatment works.	Noted that Policy R8 may apply in this case.	None
Minchery Farm is the location of the medieval Littlemore Nunnery and has very high potential for archaeological remains.	The Grade II* listed Farmhouse was the dormitory range of the Littlemore Priory. It is noted in the fact box relating to the policy that the site: *Contains Minchery Farmhouse Grade II* listed building. Potential for prehistoric, Roman and medieval archaeology.* Criterion J of the policy also requires that: *Archaeological potential will need to be explored as part of any proposed redevelopment (Policy HD5)*	None
Historic England has made a representation relating to Policy SPS13, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPS13, which is	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

summarised and responded to in the Statement of Common Ground.		

Policy SPS14: Redbridge Paddock

POLICY	SPS14
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPS14			
All respondents **raising objections** on this policy/chapter	57.19	90.12	138.49	104.18

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
CPRE is concerned that this site, until recently designated as Green Belt, has considerable biodiversity value. It is rewilded and there is an undisturbed and dark riverside habitat as part of the Thames corridor.	The site was removed from the Green Belt through the Oxford Local Plan 2036 process. Criterion f) of the draft policy, carried forward from OLP36, therefore sets out that 'Compensatory improvements should be made to the surrounding areas of remaining Green belt in accordance with the identification of Opportunities to Enhance the Beneficial Use of the Green Belt Land Report (LUC 2018). A 10m buffer is required to the river. Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. A phase 1 habitat survey was carried out to inform the OLP36,	None.

	which did not identify significant habitat that would prevent development of the site. Further biodiversity work to inform the application has not highlighted biodiversity of a value that would be difficult to compensate for.	
The former landfill site has waste to a depth of over 6m and contaminants may be disturbed and pollute river and groundwater. There may be adverse impacts on the SSSI on the opposite riverbank.	Of course the former use as a landfill will have created contamination, which will need to be remediated. Work to understand the contamination and identify suitable remediation has taken place over a long time period to inform development of a planning application. This has confirmed there is a feasible solution to the issue. The Policy, in criterion p, is very clear that proposals '...will need to demonstrate how contamination issues arising from this former landfill site will be resolved.'	None.
The site should not be allocated as it is next to Cowley and East Oxford, with the least amount of green space per inhabitant in Oxford.	It is unclear what study is being referred to. It should be noted that the site is within the New Hinksey area of the 2022 Green Infrastructure Study (which is not identified as having a shortage). In terms of accessibility of green space, the study is concerned with distances to publicly accessible amenity green space, parks and accessible open space. This site is an inaccessible private space. Development on the site would be required to bring forward public open space.	None.
Heritage and amenity must be preserved; the paddock is a very visually attractive gateway to the city.	The key heritage consideration of this site is that it is visible from Iffley Conservation Area and that there is potential archaeology. The policy also notes that design should be sensitive	None.

	to the broader landscape setting (criterion j). The site is an important gateway site, but it is considered that a development can come forward that responds well to this context. Criterion i says: 'It is important that this gateway site into the city centre is designed to give a clear identity.	
The Environment Agency has made a representation relating to Policy SPS14, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy SPS14, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS15: Sandy Lane Recreation Ground

POLICY	**SPS15**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPS15**		
All respondents **raising objections** on this policy/chapter	81.19	85.19	138.5

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Historic England have made representations against policy SPS15, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Sport England have made representations against policy SPS15, these are addressed through the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Should not be allocated, as site is located next to Cowley and East Oxford with least amount of green space per inhabitant in Oxford and this land is required for increasing population and any replacement sport facilities from Cowley/Littlemore.	The allocation requires any development to meet requirements for new open space (as per policy G2), as well as protected green infrastructure (as per policy G1). It also sets out expectations for how reprovision of any lost sports facilities should be addressed.	No further change proposed.

Policy SPS16: Templars Square

3086

POLICY	SPS16
All respondents **supporting** policy	30.19

COMMENT SUMMARY	OFFICER RESPONSE
Particularly welcome the inclusion of community facilities and medical healthcare facilities among the range of possible uses.	Support is welcomed.

POLICY	SPS16				
All respondents **raising objections** on this policy/chapter	47.2	81.2	115.6	89.27	136.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is noted that the policy requires Templars Square to continue to function as a district centre. However, there is a risk that the combination of reduced parking, nearby LTNs and potential future congestion charging could cumulatively reduce accessibility for some user groups and undermine the centre's role. The policy does not define what level of public parking is considered 'enough' for a district centre that serves a wide catchment, nor how impacts on disabled users, older people families with children and those carrying bulk shopping will be assessed. There should be clearer safeguards and evidence to ensure the centre is supported.	Currently, there is a very large amount of public parking, some of which is not in use, and there is considerable scope to reduce this and make better use of the space. The suitable level of parking will depend on the precise nature of the proposals and will need to be determined when there are detailed proposals, on the basis of the wider transport context at the time. Quality of the public realm and movement for pedestrians, wheelers and public transport access are also important to the success of the centre.	None.
The breadth of uses supported by the policy is positive, but the policy does not give explicit guidance on retaining essential day to day services, e.g. convenience food, pharmacy, banking, post office, affordable cafes, that underpin the centres role for less mobile and lower income households. If housing and higher value commercial uses drive up rents or displace basic retain and service functions then residents may have to travel further afield for weekly shopping and essential services, potentially conflicting with the NPPF aim of supporting local centres and reducing the need to travel.	Many of the uses listed fall into the same use class in the Use Class Order. The planning system cannot control the nature of the user within the suitable use (for example it clearly can't ensure cheaper rather than dearer cafes or food outlets or supermarkets). The policy, whilst allowing a significant amount of new retail, does protect the overall district centre function of the site.	None.
The BNP Paribas Viability Assessment for the Plan recognises that there is no 'particular level	The BNP Paribas Viability Assessment simply acknowledges that there is stark variability in	None.

of affordable housing that most schemes can deliver' and it recommends a 40% target, and says 'site-specific circumstances' must be taken into account. The document does not comment on the viability implications for schemes where there is reprovision of existing affordable housing proposed. Policy SPS16 should specifically recognise that affordable housing requirements will be determined through a site-specific approach. This is in line with the viability assessment recommendations.	viability for residential depending on the location, the nature of the proposed scheme and the existing use. It is therefore necessary to apply some judgement. There is no attempt, for example, to make conversion of R&D to residential affordable, because in many cases, even with 0% affordable housing, it simply won't be. The 40% level is expected to be generally achievable for the types of schemes likely to come forward and expected in the Plan. Policy S4 already allows applicants to demonstrate particular circumstances that justify a need for a viability assessment to inform negotiations about a reduced level or different tenure split of affordable housing, working through the cascade.	
Policy SPS16 should recognise that the redevelopment will result in a reduction of retail floorspace, and residential will be the primary use. The vacant units reflect the changing consumer habits since Covid-19, which, alongside urgent housing need, no longer allows retail uses to take precedence in district centres. Their vitality depends on a suitable blend of uses. The draft policy requires active frontages at ground floor level and this could be understood as site-specific recognition that the residential frontage can also be 'active'. If this is not the case, this should be clarified. The policies map suggests internal areas of the shopping centre are 'District Centre Active Frontage' but an active frontage is an	The policy is not framed in terms of retail floorspace or retail frontages in acknowledgement of the changes to the Use Class Order to commercial Use Class E and also the changing nature of district centres. The policy says that planning permission will be granted for a 'mixed-sed development' that supports the ongoing role as a key part of the Cowley District Centre but that also delivers a 'significant amount of new residential development'. It goes on to say that alongside residential, development should include town centre uses that provide active frontages at ground floor level. Retail is listed as one of a wide range of town centre uses that may be delivered.	None.

outward and street-facing unit/frontage. Therefore, this should be aligned with outward facing active units only. The landowner (ORVIL) can assist with defining existing active frontages.	In terms of the active frontage, the policies says that active frontages will be required along 'identified principal routes'. This acknowledges that these may well be along the outside edges facing the existing main roads, but that there should be a principal route with active frontages that cuts through the middle of the development, ensuring people are drawn into and through the site. This is considered important to the successful long-term redevelopment of the centre. However, this means there is full acknowledgement that the redevelopment will not simply be expected to take forward the same placement or amount of active frontage as now, and that identifying them after redevelopment will be led by the design of the development; it is just important that that does include a principal route through the site. Being that it will be a principal route, it is not considered it would act like an 'internal' space. Within the active frontage there will be options for a wide range of town centre uses at the ground floor, far from being restricted to just retail. Also, the percentage thresholds means non-active uses can be interspersed within it (e.g. residential entrances if some of those need to be act ground floor facing the principal route/s). There is therefore no need to weaken the definition of an active frontage by including residential within it.	

The policy should acknowledge deliverability considerations that require a phased approach to be taken.	Policy SPS16 does not preclude phased development. However, it could give a more explicit acknowledgement with an amendment to criterion d.	Proposed main modification to acknowledge the potential for phased development: d) A masterplan should be produced to help organise services, access, movement routes, landscape, public realm and heights across the site. It is important that any piecemeal development or any phasing of the delivery does not prejudice the overall aim of a comprehensive regeneration across the site.
Historic England has made a representation relating to Policy SPS16, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The ICB (now NHS Thames Valley) has made a representation relating to Policy SPS16, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPS16, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPS17: Unipart Site

POLICY	**SPS17**
All respondents **supporting** policy	117.7

COMMENT SUMMARY	OFFICER RESPONSE
The Regulation 19 Submission Draft included Areas of Focus for development, including the Cowley Branch Line, Littlemore and The Leys Area of Focus. This area contained several of the city's key employment sites with the Unipart Site adjacent to the Area of Focus. The site's acceptability for Industrial (Class B2), and Storage or Distribution (Class B8) uses with ancillary offices, together with Research and Industrial Processes (Class E) uses and other complementary uses is supported. Logicor are also exploring measures to currently improve the use of the site and the policy principles and site-specific requirements of Policy SPS17 remain consistent and are considered acceptable.	The Reg. 19 Proposed Submission draft for the Oxford Local Plan 2045 refers to this Area of Focus (AOF) as the Cowley Branch Line AOF. The Unipart site is included within the Cowley Branch Line AOF in the Oxford Local Plan 2045. Support for mix of uses is welcomed. We note that the policy principles and site-specific requirements are considered acceptable.

3091

POLICY	SPS17	
All respondents **raising objections** on this policy/chapter	57.2	81.21

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Site has been subject to an allocation since 2016 without much change in the meantime. Most of the site is used for parking or storage. It represents a huge failure to redevelop what is effectively a Brownfield site and a large one. Oxford City Council provides no explanation as to why this is. Could have housed the proposed Oxford United Football stadium instead of building this on the Green Belt.	As part of developing the Local Plan 2045, confirmation has been sought from landowners as to their intentions for bringing forward sites that are subject to an allocation, which is important for demonstrating that the allocation is deliverable. However, while an allocation increases certainty for landowners/ developers bringing forward sites, the Local Plan itself cannot force development to come forward. The	No further change proposed.

Other options like increase in business rates for sites like this would encourage owners to progress redevelopment. Pointless to designate sites like this solely for employment use when there is apparently no interest in developing them for such purposes and an affordable homes crisis in the City. Should be stated that residential use of this site is appropriate. This site is 30.63 hectares which could all be allocated for homes. Policy E1 must be less restrictive to allow this	Unipart site itself is likely to play an important role in helping the city to meet its identified employment land needs. Business rates are governed by their own set of processes and legislation. It is not within the scope of the planning system to make changes to business rates. While Policy E1 does protect Key Employment Sites, it also introduces a permissive approach to housing delivery whereby landowners/developers can, if they choose, bring forward proposals for housing at Key Employment Sites, subject certain policy criteria being met. See officer response to Policy E1 for further details.	
Historic England has made a representation relating to Policy SPS17, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

3092

Policy MRORAOF: Marston Road and Old Road Area of Focus

POLICY	MRORAOF
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	MRORAOF				
All respondents **raising objections** on this policy/chapter	47.21	93.1	105.6	106.1	138.53

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Text of the policy emphasises the need to manage commuter parking and to expand CPZ coverage around major employment and education sites. There is limited publicly available evidence within the Plan grappling with transport implications e.g. how design of CPZ will benefit local residents/businesses; how access for patients, carers, tradespeople and those with irregular working hours will be maintained as hospital and university activity intensifies; how displacement risks will be assessed at the area wide scale; what complementary measures will be used to avoid creating new congestion or safety issues on adjacent streets etc. A stronger link between MRORAOF and supporting highway/traffic evidence would help demonstrate that this test is met. Several suggestions made relating to how to address this point, including that the policy should: – include explicit reference in the supporting text to the transport, parking and environmental evidence that underpins the AoF (e.g. area wide modelling, parking surveys, air quality assessments).	The Area of Focus policies set out broad spatial considerations relevant to the area which could be applicable to multiple development sites. Unlike the more detailed site allocations policies, it does not set out details like minimum housing numbers, or specific site requirements, and its considerations are therefore much more general as they need to apply to a much larger area and a more varied set of development proposals. As such, they are not supported by the types of assessments suggested in the comment, nor would it be feasible to undertake them at Local Plan stage. Whilst the Local Plan has limited influence over transport management, Policy C6 sets out requirements for transport assessments and travel plans which it requires to be submitted for development that is likely to generate significant amounts of movement. This policy includes criteria that require the needs of people with disabilities and reduced mobility in relation to all modes of transport to be addressed. Meanwhile, policies C7 and C8 set out standards required for cycling provision and motor vehicle parking. These policies will	No further change proposed.

– require that development proposals and any CPZ expansion in the MRORAOF area be supported by Transport Assessments that consider cumulative impacts e.g. traffic displacement to adjacent streets and effects on air quality and noise. – clarify that CPZ design must ensure adequate, affordable permit and visitor provision for local residents, carers, patients and service users, with particular regard to those with disabilities or mobility impairments.	apply to applicable development within the AoF alongside this policy and as such, they do not need to be repeated in here. We respond on the matter of CPZs below.	
On CPZ and safeguarding Community Facilities Include a criterion that CPZs and traffic measures around key community assets (such as community halls, schools, health centres and local shops) should be designed to maintain reasonable short stay and blue badge access, with time limited bays or shared use arrangements where appropriate. Encourage a phased or pilot approach to new CPZs or traffic restrictions within MRORAOF, with monitoring of traffic, parking and environmental indicators, and a clear mechanism for adjusting measures if unacceptable displacement or access problems arise.	Controlled Parking Zones (CPZs) are designed, managed and maintained by the local highways authority, which sits under Oxfordshire County Council. As such, the Local Plan has no influence on how these are designed and they are not addressed in the AoF policy. Nevertheless, applicants will need to consider the requirements of policy C6 alongside this policy and, as set out above, this policy sets requirements for transport assessments and travel plans and includes criteria requiring needs of people with disabilities and reduced mobility in relation to all modes of transport are addressed.	No further change proposed.
AoF includes, or is adjacent to, several large development sites (for example along Old Road and Marston Road) that will generate construction and service traffic as they are built out. MRORAOF does not explicitly address: implications of this (e.g. where construction	Whilst the point is acknowledged, construction management plans are a requirement of policy C6, which would be applicable in or out of the AoF, as such there is no need for this to be repeated.	No further change proposed.

workers will park, how transport will be impacted by temporary transport restrictions/measures. Additional clarity in MRORAOF on construction and servicing strategies would improve confidence in deliverability. – To address, policy should Require that major development proposals within the AoF include a construction and servicing parking strategy, demonstrating how contractor and service vehicles will be managed without causing unsafe or illegal parking on surrounding streets.		
The policy needs to address environmental health impacts more. AoF's seeks to support access to major health facilities, and refers to the need to improve active travel connections and public transport, and the Plan overall aims to improve air quality and reduce carbon emissions. If parking controls and route restrictions displace traffic or cause longer diversions, there is a risk of localised increases in: traffic volumes on certain streets, noise and air pollution, and perceived severance for pedestrians and cyclists. – Policy should include environmental and health safeguards e.g. requiring that significant changes to traffic patterns or parking controls within the AoF be subject to proportionate air quality and noise assessment, with mitigation (e.g. traffic calming, planting, low emission bus routes) where risks are identified. – Should commit to ongoing engagement with residents and stakeholders,	Similar to the above, these issues should be picked up through Policy C6's construction management plans requirements. Additionally, other policies in the Local Plan are also of relevance, including Policy R4 (which addresses Air Quality impacts and requirements for air quality assessment), and Policy R8 (which seeks to ensure development mitigates impacts on environmental health and amenity).	No further change proposed.

including hospitals, universities, parish councils and community groups, to review the effectiveness of measures and ensure they continue to support both sustainable transport and local accessibility.		
The AOF needs to better grapple with the cumulative impacts of development across the three allocations (SPE3; SPE6 and SPE11) within its boundaries and should be brought together in the plan to make clear their geographical proximity. A range of cummulative impacts that need to be considered are highlighted including: – Impact of 160 additional dwellings/or student rooms equivalent, needs to be recognised in the provision of sufficient infrastructure/facilities (e.g. additional demand on buses, local shops, pharmacies, doctors and dentists). – Impacts on the SSSI, including consideration of how mitigation in one area could impact mitigation needed/already delivered in another area. Also how this would affect sewage system and knock on impacts to SSSI. – Exacerbating already present flood risk (e.g. Ferry Road quoted as example of area already susceptible). – Also need to consider currently unknown future intentions of development on other sites such as the Clive Booth	The purpose of the Area of Focus policies is to set out broader considerations that could apply to any development coming forward within the area, including with consideration for the existing character and sensitivities of the area. Where particular site allocations are included, these then provide more site-specific requirements which are informed by evidence such as the site capacity assessments (included in the evidence base). We have sought to ensure that the MRORAOF policy references many of the sensitivities picked up in these comments, e.g. sensitivities of the SSSIs, the historic environment etc. The three allocations referenced also discuss these issues in greater detail in the specific context of those sites. There are then other policies in the Local Plan which will also apply, e.g. Policies G6 (protecting biodiversity), G7 and G8 (flood risk and SuDS), HD3-5 (heritage assets). Whilst the impacts of each proposal need to be considered on their own merits, as and when they come forward, this policy framework is also intended to help mitigate negative cumulative impacts across the wider area as far as possible through the Local Plan process.	No further change proposed.

3096

student village and how this could further impact infrastructure/services. – Impacts on the conservation area of this development (and future development), as well as on green infrastructure in the area. The three sites need to be developed in a way that reflects the character of the area described in the draft plan, and to provide a coherent – though not uniform – frontage to the Marston Road.		
Welcome the inclusion of this policy which notes the qualities of the area and seeks positive change, however, with regard to the intention to stimulate sustainable development, the policy would be improved by modifying the description of the area removing references to 'rural' character which are inaccurate. Whilst the policy's description of the area as 'green' is representative, we do not feel the reference to 'rural' reflects its character and may hinder efficient use of land desired by the Council. The area's verdant character formed by mature trees and parkland in the vicinity part of the patchwork of the city, rather than countryside. This is particularly so in the context of the redevelopment of Oxford Brookes' student accommodation adjacent to Cuckoo Lane (ref. 21/01185/FUL) which features blocks up to six storeys in height. The reference to a rural character should be omitted to ensure development policies in this area are effective	Whilst it is acknowledged that there is some subjectivity to how the area could be described, and that the nature of the area varies somewhat, our analysis and the text in criterion g) of the policy is supported by the Oxford Landscape Character Assessment (see addendum produced in 2022) which generally describes the area in and around Cuckoo Lane in this way (e.g. see 7A Headington Hill). The description of the wider AoF in the supporting text does not suggest that the entire area is 'rural' in character, however.	No further change proposed

and the plan is sound. This change will not undermine the purpose of the policy or desire to maintain the green character but will remove a potential barrier to beneficial development.		
Incorporating green spaces such as Headington Hill Park, South Park and affects the Lye Valley is unjustified and ineffective. These are also identified as core green spaces, whilst the AoF states that permission will be granted for new development within the AoF, and this leads to confusion as to which policy (either G1 or the AoF) prevails. Difficult to understand the logic of incorporating public green space unless to allow building on green spaces or to privatise it.	The policies of the Local Plan need to be read as a whole, as such both apply. The inclusion of the green spaces within the AoF does not mean they are being suggested as development opportunities. They form an important part of the wider local context for any development proposed within the AoF as such it is not considered appropriate to cut them out of the AoF boundaries.	No further change proposed.
Seeking "opportunities" to "consolidate and reduce" car parking is meaningless without clear objectives set is ineffective	It is considered important to ensure that opportunities are sought to reduce car parking in the AoF.	No further change proposed.
Policy is nonsensical linking different sites and areas that have nothing to do with each other with different constraints.	The Council considers this to be an area where change is anticipated over the plan period resulting from new developments in the locality. There are also various sensitivities – e.g. the proximity to the SSSIs and various heritage assets which need to be considered. As such, it is considered important to set out some broad considerations through the AoF policy which can help guide these changes in an appropriate way.	No further change proposed.
The policy should be amended to more clearly reflect the emphasis on densification and the more efficient use of land highlighted in the supporting text. In particular, the policy should acknowledge the opportunities identified within	There is no need to repeat this in the policy. The emphasis on efficient use of land is repeated throughout the plan, and particularly within Policy S2 (High Quality Design).	None

the Area of Focus to make more efficient use of land.		
The Site Allocation policies for Oxford Brookes; Old Road Campus; and Clive Booth Hall have disappeared. These addressed specific site constraints and this is unjustified and unsound as each site has its own constraints (e.g. Old Road Campus has recently had a nearly 500 space underground car park approved although immediately above Cowley Marsh and the Lye Valley South Fen).	Previous allocations in the existing Local Plan do not need to be automatically carried forward into the new Local Plan and their absence does not impact the function of this policy. Indeed, where allocations are present (or not), the AoF policy is a separate consideration for applications coming forward within its boundaries. For reference, development at Clive Booth Hall/Oxford Brookes is already underway and Old Road Campus is a key employment site, as such, applications on the site would be addressed through Policy E1.	No further change proposed.
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 (eg: John Radcliffe), Pullen's Lane, Headington Schools, Gov and Harcourt, Oxford Brookes) or be a separate policy, it extends well beyond the MRORAOF area so is ineffective and unsound, muddled.	The AoF already references Cuckoo Lane and as such this would need to be considered where relevant for any development site within the AoF boundaries. Additionally, as a non-designated heritage asset, this would need to be considered through the overarching Policy HD4 – including for applications outside of the AoF.	No further change proposed.

3099

Policy SPE1: Churchill Hospital

POLICY	**SPE1**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE1**

All respondents **raising objections** on this policy/chapter	90.13	105.8	138.54

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Natural England has made a representation relating to Policy SPE1, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Amend criterion b) so that other suitable uses can have an operational and/or research link to hospital healthcare and education and not just operational and/or research link to this hospital.	The policy lists a number of uses linked to the hospital which we consider to be suitable and that the proposed amendment would be inappropriate.	None
Excessive parking provision is responsible for air quality, health and environmental issues caused by daily traffic congestion in Headington. Statements re: Lye Valley should not be included in this site policy but applied generally as discussed in response to G6 and G7. Reduce parking in exchange for further development. Criterion k) should be amended to "reduce car parking with no increase permitted". Add in "operational phase" to criterion d).	The site allocation policy wording is specific to the potential impacts of development at the Churchill Hospital site on the Lye Valley SSSI. It is included in addition to Policies G6 and G7. The policy wording is explicit in identifying that the site is currently dominated by surface level car parking and requires that this is rationalised to make the most efficient use of land. Development proposals will need to demonstrate how parking and car movement has been addressed and where reductions can be made. Criterion d) refers to both construction and the design of development proposals. This could be amended to provide greater clarity.	**Mod proposed to update of Policy SPE1 as follows:** *A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI. ~~and a~~ Additional protective and enhancement measures for river and wetland restoration, as required around the watercourse and ecological buffers zones (minimum 10metres from bank top), should form part of development proposals.*

Policy SPE2: East Oxford Bowls Club

POLICY	SPE2
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPE2				
All respondents **raising objections** on this policy/chapter	82.2	91.1	89.28	85.17	138.55

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The development on greenfield land is not justified. It would bring unnecessary environmental damage to the local GI network and conflict with the plan's own Policy S1 and harm the setting of the Bartlemas Conservation area (already damaged by housing at Sinnet Court). The Conservation Area Appraisal says that the rural 'undeveloped' character of Bartlemas is paramount to the area's significance and historic elements of seclusion and isolation should be preserved and enhanced. The 'countryside' setting of the listed Farmhouse and Chapel and open views across the area to Oriel Wood and the secluded character of Bartlemas lane and the allotments will be harmed by vegetation clearance, lighting, new access and traffic. The adjacent allotments are core green infrastructure.	The allocation of this site is considered to be justified. This site is considered to meet the test of being surplus to requirements in terms of its sports function. The bowls club folded over 20 years ago due to lack of interest and there has not been recent use of the fenced off site. The Oxford City biodiversity surveys 2025 included this site and did not find there was likely to be biodiversity interest that would prevent development. The fronts Cowley Road, and a significant green buffer to the historic buildings of Bartlemas would remain in the allotments.	None.

The landowner considers the site is unlikely to be capable of accommodating 10 dwellings, due to constraints such as it being in the conservation area and the presence of trees and hedges and need for qualitative improvements to GI. This reduces the developable area considerably from 0.3ha and is as low as 0.15ha. A flatted development is at odds with the surrounding character.	The Site Capacity Assessment sets out how the minimum capacity for this site was determined. This considers the constraints and features that should influence design and concludes in summary: The minimum capacity for the site has been calculated with the following assumptions: • Imitation of the block size to the east of the site, thereby tying into the Bartlemas Conservation Area within which the site sits (approx. 35dph). • Taking into account protected green infrastructure and areas at risk of surface water flooding in the developable site size. The capacity assumed is low and reflective of the characteristics of the site and its setting. Immediately southeast of the site (the other side of Batlemas Close) is a substantial terrace of 2-2.5 storey homes. Even as houses, this terrace style frontage could be continued at provide at least 10 homes, leaving room for retention of green space. Therefore, 10 units seems very achievable as a minimum.	None.
Cowley has the least green space provision per capita in the city. Removal of yet more green space is unjustified.	It is unclear which study is being referred to. It should be noted that the site is within the St Clement's area of the 2022 Green Infrastructure Study. In terms of accessibility of green space, the study is concerned with distances to parks and accessible open space. This site is a fully enclosed and inaccessible private space.	

Sport England has made a representation relating to Policy SPE2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPE2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE3: Government Buildings and Harcourt House

POLICY	SPE3
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE3				
All respondents **raising objections** on this policy/chapter	57.21	81.22	90.7	98.11	106.2
	89.29	138.56			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The two sites have remained vacant for many years, despite appearing in previous Local Plans and having high potential for redevelopment / housebuilding. A Compulsory Purchase Order should therefore be included in this policy; Policy E1 must be less restrictive to allow this.	The landowner has confirmed their intentions to develop the site. A Compulsory Purchase Order is not considered necessary and is not within the control of the Local Plan.	None.

Historic England have made a representation relating to Policy SPE3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy SPE3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Taken individually, sound, but the points made elsewhere regarding cumulative impact of other site allocations in the vicinity apply.	Comment on taking into account cumulative impacts of site allocations in the wider area has been addressed under the responses relating to the Marston Road and Old Road Area of Focus section of the consultation summary – refer to that section.	None
Support retention of uses set out under existing OLP2036 Policy SP16. Centre maintains aspiration to include commercial research and development use within site redevelopment.	The policy sets out that other complementary commercial uses will be considered on their merits.	None
Requirement for green space provision should be omitted as this is already addressed effectively in development management policies. Inspector of current Local Plan required removal of mandatory provision of on-site green space via site allocation policy.	Whilst the policy cross references to Policy G2, it then seeks to set out how the requirements could be achieved onsite. This is intended to be helpful to applicants in terms of what might be expected, but alternative approaches in order to meet the requirements of policy G2 would also be considered.	None.
Extensive, lengthy commentary lacks clarity and would be better expressed as supplementary guidance; this would also help differentiate between strict requirements and guidance.	The same structure is being followed across the site allocations. Whilst the criteria in the policy are more detailed in the absence of supporting text, this is generally because we have sought to include everything of relevance in the policy	None

	along with helpful guidance about how different requirements can be met.	
Oxfordshire County Council have made a representation relating to Policy SPE3, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Ineffective, as no specific amount of public space is mentioned.	The policy cross references to Policy G2 which includes requirements for the provision of new public open space for residential and mixed-use sites.	None
Unjustified, as no mention of the need to preserve the seclusion of Headington Hill Park. Watching brief required for the end of northern part of Cuckoo Lane, on the old Oxford City boundary	The urban design and heritage section of the policy sets out various requirements in terms of mitigating impacts upon the setting of the heritage assets, which includes the Headington Hill Conservation Area. Reference is made to the protection of the Headington Hill view cone and to mitigating amenity impacts on the setting of the Park. The summary box flags a range of notable heritage assets that are of relevance to the allocation, this includes Cuckoo Lane. Applicants would also need to consider impacts on this in relation to Policy HD4 (non-designated heritage assets) as it is listed on the OHAR. We have identified that it would be useful to incorporate a cross-reference to Policy HD4 alongside HD3 and propose to put this forward as a modification.	**Modification proposed to add an additional policy cross ref to non-designated heritage assets policy under criterion g), as follows:** *g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, taking opportunities to enhance these wherever possible (**Policy HD3 and HD4**).*

Peat and fen surveys are required at the site.	The policy notes that a biodiversity survey will be required to assess the ecological value of the site. Nonetheless, Policy G6 states that where there is a reasonable likelihood of harm or loss to protected species or natural/semi-natural habitats, targeted ecological surveys must be undertaken prior to the determination of any planning application.	None
A natural calcareous stream flows into Harcourt House from Headington Hill Park with water across the path after rain.	It is unclear what site-specific requirement would need to be incorporated in response to this point. Nevertheless, there are policies in the Local Plan that deal with mitigating impacts on watercourses, and for dealing with surface water flood risk (set out in chapter 4 and 5 of the Local Plan).	None

3106

Policy SPE4: Jesus College Sports Area

POLICY	SPE4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE4			
All respondents **raising objections** on this policy/chapter	36.3	82.3	126.3	85.13
	71.1	90.15	138.57	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Policy SPE4 is unsound because it could result in the loss or reduction of an established cricket	Policy SPE4 sets out in paragraph a) that the site is identified as supporting green	None.

facility that is actively used and forms part of Oxford's limited sporting infrastructure. The Local Plan does not clearly demonstrate that the loss of the playing field would be acceptable or that an equivalent replacement facility could realistically be provided within the city. The reduced sports field would not be large enough to support cricket matches. The retained sports pavilion at Lincoln College is unlikely to be sufficiently large for hosting sports matches concurrently at Lincoln and Jesus College sports grounds. The allocation may also conflict with national planning policy which seeks to protect existing sports facilities unless they are demonstrably surplus to requirements or replaced with equivalent provision in an appropriate location. Given the constrained nature of Oxford and the difficulty of delivering new playing fields, the loss of this facility could reduce opportunities for cricket participation. 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. The policy should be amended to ensure that the existing cricket facility and playing field are	infrastructure, therefore, development on the allocation site would need to demonstrate compliance with Policy G1 paragraph a) which relates to proposals that impact on outdoor sports including pitches. Any harm/loss will need to be mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. This approach is compliant with national policy. Policy SPE4 paragraph c) also provides some flexibility to consolidate sports provision with neighbouring sites but only where the same capacity to meet playing pitch needs can be demonstrated.	

retained unless an equivalent or better replacement cricket ground is delivered within Oxford prior to any loss of the existing facility. Also, Oxford City Council is requested to: 1. Protect existing cricket playing fields within the Local Plan framework. 2. Reconsider housing allocations that would result in the loss of operational cricket grounds unless appropriate replacement provision can be secured. 3. Work collaboratively with Oxfordshire Cricket, local clubs and Sport England to develop a long-term strategy for cricket facilities within the city. 4. Ensure that any development proposals affecting sports grounds provide replacement facilities that are: ● equivalent or better in quality ● accessible to existing users ● delivered prior to the loss of existing facilities.		
Natural England has made a representation relating to Policy SPE4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The allocated site would bring considerable, unnecessary, environmental damage to the local green infrastructure network and to the setting of Bartlemas Conservation Area and its associated heritage assets, also conflicting with Local Plan's own strategic policy S1 criteria f), g) and h). We are concerned about the cumulative	The site allocation policies SPE4 (Jesus College) and SPE7 (Lincoln College) have been carefully considered in relation to the historic setting and the potential cumulative impacts of development on these sites. This has resulted in carefully drawn site boundaries which provide a set back from the Bartlemas	None.

impact of development at these three sites on the character and special qualities of Bartlemas Conservation Area - which has already been adversely affected by development of student Housing at Sinnet Court on its north-west fringes some years ago. The Conservation Area represents a surviving fragment of Oxford's original farmed landscape setting. The Conservation Area Appraisal, describing the vulnerability of the Area, states that "The rural 'undeveloped' character of Bartlemas is paramount to the area's significance" and that "the historic elements of seclusion and isolation should be preserved and their characteristics enhanced".	Conservation Area and specific wording in relation to urban design and heritage.	
This allocation in its entirety is part of the protected G1B green infrastructure network therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	This requirement is set out in Policy G1 and in paragraphs a) and b) of Policy SPE4.	None.
Sport England has made a representation relating to Policy SPE4/SPE7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE5: John Radcliffe Hospital

POLICY	**SPE5**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE5		
All respondents **raising objections** on this policy/chapter	105.9	109.1	138.59

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Amend criterion b) so that other suitable uses can have an operational and/or research link to hospital healthcare and education and not just operational and/or research link to this hospital.	The policy lists a number of uses linked to the hospital which we consider to be suitable and that the proposed amendment would be inappropriate.	None
Unsound as not justified - Policy notes the location of part of the site in the conservation area and suggests a masterplan should be available so that new developments and related issues such as green infrastructure and parking can be addressed in the context of the whole. We would support an initiative to produce such a plan. Propose that the 'Open space, nature, flood risk' section be expanded to include consideration for the conservation area. Also propose that 'i' and 'j' under the 'movement and access' section could introduce a requirement for a site wide transport plan, which should include a policy to minimise the impact of traffic on OHCA and to align with county policies to reduce overall traffic numbers.	The policy wording is not considered to require amendments. The text in the box preceding the policy makes reference to some trees being protected by their location within the Old Headington Conservation Area (OHCA); it is not necessary to refer to the OHCA again in the 'Open space, nature, flood risk' section. Point j. includes reference to both a transport assessment and travel plan. These should be submitted in support of any major development proposals and cover the whole site. Comments acknowledged on the site capacity assessment.	Capacity Assessment updated with correct site photo and correct street name references.

Further comments on inaccuracies in the Site Capacity Assessment.		
Unsound as not justified or effective – the policy has no goals or objectives and excludes the main issues of parking levels and flooding. Policy has no targets to reduce parking provision to enable a more efficient use of land or address the climate change, environment and public health issue created by the hospital. Flood mitigation is NOT sufficient, reduction must be enforced. Thames Water and the Environment Agency, to establish the appropriate drainage mitigation measures for any development. Heritage statements are factually incorrect. Amendments suggested to make policy sound relate to parking, green space, heritage and flood risk.	Comments noted. The policy wording is not considered to require amendments.	None

Policy SPE6: Land Surrounding St Clement's Church

POLICY	**SPE6**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE6**		
All respondents **raising objections** on this policy/chapter	81.23	98.12	138.6

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**

Cumulative impacts and the need for coherent planning in the Marston Road should be considered. The road junction will be difficult on this congested point of the Marston Road and this will be worsened by cumulative impacts.	The scale of development expected, alongside the low level of parking expected by the parking standards (Policy C8) means that the site is not expected to cause significant traffic-generation. The site has been considered by Oxfordshire County Council, who have not raised highways concerns with the allocation. The policy carefully considers the most likely suitable access points.	None.
Care needs to be taken to avoid light-spill onto St Clement's Church at night; the illuminated church surrounded by dark woodland is a night-time features of the Marston Road. Harm should be avoided on ' Spires View' from South Parks.	The policy does refer to avoiding artificial light alongside the Cherwell and also by the church if it is found to support roosting bats. The policy notes the important heritage features that could be impacted by the development and requires design to respond carefully to these. The southern part of the site is in a view cone and this is noted. However, Historic England have also noted that the policy itself contains less detail about the heritage assets than some other policies.	Main Modification proposed to add more detail about heritage assets into the policy itself.
Adverse impact on the ecology of the Cherwell should be avoided. The site is too close to the floodplain of the Cherwell on the western side and cuts into the wildlife corridor of the Cherwell. Development should be avoided in FZ3a.	The policy says that habitats should be preserved and enhanced, with retention of trees and hedgerows where possible. The policy contains multiple criteria (a-i) relating to open space, nature and flood risk. The Policy acknowledges that: *'Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the*	None.

	suggested measures set out for this area. Refer to the LNRS mapping tool for further details.' In addition, a 10m buffer is required alongside the Cherwell. The area of flood risk is in the southwest part of the site, and the policy is clear that development should avoid this area.	
As the Marston SSSI is upstream of the site it is hard to understand how it could possibly affect it.	Because of the proximity to the SSSI and location immediately adjacent to the Cherwell this site is identified in the Source Pathway Receptor Analysis as having potential impacts on the SSSI. The New Marston Meadows SSSI is sensitive to changes in the flows and quality of water in the Cherwell due to being in its floodplain. It is not the case that a development can't have any upstream impacts on river flow.	None.
Historic England has made a representation relating to Policy SPE6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE7: Lincoln College Sports Ground

POLICY	**SPE7**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE7**		
All respondents **raising objections** on this policy/chapter	36.4	126.2	85.13
	82.4	102.5	138.58

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The allocation may also conflict with national planning policy which seeks to protect existing sports facilities unless they are demonstrably surplus to requirements or replaced with equivalent provision in an appropriate location. Given the constrained nature of Oxford and the difficulty of delivering new playing fields, the loss of this facility could reduce opportunities for cricket participation. 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. The policy should be amended to ensure that the existing cricket facility and playing field are retained unless an equivalent or better replacement cricket ground is delivered within Oxford prior to any loss of the existing facility. Also, Oxford City Council is requested to: 1. Protect existing cricket playing fields within the Local Plan framework. 2. Reconsider housing allocations that would result in the loss of operational cricket grounds unless appropriate replacement provision can be secured.	Policy SPE4 sets out in paragraph a) that the site is identified as supporting green infrastructure, therefore, development on the allocation site would need to demonstrate compliance with Policy G1 paragraph a) which relates to proposals that impact on outdoor sports including pitches. Any harm/loss will need to be mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. This approach is compliant with national policy. Policy SPE4 paragraph c) also provides some flexibility to consolidate sports provision with neighbouring sites but only where the same capacity to meet playing pitch needs can be demonstrated.	None.

3. Work collaboratively with Oxfordshire Cricket, local clubs and Sport England to develop a long-term strategy for cricket facilities within the city. 4. Ensure that any development proposals affecting sports grounds provide replacement facilities that are: ● equivalent or better in quality ● accessible to existing users ● delivered prior to the loss of existing facilities.		
Lincoln College is surprised that the Council proposed to allocate just the eastern portion of the Sports Ground, via Policy SPE7. Ongoing pre-application discussions with the Local Planning Authority have included preliminary heritage research and assessment to inform this stage of the work and to provide appropriate context for the visual appraisal. This has included a review of the heritage significance of the adjacent Bartlemas Conservation Area, relevant listed and non-listed heritage assets, and their settings, together with an understanding of how the site currently relates to these assets. In short, the precise location of development within the allocation could be refined through the next stage of design, following more detailed analysis of townscape impact, heritage issues, access geometry and landscape relationships. The alternative red line proposed	Following discussions with the College, amendments have been agreed in the Statement of Common Ground (SoCG) in Appendix 1 – Statements of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

in the pre-application submission therefore encompasses the area within which development could reasonably be accommodated whilst allowing the final siting to respond to the key considerations.		
Sport England has made a representation relating to Policy SPE7/SPE4, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE8: Manzil Way Resource Centre

POLICY	**SPE8**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPE8**				
All respondents **raising objections** on this policy/chapter	111.2	138.61			

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Oxford Health NHS Foundation Trust has made a representation relating to Policy SPE8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Policy is unsound as it not justified. The phrase "Could be car free" should be changed to "must be car free".	This phrase does not appear in either Policy SPE8 or its supporting text.	None

Policy SPE9: Marston Paddock Extension

POLICY	SPE9
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPE9	
All respondents **raising objections** on this policy/chapter	4.1	42.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Development is in a conservation area with many houses of historical interest. Access to the proposed site is limited and only possible by driving down narrow lanes in close proximity to houses and the church. Old Marston Village is already a poorly managed 'rat run' for commuters and school traffic with no efforts made by the council to limit volume or speed. Traffic has significantly increased in the village since the introduction of the congestion charge. Recent housing developments did not put any measures in place to manage this, so it's assumed this will be similar. Mill Lane building works have been disruptive and damaging to local roads, verges, pavements and houses. The current infrastructure of the village continues to be damaged to builders can make a profit.	Some of these comments relate to County Council transport measures outside the remit of the planning. The County Council as highways authority has reviewed all potential site allocations and had no in principle objections to the allocation of this site for 20 homes, and has not made a representation about it. The potential for access has been established by the development to the north, now completed and functioning successfully. Policies C6-C8 of the Plan ensure necessary transport-related measures are put in place and manage parking levels.	None.

Lucy Developments Ltd has an option on the site and is promoting the site for a minimum of 20 new family homes. Lucy Developments Ltd largely agree with the wording and provisions of Policy SPE9 but the point of contention is the red line area of the site. The draft allocation seeks to deliver a minimum of 20 homes on the 0.51ha site. To delivery a scheme that meets the policy criteria relating to BNG, green links, amenity green space and so on, will require use of the entire site in the control of Lucy Developments Ltd. The illustrative masterplan shows the area most appropriate for residential development, which is 0.53ha, which would provide 18-20 units at 34-38dph. The north-east section of the site, closes to the A40, is indicatively deemed most suitable for open green space and supporting blue infrastructure.	The larger site area in the control of Lucy Developments Ltd was put forward at the start of the OLP45 Plan-making cycle, and the City Council understood the intention was to bring forward 20 homes on the area of grey belt. The indicative masterplan does show some development beyond what is considered to be PDL/grey belt. The area to the east of the built-out Marston Paddock development and south of the A40 was shown on the indicative masterplan as for use for GI enhancement/an attenuation pond only. None of what was proposed for that area of land would need an allocation policy. All use for BNG enhancement required as a result of development or for SuDS and so on could take place without this area being within the allocation. Given that Lucy Developments Ltd seemed to have no intention of developing on this area, it was not included in the allocation. This seemed the most sensible approach, because the work that would need to be done to assess that area of the ownership for an allocation would be considerable and there are potential issues that would make it unsuitable, for example access and the increased amount of traffic that would be generated, and the currently unknown biodiversity interest. Furthermore, the whole site would need to be removed from Green Belt, but a potential 20 dwelling development would not justify removal of such a large area of Green Belt. The	None.

	Reg19 representation from Lucy Developments Ltd now says that this space is 'indicatively deemed most suitable for open green space and supporting blue infrastructure', which suggests that, if the red line were extended, this would be taken as showing the whole site could be developed, when at this point the wider site has not been properly considered for its suitability. The approach the City Council took was to allocate only the area of PDL it considers to be grey belt, which is the area it understood to be intended for development, and which is large enough to accommodate a minimum of 20 homes at less than 40dph, which is considerably less than the 50dph on the site to the north and which would seem appropriate to the site context. To allocate a larger site for development than seems necessary in order to achieve the development of the intended number of dwellings would not be justified, especially as that would involve removing more land from the Green Belt, and land which is not grey belt.	
Lucy Developments Ltd understands the City Council's intention to make an exceptional circumstances case, but does not consider this to be necessary as the land is considered to be grey belt. The site forms only part of the assessed Green Belt parcel 114(a). The majority of this parcel is open and development, but the site is mainly PDL and fundamentally not	It is necessary for an exceptional circumstances case to be made to remove land from the Green Belt during the plan-making process, in order that in can be allocated for development, even if the land is grey belt. All Green Belt parcels or sites put forward in the Green Belt were considered for development as part of the plan-making	None.

‘pastoral field and woodland’. The Green belt report assessed potential moderate-high harm to the Green Belt purposes if the site were to be removed. This negative assessment is considered to be in relation to parts of the parcel outside of the control of Lucy Developments Ltd.	process, regardless of whether they are grey belt or not, and regardless of how strongly they performed against the Green Belt purposes. However, the vast majority of Green Belt within Oxford is not developable for three main reasons (or a combination of the three), either it is functional floodplain, nationally protected for biodiversity interest or there is not landowner interest in developing the site. There were also found to be some other site-specific reasons that sites were not suitable, in most cases involving access. The majority of parcel 114(a) has a landowner not interested in development. Of the part in the control of Lucy Development Ltd, the reasons for not suggesting a site allocation across the whole ownership are not related to the Green Belt function or assessment, but are the reasons set out in the response above.	
We largely agree with the policy considerations and physical/environmental considerations as set out in the SHLAA but query the extent to which the site supports the function of the GI network, with its strong connection with urban form to the north, south and west and its proximity to the A40. It is not part of a wider green network, is of relatively low environmental quality and is not accessible by the public.	The site has not been assessed as being part of the core GI network, but the site does have some green infrastructure interest.	None.

Policy SPE10: Nuffield Orthopaedic Centre

POLICY	SPE10
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE10
All respondents **raising objections** on this policy/chapter	138.62

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Policy is unsound as is not justified - It's not clear why employer-led development is not included. Peat reserves must be protected. The "Impact risk zone" of the Lye Valley is a computer generated radius and is not relevant, the ground and surface water catchments, are. The phrase "Consolidate parking" is ineffective as it is meaningless, a reduction is required. High probability of roman potteries and medieval activity on Old Road.	Policy does not include any reference to residential development. It acknowledges the recorded peat reserves requiring these to be protected and any harm to them mitigated. It also acknowledges that any development could impact on surface and ground water conditions, requiring compliance with Policy G6. The supporting text acknowledges the area's potential for archaeological interest.	None

Policy SPE11: Oxford Brookes Marston Road Campus

POLICY	SPE11
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPE11

All respondents **raising objections** on this policy/chapter	81.24	98.13
	103.1	105.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The School buildings are recognised as an Oxford Heritage Asset, and the retention of the building as a significant historic feature of the Marston Road is regarded as essential. However, demolition is envisaged as a possibility in the plan, and this is not considered acceptable. There is a suggestion that the land within the internal quad might be preserved as a Local Wildlife Site if the former School and the quad itself were to be demolished around it. Although that would be better than nothing, it raises the question as to whether the wildlife habitat formed by the quad would survive the quad's demolition; that seems an unsound assumption.	The allocation policy requires that design proposals acknowledge the significance of the historic Milham Ford School buildings and the plan (Policy R2) requires that applicants demonstrate that re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition. The internal quad is already designated as a Local Wildlife Site, and there are requirements in the plan (policy G6) to mitigate the potential impacts of development.	None
The building has not been Milham Ford School for 23 years now and the Quad was never part of the grounds but within the building which is now 'Oxford Brookes Marston Road Campus'	The references in the policy to the Milham Ford School apply to the historic name of the main building and is clearly stated as such. The location of the Quad in relation to the building is also clearly stated.	None.
Historic England has made a representation relating to Policy SPE11, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Amend policy wording as follows: • Remove criterion (h); • Refer to treeline in criterion (d) as 'mature' rather than 'established'; • Change wording around number of units required.	Criterion (h) is consistent with the approach of the plan. Policy R2) requires that applicants demonstrate that re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition. As the internal quad is designated as a Local Wildlife Site, there are requirements in the plan (policy G6) to mitigate the potential impacts of development. Criterion (d) is suitability worded as part of a description of the existing condition of the site and the suggestions are not considered necessary to make the plan sound. The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

3123

Policy SPE12: Rectory Centre

POLICY	**SPE12**
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	**SPE12**
All respondents **raising objections** on this policy/chapter	111.2

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxford Health NHS Trust has made a representation relating to Policy SPE12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPE13: Ruskin Campus

POLICY	SPE13
All respondents **supporting** policy	No representations were received in support of this policy.

POLICY	SPE13		
All respondents **raising objections** on this policy/chapter	103.3	109.2	138.3

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The policy is ineffective as it assumes one big development. This would not apply to say, a moderate extension to an existing building. It is unclear if residential development must be linked to academic uses.	There are a number of sites that have policies that will apply to development that comes forward over time and if a modest development is proposed then it may be that only certain aspects of the policy are relevant. It is unlikely that residential development not linked to the academic use would be feasible within the campus, but the policy does not rule that out in case it does come forward.	None.

The planning application that was approved in 2022 was for the demolition and provision of new student accommodation. This- like the fate of many previous applications for the same site for similar work- will expire in June of this year. Submissions to the OLP2040 examination from Quod on behalf of UWL showed student accommodation would be a minor component of new development on the site and suggested the campus site could be used for non-educational 'enterprise' purposes. In 2024 and subsequently, Ruskin has advertised office accommodation in Smith House	Work has commenced on the 2022 application, so it has not expired. The policy can't prevent buildings being used for their lawful use by an occupier other than the university. The Planning system cannot take account of who an owner or occupier is.	None.
Just south of the red line I've seen a flowing spring, marsh plants and peat development. How will campus development not interrupt this flow and keep it unpolluted. The zone between SPE13 and SPE14 is suggested for biodiversity enhancements. Enhancement would mean making a really wet fen habitat to reinstate what would have been there before damaging drainage. Public access would need to be restricted due to wetness. A wetland without public access sandwiched between two developed areas seems unlikely to survive or be much appreciated. It would need a wide buffer and good green connectivity.	Development proposals on both sites will need to delivery biodiversity net gain. Keeping green connectivity through the sites and important existing green features is important, as is noted in both policies. Criterion e) of Policy SPE13 says *'Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.'*	None.

Policy SPE14: Ruskin Field

POLICY	SPE14
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE14				
All respondents **raising objections** on this policy/chapter	6.1	8.1	9.1	10.1	11.1
	18.1	19.1	20.1	21.1	22.1
	24.1	25.1	26.1	28.1	29.1
	33.1	34.1	35.1	37.1	38.1
	39.1	41.1	44.1	45.1	54.1
	55.1	62.1	68.1	72.1	73.1
	74.1	75.1	76.1	103.4	109.3
	120.2	121.1	138.2	139.18	146.1
	149.1	150.1	155.1	156.1	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Not legally compliant: Council will financially benefit from the sale of Council-owned land for access, in effect seeking to grant itself planning permission. The greater the number of houses, the greater the financial benefit. Also risk of Council ignoring an increasing amount of damage to the natural and historic environment in order to further the gain. At least this is a flagrant conflict of interest and	At a meeting on Cabinet approved the Heads of Terms for an Option Agreement for the disposal of land at Foxwell Drive, noting that any development was subject to planning. At the meeting it was noted that the option agreement would mean that if any relevant development gained permission the Council could then grant necessary access to land. It was noted that that meeting was not the place to discuss whether or not development on this land	None.

at worst, total misuse of power, bordering on the illegal. This situation must result in potential for judicial challenge. The fact that the Council has purchased an access route does not suddenly make what was wrong in the first place right. Policy can only be sound by removing the site allocation/policy can only be made sound by removing the option facility/planning decisions must be made by a different planning authority.	would be good or bad, as that would be tested through the planning process. The local plan will need to consider sites owned by the City Council (although this site is not, the developer has been granted an option to use City Council land to gain access. This local plan process happens independently of City Council property considerations).	
The policy wording emphasis is on the environmental considerations, yet the policy seems ultimately to advocate development. There are huge housing developments over at Bayswater and Barton that can happily satisfy the housing need in this part of Oxford. Given the considerable quantity of new housing at these nearby sites it would be an act of environmental vandalism to build on a small, sensitive site of such importance.	Housing need is calculated by local authority area, and if there is no capacity in that area then agreements must be made with neighbouring authorities about the 'unmet need'. Developments on the edge of Oxford will be partly to meet Oxford's unmet need, but also help to meet those authorities' own housing needs. When exporting need, every effort must first be made to identify potential housing capacity with Oxford.	None.
Siting development here will harm existing neighbouring uses; would impact on Dunstan Park and the children's play area in terms of noise, pollution and air quality. development would negatively a tiny forest;	Whilst the potential impacts on local amenity will be considered as part of an application with detailed proposals, there is not considered to be an intrinsic level of harm in principle that would be caused by development of housing on this site.	None.
Access roads (Old High Street and in Marston) are not sufficient to service this amount of new build – emergency vehicles in particular are hindered by existing traffic levels. Traffic congestion at the pinch points in Old Headington and Northway is a huge problem.	There are good sustainable travel links from the site. The X3 runs along Foxwell Drive into Oxford city centre every 20 minutes during the day and it runs early to late including on Sundays. There is potential for development here largely served by sustainable travel means. Any detailed application	None.

Given the council's efforts to reduce traffic around Oxford, so it would be illogical for the council to allow housing to be built on this site, which would obviously increase pressure on the already overloaded road system. Having access from Foxwell Drive would impact Copse Lane, Dunstan Road, St Andrews Road, and Ambleside Drive and Saxon Way - roads that are already overloaded at peak hours. New bus services would not significantly reduce traffic. The area does not have opportunities for sustainable travel links/public transport in the area is poor. It's a long walk to frequent services on the London Road. This will give rise to an increase in the number of cars.	would need to demonstrate the there are minimal transport impacts or that these can be limited. However, in principle it is considered that housing development on this site that is acceptable in transport terms is certainly possible.	
An access to the A40 at Foxwell Drive would be dangerous. There would be pressure to create links from the site to the A40.	A new access road to the ring road would be highly unlikely to be approved by the Highway Authority and is not suggested in the site allocation policy, assumed, or necessary for the development.	None.
New owners would use Stoke Place to park their cars, adding to an already difficult situation.	Parking provisions will need to be considered carefully as part of any detailed proposal and application, and the policies of the plan require consideration of transport impacts. Stoke Place becomes a bridleway at the north end, alongside the site, and does not have good connectivity with the site.	None.
Upgrading Stoke Place/ cycle path to ring road to make it more attractive for cycles, walking, mobility scooters and provide a link into the site from this route and retain some areas as park/ trees for communities to enjoy.	Criterion o) of the policy says: Stoke Place is not suitable for providing vehicular access, but access to it for walkers, cyclists and wheelers should be considered in order to ensure permeability.	None.

Existing infrastructure such as schools and drainage are also likely to be overloaded.	The Infrastructure Delivery Plan assesses the need for infrastructure arising from anticipated growth in Oxford. There is not anticipated to be an increase in need for school places that can't be met.	None.
Any development would represent a considerable threat to wildlife, water courses and vegetation. Any development would be on greenfield which would have negative impact on an important green infrastructure network. This doesn't comply with the need to enhance biodiversity and facilitate wildlife movement. Development will disrupt the wildlife corridor that runs from Barton triangle to Dunstan Park. The green fields provide a crucial contribution to the character of the unusual village setting within the ring road and provide a link for wildlife between Dunstan Park to the west and the Oxford Preservation Trust land to the east. Development here would undermine the environmental value and special character of the area. It would destroy the character of a much loved and enjoyed part of the city. The council surely has a duty to preserve and enhance such an asset.	The site allocation includes the northern part of the fields only, leaving the southern part, where there is a pond, to remain as a wildlife corridor from west to east. The site is not accessible to the public and is not part of the core Local Nature Recovery Network (which would not itself preclude development anyway). However, as noted in the information box above Policy SPE14, there are protected species potentially present and using the habitats including commuting bats, breeding birds, reptiles, amphibians and invertebrates. The policy responds to the likely ecological value of the site, which is likely to be focused on trees and hedgerows. Criterion a says '...*trees and hedgerows at the boundaries of the site and running through the site should be retained as far as possible, and opportunities taken for enhancement.'* Criterion b says *'New native hedge and tree planting should connect existing trees and hedgerows.'*	None.
Policy can be made sound by ensuring housing is not approved in areas that flood, upgrades to the sewerage system or keeping residential numbers low so as not to adversely impact sewage capacity	The site is in Flood Zone 1 and does not have significant areas of surface water flooding either. These occur only along the drainage course through the middle of the site and in the north parallel to the A40.	None.
Old Headington used to have 'protected open space' which strictly limited building. The	Policy SPE14, in criterion a, is clear that *'The green character of the site is important to the setting of*	None.

green belt no longer exists and allocation of the site would further diminish the remaining green areas. Development would not take account of the local historical context and respond to the heritage significance of the conservation area; would not be in accordance with para 20.d and para 202 of the NPPF (conserving and enhancing the natural, built and historic environment including landscapes and GI and protecting heritage assets). Development would significantly harm the setting of the Old Headington Conservation Area. It would completely alter the character and appearance of the wider Conservation Area and would affect views towards Old Headington from the Elsfield View Cone, the importance of which is specifically referenced in the Assessment of the Oxford Views Cones 2015. The loss of three green fields at the heart of the band of fields that run from Dunstan Park to Barton Lane, framing the village at its northern edge, would cause substantial damage to a designated heritage asset, stripping it of one of the features that give the conservation area its special character. In terms of balancing benefits it is not credible that any advantages gained by building 28 houses could outweigh the consequent environmental degradation.	*the Old Headington Conservation Area'.* However, there is considered potential for carefully designed development, which would have to be of low height and density, and most importantly retain green infrastructure and green corridors. The criterion g says: '*Significant green features should be incorporated to retain the function of the site as one of the few vestiges of the rural character of the conservation area, important to its setting and understanding history.'* The site is not within a view cone, but there is potential for it to impact views from the Elsfield View Cone. For this reason, criterion h) says that '*Buildings should be carefully placed to retain important views across the site and visual links with rural hills beyond...'* The Green Belt does still exist, but this site is not in the Green Belt. Old Headington Conservation Area ensures development is considered in terms of its impact on the identified special character of the area, and must respond to it.	
Support identification of Ruskin Field as proposed allocation but consider some of the	The land owner's suggestion that the whole field should be allocated for development is responded	None.

policy requirements are not adequately justified and the policy could be made more effective to deliver the Promoter's identified capacity of at least 130 dwellings. Have indicated the Policies Map and red line area in the allocation do not include the proposed access via Foxwell Drive and requested these are both amended to include the land for this access. Also disagree with the requirements in criterion 'd', 'h', 'i', 'j' and 'k' of the policy suggesting amendments to each of these.	to in the section about omission sites. There is not considered to be a need to extend the site boundary to include all of the area that would need to be included in works to provide an access for Foxhall Drive. Detailed proposals for this site will require careful consideration of all the points listed in the policy in order to be successful. The policy sets out how considerations relating to the generic policies of the plan are likely to be relevant, and gives indications about how development proposals will need to respond to known features and characteristics of the site. No modifications are proposed.	
Around the northern side of Headington Hill there are a number of small spring or seepage alkaline calcareous fen sites fed by the Headington Limestone and with significant peat formation, more are being discovered. SPE14 is likely to have some accumulated peat deposits present and is therefore unsuitable for any development. It would be better restored to a more biodiverse wetland. Ruskin Field contains fen valley habitats and abuts Larkins Lane Field and Dunstan Park, both ecologically rich sites and the subjects of ongoing spring fed calcareous fen (valley fen) restoration projects. The development of Ruskin Field would pose a severe threat to these rare habitats and would cause significant harm to the peat deposits contained underneath them. The adjoining fields between this site and Dunstan Park also contain evidence of these habitats.	Botanical survey notes from surveys carried out in 2017 show that the northern fields, i.e. those in SPE14 are largely semi-improved neutral grassland. The site currently allocated in the Oxford Local Plan 2036 includes a pond, an area of hard rushes, an orchard and secondary broadleaved woodland. These areas are not proposed for allocation in the Oxford Local Plan 2045. There are known peat deposits on Dunstan Park, but there are not known peat deposits on Ruskin Field. Policy R6 requires that: *'Proposals for new major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the City Council to determine any potential impacts on reserves....".* Policy R6 would apply to Ruskin Field, so development could not take place without understanding of any potential impacts on the peat reserves. All of the site is over 100m from the known peat reserves. The following shows the	None.

The fields support an unusual array of ferns and sedges which thrive as there are important peat deposits - particularly in the line of the proposed access road. These nationally important peat deposits require a wide area of green land to survive - they would disappear for good if this development goes ahead.	buffers at 50m, 100m and 150m from peat deposits at Dunstan Park. Criterion f of SPE14 says: '*Due to the site's proximity to recorded peat reserves associated with Dunstan Park, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.'* Detailed biodiversity and habitat surveys will be required as part of any application, and biodiversity impacts will need to be mitigated.	

Surprised that the allocation policy does not refer to the neighbouring site (SPE13: Ruskin Campus), as the cumulative effect of both site allocations should be considered together.	The Ruskin Campus site (SPE13) is an already built-up site where intensification is proposed and likely to continue over time (permission is already granted for some development within the campus). This will happen independently of any development on the Ruskin Field site.	None.
The proposed policy fails to take into account the reasonable alternatives and is not based on proportionate evidence and is therefore not justified.	At Regulation 18 stage, various options for the plan's approach were considered, as set out in the SA and supporting background papers. In terms of site allocations, the starting point for identified sites is that they should be allocated unless there are insurmountable factors that are likely to prevent development. Uses are in accordance with landowner intentions where these are compliant with the Plan strategy.	None.
The site should not be allocated for housing. Reference should also be made to include policy plans to establish: the number of houses being proposed, the mix of houses, the traffic impact onto the Foxwell Drive immediate area, the increased traffic impact through and to Old Headington, the visual damage to the green setting of Old Headington conservation area.	Much of this describes the details that would be required alongside a detailed planning application submission.	None.
The landowner has made an extensive and wide ranging representation (ref 156.1) The basis of this representation is the assertion that the site allocation policies are heavily constraints based, overly detailed, repetitive of other policies and set out matters that would be more appropriate to pre-application discussions and management	It is a helpful approach for the site allocation policy to apply the generic policies of the plan to the site, setting out some of the considerations that are relevant and indicating how those issues may be overcome. The contribution of this site to the special character of the conservation area is something that will need to be addressed through any detailed design, and it is appropriate for the allocation policy to give some direction to how this	None.

through the development management process. Examples include The overstatement of the contribution of the site to the character of the Old Headington Conservation Area and the assertion that the development could have an impact from the Elsfield View Cone, even though none of the site is in the view cone. The site's previous contribution as a transition to open countryside has been substantially changed by the construction of the bypass and by the development of Parton Park. Therefore, the policy should more positively recognise the site as a significant and unique opportunity to meet housing need in a sustainable location.	may be done, and what may be expected in an application. It is not overly prescriptive, and scope is given for a creative design response, but the policy includes some fundamental expectations, which relate to the generic policies of the plan and apply them. Views to, from and within the site will be important to consider in terms of how development may impact on their character.	

Policy SPE15: Slade House

POLICY	SPE15
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE15	
All respondents **raising objections** on this policy/chapter	111.1	138.63

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

Oxford Health NHS Foundation Trust has made a representation relating to Policy SPE8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Policy is unsound as not justified - Site has excessive surface level onsite parking, and important green space that should be preserved. Footpath connecting Horspath Driftway to the ringroad appears to be blocked by householders and should be reopened. There is no statement on how extra staff will be managed. Greenfield runoff rates must be achieved. Green spaces must be marked on Policy Map and preserved.	Site allocations can feature specific thematic issues that are covered by other policies but usually this is only when there are site-specific issues that need to be addressed within a particular site allocation policy.	None

Policy SPE16: Thornhill Park (phase 2)

POLICY	SPE16
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE16
All respondents **raising objections** on this policy/chapter	85.14

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Sport England have made a representation relating to SPE16, which is summarised and	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

responded to in the Statement of Common Ground.		

Policy SPE17: Union Street Car Park

POLICY	SPE17
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPE17	
All respondents **raising objections** on this policy/chapter	81.25	138.64

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPE17, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The reduction of the car park seems difficult to achieve without a severe economic impact as it is normally at or near capacity, therefore contrary to Policy C2, Maintaining Vibrant Centres, no rationale given for allocation, therefore is unjustified further it is ineffective as it relies on a future determination.	The site is being considered for inclusion in the plan as an allocation because of developer interest in delivering residential units, and the sustainable location in the district centre. It will be a requirement in the policy that any development retains car parking on site at a sufficient level – as determined by relevant officers in the City Council - to support the district centre.	None required.

Policy SPE18: Warneford Hospital

POLICY	SPE18
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPE18			
All respondents **raising objections** on this policy/chapter	90.14	108.1	85.15	138.65

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Natural England has made a representation relating to Policy SPE18, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The approach with the Warneford policy descends to a level of detail which is both selective and unnecessary. It is not succinct; is not positively prepared; has not been shaped by effective engagement with stakeholders; and does not avoid unnecessary duplication of policies.	The comments against the particular issues summarised in the rest of this table respond to this overarching point.	No further change proposed.
Policy does not start with a clear explanation of its purpose or of the important background to the site. It should be apparent on the face of the policy that the existing hospital and its	The introduction to Chapter 8 sets out the purpose of the policies that follow on from it. Each site allocation then follows the same general structure. By including the site as an	No further change proposed.

outbuildings are in urgent need of refurbishment or redevelopment, that a new hospital is needed and that the comprehensive development of the site can achieve major benefits, which are directly consistent with the stated objectives of the Plan.	allocation, the Local Plan is identifying it as an opportunity for development. In various parts of the policy, opportunities are identified, including under criterion g) that *redevelopment of the site offers a valuable opportunity to enhance mental healthcare provision and associated research.*	
Not necessary for the site allocation policy to repeat or summarise the requirements of other local plan polices, particularly concerned that, where other policies are referenced, they are given with a partial summary or reinvention of those policies. If reference to other policies is necessary, a model approach is the current adopted policy.	As set out in the intro to chapter 8, the detail relating to other cross-referenced policies within the site allocations is intended to give detailed guidance to apply the policies of the plan to the site allocations. They are generally referenced where there are particular site-specific considerations and include examples for how applicants could meet the policy requirements. We have followed the same approach across all of the allocations.	No further change proposed.
New draft policy SP18 is 1,057 words compared with the combined total of 535 words in the existing Plan for the policy and the supporting text of SP22. Policy is not succinct and the approach is not proportionate.	The rationale for the additional guidance provided for in the policy is set out above. Whilst the policy may be longer, we do not agree that this means it is not succinct or proportionate.	No further change proposed.
The draft SP18 is negatively expressed and heavily constraints based. By contrast, the existing Policy SP22 recognises the need for planned change, including the need to construct a new hospital on the site of the former playing field (inevitably resulting in a loss of open character compared with today but consistent with, rather than contrary to policy).	It should be noted that criterion a) of the policy clearly identifies that t*he loss of the former sports facility is considered justified only due to the need for and benefits of new hospital development.* In relation to the topic of constraints, as with all the allocations, we have sought to ensure that the key considerations of relevance to the design process in the context of the site are clearly set out. Omitting these from the policy	No further change proposed.

	would not mean that these considerations are not of relevance. Wherever possible, we have then sought to set out examples of how we think design could be tailored to respond to these points, which is intended to provide further clarity to applicants as to what might be expected. Of course, these may not be the only way to respond to these topics.	
The site is not currently designated as Supporting Green Infrastructure and that proposed designation should be removed from the site allocation.	The designation of core and supporting green spaces is new for this Local Plan as part of Policy G1. As G1 sets out, supporting spaces are *designated for their important role in enhancing the* (green infrastructure) *network and its overall function.* Our assessment of the green spaces on the site indicates that they can clearly be seen to be meeting a role in supporting and enhancing the function of the wider network in the area, and as such, they meet the criteria for being identified as supporting green spaces. Nevertheless, the designation does not prevent development, it simply seeks to ensure that harm/loss to these spaces is resisted unless this can be mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher.	No further change proposed.
Wording in current adopted policy, "… development of 3-4 storeys is likely to be appropriate… ", is absent from LP2045 version. This wording has proven to be not only correct (and supported by the design review process), it has also assisted in the public understanding that this site is suitable for buildings of some	The wording of criterion h) simply requires that applicants demonstrate that buildings are of an appropriate height, scale and massing when considering the wider context of the site. It does not preclude development of 3-4 storeys. It also allows for flexibility to respond to	No further change proposed.

scale. Again, the Regulation 19 wording (stating that new buildings should be of an appropriate height, scale and massing that responds to wider context) is neither helpful nor positively worded.	changing context of the wider area over the Local Plan's lifetime.	
Sport England have made representations against policy SPE18, these are addressed through the Statement of Common	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Planning permission is already in progress – See comments made against other policies (Churchill; Policy H5; R4 - (in relation to Parking), G1-G9, and Lye Valley).	No further response, comments on separate policies dealt with through the applicable sections elsewhere in the consultation statement.	No further change proposed.

Policy NCCAOF: University Area North of the City Centre Area of Focus

No representations received against this policy.

Policy WEBRAOF: West End and Botley Road Area of Focus

POLICY	WEBRAOF
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	WEBRAOF				
All respondents **raising objections** on this policy/chapter	40.9	88.3	88.7	115.7	134.10
	138.7	139.19	159.14		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION

The approach to identifying the West End and Botley Road Area of Focus is positive. It is welcomed that the Local Plan notes the opportunity for Botley Road Retail Park to provide a contribution to Oxfords employment needs. The Botley Road Retail Park Supplementary Planning Document (SPD) already provides clear and robust guidance to support the site's coordinated regeneration. The SPD sets a strong framework to guide development in a manner that is integrated, sustainable, and responsive to the local area. Draft Policy S2 states that proposals shall align with design principles in SPDs such as the Botley Road Retail Park DB and that the Council shall be proactive in producing additional local design codes when a need arises involving the local community and landowners who wish to produce design guidance for their areas. In our view, given that there is already a Development Brief for Botley Road Retail Park, the introduction of further planning policy layers or site-specific design codes for Botley Road is unnecessary and risks creating duplication of policy and delaying emerging applications due to confusion around the correct development parameters. Any further codification through design codes or prescriptive policy would risk limiting the flexibility needed to respond to market	General comment noted. The City Council has not produced a Supplementary Planning Document (SPD) for the Botley Road Retail Park. Rather, a Technical Advice Note (TAN) in the form of a Design Brief, was produced to help guide the known potential redevelopment opportunities at the Botley Road in the absence of a formal policy framework. Draft Policy S2 states: *For Areas of Focus, the City Centre and District Centres, and other areas with more detailed guidance, proposals should refer to and align with the design principles set out in the Local Plan or in supporting documents such as SPDs and development briefs. The City Council will be proactive in producing additional local design codes or guidance when a need arises with the involvement of the local community, landowners and other stakeholders, and will support neighbourhood planning groups who wish to produce design guidance for their areas.* It is important that Policy S2 and Policy HD1, as strategic policies, provide, through Appendix 1.1, a consistent and comprehensive approach to ensuring high quality design of	No change proposed

conditions, innovative design approaches, or evolving employment needs.	developments. Given that the Botley Road Retail Park Design Brief TAN already exists, Policy S2 ensures that the principles already established through the Botley Road Retail Park Design Brief TAN are incorporated into the associated design checklist. The second part of the section quoted from Policy S2 (above) relates to the production of "additional design codes when a need arises". It is important to future proof this policy as not every part of the city benefits from locally specific design guidance.	
Network Rail has made a representation relating to Policy WEBRAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The BOB ICB (now NHS Thames Valley) has made a representation relating to Policy WEBRAOF, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The following modification to Bullet point e) of Policy WEBRAOF is proposed: *e) Good quality urban design and place making including appropriate building heights for their setting ~~that do not negatively impact on key views or historic skylines~~.* This modification is suggested because the change to a view / skyline cannot in itself automatically be considered a negative impact. Given that wherever buildings are proposed over 15 metres, they should be accompanied by a visual impact assessment, which is required to	We do not accept the proposed modification to bullet point e). The policy does not in fact suggest that a change to the key views or the historic skylines would be automatically considered a negative impact. But rather, it qualifies the importance of delivering appropriate building heights for their setting. This policy is positively framed and sets out the conditions where planning permission would be granted. The policy is	No change proposed.

show how the proposal relates to Oxford's historic skyline/views and how it has had regard to the High Buildings TAN, it is considered that the words 'that do not negatively impact on key views or historic skyline' can be removed from the Policy, as this process is already captured via the High Buildings TAN.	seeking to "ensure that opportunities are taken to deliver... ...e) Good quality urban design and place making..." As a locationally specific policy, it highlights some of the specific elements of the area. The policy then and qualifies the type of impact that is acceptable, (i.e. ...*appropriate building heights for their setting that do not negatively impact on key views or historic skylines.").* This does not automatically mean that any change to the skyline is a negative impact.	
The policy does not address flooding although historically this area has flooded repeatedly. It is foolish to build to develop here. SUDS cannot work if less than one metre above the highest water table point.	Other policies in the plan specifically address flood risk and SuDS.	No change proposed
Development within the West End and the Botley Road needs very careful management to prevent harm to the: • views towards the western hills from the city centre, • views from the western hills towards the historic city centre. These are highly sensitive locations within some of the key historic defensive views out from St George's Tower to the west and from Raleigh Park, Harcourt Hill and Boars Hill looking towards the city. The policy should specifically refer to this, to ensure that new buildings are limited to appropriate heights.	Other policies in the plan (including Policies HD6 and relevant site allocations) already set out planning policy in relation to views and building heights. As the plan should be read as a whole, there is no need to repeat local policy requirements which is more accurately articulated elsewhere in the plan.	No change proposed.

The Oxford Growth Commission (OGC) Interim Report (December 2025) identifies an opportunity area that includes the western part of the city centre and Osney Mead. Annex B of the OGC Interim Report describes the area as presenting "opportunities for transformational economic growth and residential development in and near to Oxford city centre." And that there are "Significant opportunities for redevelopment of brownfield sites in a sustainable location close to Oxford City Centre, Oxford Station and existing employment sites". This area of focus it should be extended to include the land to the west of the Oxford Railway Station and current station car park as well as the proposed allocation sites covered by Policy SPCW2 – Botley Road Sites around Cripley Road. This location will play an important part in the overall redevelopment of the area as it is forms a gateway into Oxford once the River is crossed.	We do not consider that is appropriate to extend the WEBRAOF boundary to include this site allocation. This site is located in a residential area of the city, near to the city centre. This approach, given the site's allocation for a net gain of 20 residential dwellings, aligns with the OGC Interim Report. This is because it is a residential led development near to Oxford city centre. In fact, it is one of a number of opportunities involving the redevelopment of brownfield sites close to the city centre, Oxford Railway Station and existing employment sites. Given the site's suburban context, its relatively small size, and the existing uses at the site (including existing residential uses, hotels and an element of Use Class E (retail), this site plays a small, yet important role in supporting the city's overall housing delivery. Most sites that come forward in Oxford are for less than fifty dwellings, but each makes an important contribution helping Oxford deliver much needed housing (in particular, social housing). The Area of Focus is for sites within the western part of the city centre (referred to for many years as Oxford's West End), and has been extended to include the Botley Road Retail Park (which has been seeing a transition over recent years from a 1980s car-dominated retail park to	No change proposed.

	an urban science district with modern R&D space. Given the nature of this allocation, it would not actually benefit from being included within the West End and Botley Road Area of Focus. This is because the site's relatively small capacity for a net gain of 20 residential dwellings is situated in a location which is contextually near to, rather than within, the West End of the city centre, (separated by the hard physical boundary of the railway). The scale and nature of the allocation itself - a residential allocation for a net gain of 20 dwellings, that enables the replacement of existing uses, subject to compliance with the rest of the local policy framework in the plan, by virtue of its location, does not need to be within the Area of Focus. The Area of Focus does not confer additional benefits in relation to the acceptability of land-uses. We do not accept that the WEBRAOF should be extended.	

Policy SPCW1: Banbury Road University Sites – Parcel B

POLICY	SPN6
All respondents **supporting** policy	No representations were made in support of the policy.

POLICY	SPCW2

All respondents **raising objections** on this policy/chapter	105.10	
SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
In the policy, replace "minimum number of homes to be developed is" with "development is expected to deliver around".	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel

POLICY	**SPCW2**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPCW2**			
All respondents **raising objections** on this policy/chapter	81.26	88.11	104.12	159.15

SUMMARY OF ISSUES RAISED	**OFFICER RESPONSE**	**PROPOSED ACTION**
Historic England has made a representation relating to Policy SPCW2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPCW2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The Environment Agency has made a representation relating to Policy SPCW2, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
ChCh suggests that this Policy should include greater flexibility by the addition of a reference to student accommodation in the list of 'other suitable uses for the site' (i.e. an equivalent number of rooms to the number of dwellings which could be provided when the relevant ratio is applied). Amend the following wording in the supporting text: "Other suitable uses for the site could include: • Hotel accommodation; • Replacement retail (Use Class E); • <u>Student accommodation"</u> No other amendments sought (subject to confirmation of the changes sought to Housing Policies H2 and H3).	The City Council does not accept the inclusion of student accommodation within this policy. This is because the site is located outside the city centre and would not be align with the plan's approach regarding the location of student accommodation. As such we do not accept the proposed change to this policy.	No change proposed.

Policy SPCW3: Canalside Land, Jericho

POLICY	SPCW3
All respondents **supporting** policy	79.1

COMMENT SUMMARY	OFFICER RESPONSE
Content that policy meets soundness and legal compliance tests.	Support is welcomed.

POLICY	SPCW3	
All respondents **raising objections** on this policy/chapter	49.3	104.9

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Noted that bridge crossing is not required and connectivity improvements could be secured via financial contribution where viable; this is welcomed. Bridge crossing will need agreement of Canal and River Trust so outside of applicant's control. In 10 years, a suitable bridge position / design has not been agreed; flexibility to the policy wording re bridge or improvements over the canal should be considered.	The policy wording reflects a flexible approach, which opens possibilities for alternatives to how improved connectivity could be delivered but includes the potential for a bridge crossing, if feasible.	None.
The Environment Agency has made a representation relating to Policy SPCW3, and this is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPCW4: Faculty of Music

POLICY	SPCW4
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW4
All respondents **raising objections** on this policy/chapter	159.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Site Boundary: The identified red line for the property does not accurately reflect the true boundary of the property and should be adjusted to include the full extent of the Music Practice rooms and align with the western bank of the Trill Mill Stream. This correction should be carried forward within the Oxford Local Plan 2045 Policies Map, with the site area updated from 0.33ha to 0.32ha to reflect this change. Flood Zone: The site has been identified within Flood Zone 2. The Environment Agency Flood Zone map shows the majority of the site within Flood Zone 1, with only a small area of the southeast corner within Flood Zone 2. It is considered the flood zone should be updated to reflect the majority of the site and read 'Flood Zone 1'. Open space, nature and flood risk:	Site boundary: The basemap display of the site arranges the buildings into simple blocks that aren't always a true reflection of what is on the site. Aerial photography confirms that the site boundary, as is, does capture all the buildings on the site and is therefore correct. Flood Zone: Even if only a small part of the site lies within a Flood Zone, the site is still considered to be within that Flood Zone, which in this case is Flood Zone 2. Open space, nature and flood risk: The 10m buffer zone is supported by the Environment Agency and is a starting point for any development proposal. If it is considered that it would not be possible to retain this 10m buffer, proposals would need to demonstrate why this isn't the case and that the benefits of	Site boundary: No proposed change Flood Zone: No proposed change Open space, nature and flood risk: No proposed change Movement and access: No proposed change

Part b) of the policy should be amended to provide more flexibility so the 10m buffer between the edge of the development should be "considered" rather than "retained". The 10m buffer zone has the potential to provide some amenity benefit for its future occupants and could facilitate improved access to the adjacent Memorial Garden or Christ Church Meadow. Any such access (supported by part j) under movement and access), may require facilitation through appropriate and considered development within the 10m zone. <u>Movement and access:</u> Part j) of the policy states that new residential development should be car free. The policy should be amended to allow for *"provision for disabled parking and essential operational/service vehicle access may be permitted where it is demonstrated to be necessary for the functioning of the academic, residential or student accommodation uses on the site."* As an operational site for academic uses, residential and/or student accommodation, it will be necessary to retain some parking areas to ensure that there is both the opportunity to service the site and/or provide spaces for disabled parking.	not implementing this would outweigh any harm. <u>Movement and access:</u> The site is situated within a sustainable location in the city centre. Whilst part j) of the policy does state that new residential development should be car free, part g) of the policy notes that *"Opportunities should be taken to reduce the level of car parking along Floyds Row."* It is expected that the reduced level of parking will still be able to sufficiently provide enough space for disabled parking and servicing the site.	

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Policy SPCW5: Jowett Walk

No representations received against this policy.

Policy SPCW6: Manor Place

POLICY	SPCW6
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW6			
All respondents **raising objections** on this policy/chapter	81.27	89.3	90.9	123.1

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPCW6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxfordshire County Council has made a representation relating to Policy SPCW6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Natural England has made a representation relating to Policy SPCW6, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Note that the minimum number of units allocated for the site has remained at 43, which we believe represents an underdevelopment of	A site capacity assessment has considered all relevant factors to come to this figure. The site has heritage constraints which will require	None.

the site. Consider that the site has the potential to accommodate a significantly larger proportion of units given its inner-city location and proximity to campuses and suggest minimum unit threshold is increased to 90 residential units (equivalent to c. 150 PBSA units) in order to promote effective use of land in line with Section 11 of the NPPF.	sensitive design. It also lies within a view cone and within the locally designated high buildings area. The 43 is a minimum figure and does not preclude a higher number coming forward as part of a planning application.	

Policy SPCW7: Nuffield Sites

POLICY	SPCW7
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW7			
All respondents **raising objections** on this policy/chapter	81.28	88.12	104.6	134.11

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPCW7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPCW7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The Environment Agency has made a representation relating to Policy SPCW7, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
We do not support inclusion of the phrase 'net gain' in the policy as it makes the delivery of the overall aspirations for the Nuffield Sites challenging. We understand that vacant units have already been accounted for. However, the policy is not explicit.	The extant Oxford Local Plan 2036 (OLP2036) allocates minimum numbers of residential dwellings to be delivered across a number of sites in the West End of the city centre. Extant Policy SP1 – West End Sites (OLP2036) sets out minimum numbers of dwellings to be delivered at the Island site and the Worcester Street Car Park site (two of the three sites that make up the Nuffield Sites allocation policy). The total number of dwellings for the Island site and the Worcester St Car Park site, as established through extant Policy SP1 – West End Sites is 58. Policy SPCW7 Nuffield Sites, in the emerging Local Plan 2045 allocates the site for a minimum of 59i dwellings (net gain). This takes account of an additional habitable dwelling, which would need to be re-provided as part of any comprehensive redevelopment of the site. We do not consider that this would be challenging to the delivery of the overall aspirations for the Nuffield sites. We consider that the retention of the phrase 'net gain' to be an important phrase in this policy.	No proposed changes.
We suggest the following modification to part b) to ensure such opportunities are investigated and carried forward, if feasible.	We understand some of the challenges around improving access to the Castle Mill Stream from the Worcester St Car Park Site. As such we can propose a modification to this part of the policy	The following modification is therefore proposed to part b) of Policy SPCW7 to clarify the situation regarding access improvements to

b) Opportunities should be explored taken to improve access to Castle Mill Stream from the Worcester St Car Park site.	to clarify the situation, i.e., that opportunities to improve access to the Castle Mill Stream should be explored, rather than should be taken.	the Castle Mill Stream from the Worcester Street Car Park Site. b) Opportunities should be explored ~~taken~~ to improve access to Castle Mill Stream from the Worcester St Car Park site.
Part e) of the policy, relating to Flood Risk Assessment, is overly detailed. The policy requirements would form part of an FRA as required by national policy. We consider this part of the policy can be simplified.	We do not support the simplification of this policy in the manner suggested. The Level 2 SFRA for this site includes specifics, which have been included in this policy. A consistent approach has been taken to incorporating site-specifics where SFRA Level 2 assessments have been undertaken to support site allocation policies in the plan.	No proposed changes.
Part g) of the policy, which relates to landscape/visual impact assessment states that: With respect to part g) which focuses on landscape / visual impact assessment work, part g) we suggest the following modification: g) ...Special attention will need to be paid to views from the Castle Motte to manage avoid harm to the setting of Oxford Castle. This is because, while the visual impact assessment work will serve to inform and guide any scheme development, it is likely to be impossible given the immediate context to avoid harm completely. Adding this prescriptive restriction is considered unhelpful.	We do not support the proposed changes to part g) of this policy, which we consider would weaken the importance given to designated heritage assets and their setting by the NPPF. Harm to the setting of the Oxford Castle Scheduled Ancient Monument and associated Grade I and Grade II Listed Buildings should be avoided rather than 'managed'. The Plan also includes Policy HD3 – Designated Heritage Assets, which reflects paragraphs 207-221 of the Framework.	No proposed changes.
It must be ensured that the overall aspiration of the Nuffield Sites is not lost or stymied by overly prescriptive or constraining policy. By making this change, the policy requirement still	We do not support the proposed modifications to part "h)" of the policy. Part "h)" aligns with Policy HD4 – Non-designated Heritage Assets,	No change proposed.

ensures respectful and careful consideration is given to this important view. The existing scale and function of the Nuffield Sites, particularly the land south of Frideswide Square and Island Site, must be recognised for their limited contribution to the entrance of the city. To enable transformational change and to achieve the objectives set out in the draft Plan and the West End and Osney Mead SPD, we suggest the following modification to Part h) of the Policy: h) Proposals should review if demonstrate how the existing designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach.	which articulates relevant paragraphs of the Framework. Weakening the policy in this way would not be consistent with the importance given by the NPPF to heritage assets.	

Policy SPCW8: Osney Mead

POLICY	SPCW8
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW8				
All respondents **raising objections** on this policy/chapter	57.22	81.29	87.10	104.11	105.11

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This large brownfield sites close to the centre of Oxford has been effectively vacant for many years. It should have been redeveloped years ago. If used for housing it could take all the homes required to meet Oxford's share of housing need. There are to two distinct issues; flooding and contamination. Neither of these are critical. The flood risk which it seems affects the access road, in and out of the site, could be raised and in any case, flooding should be much less once the Oxford Flood Alleviation Scheme (which is well advanced) is in place. It is quite hopeless that these large post-industrial sites continue to remain as they are when one after another sites in the Green Belt, with poor to non-existent public transport links, are identified as necessary for the growth of Oxford. The policy should address the problem of ensuring this site is redeveloped during the currency of this Local Plan and some incentive should be put in place to make this happen and the reverse if it does not happen such as compulsory purchase. This site is 17.8 hectares, the vast majority if not all of which could be allocated for homes.	While parts of the site are indeed vacant, Osney Mead remains in use as an industrial estate, with many businesses located there. The landowner has expressed an interest in bringing forward an innovation quarter, which would include a mix of uses, including residential/student accommodation, providing flood risk issues (including safe access), satisfactorily addressed. The Oxford Flood Alleviation Scheme (OFAS) once delivered will certainly improve the existing situation. However, OFAS will take a number of years to be implemented in full. We consider that the policy is sound and accurately reflects both the landowner's intentions and what is achievable at the site. All policies include minimum housing numbers. See Policy E1 officer response for further details.	None.

Policy E1 must be less restrictive to allow this.		
Historic England has made a representation relating to Policy SPCW8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Oxford University Development (OUD) has made a representation relating to Policy SPCW8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made a representation relating to Policy SPCW8, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
In the policy, replace “a minimum of” with “around” when referring to dwellings to be delivered on site.	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Policy SPCW9: Oxford Railway Station and Becket Street Car Park

POLICY	**SPCW9**
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	**SPCW9**			
All respondents **raising objections** on this policy/chapter	43.12	81.3	88.9	88.10

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
This policy does not mention permitting pick up/drop off at railway station by private cars. Include specific text to require such facilities to be provided.	Other policies in the plan address motor vehicle parking. For instance, Policy C8 specifically includes requirements for non-residential development. Bullet point n) of the policy seeks a reduction in car parking spaces at the site. However, changes in car parking at railway stations are subject to confirmation and approval from the Office of Rail and Road (ORR) as set out in the policy. This would include any changes to short stay pick-up and drop off parking.	No change proposed.
Historic England has made a representation relating to Policy SPCW9, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Network Rail has made a representation relating to Policy SPCW9, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPCW10: Oxpens

POLICY	SPCW10
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW10
All respondents **raising objections** on this policy/chapter	85.16

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Sport England has made a representation relating to Policy SPCW10, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Policy SPCW11: St Thomas School and Osney Warehouse

POLICY	SPCW11
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW11		
All respondents **raising objections** on this policy/chapter	104.4	139.2	159.17

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Environment Agency has made a representation relating to Policy SPCW11, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
Overall, we have no objections to the allocation of these sites. However, the former St Thomas School building should be specifically retained as a policy condition and sufficient weight needs to be given to its retention and preservation within any forthcoming policy text. Built around	The former St Thomas School is not a designated heritage asset, as such we cannot require its retention. However, bullet point h) already requires proposals to "consider retention of the St. Thomas's School building where possible because of its townscape value	No changes proposed.

1870, this is a good example of a late 19th-century school building, whilst also providing a remnant of the historical evolution of the evolution of the St Thomas's parish and those who lived there as specifically referenced within the Oxford Central (City & University) Conservation Area Appraisal.	and clear representation of past usage of the area". We consider that the policy is sufficient in this regard.	
There are no community facilities currently on site. The units are let on commercial leases, albeit one of the occupiers is a charity. The use class of the properties falls within Use Class E and not that of community facilities. Amend the following wording in the supporting text: Current Use(s): St Thomas site is a former school building now in use by [various organisations including] *charities* [and social enterprises]. Osney Warehouse site is in use *by* a[s] visual arts company including studio, exhibition, education spaces *and storage*[/community uses].	While we note the leasing agreements, we consider that the policy box setting out the current uses is an accurate representation of the organisations that occupy the site. As such, we do not accept the modifications proposed to the "Current Use(s)" in the policy box. These modifications seem to be designed to remove any notion that the occupiers of the site bring social value to the area. OVADA is a non-profit company limited by guarantee (a social enterprise) with a strong community focus, occupying the Osney Warehouse. While the St Thomas School House site is home to a local employment charity and social enterprise (Aspire), as well as being home to other not-for-profit organisations including a Community Benefit Society with charitable aims.	No changes proposed.
Propose the following modification to Policy SPCW11. *Planning permission will be granted for a mix~~ed~~ of use<u>s including employment and / or residential (market, student or specialist forms)</u> ~~development which should include retention or reprovision of community facilities~~. The*	We do not accept the modifications to Policy SPCW11. The introduction of an "and/or" clause in relation employment and housing is at odds with the policy's minimum requirement to deliver 10 dwellings, as such it is not an acceptable change.	No changes proposed.

minimum number of dwellings to be delivered on the site is 10 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.	Similarly, the removal of the requirement to re-provide the community facilities is not accepted.	

Policy SPCW12: West Wellington Square

POLICY	SPCW12
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	SPCW12	
All respondents **raising objections** on this policy/chapter	81.31	105.12

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Historic England has made a representation relating to Policy SPCW12, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
In the policy, replace “minimum number of homes to be developed is” with “development is expected to deliver around”.	The number of dwellings has been determined by an assessment of the site taking into consideration the site size, physical constraints, and an appropriate level of density that is suitable for the setting. The policy wording is clear that it is a minimum requirement.	None

Omission Sites

POLICY	Omission sites
All respondents **supporting** policy	No representations were made in support of this policy.

POLICY	Omission sites				
All respondents **raising objections** on this policy/chapter	107.1	128.4	156.2	138.66	138.67
	138.68	138.69			

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxford Stadium omission site. The OLP2045 does not carry forward the Site Allocation Policy SP51 in the OLP36, concluding that the site is available but development would mean current community uses would need to cease operations if the site were to be redeveloped. This assumes the site can either be retained in its current state or be redeveloped in its entirety, yet Policy SP51 is quite clear that the permitted enabling development would be residential development '...on the car park or other areas that will not affect the operation or heritage interest...'. The owner would prefer to see this more flexible approach, which would give the greyhound racing and speedway operations the best chance to survive.	The site was submitted in the call for sites for housing. This was discussed with the landowner, to explore whether there was still an interest in housing as enabling development, alongside the use of the stadium for greyhound racing and speedway. It should be noted that, at the time the OLP36 was draft the stadium was not in use for these primary uses and it was thought enabling development would help bring it back. The landowner was clear that, in the context of a stadium brought back into use and currently operating, and following further consideration and the lack of identified alternative parking options, development on the car park alongside the existing uses was not considered feasible. It is notable that the landowner, whilst requesting in their	None.

It is noteworthy that the supporting text to Policy C3 states that 'Policy C3 does not apply to places for outdoor sport and recreation (which are in the Use Class F.2), because these are dealt with in Policy G1. This approach casts doubt on whether the Council considers the site a community use at all, which renders the SHLAA conclusion even more questionable. The owner has previously questioned whether the Stadium is a community use at all, as it is a commercial enterprise and it is not feasible to protect the existing uses or re-provide similar uses within the site in the event that the existing greyhound and speedway uses become unviable. Given the chronic shortage of housing, the landowner does not understand the logic that has led to this site not being allocated in the new Plan. Having no allocation significantly reduces the potential options for the future use or redevelopment of the site should the greyhound racing and/or speedway cease operating.	representation the flexibility of a policy that supports enabling development, concludes by saying that the lack of a policy would make it difficult for housing to come forward should it not be possible to continue the speedway or greyhound racing. It does not seem to be the case that the landowner is now saying that housing development is possible or intended alongside the existing uses. There is no intention to have a policy allocation that says what could or should happen if the current use of the site ends. If it ends, the landowner can make a proposal that would be assessed against the generic policies of the Plan. In terms of the comments about community use- this relates to the explanation in the SHLAA that community uses would need to cease operation if the site were to be developed. This is not trying to give a formal definition of the uses or note which generic policy of the Plan would apply. In any event, motorsport is not included in Used Class F2 and Policy G1 does not apply either. However, the site clearly has a function that is important for the local community and there seemed to be a stark choice of allocating the site for housing which would lead to the loss of this use or not allocating the site.	
Coolidge Close The OLP36 had a policy which is not being carried forward as it is potentially less than 10 houses. No further development should be	It is assumed that the representor is concerned that, without a policy allocation, development will be able to come forward on this site that is harmful to the Lye Valley SSSI. For small sites,	None.

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permitted in the Lye Valley and this site is in the groundwater catchment of the Lye.	generic policies in the plan should be adequate. A site allocation does not change the general approach of the plan, it just sets out how it applies to the site and adds site-specific detail and guidance. This site was not allocated in the OLP36 but it is and has been in the SHLAA table c. Development has commenced of the approved scheme for 8 homes.	
Wood Farm Health Centre The OLP36 had a policy which is not being carried forward as it is potentially less than 10 houses. No further development should be permitted in the Lye Valley and this site is in the groundwater catchment of the Lye.	The site is vacant and is available for housing. However, the site is only 0.12ha and too small for an allocation or to be included in Table B of the SHLAA (it is instead listed in Table C). It was not allocated in the OLP36. It would come forward as windfall and would need to be assessed against the generic policies for the Plan (see comments above in relation to Coolidge Close).	None.
Old Road Campus The site policy has been removed or forgotten, although it is in the current OLP36. The policy should be reinstated because the site has issues similar to the Churchill and should have the same requirements as the Churchill. Isses include sensitivity as it is in the catchment of the lye Valley, on site parking, creating increased demand for housing, huge basements that remove water retention capacity of land.	The Old Road Campus has been a previous allocation. The site is built out. The University did at one point put the site forward for the new plan because of a possible intention to extend and add to development on the site in the later years of the plan, but there are not firm ideas at this point and there is no need to have a policy that just repeats the policies of the plan that would apply should development come forward on the site, that would be in the same use as the existing site, and that would be extensions and infill only.	None.
Headington Shark House (2 new Hight Street) This should be allocated for short-stay accommodation. Given the clear absence of	The plan does not allow for hotel and short stay accommodation at all locations because it would compete with the aim of delivering	None.

real harm from the use of the premises for visitor accommodation (noting appeal decision findings) providing an allocation for the site would allow the site to realise its potential and benefit to the local area and economy, but would not harm the wording of the present policy because that allows for allocated sites to come forward. There is no minimum size for allocation. The singular nature of this site means that it cannot be made into a bigger site. It would be an asset to oxford for the site to be able to be used as proposed.	homes as a priority and because it is not likely to be suitable in all locations. Furthermore, whilst there is nothing to prevent very small sites to be allocated, generally sites are only allocated when they are large enough to benefit from site-specific detail. This site is only one house. Generic policies of the plan should be adequate for determining an application. There is no reason to allocate the site as short-stay accommodation contrary to the general aims of the Plan and the spatial strategy.	
Ruskin Field south The failure to meet Oxford's housing needs puts pressure on the Green Belt and adjoining local authorities so it should be apparent that the plan has down everything it can to maximise capacity. Deallocating a development site suitable for housing and student accommodation without any assessment or explanation is not consistent with that obligation. The land immediately north of the Ruskin College campus is 1.19ha and has development potential for c.50 dwellings or considerably more student units. The land has consistently been found by the City Council to be suitable for development. It was allocated in the OLP2036 and assessed as suitable in the withdrawn OLP2040. At Regulation 18 for the OLP2045 (was 2042) an assessment was undertaken for the allocated	Several call for sites exercises were run to inform the drafting of the Local Plan 2045. It was clear that this was to inform the undertaking of a new plan, and affirmations of assumptions about known sites were also requested. A call for sites submission was received for the northern field only. This submission referred to the larger site and existing allocation but did not include them in the red line and none of the technical information related to the current allocation, but rather to the red line proposed. From this submission and in discussions with the landowner's consultants it was understood that the interest had shifted to the northern part of the field. This shift in focus made sense given that there had been a decision taken at the City Council's Cabinet that essentially enabled access into the site from Foxwell Drive. This really changed the	None.

site and the Field to the north, 4,69ha. The assessment concluded there were 'no significant heritage concerns' or other concerns and recommended the whole site should considered further for allocation. Most recently, only the northern field (3.51ha) was assessed and the allocated site was not looked at. The University (of West London) assumed that SP56 was excluded from the assessment because its allocation would be carried over into the new Local Plan. It did not anticipate that SP56 would be de-allocated especially without any assessment or evidence base justification. The City Council did not approach the University as landowner to explain the proposed de-allocation of its land.	ability to bring forward the northern part of the site. Previously, there was no obvious access solution to the site for any kind of market housing scheme because access would have needed to be through the campus from Dunstan Road. The changed access option and information from the landowner as well as discussions with them led the City Council to re-consider the northern part of the Field, that had previously been rejected in favour of the southern part of the field Whilst there may not be constraints that prevent the site coming forward, there are clearly a number of sensitivities that must be responded to. In particular, the site is sensitive in terms of its position in the Conservation Area and next to listed buildings. It also has a pond and wetland features, hedgerows and trees. The need for biodiversity net gain, consideration of priority habitat and Urban Greening Factor, and well as the need to respond to the heritage context, means that significant green infrastructure will need to be retained on site. The smaller site to the south, currently allocated as SP56 is more sensitive in most regards. It is closer to the listed buildings and has thicker vegetation. When other access was not possible, the allocation kept to the southern part of the site, which is also potentially less sensitive in terms of views. However, given the switch to promotion of the	

	northern part of the field, the city council carried out some LVIA work and considered the landower's call for sites submission and agree that there is potential for development on the northern part of the field, albeit very careful design and low heights and densities will still be required. . This has benefits in terms of access and What is out of the question is an allocation that stretches across the whole field. It is vital that an area of green remains in the long views and to maintain some connection with the conservation area's origin as a rural settlement. This is also likely to be necessary because of the biodiversity and green infrastructure sensitivities. It should be noted that the assumption when allocating the southern field was that it would be low density development in order to respond to the listed buildings immediately adjacent and to the conservation area characteristics. The minimum number of dwellings was 20. At no point was it evidenced that SP56 had a capacity of 50 units. At Regulation the larger site with SP56 and the area of draft Policy SPE14 was referred to. However, Regulation 18 Plan was clear that within that was considered to be two separate sites, and that consideration was being given to the northern part over the southern (allocated) part, based on apparent landowner intention:	

	There is a site allocation for housing on part of Ruskin Field. The larger area of the field to the north has been put forward for development by the landowner. The northern part of the field has potentially better access than the allocated site. However, it is potentially more sensitive in terms of the heritage setting of the Old Headington Conservation Area. There is also potential for peat reserves on the site. Further investigation of the site is needed. This in no way recommends that the whole site should be considered further for an allocation. From this wording at Regulation 18 we consider it would have been clear to the landowner that the City Council understood that the northern part of the field had been put forward and that further investigation was needed. A draft of the site allocation policy SPE14 and Ruskin Campus draft policy SPE13 the site was shared with the landowner's consultants in November 2025. Comments were received back to say that the wording was not positive enough about the highly sustainable location of the site, and that constraints were overstated. No question was asked about where the draft policy was for site SP56. It would have been evident, given that two draft policies were shared, that there was not a third one. Allocation of just the northern part of the Field as put forward by the landowner in the call for sites was a consistent approach with all discussions up to that point.	

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	Whatever misunderstandings led to this point, the position of the City Council remains the same- the whole field is not suitable for an allocation and, given the current context, particularly in terms of access, the northern part of the field is more suitable for development as long as it responds to the sensitivities of the site as set out in the draft Policy SPE14.	
1 Pullens Lane It is noted that this allocation has been removed from the draft Local Plan, with the Sustainability Appraisal suggesting that, as the site is unlikely to yield more than 10 residential units, it should instead be treated as windfall. However, this reasoning does not reflect the site's strategic value for institutional development. Oxford Brookes University considers that the site remains an important opportunity to support the growth of academic and associated uses in this part of the city. Oxford Brookes University therefore requests that the site is allocated specifically for academic use (Class F), with sufficient flexibility to accommodate ancillary visitor accommodation for visiting lecturers and staff. Such an allocation would provide clarity and certainty for long term planning, ensure that the site contributes positively to meeting identified needs for educational space, and align with the wider objectives for more	The suggestions as described are open ended and require a lot of flexibility without definitive commitments that could be reckoned into housing land supply or economic area calculations. It is therefore not considered that the site will benefit from the level of site-specific detail or policy requirements that would comprise the site allocation approach of this plan. The site is not of a size (i.e. of assumed housing capacity over 10) or subject to a level of complexity that would prevent an application from being determined by generic plan policies or require its own specific allocation.	None.

efficient use of land within the surrounding Area of Focus.		

Supporting documents and miscellaneous comments

Sustainability Appraisal

Sustainability Appraisal	
All respondents **supporting** the Sustainability Appraisal	No representations were made in support of the Sustainability Appraisal.

Sustainability Appraisal					
All respondents **raising objections** to the Sustainability Appraisal	57.23	62.2	64.1	89.31	94.2
	113.2	131.1	158.3		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
SA is not justified in its lack of adequate evidence base, is not positively prepared in proposing that the Local Plan is capable of achieving sustainable development and is unlikely to be effective in in its stated goals or its ability to deliver the required results for sustainable development over the plan. As such, it is also not consistent with the NPPF.	We respond to the concerns about adequate evidence and ability to deliver sustainable development in detail in the following rows of this table. In summary, the Council considers that it has followed all the legal requirements for undertaking Sustainability Appraisal/Strategic Environmental Assessment and that this has appropriately informed the development of the Local Plan 2045.	None

Sustainability Appraisal (SA) grossly underestimates the societal, environmental and economic impacts of the Reg 19 Local Plan 2045 and is not based on proportionate evidence. Prioritising of economic growth through employment (SA topic 12), stipulated as requirements across LP policies, sends a shock wave of negative impacts across the other 11 SA topics, which the Local Plan policies frame as merely aspirational. No evidence is provided in the SA to justify the improvements in the colour coded scoring of SA topics from those in the Summary of the current situation and likely future without a plan (Table 1.2) to the Summary of overall impacts of the Local Plan (Table 1.7).	The Sustainability Appraisal is informed by a variety of data sources as well as expanded analysis of particular topics (e.g. green infrastructure, biodiversity, carbon reduction, natural resources) as documented in the supporting background papers which were published alongside the Regulation 19 Sustainability Appraisal report. The preferred growth strategy in the Local Plan is one that seeks a balanced approach to growth with a housing focus, not employment, as is discussed in Chapter 5 of the Reg 19 SA report. The SA clearly acknowledges a range of impacts across the SA objectives and this has informed the development of the Local Plan. The appraisal of the Local Plan's impacts is summarised in the non-technical summary (the tables referenced in the comment), however, more detailed versions of the appraisals are included in chapter 6. Chapter 6 appraises the impacts of the Local Plan policies (section 6.1), then the site allocations (section 6.2), then brings this together in the Whole Plan appraisal (section 6.3). The Whole Plan appraisal includes commentary (see Table 6.3) alongside the scoring which seeks to set out our reasoning for determining particular scores as transparently as possible. Whilst there is inherently some level of subjectivity/uncertainty in any such appraisal process, we are comfortable that the determined impacts against each of the SA	None

	objectives are justified and that this analysis has then appropriately informed the decisions taken in the wider Local Plan process.	
A respondent (Oxford Doughnut Economics Collaborative – Rep ID 64.1) has provided an alternative assessment of the Local Plan 2045's impacts against the 12 Sustainability Appraisal objectives. This includes suggested scores which generally indicate that the Local Plan's impact against each objective needs to be identified as more negative, or significant negative, compared to the assessment set out in the Reg 19 Sustainability Appraisal.	See response above which of relevance to this point. We would add that it is important to remember that the role of the Sustainability Appraisal process is to inform the development of the Local Plan, including helping to inform ways of mitigating any potential adverse effects that the plan might otherwise have. Sustainability impacts cannot always be avoided or entirely negated, and the SA report is as transparent about this as possible. We have reviewed the alternative scoring provided, however, we remain comfortable with the scoring of the Local Plan's impacts and the justifications as set out in Table 6.3 of the Reg 19 SA report. The SA process we've followed meets the legal requirements and has led to informed decisions which have been taken in developing the Local Plan (e.g. in relation to mitigations incorporated across the Local Plan's policies).	None
Oxfordshire County Council has made a representation relating to the Sustainability Appraisal, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
There were comments received flagging objections to the proposed monitoring framework as set out in Table 1.8. These included that the proposed framework is 'worthless' as it fails to specify any baseline	Chapter 8, paras 8.1 to 8.3 detail the rationale behind the proposed monitoring framework included in the Reg 19 Sustainability Appraisal report. It identifies that the Council seeks to report yearly on a variety of policy areas as part	None

data or targets, any means of delivery or any actions to be taken as a result of this monitoring. Another respondent suggested that the monitoring process for LP impacts should be overhauled to measure year on year genuine improvements across the 12 SA topics with data indicators to meet specific targets. It was felt that this would allow for genuine scrutiny.	of its Authority Monitoring Reports but that there are constraints in terms of resourcing to undertake monitoring, and that some data resources informing monitoring indicators are updated on longer time periods than yearly. As such, we have sought to propose a realistic and implementable SA/SEA monitoring framework that includes a mix of yearly and more long term monitoring, as set out in Table 8.1 in the report.	
The Sustainability assessment of SPS8 Land at Meadow Lane plays down the impacts of development across many different topics. Housing delivery is erroneously scored as ++ with no comment give to clarify that no housing number has been stipulated - effectively a zero allocation for housing. Erroneous assessment downplays the site's high sensitivity and cannot promise housing. This is unsustainable, not properly prepared and therefore both unsound and not legally compliant and SPS8 should be removed from the Local Plan to correct this.	The Sustainability Appraisal framework used to inform the assessment of sustainability impacts from the site allocations is published in Section 3.4.2 of the Regulation 19 Sustainability Appraisal report (and was published in the interim version consulted on at Reg 18 Preferred Options stage also). Table 3.8 in that section of the report sets out the decision-making criteria for the different scores to be assigned under the housing objective. This sets out that a ++ score should be given under the housing objective, where the sustainability appraisal for a site indicates that it has capacity for 10 or more dwellings. Where identified sites have the capacity for less than ten dwellings, the SA process would not consider them further for assessment, and they would not result in a site being allocated in the plan. Only development sites with capacity for ten or more dwellings result in a site allocation. The Sustainability Appraisal is an evidence base document, and a key decision-making tool in	None

	the plan-making process. As such, it has been used to inform the plan-making process, not the other way around.	
The sustainability assessment for SPS8 demonstrates how the site has been misunderstood, analysed insufficiently and downplays the significance of the site. Various issues flagged with the assessment (*as part of a separate submitted document – see rep ID 158.3*), including failure to identify the site as ancient meadow and thus the integral part of the Iffley conservation area. Failing to fully recognise the full heritage value of the site, including that it is historically undeveloped site and a survivor of east Oxford's agricultural history, as well as sitting in the setting of various listed buildings. Issues flagged with regard to ecology also , such as failing to recognise the ecological and/or carbon sequestration value of the hedges, of what could be considered to be 'floodplain meadows' with associated species that have the potential to be restored, also that there are various protected species present including 7 species of bats including nationally rare species nearby as well as badgers. The sustainability appraisal includes unresolved and uncertain issues including that the site is within Iffley conservation area and is within the setting of listed buildings and of non-designated heritage assets, as set out above.	The sustainability appraisal site assessment for SPS8, as well as the separate site capacity assessment form, identifies a range of constraints on the site and these have informed the allocation. In relation to the sustainability appraisal assessment for the site, the SA site assessment form as included in Appendix C of the Reg 19 Sustainability Appraisal report, already identifies potential negative and significant negative impacts against the range of heritage criteria under SA objective 11, as well as under ecology and biodiversity SA objective 10. It also picks up other constraints across the objectives. The potential for negative impacts identified through the SA assessment, alongside other work such as the separate site capacity assessment process has informed the detail of the allocation as set out in Chapter 8 of the Local Plan 2045, including a range of requirements in relation to mitigating impacts on heritage, biodiversity etc.	None
The SA does not test higher levels of growth than the Standard Method (SM), which is considered odd as it is plainly a 'reasonable	The Sustainability Appraisal has tested alternatives for setting a housing requirement at, below and above the Standard Method.	None

alternative'. The appraisal of the growth strategy alternatives identifies that whilst a case could be made for boosting greenfield/brownfield supply to either support housing or economic growth, this would come at considerable cost in terms of wider objectives. The appraisal of housing requirement policy options (option set 001) then goes on to test three options, however, option A appears to be dismissed simply because a higher level of growth could not physically be accommodated in Oxford City itself or would put pressure on other land uses. Option C (setting a requirement above SM) is concluded to also not be deliverable due to the limited capacity in the city (and acknowledging that it would result in more unmet need being generated beyond boundary). The Council's approach/preferred option is therefore based on the limited capacity of the city to ensure that the policy is deliverable and meets the tests of soundness. This approach is inconsistent with national policy (e.g. NPPF 2024 paras 24 – 28) – effective strategic planning, especially to promote growth, across local planning authorities boundaries. It is considered that in order to meet the unmet needs it falls to Oxford City to work with its neighbouring authorities to identify additional supply to meet these needs as part of their duty to co-operate, but also the requirements of the NPPF in terms of maintaining effective cooperation are relevant (as duty to co-operate	This testing was published as part of the interim Sustainability Appraisal published at Reg 18 Preferred Options stage, and then updated and published again as part of the Regulation 19 Sustainability Appraisal (e.g. to reflect the further work on the Local Plan and supporting evidence such as the Strategic Housing Land Availability Assessment (SHLAA)). Section 5.2.2 of the Regulation 19 Sustainability Appraisal report discusses this testing (see section addressing option set 001a – paras 5.40 to 5.43 and Table 5.6). The full appraisal of the options that informed this was also included in Appendix A, this includes expanded commentary on the rationale for how scores were determined in Table 5.6. The SA report details the reasoning for why the Council's preferred Option was Option B.	

about to be removed). Whilst Oxford City is constrained in terms of capacity to accommodate future housing needs, the Plan needs to be prepared in the context of overall growth taking into account the Government's new Growth Commission for Oxford which was set up in May 2025 to help accelerate growth in the city and its surrounding area.		
The Sustainability Appraisal's Options have not had due consideration to Oxford's importance to the economy, as confirmed in the Employment Land Needs Assessment (ELNA), in electing Option B when considering the Housing Requirement following the SA process. Curious that Option C was not given more consideration, as it gives greater acknowledgement of the requirement to grow beyond the LPA borders after confirming the economic significance of the settlement and surrounding area. Option C allows for a housing requirement higher than the standard method, to allow for stronger support for economic growth or affordable housing need, whilst recognising the necessity for this growth to be supported by the surrounding areas.	See response above. The options considered for housing requirement were tested equally. The rationale for selecting the preferred option is set out in the SA report (see paras 5.42 and 5.43). In this discussion, it is clearly acknowledged that the other options for setting the housing requirement (e.g. higher than the Standard Method) could have greater positive impacts in relation to delivering housing and economic growth, but that they also come at greater cost in terms of significant negative impacts against other sustainability objectives.	None

Evidence Base

POLICY	Evidence Base

All respondents **supporting** parts of the evidence base	90.16	161.3

COMMENT SUMMARY	OFFICE RESPOSE
Natural England has made a comment in support of the Habitat Regulations Assessment, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
National Highways has made a comment relating to the Transport Modelling, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	Evidence Base				
All respondents **raising objections** on parts of the evidence base	92.4	92.6	92.7	139.7	101.6
	138.1, 138.17 and 138.26	104.13	89.32	85.3	

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
Oxfordshire County Council has made a representation relating to the Habitat Regulations Assessment, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Cherwell District Council has made representations relating to various parts of the evidence base including the Employment Land Needs Assessment, Playing Pitch Strategy Interim Note and Green Belt Assessment; these are summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
[See original letter for full rep] ... the Local Plan Viability Assessment Update (December 2025) does not include a specific allowance for contributions towards healthcare. ... In our view the S106 headroom identified as part of the site-specific testing is generally sufficient to enable financial contributions to be secured for healthcare, and therefore we consider that overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. However, we are concerned that without explicit mention of required healthcare mitigation in the viability assessment, healthcare mitigation will compete with other planning obligations or be ignored entirely. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when	Contributions towards healthcare provision would, where applicable, be sought under a general S106 or CIL agreement. This is addressed by general Policy S3 Infrastructure Delivery in New Development, unless there is a specific on-site requirement for healthcare in which case it is referenced in the site allocation policy. Healthcare infrastructure is also identified in the Infrastructure Delivery Plan, that accompanies LP2045. The Viability Assessment for LP2045 builds in an assumption about the total level of S106 contributions sought from developments, which was informed by reviewing recent real life S106 agreements for a range of development types in Oxford. These would have covered contributions towards a range of uses, including healthcare where applicable. For testing purposes, the assessment assumed a 'base' level of contributions amounting to £4,000 per unit (plus £1,000 for Section 278) and £25 per square metre of commercial floorspace (Viability Assessment, para 4.32).	None

evaluating the potential planning obligations necessary to mitigate the full impact of a development. A separate cost input for health would also mean that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. Such an approach would also support the effective implementation of Draft Policy S3 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements. We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.		
The Oxford Green Belt Additional Sites Assessment is too restrictive in focusing only on the geography of Oxford. This only serves to clarify the limited and constrained opportunities for the city to accommodate additional housing and fails to consider the possible opportunities for expansion that could be explored collaboratively with neighbouring authorities.	The methodology in the latest Green Belt assessment reflects the most recent changes in the NPPF and PPG. The PPG states that authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes. Further details can be found in Background Paper 006 which acknowledges that there are both grey belt and Green Belt sites that merited further investigation for development potential. Further work was undertaken by the Council and resulted in the	None

	inclusion of an additional site allocation (SPE9 Marston Paddock extension). The Council cannot allocate land that is not within its jurisdiction and has taken the most pragmatic approach. This does not preclude further Green Belt work being undertaken in collaboration with neighbouring authorities in the future.	
The Green Infrastructure Study (GIS) 2022, part of the evidence base for OLP2045 and informing the Policy Map, is wholly deficient, factually wrong, presenting derived, and incorrect, information without explanation or evidence. Various concerns raised (*see full rep provided by respondent 186*) including reliance on cut and paste methodology and text, with fundamentally flawed methodology and data. Too many errors in various figures such as Figure 13 and Figure 14. This was pointed out the multiple errors in the survey consultation and ignored. The incorrect mappings are subsequently duplicated on the OLP2045 Policy Map. The Council has proceeded to build on almost all remaining accessible green space in the City, mostly in Council estates, leading to population growth and reduction in green space, creating inequalities, prior to 2001. It is also noted that the poorer suburbs are the most green space deprived, the greatest population increases and most building.	The Green Infrastructure Study is comprehensive and includes analysis covering a range of topics including accessibility, levels of deprivation, playgrounds/sports facilities etc. It provides an up-to-date picture of green infrastructure provision in the city and includes independent assessment across a range of topics. The GI study highlights various findings and recommendations based upon desktop study and site visits, many of which follow similar themes of previous studies – including the inequalities in access to different types of open space in the city (and the need for preventing this worsening where possible), the range in quality of spaces across the city, and the need for targeting greening measures in a variety of ways across the city particularly in light of Oxford's various constraints and pressures on land. As documented in Background Paper 005a, (which further contributes to the evidence base supporting the Local Plan's approaches to green infrastructure), whilst it was an important starting point informing the	No further change proposed.

Previous assessments undertaken such as the Green Infrastructure Surveys 2007/2020 are considered to be of a much higher quality. These found many "Urban Villages" in Oxford were green space deprived leading to inequality. They made various reccomendations, such as recommending standards of green space per 1000 residents, that more unrestricted green space should be found; that 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%.	approaches in the Local Plan including the green infrastructure network protected through Policy G1 it was not the only factor influencing the approach. The Council subsequently went on and refined the network including identifying additional spaces from various sources (including previous consultations) and undertaking further analysis which went in to defining the hierarchy of Core and Supporting spaces. Where feedback from the Reg 19 consultation identifies additional issues or changes needed to the policy or the policies map, these are responded to in the relevant sections of the consultation report, the Council will propose modifications where it agrees a change could help to address a soundness issue.	
The Lye Valley Hydrogeological Impact Assessment report is considered to be extremely disappointing and full of basic errors with meaningful guidance entirely absent. Shows a very poor understanding of the Lye Valley and has clearly not grasped even the basic issues or proposed any meaningful solutions. Respondent 138 includes a detailed appendix as part of their representation with a range of specific comments (*see original rep for full detail*) including in relation to: - Objections over the methodology undertaken for the study;	A response was provided as part of the consultation summary report to the Regulation 18 consultation, this set out that the study is considered to be important as it provides an additional level of analysis and understanding about the hydrogeological functioning of the areas (with a focus on the SSSI) and its key sensitivities which was not available previously. We understand that there may be some disagreement as to the methodologies and conclusions, however, we remain of the view that this is a useful piece of additional evidence supporting the approach to handling applications that might affect the Lye Valley.	No further change proposed.

- Objections over data sources referenced in the study or not referenced; - Disagreement over the key findings and conclusions including how these have informed the impact risk zones/tests proposed for development proposed; - That the work of the previous study looking at the area, the Lamberth report, has not been given sufficient attention, or ignored. The report remains unchanged following the Reg 18 consultation, with none of the defects raised during the consultation, addressed. It is argued that any policy in the Local Plan which is reliant on the report is unsound/unjustified for this reason.	Whilst the Local Plan is not reliant on the study alone, the work further supports the ongoing protection of the wider Lye Valley through the approaches we have embedded into the Local Plan through Policy G6, as well as cross references in various site allocations in proximity to the site. For example, it helps to highlight the complex nature of the catchment and reinforces that the considerations for how to protect the SSSI and surrounding habitats varies depending on type of development, and its location within the particular impact pathways influencing the area. This context helps to ensure that interventions which applicants will need to undertake to meet their responsibilities set out in national and local policy are as targeted and effective as they can be. Alongside the study, we have developed a Technical Advice Note which will further clarify how applicants should approach mitigation of impacts on the Lye Valley.	
Sport England has made a representation relating to the Playing Pitch Strategy and general evidence base supporting sport provision, which is summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.
The Environment Agency has made representations against the Level 1 and Level 2 SFRA, which are summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

The Environment Agency have also made comments linked to the Water Cycle Study strongly advising the Council to continue to liaise with Thames Water to receive confirmation and assurances around ensuring enough discharge capacity will be available at the Oxford Sewage Treatment Works in the short to medium term.	Noted, the Council will continue to engage with Thames Water and the Environment Agency on this topic.	Continue engagement together.

Policies Map

POLICY	Policies Map
All respondents **supporting** the policies map	No representations were made in support of the policies map.

POLICY	Policies Map				
All respondents **raising objections** on the policies map	58.8	60.8	*93.9*	103.2	120.1
	128.3	111.6	138.2		

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
It is unsound that the Policies Map does not designate the Old Marston Road shops - which include New Marston's only pharmacy and	As explained in the supporting text for policy C1, designation of an area as a local centre takes into consideration the importance of the area beyond the immediate neighbourhood,	None.

post-office – as part of the New Marston local centre.	the level of connectivity and the suitability for a range of uses. The shopping parade in question does not have the scale to be considered as a local centre in its own right, and as it is located in a predominantly residential area some distance away it is too isolated from the designated Marston Centre to be considered as part of it.	
In order to improve the effectiveness of the LP and the deliverability of the site (SPE14 Ruskin Field) it is requested that the policies map is amended to include land to the west, to accommodate the proposed access, to connect to Foxwell Drive as identified at Appendix 1.	Refer to officers responses to SPE14 representations.	Refer to officers responses to SPE14 representations.
We believe that the boundary of the Headington District Centre ought to be altered to include no's 2, 2a, 4a – 4f New High Street. As well as Shark House – and the proximity of its neighbour to the north (no 2a) to the beer garden of the Royal Standard PH – the identified terrace on the western side of New High Street also includes a hairdresser and barber's shop.	The sites in question comprise of residential properties and a hairdresser. They are not part of the frontage of the district centre and do not provide amenity or importance beyond the immediate neighbourhood so do not in themselves merit inclusion within the designated district centre area.	None.
Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to policy SPE8.	This has been noted and site reference will be amended as a minor modification.	Minor modification.
The OLP Policies Map and Local Plan must be updated to: • Correct incorrect and sloppy boundary markings. • Add missing green areas with correct designations. • Visually mark restricted, semi-restricted and	The local plan is required to address policies, designations and allocations that are within the administrative boundary of Oxford, so it would not be appropriate to include development sites outside of the boundary.	None.

fully accessible green spaces • Add Development outside OCC's boundary. • Add playgrounds with a policy to resist removal 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.	Efforts have been made to make the policies map as comprehensive as possible given time and resource constraints , and factual corrections when specifically identified can be made on an ongoing basis as required. On the interactive policies map the Green Infrastructure (GI) network spaces are identified by name, typology, designation in line with policy G1, and where known subtypology. The level of detail provided has been set at a level suitable to support the policy objectives and to be as user friendly as practical as possible.	
'Oxford Brookes Marston Road Campus' is indicated as site code SPE 10, not SPE 11 as in the 'Appendix 08 Infrastructure AOF and Site Allocations' document. 'Milham Ford Field and Quad LWS 50I05' seems not indicated on the map by horizontal bar green bars as are other LWS within the city.	This has been noted and site reference will be amended as a minor modification. Visibility settings on the interactive map will be adjusted to ensure that the LWS can be viewed at larger scales.	Minor modification.
South Oxfordshire DC and Vale of White Horse DC commented on the appropriate extents of the policies map in relation to designations and safeguarded land for infrastructure.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

Miscellaneous Comments

POLICY	Miscellaneous Comments		
All respondents **supporting** through other miscellaneous comments	161.4		

COMMENT SUMMARY	OFFICE RESPOSE
National Highways has made supportive comments on the draft Oxford Local Plan 2045, which are summarised and responded to in the Statement of Common Ground.	Refer to the copy of responses included as part of the SoCG which are duplicated in Appendix 1.

POLICY	Miscellaneous Comments				
All respondents **raising objections** through other miscellaneous comments	154.1				

SUMMARY OF ISSUES RAISED	OFFICER RESPONSE	PROPOSED ACTION
The Draft Local Plan is 'Unsound' because its 'public consultation' which should have been designed to ask people's views of the proposed policies instead, by misleading wording, led people to agree to a policy which, had it been	This response is directed towards the Regulation 18 Stage Consultation process and materials. The Reg. 18 Stage consultation was undertaken in line with the Statement of Community Involvement (SCI). We consider that the approach taken to consultation went beyond the statutory minimum requirements.	No further action.

expressed more clearly, they would never have agreed to. The draft Local Plan is unsound owing to the faulty process of Public Consultation which underpins it		

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Appendix 1 – Statements of Common Ground tables of comments/responses

The following appendix includes tables of comments received from bodies with which the Council is undertaking Statements of Common Ground along with officer responses.

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Natural England

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
G1	**Policy G1 – Protection of Green Infrastructure** NE welcomes the inclusion of a Green Infrastructure (GI) policy.... NE welcome the identification and protection of those spaces forming part of the GI core network G1A and G1B as identified on the proposals map.	Support for Policy G1 and the identification of the Core (G1A) and Supporting (G1B) spaces is welcomed.	No change proposed
G2	**Policy G2 – Enhancement and provision of new green and blue features** <u>Watercourse buffer</u> The plan recognises the opportunity to enhance blue corridors and NE welcome the inclusion of a commitment to restore bankside and instream habitats, leaving an undeveloped buffer zone of at least 10m width. We would encourage you to identify those site allocations where these opportunities exist and provide details of the buffer zone requirements within each of the allocation policies to ensure that these opportunities are a requirement. This would be particularly beneficial where sites are adjacent to SSSI or SAC sites and would act to enhance and	<u>Watercourse buffer</u> Representation relates to certain site allocation policies only. See representations for SPCW6 – Manor Place, and SPS8 – Meadow Lane The proximity of development sites to SSSIs has been assessed in the Source Pathway Receptor Analysis. Any site allocations within Impact Risk Zones (IRZs) for the relevant SSSIs have been identified in the relevant site allocation policies.	<u>Watercourse buffer</u> No change proposed to Policy G2.

3190

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	strengthen the existing identified G6 ecological and G1 GI network.		
G4	**Policy G4 – Delivering mandatory net gains in biodiversity** Higher than 10% BNG target NE welcome the inclusion of a commitment to deliver the mandatory 10% net gain in biodiversity. NE encourages the City Council to be more ambitious and consider a higher percentage to align with the shared regional principles of the Oxford-Cambridge Growth Corridor – i.e., 20% Strategic approach The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of biodiversity networks. Off-site reprovision of BNG Where reprovision of BNG cannot be delivered on site, the plan should set out where this might be delivered across the ecological network (Policy G6) across the plan area, in a similar way that is proposed within policy G1 for GI provision.	Higher than 10% BNG Target As set out in previous discussions, whilst we have elected to maintain a 10% Biodiversity Net Gain (BNG) target, which aligns with the legislation, Policy G4 encourages a higher delivery of BNG where possible. National guidance is clear the plan-makers should not set targets that exceed 10% unless this can be justified. Setting a policy target that exceeds the mandated 10% in Oxford is likely to be challenging due to the constrained nature of many of the site allocations. A higher target could also result in additional offsetting payments for biodiversity units being delivered through offsetting into biodiversity net gain elsewhere, outside of Oxford. Instead, we have sought a locally tailored approach to boosting gains for biodiversity and the wider environment which fits with Oxford's setting, as discussed further below. Strategic approach Chapter 4 of the Local Plan 2045 provides an over-arching approach to supporting both the Green Infrastructure (GI) and biodiversity networks, which aligns with your comments. Policies G1-G6 set out a strong hierarchy of protection for existing green features through Policy G1 and more explicit requirements for ecological sites (Policy G6). The Local Plan promotes new greening with Policy G2 seeking to secure new multi-functional green features,	Higher than 10% BNG Target No change proposed Strategic approach No change proposed Offsite reprovision of BNG No change proposed

3191

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
		whilst we are also including a new policy for Oxford focussed on increasing surface greening via the Urban Greening Factor (Policy G3) - adapted from NE's own guidance. In relation to securing more space for biodiversity, the Local Plan includes specific requirements for the delivery of onsite ecological enhancements that are important for many priority species but not recognised through the BNG process (Policy G5). This would sit alongside and enhance the provisions of the Statutory BNG requirements. <u>Offsite reprovision of BNG</u> Policy G4 already prioritises the delivery of BNG onsite and sets out a hierarchy to be followed where on-site (or adjacent) delivery is not feasible, in line with Natural England's suggestion. We have sought to ensure that the LNRS is incorporated into this hierarchy, so that applicants are guided by the opportunities it identifies where onsite delivery is not possible. The policy also recognises that there will be opportunities to deliver BNG that aligns with the delivery of measures identified in the LNRS. This will be particularly relevant where development proposals are located in areas identified within the LNRS. Separately, where site allocation policies contain land that has been identified within the LNRS, a reference is included within each policy.	
G6	**Policy G6 – Protecting Oxford's biodiversity including the ecological network**		

3192

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	General comment ... Local ecological networks form part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Ecological enhancements ...Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. General comment re: sites within Oxford's ecological network NE welcome the commitment to safeguard key sites within Oxford's ecological network (including Oxford Meadows SAC). Adjacent to SSSI/ SAC etc. NE encourage the City Council to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI and stipulate within the allocation policy that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required. Irreplaceable habitats We encourage the City Council to be ambitious in terms of the protection, strengthening and enhancement of the ecological network and suggest a commitment to the protection of	General comment General comment noted. Ecological enhancements Policy G2 sets out how enhancements to the green and blue infrastructure network should be delivered, while Policy G4 sets out how BNG requirements are to be delivered prioritising on-site and then off-site delivery. Together these policies work to contribute to the enhancement of ecological networks. General comment re: sites within Oxford's ecological network General comment noted. Sites adjacent to SSSI/ SAC etc. The Local Plan 2045 does not allocate any sites immediately adjacent to the Oxford Meadows SAC. The proximity of development sites to SSSIs has been assessed in the Source Pathway Receptor Analysis. Any site allocations within Impact Risk Zones (IRZs) for the relevant SSSIs have been identified in the relevant site allocation policies. The following four policies are located immediately adjacent (or very close to) a SSSI. *Policy SPS14 – Redbridge Paddock* is separated from the Iffley Meadows SSSI by the River Thames. The policy recognises that the site lies within the identified impact risk zone for the Iffley Meadows SSSI. Policy wording has been included to ensure no adverse impacts on the SSSI. Additional policy wording has been included that relates to the incorporation of SuDS and a groundwater and surface water assessment. *Policy SPE1 – Churchill Hospital* is adjacent to the Lye Valley SSSI. The policy box for the site highlights this,	General comment No change proposed Ecological enhancements No change proposed General comment re: sites within Oxford's ecological network No change proposed Adjacent to SSSI/ SAC etc. No change proposed Irreplaceable habitats No change proposed Nature recovery network No change proposed

3193

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	irreplaceable habitats and priority habitats (such as lowland fen), in the policy wording. <u>Nature recovery network</u> NE encourage the City Council to consider the Oxford Nature Recovery Network and welcome the reference to the Oxfordshire Local Nature Recovery Strategy in the site allocation policies.	and the site's location within the identified impact risk zones for the Lye Valley SSSI. Policy wording has been included to ensure no adverse impacts on the Lye Valley SSSI. Policy wording has also been included to ensure that the applicable tests identified within the relevant risk zones in the Lye Valley Study/ TAN are satisfied. Given the site's proximity to the SSSI, additional text relating to construction buffers and watercourse buffers (Policy G2) has also been included. *Policy SPE10: - Nuffield Orthopaedic Centre* acknowledges the proximity of the site to the Rock Edge Geological SSSI, situated on the other side off Windmill Road. The policy includes policy text relating to a construction buffer. Appropriate text has also been included in the policy in relation to the site's location within the identified impact risk zone for the Lye Valley SSSI. *Policy SPCW6 – Manor Place* identifies the proximity of the site to both Magdalen Grove Geological SSSI (adjacent) and the New Marston Meadows SSSI (within the impact risk zone). Given the proximity of the site to the Magdalen Grove Geological SSSI text has been included within the policy relating to a construction buffer. Appropriate text has also been included in the policy in relation to the site's location within the identified impact risk zone for the New Marston Meadows SSSI. No other site allocations have been proposed adjacent to SSSIs. <u>Irreplaceable habitats</u>	

3194

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
		Policy G6 includes a specific section that covers *internationally and nationally designated sites and irreplaceable habitats*. This section of the policy refers to the appropriate sections of the NPPF (paras 193-195), or their equivalent paragraphs in any update of national policy. Local Plans drafted under the NPPF (Dec 2024) should be in conformity with national policy and as such the national policy position with regard to irreplaceable habitats has not been duplicated in the Oxford Local Plan 2045. <u>Nature recovery network</u> The TVERC Nature Recovery Network (NRN) has informed the development of the city's GI network (particularly the network of core (G1a) spaces. Where the Oxfordshire NRN identified a green space in the city containing a significant area of "core space" as defined by the TVERC NRN, and it was determined that space contributed to a clear green corridor function within the city, this resulted in those spaces being designated as part of the core GI network for Oxford.	
Omission poilcy	<u>Lye Valley SSSI: Further details</u> NE encourages the City Council to include the details of a policy specific to the Lye Valley SSSI and the requirements for development in relation to SuDS etc., within a Local Plan policy rather than a Technical Advice Note (TAN). NE appreciates that the evidence (hydrogeological survey) that will guide planning requirements has only just	<u>Lye Valley SSSI: Further details</u> Policy G6 provides the overarching protection for all the designated sites including the Lye Valley. The supporting text explicitly references Lye Valley as one of the SSSIs with particular sensitivities and sets out the types of adverse impacts it is susceptible to. Furthermore, we have also included on the policies map the Impact risk Zones identified through the JBA Hydrogeological Report, to assist applicants. We expect that the Technical Advice Note will then provide further guidance for applicants, informed by	<u>Lye Valley SSSI: Further details</u> No change proposed, however, we look forward to continuing to engage with you on finalising the Technical Advice Note ready for publication.

3195

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	been published and that the TAN is under development. However, if it is possible to incorporate this into the Local Plan that would be preferable to a TAN.	the JBA study, in how these adverse impacts should be addressed in each of the Impact Risk Zones. Additionally, we would flag that we have also sought to include explicit encouragement for applicants within the Marston Road and Old Road Area of Focus policy to explore opportunities for design interventions on their sites that could go further than mitigating harm and secure a betterment for the Lye Valley (e.g. reducing hard surface cover). See supporting text to that policy and also criterion C of the policy.	
SPN3	**SPN3 – Oxford North Remaining Phases** <u>Public open space delivery: HRA mitigation</u> NE advises that the GI provide as part of the development within the SPN3 allocation is mapped and included within the Core GI Network (Policy G1) as it forms part of the mitigation for recreational impacts on the Oxford Meadows SAC and should therefore be protected from development in perpetuity.	<u>Public open space delivery: HRA mitigation</u> Some of the public open space that has been provided to mitigate recreational impacts at the Oxford Meadows SAC has already been delivered on land which falls outside of the emerging Local Plan 2045 site allocation. However, the entire site areas is included within the redline boundary of the outline planning application. As the delivery of the public open space is being administered through the implementation of that application (which is ongoing), that is why it has not been formally designated as part of the GI network. The Council will consider how best to ensure that this particular public open is maintained beyond the requirements of the planning permission.	<u>Public open space delivery: HRA mitigation:</u> No change proposed
SPE1	**SPE3 –Government Buildings and Harcourt House** <u>General comment</u> NE welcome recognition that there may be hydrological impacts from development at this location on the New Marston Meadows SSSI.	<u>General comment</u> General comment noted. <u>Fragmentation of linkages</u>	<u>General comment</u> No change proposed <u>Fragmentation of linkages</u> No further change proposed

3196

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	Fragmentation of linkages However, due to its proximity to the SSSI (and the presence of open mosaic priority habitat) and the site's likely high biodiversity value, NE concerned that development here will impact on the wider ecological network to which the site is linked potentially resulting in the fragmentation of linkages of linkages. NE state that "further information should be provided to evidence whether the site is deliverable"	The policy sets out that proposals should seek to retain existing features wherever possible. Additionally, under criterion c, as part of maintaining the UGF score, the policy encourages new or enhanced features which should seek to enhance connections through the site, such as wildlife corridors. We believe this helps to address NE's concerns relating to fragmentation of linkages. Criterion e flags the presence of priority habitat on site and sets out expectations of applicants where they could impact this. As with all the allocations, we have sought to consider a range of factors (e.g. biodiversity, heritage etc) in coming to the minimum capacity of the site and the requirements set out in the policy. The narrative of this assessment is captured in the site capacity assessments within the evidence base.	
N/A	N/A - Headington Hill Hall and Clive Booth Student Village (SPE3 – policy reference refers to site no longer put forward in the Oxford Local Plan 2045)	This representation relates to a site that was not taken forward in the Oxford Local Plan 2045.	No change proposed
SPCW6	**Policy SPCW6 – Manor Place** General comment NE welcomes 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 hydrological assessment and SuDS. Priority habitat There are pockets of priority habitat located within this allocation which will contribute to the ecological network, and the site as a whole will likely be of	General comment General comment noted. Priority habitat Policy box for SPCW6 already notes that the site may contain S41 (Priority/Principal) habitats Watercourse buffer (Policy G2) We can insert some wording in the policy to align approach with other site allocation policies that are located adjacent to watercourses.	General comment No change proposed Priority habitat No change proposed Watercourse buffer (Policy G2) We suggest the following mod could be proposed: *f) A buffer should be retained along the watercourse* ***(Policy G2)****.*

3197

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	high biodiversity value give the habitats present here and its location next to the River Cherwell. Watercourse buffer (Policy G2) NE encourages the City Council to identify the requirement for a buffer strip to be put in place of at least 10m from the River Cherwell as per Policy G2 to ensure that this is clear within the allocation policy.		The subsequent bullet points within the policy will also need to be updated.
SPS3	**Policy SPS3 – Bertie Place Recreation Ground** General comment NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. GI Network reference The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	General comment General comment noted. GI Network reference To overcome this objection to the plan and to provide internal consistency for the policies themselves, some policy wording is suggested. This is in the form of an additional bullet point proposed to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading.	General comment No change proposed GI Network reference Additional bullet point proposed to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading. *f) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.* The subsequent bullet points within the policy will also need to be updated to reflect this wording.
SPS8	**Policy SPS8: Land at Meadow Lane** General comment NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for	General comment General comment noted.	General comment No change proposed

3198

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	hydrological assessment and SuDS features due to this site's proximity to the SSSI. Watercourse buffer NE encourages the City Council to identify the requirement for a buffer strip to be put in place of at least 10m from the watercourse to the west of the site as per Policy G2 to ensure that this is clear within the allocation policy. GI Network reference The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, with a likely high biodiversity value particularly in relation to the invertebrate interest present which will contribute to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	Watercourse buffer Policy SPS8 already includes reference to the retention of a buffer along the watercourse. We propose a modification to make it clear that that bullet point g) makes reference to Policy G2. GI Network reference To overcome this objection to the plan and to provide internal consistency for the policies themselves, some policy wording is suggested. This is in the form of an additional bullet point proposed to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading.	Watercourse buffer We propose a modification to make it clear that that bullet point g) makes reference to Policy G2, as follows: *g) A buffer should be retained along the watercourse (**Policy G2**).* GI Network reference We propose an additional bullet point to be added to Policy SPS3 under the **Open Space, Nature and Flood Risk** heading: *h) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.* The subsequent bullet points within the policy will need updating.
SPS14	**Policy SPS14: Redbridge Paddock** General comment NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. GI Network reference	General comment General comment noted. GI Network reference Paragraph b) of this policy already includes a reference to supporting GI. Paragraph a) of this policy already sets out that the site falls within the impact risk zone for the Iffley Meadows	General comment No changes proposed GI Network reference No changes proposed Fragmentation of linkages No changes proposed

3199

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Fragmentation of linkages Due to the potential high biodiversity value of this site and potential for fragmentation of linkages impacting on the SSSI, further information should be provided to evidence whether this is deliverable.	SSSI and includes appropriate wording to ensure no adverse impacts on the SSSI. Fragmentation of linkages In relation to the point about potential fragmentation impacts, the Council has reviewed this further and consider that if a proposal were to meaningfully retain a green buffer (including mature trees) and protect the river corridor/riparian corridor as the policy sets out, then the connectivity through the landscape would be preserved and this would mitigate any potential fragmentation impacts on the SSSI. The Council has reviewed the wording of the allocation in response to NE's concern and consider that the above is addressed via the current wording in bullet points d) and e) of the policy which sets out the importance of considering the SSSI and the retention of a green watercourse buffer in accordance with Policy G2.	
SPE1	**Policy SPE1: Churchill Hospital** General comment The above allocation falls within the Lye Valley SSSI Impact Risk Zone. The Lye Valley SSSI is a lowland fen spring fed system and is highly sensitive to changes in water quantity and quality. We welcome wording within the policy which states 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.	General comment General comment noted. Urban Greening Factor The UGF policy is a new approach for Oxford, and the targets we have set are informed by previous testing and what we felt would be most achievable across the city to secure a range of benefits. In relation to the Lye Valley area, The JBA Hydrogeological Study sets out the complex nature of the catchment and the different risks that apply in different areas. It is likely that bespoke, specific mitigation measures will be required to address	General comment No change proposed Urban Greening Factor No change proposed

3200

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
	Urban Greening Factor NE encourages the City Council to be ambitious, particularly for those allocations which adjoin the Lye Valley SSSI. NE suggests, for site allocations adjoining the Lye Valley SSSI, a higher minimum target score for the Urban Greening Factor (set out in Policy G3), is considered. This is due to the increased importance in this area for natural surface coverage which in turn, ensures that the hydrological processes on which Lye Valley SSSI depends, are maintained.	particular surface and groundwater quantity and quality issues that may arise from development proposals. This will depend on what development is proposed and where within the locally identified IRZs for Lye Valley. Our concern, given the sensitivities of the habitats within the Lye Valley, is that setting a higher UGF target for this area could undermine the findings of the study or suggest that this is sufficient mitigation for impacts from development near by. In actuality, any measures required to mitigate the impacts on the SSSI should be specifically informed by the guidance in the site allocations and the Technical Advice Note (which builds on the recommendations of the JBA study) and carried out for that purpose. This may include higher levels of natural surface cover, but there may be other interventions/design choices which are also just as important (or more so), depending on what is proposed.	
SPE18	**Policy SPE18: Warneford Hospital** GI Network reference Policy SPE18 Warneford Hospital contains pockets of G1B green infrastructure as identified in the protected network and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network, therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network Policy G1b should be referenced in policy	GI Network reference Criteria b) of Policy SPE18 already includes the following which addresses NE's objection: *... Losses of open space identified as supporting green infrastructure (Policy G1) will also need to be mitigated through enhancement of remaining GI. These requirements could be met in different ways, such as through enhancement of remaining areas of amenity grassland, additional planting such as new trees that can enhance canopy cover and the setting of the listed buildings, or improvements in linkages to nearby habitat, as well as new habitat creation.*	GI Network reference No change proposed

3201

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
SPE4	**Policy SPE4: Jesus College Sports Area** GI Network reference This allocation in its entirety is part of the protected G1B green infrastructure network therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Policy G1b should be referenced in policy	GI Network reference Criteria a) of policy already includes the following text which addresses NE's objection: *The entirety of both sites has been identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining on-site, and adjacent, areas of open space by improving the functionality of these spaces in terms of wider benefits they provide people and species.*	GI Network reference No change proposed
HRA	**Habitat Regulations Assessment** HRA Natural England agree with the conclusions presented in the HRA that there will be no Likely Significant Effects as a result of the plan on the Oxford Meadows Special Area of Conservation (SAC) in terms of water quality or recreational disturbance. Provided you have followed the advice set out within Annex A regarding the assessment of air quality, we can also agree with the conclusion of no LSE set out in the HRA in relation to air quality impacts.	HRA The City Council is pleased that NE agree with the HRA conclusions relating to water (quality and quantity) and recreational disturbance. Having reviewed the advice set out in "Annex A", regarding air quality assessment, the City Council is confident that the assessment undertaken in relation to air quality impacts has followed this advice.	HRA No further work required/ no changes need to the Plan.

3202

Historic England

Policy/section	Summary of HE Reg 19 comment	HE Reg 19 suggested change	Oxford City Council response/proposed modification
Policy S2: High Quality Design	Policy is considered sound - support reference to the role of heritage in the Council's strategic approach to high quality design.	N/A	Support is noted thanks, no further action proposed.
Policy E1: Employment Strategy	HE retain concern about first paragraph on new employment generating uses because this now includes broad reference to sites within the city centre. Would prefer a qualifier indicating that intensification and modernisation may need to be handled sensitively for some sites. Suggest adding "appropriate". Alternative would be a reference to other relevant policies in the plan	Amendments to wording as follows: *Planning permission will be granted for the appropriate intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre.*	Whilst we appreciate the concern, the qualifier does not in practice add any additional specificity without defining what we mean by 'appropriate', which will of course vary depending on site context. The policies of the Local Plan need to be read as a whole and other policies of the Local Plan, such as the detail covered throughout chapter 6 should ensure that any intensification/ modernisation is appropriate for the location, including ensuring that any harm to nearby sensitive features is avoided/mitigated through careful design choices. We do not currently propose any further modifications in relation to this comment.
Policy R3: retro-fitting existing buildings	Policy is considered sound – HE support this policy, making clear that traditional buildings require a different approach to retrofit measures when compared with adapting modern buildings to improve their carbon and energy efficiency.	N/A	Support is noted thanks, no further action proposed.
Policy HD3: designated heritage assets	1. The Reg 19 Local Plan switches terminology to refer to a heritage statement rather than heritage assessment (in previous iterations). HE consider that reference to heritage	Amendments to wording, corresponding to the 3 points made: 1. Policy should reference heritage assessment rather than heritage statement.	We are happy to agree to the first two points and the modifications suggested by HE as follows: 1. **Mod proposed to amend references from heritage statement to heritage assessment throughout the Local Plan (affects multiple policies e.g. HD3, HD4 and HD5).**

3203

	assessment more accurately reflects the subsequent policy requirement and the direction of travel through the draft NPPF consultation 2026. 2. Strongly recommend that the potential for proposals to enhance significance and its appreciation is incorporated into the policy wording. The potential for proposals to deliver other heritage benefits could effectively be incorporated into criterion c. 3. There is no subsection to the policy on scheduled monuments, which is an unnecessary omission that should be rectified. HE suggest additional text for inclusion.	*2.* Amend to criterion b) as follows: *That the development of the proposal and its design process have been informed by an understanding of the significance of the heritage asset including its setting, that enhancements to significance and its appreciation have been identified where possible, and that harm to its significance has been avoided....* Amend to criterion c) as follows: ...*and that measures are incorporated into the proposal that mitigate or reduce the harm where appropriate and/or deliver other heritage benefits.* 3. Additional policy sub-section addressing considerations for Scheduled Monuments and nationally significant Archaeology – see Reg 19 response for suggested wording.	**2. Mods proposed to criteria b) and c) as per the suggestions.** **3.** Whilst we note the concern about the omission of reference to scheduled monuments in the policy, we would draw your attention to the fact these are referenced in supporting text. Within the policy wording itself, we have tried to focus only on locally specific considerations that do not repeat national policy, but at present, we are struggling to see how the additional wording suggested aligns with this approach. For example, criteria c and d seem to repeat NPPF tests. Equally, within proposed criteria c, the wording about non-designated assets seems to repeat footnote 75 of NPPF (and is already covered at end of HD4). Nevertheless, further to our catch up, we think we could propose a modification that would bring attention to scheduled monuments and cross reference to policy HD5. **Modification adding some additional wording to the policy as follows:** *Specific considerations for scheduled monuments* *Proposals within the site or setting of scheduled monuments should consider the potential for non-designated heritage assets of archaeological interest, which could be of demonstrably equivalent significance to scheduled monuments. Where present, impacts on these assets will need to be addressed in line with the requirements of Policy HD5 and the NPPF.*
Policy HD4: Non-designated heritage assets	Proposed amendment to policy cross reference.	Reference should be made to HD3 rather than HD4 in the final line.	Agree, this is an erroneous reference. **Mod proposed to update cross reference from HD4 to HD3 in final para of policy.**
Policy HD5: Archaeology	Proposed amendment to policy cross reference.	Reference should be made to HD3 rather than HD2 and HD4.	Agree, these are erroneous references. **Mod proposed to update cross references as follows:**

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			Proposals which would or may affect archaeological deposits or features that are designated heritage assets will be considered against the requirements of Policy HD3~~relevant policy approach (Draft Policy HD2 Listed Buildings, Draft Policy HD4 Scheduled Monuments).~~
Policy HD6: Views and building heights	Support for the policy as worded.	N/A	Support is noted thanks, no further action proposed.
Policy NEOAOF: Northern Edge of Oxford Area of Focus	Proposed amendment to policy cross reference.	Reference should be made to HD6 rather than HD9.	Agree, this is an erroneous reference. **Mod proposed to update cross reference from HD9 to HD6 under criterion g) of the policy as follows:** *Development proposals should be developed in accordance with Policy ~~HD9~~HD6 and where applicable with the site-specific allocation.*
Policy SPN3: Oxford North Remaining Phases AND VARIOUS OTHER POLICIES	Check policy cross references. Policy SPN1 includes reference to impacts on conservation areas with a cross-reference to HD3. Here, in policy SPN3 they are referenced in the context of HD1. In policy SPS9 reference is made to both HD1 and HD3.	We recommend checking that the Council is comfortable the correct policies are being cited on when considering impacts on the character of conservation areas, in this and other site allocations.	Agree, there are some erroneous references here. **Mods proposed to correct the cross references in the following policies:** - **SPN3 (HD1 to be changed to HD3 in criterion h)** - **SPS9 (HD1 ref to be removed from criterion g)**
Policy SPN5: Pear Tree Farm	Reference is made to the need for further archaeological investigation only for any "sizable redevelopment". The meaning is unclear and open to interpretation. Harm to archaeological assets is not necessarily dependent on the size of the development, but its location. A small development in a location that contains important remains will lead to harm.	The wording here needs to be reviewed by the Council's archaeological adviser and revised.	Agree this wording is unhelpful. **Mod proposed as follows:** n) *This area is of archaeological interest for potential prehistoric and Roman remains, which will require further investigation as part of any ~~sizable~~ redevelopment **(Policy HD5).***

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Policy CBLAOF: Cowley Branch Line area of focus	We note the different criteria that were included in the OLP2040 Regulation 19 have been dropped, presumably because of the more detailed work that has been done that is embedded in the CBL Densification Study. We look forward to the publication of that study. We highlight that impact on views and heritage significance connect with views towards the historic core, not just from the core.	Reference should be made to HD6 rather than HD9. h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from or to the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD69 and the site-specific allocation, where applicable ...	Agree with suggested amends. **Mods to be proposed as follows:** *h) Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from, or to, the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy HD9HD6 and the site-specific allocation...*
Policy SPS2: ARC Oxford	Proposed policy cross reference	The site allocation policy in OLP2024 Regulation 19 refers to the consideration of impacts within the setting of the adjacent conservation area and listed building (HD1 and HD2). These considerations remain relevant and should be reinstated with a reference to policy HD3.	**Propose a mod to add a new criterion under the Urban Design and Heritage section, before the current criterion g) relating to archaeological remains, to read as follows:** *g) Proposals should be designed in a way that is sensitive to the nearby listed building, as well as the Temple Cowley Conservation Area which lies adjacent to the site, particularly regarding heights, massing, roofscape and impacts on local character and street scene (**Policy HD3**).* **Letters for criteria that follow will need to be updated to account for new one added.**
Policy SPS6: Former Iffley Mead Playing Field	Reference is made to any sizable development requiring pre-determination evaluation.	This wording should be reviewed by the Council's archaeological adviser.	Agree this wording is unhelpful. **Mod proposed as follows:** *e) Proposals should ensure that the archaeological assets are appropriately investigated and responded to **(Policy HD5)**. Any sizable development will require pre-determination evaluation (geophysical survey and trenching).*
Policy SPS7: Kassam Stadium	Support for the policy as worded/	N/A	Support is noted thanks, no further action proposed.

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Policy SPS10: MINI Plant Oxford	The policy omits reference to HD6 and the CBL Densification Study. While reference is made to blending into surrounding views, the policy needs to connect with both the relevant policy and the 2025 study.	Reference should be made to the CBL Densification Study and HD6	We will propose a mod adding in a reference to the CBL study and High Buildings TAN, however, we do not propose to add a cross-ref to HD6 as this is only flagged in allocations explicitly where there are particular concerns in relation to protected view cones. Whilst HD6 may be of relevance to applications elsewhere in the city, this does not need to be repeated throughout all allocations as the Local Plan's policies need to be read as a whole. **Mod to be proposed to criterion e) as follows:** *e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar and on the approach, so as to reduce feelings of overbearing and dominating of the adjacent streetscape. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025). Variations in materials, including selection of materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.*
Policy SPS11: Overflow Car Park at Kassam Stadium		Reference should be made to the CBL Densification Study and HD6	We will propose a mod adding in a reference to the CBL study and High Buildings TAN, please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6 also. **Mod to be proposed as follows:** *h) There is greatest potential for higher and larger plot buildings in front of the railway embankment and in the centre of the site, building in height from the outer edges towards the centre and north of the site. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

Policy SPS12: Oxford Science Park		1. Reference should be made to policy HD6 to align with the approach elsewhere in the plan. 2. The allocation should make clear the importance of avoiding harm to any buried remains of Littlemore Priory discovered within the Science Park. 3. Suggest avoiding the implication that proposals should preserve the setting of the Farmhouse, when its significance has been harmed by development within its setting. It would be more appropriate to require proposals to "enhance" the setting.	1. Please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6. 2. Policy criterion k) does flag the potential for remains associated with Littlemore Priory and cross refers to policy HD5, which we feel addresses that part of your comment sufficiently. **3. We are happy to propose a mod to criterion j as follows:** *j) Development proposals must be designed to preserve and enhance the setting of the adjoining Grade II* listed Minchery Farmhouse, particularly plots in the east of the site **(Policy HD3)**.*
Policy SPS13: Ozone Leisure Park and Minchery Farmhouse	Welcome the newly drawn boundaries for this site.	The allocation should make clear the importance of avoiding harm to the buried remains of Littlemore Priory. Similar to agreed mods on LP2040, encourage that focus to be integrated within policy SPS13, with potential revised wording as follows: "The heritage significance of Littlemore Priory should inform the design of schemes including avoiding harm to buried remains and seeking opportunities to better reveal and appreciate the significance of those remains".	We agree some additional detail would be helpful and propose to use similar wording to that of SPS12. **We propose a mod to amend criterion J as follows:** *j) ~~Archaeological potential will need to be explored as part of any proposed redevelopment (Policy HD5).~~ Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and remains of Littlemore Priory. Proposals should ensure that the archaeological assets are appropriately investigated and responded to **(Policy HD5)**.* **We also propose a mod to the 'Notable Heritage Assets' line in the summary box above the policy as follows:** *Contains Minchery Farmhouse Grade II* listed building. Potential for prehistoric, Roman and*

			medieval archaeology, including remains associated with Littlemore Priory.
Policy SPS15: Sandy Lane Recreation Ground Policy SPS16: Templars Square Policy SPS17: Unipart Site		We recommend referring to the CBL Densification Study (all three sites) and policy HD6 (SPS15 and SPS17).	We will propose mods adding in references to the CBL study and High Buildings TAN, please see comment against SPS10 explaining why we do not propose to include a cross-ref to HD6 for SPS15 and SPS17. **Mods to be proposed as follows:** **SPS15 – Sandy Lane – Amend to criterion i) as follows:** *i) Whilst the site is in an area of the city with fewer constraints or less sensitivity in terms of views, development proposals will need to consider and mitigate impacts on the sensitive skyline and surrounding area, particularly when viewed in combination with existing and planned development on adjacent sites. This could be achieved in various ways, such as by avoiding built forms with excessively overbearing scale or massing and avoiding roofscapes that are excessively uniform. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).* **SPS16 – Templars Square – Amend to criterion g) as follows:** *g) Because of the position of the site on a ridge in an elevated position relative to the city core, there is potential for development to alter views from and to the Historic Core Area (both in the foreground and background of views). Therefore, the townscape and visual impact of any development on views to, across and from the Historic Core Area must be understood, described and explained thoroughly, including with a Visual Impact Assessment, in compliance with Policy HD6. Heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

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			SPS17 – Unipart Site – New criterion to be added under Urban Design and Heritage section after existing criterion i), (and criteria after to be re-lettered), as follows: *j) Building heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*
Policy SPE3: Government Buildings and Harcourt House		Reference should be made to the Headington Hill and St Clements Conservation Areas, as included in the OLP2040 Regulation 19	We have sought to list the key assets of relevance, including these conservation areas, in the info box above the policy box. **However, we will propose the following mod:** *g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, such as the Headington Hill and St Clements Conservation Areas, taking opportunities to enhance these wherever possible* ***(Policy HD3)****.*
Policy SPE6: Land surrounding St Clement's Church	Allocation is considered **unsound**. Unlikely to be effective due to its vague approach to heritage considerations and inconsistent with national policy (NPPF paragraph 203), failing to represent a positive strategy for the historic environment. The policy refers in criterion j) to the need to consider impacts on the significance of "the heritage assets listed [sic] above". This is un-necessarily vague and is open to interpretation, undermining a suitable approach to development in what is a sensitive site. Also, we note the assets referenced (presumably in	While the policy does provide a welcome steer towards limiting heights, we still recommend a cross reference to policy HD6 (noting the site intersects with a view cone). Wording changes would address our soundness concerns on this policy, making clearer the heritage considerations that need to be taken into account for this allocation.	**Mod proposed to the summary info box above the policy, in the notable heritage assets section, as follows:** *Site surrounds Grade II* listed St Clement's Church. Southern half of the site within South Park View Cone. Within St Clement's and Iffley Road Conservation Area and within setting of Headington Hill Conservation Area. The Grade I Registered Park and Garden Magdalen College lies adjacent to the site.* Current criterion n) reflects the additional specificity which we think would address your concerns relating to criterion j). **We propose a mod to correct the typo in criterion j), and then to remove and incorporate criterion n) into criterion j).**

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	"Notable heritage assets") do not refer to the adjacent Grade I Registered Park and Garden.		*j) Development proposals should be designed with consideration of their impacts on the significance of the heritage assets ~~ilisted~~ listed above (**Policy HD3**). Buildings should be arranged in a way that maintains the openness of the riverside setting, that does not compete with the Grade II* listed St. Clement's Church, and is sensitive to the adjacent Registered Park and Garden. Proposals should also maintain the hedge and treeline on the Marston Road and the avenue of trees south of the church that screen it and contribute strongly to the character of its setting.* We agree additional reference to the view cone and to HD6 would be useful, and **propose a mod to current criterion l) as follows**: *...Heights should drop towards the Cherwell, to be sympathetic to the relatively rural setting of the river and will also need to be designed with consideration for the view cone which passes through the site (**Policy HD6**). The green screening...*
Policy SPE11: Oxford Brookes Marston Road Campus	Given the reference to the OHAR in criterion g, it's appropriate surely to cross-refer to HD4?		**Agreed, we propose a modification (which also inserts a missing apostrophe in first sentence) as follows:** *g) Design proposals should acknowledge the Milham Ford School building's status as a local landmark in a historic, social and physical sense. The OHAR designation report highlights the elements that are distinctive to the building and its significance which will be of relevance when addressing potential impacts on this non-designated heritage asset (**Policy HD4**).*
Policy SPE17: Union Street Car Park	The OLP 2040 Regulation 19 refers to the archaeological potential of the site (though incorporating 159 –161		**Proposed mod to add detail to the notable heritage assets section in summary box before policy as follows:**

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	Cowley Road). If there is archaeological potential for Union Street Car Park, this should be acknowledged in the policy with a reference to HD5.		*No designated buildings, spaces or structures on site. Site is within the Crescent Hall View Cone. Some potential for archaeological remains in the area related to former uses as a clay pit and brick yard and in relation to the Civil War Parliamentarian Line.* **Additional criterion to be added under urban design and heritage section as follows:** *XX) There is also the potential presence of archaeological assets on the site, including in relation to the Civil War Parliamentarian Line. Proposals should ensure that these are appropriately investigated and responded to (**Policy HD5**).* **Criteria after the new addition above will need to be re-lettered.**
Policy SPCW2: Botley Road Sites around Cripley Road including 110 River Hotel and Westgate Hotel	Allocation is considered **unsound**. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on the approach anticipated to the non-designated hotels and is missing reference to HD4. The table above the policy states that River Hotel and Westgate hotel are on the Oxford Heritage Asset Register (OHAR); yet the policy does not seek to conserve or enhance the heritage significance of these buildings, it simply requires development needing to understand the significance of the site and its surrounding context.	Ref needed to HD4 Potentially, criteria f and h could be combined. Wording changes would address our soundness concerns on this policy to make explicit the approach to redevelopment of these assets on the OHAR, conserving or enhancing their heritage significance.	**We propose the following modification:** *e) Development proposals should be designed with consideration of their impacts on the setting of the Osney Town Conservation Area **(Policy HD3)**, as well as the non-designated heritage assets identified on the OHAR (**Policy HD4**).* We agree that criteria f) and h) could be consolidated. **We propose mods to delete criterion h), and update letters of criteria after, and to update criterion f) so it incorporates what was in criterion h) as follows:** *f) The Boar's Hill view cone covers the entire site allocation. Proposals should be designed in a way that responds to this protected view. Additionally, proposed development that exceeds the height*

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			*stated in the High Buildings TAN may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed (**Policy HD6**).*
Policy SPCW6: Manor Place	Allocation is considered **unsound**. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on key heritage considerations. It does not represent a positive strategy for the historic environment as worded (paragraph 203).	The policy omits reference to the adjacent RPG (Grade I) and the nearby listed buildings (which also include Grade I assets). We refer to the changes to policy agreed in our signed Statement of Common Ground; implementing those changes in full would address our soundness concerns on this policy.	These additional assets are all listed in the notable heritage assets part of the summary box above the policy, however, we agree that the policy criteria could be improved upon. **We propose the following mods:** *e) The hedged boundaries are an important characteristic of the area and should be retained, as should the mature trees and areas of trees in the northern and southern corners, helping retain the green, semi-rural character of the setting as well as screening the site and providing a buffer to the highly graded designated heritage assets within St Catherine's College.* *Urban Design and heritage* *f) ~~Development should seek to preserve the special character of the conservation area within which it lies~~ Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, and the setting of the two adjacent Registered Park and Gardens (**Policy HD3**). The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.* **We also, propose a mod to make the summary box, notable heritage assets clearer:** *...It is adjacent to Magdalen College Grade I Registered Park and Garden and the Landscape at St*

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			Catherine's College Grade I Registered Park and Garden....
Policy SPCW7: Nuffield Sites	Allocation is considered **unsound**. Inconsistent with national policy. NPPF paragraph 202 acknowledges that heritage assets are an irreplaceable resource, but the policy is silent on key heritage considerations and risks harm to the avoidable harm to the character of the conservation area. It does not represent a positive strategy for the historic environment as worded (paragraph 203). Concerns about the lack of clarity in the vision of what's proposed for these three sites, particularly the site south of St. Frideswide Square. All buildings south of St Frideswide's Square are identified as being positive contributors to the conservation area in the Central Conservation Area Appraisal. To include them broadly in site SPCW7 as proposed makes their future very uncertain. Wording of criterion h) is not as clear as it needs to be. Aside from the conservation area, what other designated heritage assets are being incorporated into the development? The supporting Heritage Impact Assessment does not engage in assessing the impacts on significance of relevant heritage assets,	An alternative approach that we believe could resolve our soundness concerns is to separate the site south of Frideswide Square into a separate allocation, which focuses principally on the reuse of assets and acknowledges that they all contribute positively to the conservation area. We would welcome the opportunity to work with the Council on the wording for such a policy. Combining this site with the other two Nuffield sites blurs key issues in an unhelpful way. This would leave the two other sites – the Island site and the car park – which could be grouped together, as they are already. We suggest the following alternative wording for the development of those two sites: "h) Development proposals should show how the design of the scheme has been influenced by and has considered the city's heritage. Proposals should demonstrate how they conserve or enhance the character of the conservation area (in accordance with HD3) and how the existing non-designated heritage assets such as the Royal Oxford Hotel, ~~can~~ will be incorporated into plans to redevelop the site (in accordance with HD4), or justify an alternative approach."	We disagree that the allocation would benefit from being split up, or that this is necessary for soundness; however, we would be happy to propose some further modification to the criteria of the policy in line with your suggestions, as per the below. **Modification to be proposed to criteria f) and h) under the urban design and heritage section of the policy as follows:** *f) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views **(Policy HD6)**. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Applications must be supported by a full assessment so that the full impacts can be understood and assessed.* *h) Development proposals should show how the design of the scheme has been influenced by and has considered the city's heritage. Proposals should demonstrate how they would conserve or enhance the character of the conservation area (**Policy HD3**) and how the existing designated and non-designated heritage assets, in particular the Royal Oxford Hotel and 18-26 Park End Street, would ~~can~~ be incorporated into plans to redevelop the site, or justify an alternative approach (**Policies HD3 and HD4**).*

	presumably because maximum flexibility is sought and there are no scheme designs to consider at this stage.	Furthermore, reference should be made to HD6 in criterion f.	
Policy SPCW8: Osney Mead	In our signed Statement of Common Ground (for Local Plan 2040 preparation), we agreed reference to "the setting of Osney Abbey Scheduled Monument (in accordance with policy HD4), including through design, interpretation and/or enhanced screening, and".	Recommend this agreed wording (modified to refer to HD3) is integrated.	Upon further reflection, we are unable to identify how development on the Osney Mead site can practically be expected to bring about enhancements to the setting of the scheduled monument. We have also now sought a view from a colleague in the heritage team on this matter and they are in agreement. As such, we do not propose to carry forward this wording.
Policy SPCW9: Oxford Railway Station and Becket St Car Park	Allocation is considered **unsound**. Not justified by proportionate evidence. Given the heritage sensitivity of this prominent location at a key entry point to the city, it is vital that the allocation is informed by adequate consideration of heritage impacts. Without such work, the allocation also does not represent a positive strategy for the historic environment (in accordance with paragraph 203).	To be sound, in our opinion, this allocation needs to be informed by heritage impact assessment, and the policy revised to take account of a better understanding of heritage significance and impacts on significance. Cross references are also needed to policies HD3, HD6 and potentially HD4.	We have reviewed and updated the 'South and east of Oxford Station' section of the Heritage Impact Assessment so that the area of assessment now incorporates the railway station area more explicitly, alongside the Nuffield Sites. This has highlighted a few extra details in relation to heritage sensitivity which we propose to incorporate into the summary box for the policy and the allocation's requirements. **Mods proposed to update the 'Notable Heritage Assets' section of the summary box before the policy to improve accuracy/clarity, as follows**: *The site is located within the Historic Core Area and within several view cones (in particular, Raleigh Park and Boar's Hill). The site is in close proximity to ~~contains~~ the Central (City and University) Conservation Area to the east, as well as the Scheduled Ancient Monuments of Rewley Abbey (predominantly below ground) and Swing Bridge at Sheepwash Channel. The site is within the setting of several Listed Buildings, including Church of St Thomas the Martyr (Grade II) (directly opposite to the east) and its surrounding churchyard and*

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			boundary walls, Combe House (Grade II) and St Thomas Vicarage (Grade II). There are also Oxford Heritage Asset Register (OHAR) assets nearby including the Former Castle Hotel (23 Park End Street), the Sheepwash Channel, and the Westgate Hotel (Botley Road). *The southern end of this plot extends into the precinct of Osney Abbey.* **Mods proposed to update the 'urban design and heritage' section with an additional criterion, (new criterion should slot in before the existing criterion j), and subsequent criteria re-lettered) to reflect the updates to the Heritage Impact Assessment, as follows:** *XX) Development proposals should be designed to avoid or mitigate their impacts on the significance and setting of the designated heritage assets nearby including the Central (University and City) Conservation Area, the various listed buildings, and scheduled monuments, as well as the non-designated heritage assets (**Policies HD3 and HD4**).* **Mod proposed to add in cross-reference to policy HD6 in criterion i), as follows:** *i) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views **(Policy HD6).** In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work (to support the masterplan-led approach, or development proposals), the key views should be discussed and agreed in advance in*

			writing with the City Council. A full assessment should accompany proposals so that the full impacts can be understood and assessed.
Policy SPCW12: West Wellington	Query the phrasing of criterion d. The site lies fully within the conservation area, so it would seem remiss not to refer to that explicitly. Is it possible to "incorporate" other designated heritage assets into the scheme? There are no other designated heritage assets within the site. We recommend rewording this criterion.		**We propose the following mod to criterion d):** *d) Development proposals should be designed with consideration for their impacts on the significance and setting of the conservation area and the nearby listed buildings ~~Proposals should demonstrate how the surrounding designated and non designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach~~* ***(Policy HD3)****.*

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Environment Agency

Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
Policy G2: Enhancement and Provision of New Green and Blue Features	1. The second bullet of the 'Policy Implementation' section refers to "embankments" which can cause confusion as it suggests a manmade raised bank top. Replace this word with "bank tops". 2. Box 4.1 misses the opportunity to strengthen the ecological connectivity provided by rivers – suggest additional wording. 3. Acknowledge that Policy G7 contains a statement on culverts but that is in the context of flood risk and it not being seen as a requirement for the benefit of ecology within the watercourse environment. This should be included as requirement of Policy G2. 4. As per point 2 above, the strengthening of the ecological connection provided by rivers should also be reflected in the wording of Policy G2. 5. Within the Policy, more emphasis should be placed on protecting blue corridors and more detail provided on where the ecological	Amendments to wording, corresponding to the five points made: 1. Amend bullet two as follows: *"…. seeks to facilitate opportunities to re-naturalise spaces near watercourses. This could mean thinking about ways to reinstate ~~embankments~~ bank tops by removing artificial materials and 're-wilding' them which can…."* 2. Amend paragraph entitled "Strengthening linkages between area to enhance network connectivity" as follows: *"by incorporating linear features like lines of trees/hedges, creating new pockets of green space that can form 'stepping stones' between larger spaces or taking opportunities to ecologically enhance river corridors and open up and enhance access to….."* 3. Amend Policy G2 to include the following requirement: *"Planning permission will only be granted for proposals which do not involve the culverting of watercourses, and which do not prejudice future opportunities for de-culverting. Opportunities for*	1. Agree that the wording to Policy G2 can be amended as requested in the suggested change by the EA. (See Main Modifications table for full amendment.) 2. Agree that the additional wording to the supporting text can be amended as requested in the suggested change by the EA. (See Main Modifications table for full amendment.) 3. The Council considers that Policy G7 clearly states the importance of not allowing culverting of open watercourses and that the supporting text of this policy highlights the ecological benefits of not allowing culverts. This does not need to be repeated in Policy G2. 4. Agree that the additional wording to Policy G2 can be amended as requested in the suggested change by the EA. (See Main Modifications table for full amendment.) 5. Agree that the additional wording to the following header within the policy: "*Opportunities to enhance and protect blue corridors*" can be amended as suggested by the EA. However, the Council considers it more appropriate to include the reference to where the ecological buffer zones should be measured from within the 'policy implementation' section of the supporting

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	buffer zone should be measured from.	*de-culverting of watercourses should be actively pursued as a valuable enhancement to rivers and streams."* 4. Amend bullet d of the Policy as follows: *"Where there is an opportunity to strengthen links between green spaces, particularly ecological sites, creating linkages with surrounding green infrastructure (e.g. by including lines of trees/hedges and river corridors to support linkages)".* *5.* After bullet j, the next header should be amended to: *"Opportunities to protect and enhance blue corridors."* Part of the text below this header should also be amended to: *"An ecological buffer zone of at least 10 metres (measured from the top of the bank) ~~with~~ should be retained, or if it is not already in place it should be reinstated where possible.*	text, rather than within the policy. (See Main Modifications table for full amendments.)
Policy G7: Flood Risk and Flood Risk Assessments	The EA are pleased to note that the two previous comments made against the Regulation 18 version of the Plan have been included/ updated in this version.	N/A	Support is noted – thank you. No further action proposed.

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
Policy G8: Sustainable Drainage Systems (SuDS)	Propose additional wording to policy to highlight that deep infiltration features are generally not supported.	Amend the end of the third paragraph of the policy as follows: *"Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable. Deep infiltration features/soakaways are generally not endorsed and not considered to be SuDS."*	Do not consider that an amendment to the policy is required. An additional bullet to include some of this information would be more appropriate within the 'policy implementation' section of the supporting text. We are happy to include the first part of the sentence but do not think it is necessary to include *"and not considered to be SuDS"* because whilst these features may not be desirable, they could still generally be described as SuDS. (See Main Modifications table for full amendment.)
Policy R5: Water Resources and Quality	Generally support the Policy but would like it to show that new developments will not use non-mains drainage where connection to the public sewer is considered reasonable.	Amend Policy R5 to include the following requirement: *"The use of private sewage disposal facilities within publicly sewered areas will only be acceptable if the applicant can demonstrate that the additional cost of connecting to the sewer would be unreasonable, connection is not practically feasible, or the proposed private sewerage system would provide additional environmental benefits that would outweigh the potential environmental risks."*	**We are happy to propose a modification to add an additional requirement under the foul and surface water drainage section (in between the two existing paras) of the policy as follows:** *Proposed development should avoid utilising private wastewater drainage systems where a public sewer connection is available, unless the necessity of this can be robustly justified.* We suggest the justification requirement should be expanded upon in the policy implementation text above the policy. **We propose an additional bullet point to be added under policy implementation as follows:** • *Relying upon private wastewater drainage methods, such as septic tanks, introduces additional environmental risks as it will typically fall on the owner to ensure that they are appropriately maintained in future, in order to avoid wider contamination due to spills/leaks. Developments are therefore expected to connect into the public sewer system for*

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			drainage of wastewater unless an alternative approach can be robustly justified, such as by showing that public sewer connection is unfeasible, or that there would be additional environmental benefits that would outweigh the potential environmental risks.
Policy I2: Safeguarding Land for Infrastructure (a - Oxford Flood Alleviation Scheme)	The EA are pleased that the Council has taken their advice about including a safeguarding policy in relation to the Oxford Flood Alleviation Scheme (OFAS) and that it is included in the Policies Map. The site boundaries of two of the allocations: Osney Mead and Redbridge Paddock lie adjacent to OFAS. It would therefore be beneficial if OFAS was referenced in these respective site allocation policies.	Amendments to Policy SPS14 (Redbridge Paddock) and Policy SPCW8 (Osney Mead) to include a reference to OFAS. To note- these sites are adjacent to the safeguarded area of the OFAS, but Redbridge Paddock is not directly adjacent to the proposed OFAS channel.	Agree that the reference to OFAS can be added as a new paragraph at the end of the "Open space, nature, flood risk" section of both site policies SPS14 (Redbridge Paddock) and SPCW8 (Osney Mead), as follows: *"Land safeguarded for OFAS is adjacent to the site (**Policy I2**)."* (See Main Modifications table for full amendments.)
SITES referred to but not in Reg 19 document	The EA has made various comments on the following 11 sites: • 1 Pullens Lane • 2 Harberton Mead • Bayards Hill Primary School Part Playing Fields • Clarendon Centre • Edge of Playing Fields, Oxford Academy • Land off Harolde Close • Old Road Campus	N/A	The Council has confirmed to the EA that these sites are not allocated in the Reg 19 version of the Plan, therefore the EA has agreed to withdraw all comments in relation to these sites.

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	• Oriel College Sports Ground and adjoining land (comprising 263 and 639) • ROQ site • Oxford Stadium • Uni of Oxford Science Area & Keble Road		
Policy SPS1: 474 Cowley Road	29% (0.12ha) of the site is covered within fluvial flood extents. No proposed number of dwellings offered currently, so unable to confirm general allocation suitability regarding floodplain compensation concerns. Concerned with safe access/egress routes having to travel within FZ3a and flashy catchment. Updated modelling will also be required to confirm site suitability.	Require minimum number of dwellings for site to ascertain if floodplain compensation can be achieved on site. A more detailed review of the access/egress to the site will still need to be undertaken within a SFRA - these routes should be provided and avoid FZ3a.	The Level 2 SFRA considers that the main access to the site does lie within the design flood event and that a site-specific FRA would need to further investigate this and likely utilise updated modelling results for Boundary Brook. **We are happy to propose a modification to include an additional requirement (at the start of the final sentence of bullet d) under the open space, nature and flood risk section of the policy as follows:** *Updated modelling of Boundary Brook will also be required to inform a ~~A~~ site-specific FRA, which should also consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site.* In respect of the other points raised, a minimum number of dwellings expected on this site allocation (14) is provided in the policy. The Level 2 SFRA undertaken for this site highlights that development is possible as the majority of the site lies within Flood Zone 1 and outside the design flood extent (so floodplain compensation may not be necessary or minimal). In addition, the areas of high surface water flood risk mirror the fluvial

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			flood extents. In this regard it should be possible to accommodate development at the site. The site allocation policy reflects the level of flood risk present at the site, particularly along the access and states that this should be considered in a site-specific FRA. We feel this is more appropriate as it is dependent on the design of the site which is unknown at this present time. Any development proposal would also have to meet the requirements of Policy G7 which addresses flood risk and FRAs and clearly sets out the criteria that need to be met before planning permission will be granted.
Policy SPCW11: St Thomas School and Osney Warehouse	Site is 0.41ha with 10 dwellings proposed (0.17ha). With 92% of the site being inundated during the design flood event, there is limited space on site outside of design flood event for suitable development/compensatory storage.	It is very unlikely that without substantial re-development that suitable floodplain compensation will be possible on this site, and without this, the site would be undevelopable. The policy should explicitly state that the development would need to not increase the footprint compared to the existing built footprint on site.	A site-specific FRA is required for this site which is located within Flood Zone 2 and currently contains development. It is made up of two parcels – one containing a former school building and the other the warehouse. The Level 2 SFRA does highlight that the parcel containing the former school is at more risk of flooding than the Osney warehouse parcel, therefore it would be expected that the more vulnerable part of the allocation, i.e. the dwellings would be located here. The site allocation policy reflects this and specifically states that a sequential approach should be taken to locating development on the site as well as highlighting that modelling will need to be undertaken to assess off-site impacts and compensatory requirements should ground raising need to be implemented. Furthermore, a significant part of each parcel already contains development, therefore it is unlikely that any new development will occupy a footprint larger than

Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
			existing and therefore unlikely that compensation would be needed. The Council therefore considers that flood risk at this site has been addressed suitably in both the site allocation and flood risk policies and that no further action is required. We do not believe it necessary to include the point about not increasing the built footprint of the site in the allocation policy, as we consider that the requirements of Policy G7 already addresses this and explicitly states that proposed development should not increase flood risk elsewhere.
Policy SPS13: Ozone Leisure Park and Minchery Farmhouse	Further information is needed regarding proposed number of dwellings before confirming soundness. Large amount of space on site outside of fluvial flood extents, so expectation is that the sequential approach would have to be taken.	In order to address soundness points b and d, the number of dwellings must be confirmed and the LPA should set out that a sequential approach must be taken to site layout and ensure that development is outside the fluvial flood events.	This site is one of three sites that are linked and the relevant site allocation policies clearly state this. Policy SPS7 (Kassam Stadium) contains the minimum number of dwellings to be delivered (290) but there is flexibility to deliver across all three sites if required as long as the minimum number is achieved. All three site policies clearly state that a site-specific FRA is required and that a sequential approach must be taken to locating development on the site. This site allocation specifically states that "*development should avoid the areas of Flood Zone 3 along the brook and across the whole southwest corner,…"*. The Council therefore considers that flood risk at this site has been addressed suitably in both the site allocation and flood risk policies and that no further action is required.
Policy SPS7: Kassam Stadium	Updated modelling would be required to fully confirm suitability as we stated in our previous comments made on the level 2 SFRA.	Providing updated modelling and reflecting this in a Level 2 SFRA may overcome soundness points b and d.	As expressed for Policy SPS13 above, this site is one of three allocations that are linked. This allocation contains the minimum number of dwellings to be delivered (290) but there is flexibility to deliver across all three linked sites if

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			required, as long as the minimum number is achieved. The allocation policy requires that a sequential approach must be taken to locating development on the site and specifically states that "*development should avoid the areas of Flood Zone 3 along the brook.*" The Council is aware that the EA's Flood Map for Planning was updated in March 2025 and contains both national flood information and local flood model outputs but that these do not contain updated modelling for the smaller watercourses in Oxford, such as for Boundary Brook, Littlemore Brook and Northfield Brook. The Council discussed with the SFRA consultants whether to update the models for these brooks in the Level 2 SFRA, balancing this against the cost and usefulness of the information the modelling was likely to present. On balance, and taking a proportionate approach, the Council determined that it wouldn't undertake further modelling for these brooks, due to the small number of allocations that would be affected but more importantly, it was considered that updated modelling of these brooks would not provide us with information that the Level 2 SFRA does not already consider. The Level 2 SFRA has indicated that this site is at low risk from fluvial (river) flooding but at moderate risk from all other sources including pluvial (surface water) flooding. Northfield Brook runs along the northern boundary of this site and based on the EA's updated RoFSW (Risk of Flooding from Surface Water) maps, it identified that that the surface water flood risk is concentrated around the southern section of the Kassam Stadium. Any site-specific SFRA undertaken will have to use the most up-to-date mapping

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			available at the time, so this will also be flagged in any assessment and can be used to ensure that development, particularly more vulnerable development, is directed away from areas on the site that are at risk from any source of flooding. The Council therefore considers that the models for the watercourses such as Boundary Brook, Littlemore Brook and Northfield Brook do not need to be updated and that the risk has been identified in the Level 2 SFRA, especially from the surface water flood mapping, and that more detail will be available once a site-specific FRA is undertaken.
Policy SPCW7: Nuffield sites Land South of Frideswide Square (624)	Site is 0.26ha with 59 dwellings (0.98ha) proposed for the site. Currently this would far exceed the site for available space. 100% of the site falls within the design flood event levels, so there would be no room available for floodplain compensation as currently proposed. There is no confirmation of this approach being undertaken so far.	Need to ensure the number of dwellings proposed can be built on the existing footprint of the site because flood storage compensation for any increase in built footprint is not feasible on this site. The site is currently contrary to paragraph 181 of the NPPF which states that within the site, the most vulnerable development is located in areas of lowest flood risk, additionally that development must not increase flood risk elsewhere.	This parcel is one of three parcels (including the Island Site off Hythe Bridge Street, and Worcester Street Car Park and Public House) that forms this site allocation. The minimum allocation of 59 dwellings is across ALL three parcels, not just this one. The policy requires a site-specific FRA to be undertaken and states that *"a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding."* This applies to all three parcels and the Level 2 SFRA clearly shows that a large part of the Worcester Street Car Park lies in Flood Zone 1, even accounting for climate change and that the area of highest surface water flood risk mirrors a similar area. In addition, most of the Island Site is already covered in built development, therefore there is an opportunity to significantly improve flood mitigation here as part of any redevelopment.

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Policy SPS12: Oxford Science Park	Would need confirmation regarding future use of land and modelling before we can confirm suitability. Available space on site for proposed allocation, but further information needed.	Must confirm the appropriate 'complementary uses' of the land and provide updated modelling to confirm the site's suitability for additional development to overcome the soundness issues. This is to ensure the development is located in appropriate areas and provides the necessary flood storage compensation if required, in line with paragraphs 170 and 174 of the NPPF which steers development away from high flood risk areas.	This is predominantly an employment site, where an element of residential would be supported and other complementary uses would be considered on their merits. The policy wording does state that *"parts of the site are Flood Zone 3b, mainly along the Brook, and a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk."* Therefore, if an application were to come in for a more vulnerable use, such as housing, the FRA would have to demonstrate that it was sited in the lowest possible areas of flood risk within the site. This is possible as a large proportion of the site lies within Flood Zone 1 (accounting for climate change) and/ or not within an area of high surface water flood risk. It is not possible to provide more information on what will come forward as the policy provides some flexibility towards this, whilst being clear that housing would not be the predominant use on site.
Policy SPCW3: Canalside Land, Jericho	Concerned that there is insufficient space to deliver the proposed allocation without increasing flood risk elsewhere. We appreciate that the Level 2 SFRA discusses the use of the sequential approach to avoid placing new developments within FZ3b and ideally into areas of lowest flood risk in the first instance. However, 0.3 out of 0.5ha of the site is proposed to be used for development (dwellings). During the 1%+41% CC AEP design flood event, 78.3% of the site is inundated (0.39ha). In turn, there would be an	To address the soundness issues with this policy, the area of the site proposed for redevelopment would need to be reduced significantly to make suitable compensation possible. Alternatively, the existing footprint used. In this case the space available for flood storage compensation for any increase in footprint is limited and we have soundness concerns for the site's deliverability in accordance with paragraph 181 of the NPPF. Additionally, the correct climate change allowance of 41% should be	The Council acknowledges that this is a historical site where flood risk issues have become more complex over time, but also note that permission for a mixed-use scheme including residential development only recently lapsed in early 2026. This is a brownfield site where a large proportion of the site lies within Flood Zone 2, with the highest levels of flood risk more limited towards the western boundary of the site, adjacent to the Oxford canal. The site allocation does not contain a minimum number of dwellings and there is an opportunity to significantly improve the management of flood risk both on and off- site if the site is redeveloped. Much of the existing site

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	extremely limited amount of space available outside of the design flood event (0.11ha) to propose suitable level for level compensation that would mitigate the floodplain storage space lost by the new development. As it appears very unlikely to offer enough space on site to offer suitable compensation, we would object to this at the planning stage. It is unlikely that this allocation as proposed would be deliverable. The Level 2 SFRA mentions using a freeboard of 300mm above the 26% CC AEP event (57.6m AOD) to mitigate flood risk to the development, however, we would have expected the 41% CC AEP design flood event level of 57.75m AOD to have been used instead (so a minimum proposed level of 58.05m AOD). There are concerns regarding access and egress to the site. The site and surrounding area are heavily inundated during the design flood events, and safe access to and from the site appears to be limited.	used to assess the finished floor levels and a minimum 300mm freeboard imposed in addition to the design flood level (using 41% climate change allowance).	area comprises impermeable hardstanding and there is potential to provide suitable compensation on greenfield land immediately adjacent to the site. The Level 2 SFRA has identified the best route of egress which is predominantly flood free apart from a 50m section along Combe Road. The hazard rating along Combe Road is low as in this section, a maximum depth and velocity of 0.12m and 0.01 m/s is reached. In addition, the site falls within the River Thames catchment which is dominated by chalk. It has a has relatively slow river response times to storm events, being groundwater, rather than surface water dominated. This increases the time taken for inundation and for adequate warnings and preparation in an extreme flood event. The Level 2 SFRA assessed both scenarios using 26% and 41% climate change allowances to provide more detail on fluvial flooding. A site-specific FRA will provide more detail about the preferred finished floor levels at the time a planning application is submitted using the latest information. In conclusion, the Council believes that this site should still be allocated and that there will be opportunities to overcome the issues that have been raised by the EA. The allocation can make a positive contribution to Oxford's housing need, which already cannot be fully met within the city.
Policy SPS4: Cowley Marsh Depot	Concerned that the development proposed would be inappropriate at	The first soundness issue to be addressed is to clarify that there will	The Level 2 SFRA considers that the main access to the site does lie within the design flood event and

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	the current scale proposed. The site is 1.7ha, with an estimated 83 dwellings (1.4ha) proposed within it. 30% of the site (0.51ha) falls within FZ3b, and in turn it is very likely that some of this area would be required to be used for the dwellings at the current scales proposed. More vulnerable development within FZ3b would be considered inappropriate. There also appears to be very limited space on site outside of the design flood event which covers 58% (0.99ha) to undertake an appropriate amount of level for level compensation that would be required for any new developments within this area. In turn there would be a significant amount of floodplain capacity lost at this site and would be considered to increase flood risk to the surrounding areas. Due to the scale of proposed development and lack of space for suitable compensation, we would likely object to this at the planning stage. Updated modelling is required as the current assessment is based of New National Model (NNM) informed data, which is suitable for high level use but not for site-specific FRAs where the risk is so high.	be no development within FZ3b, as this would be contrary to the NPPF and Table 2 of the PPG. The second soundness issue to be addressed is the area on site suitable for level for level flood storage compensation. The lack of space for compensation could result in an increase in flood risk elsewhere, contrary to paragraph 181 of the NPPF. The third soundness issue to be addressed is for the correct modelling to be used. The final soundness issue to be addressed is to ensure safe access and egress from the site. Paragraph 181 (part e) of the NPPF states that safe access and egress routes must be included for development within Flood Zones 2 and 3. Overall, it is likely that the development proposed will need to be heavily reduced in scale.	that a site-specific FRA would need to further investigate this and likely utilise updated modelling results for Boundary Brook. **We are happy to propose a modification to include an additional requirement (within the second sentence of bullet f) under the open space, nature and flood risk section of the policy as follows:** *f) A sequential approach must be taken to locating development on the site. A site-specific Flood Risk Assessment (FRA) will be required which should be informed by updated modelling of Boundary Brook. The FRA should also investigate the flood risk the presence of the nearby culvert presents and identify…."* In respect of the other points raised, we have reconsidered the site capacity and believe that the same capacity can still be achieved with a slightly higher density on the site (70 dph instead of the previously assumed 60dph) which is still appropriate for that particular location and not located within FZ3b. The open space required on the site can be located within the areas of highest flood risk and there are opportunities on green space immediately to the rear of the site to provide flood storage compensation.

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	Concerns regarding access and egress to the site, as the surrounding area is heavily inundated.		
Policy SPCW7: Nuffield sites 70 - Island Site, Park End Street/Hythe Bridge Street	Concerns that there will not be sufficient space available on this site for development and not increase flood risk elsewhere. This site is 0.65ha in size and currently 59 dwellings (0.98ha) are proposed to be built. The Level 2 SFRA discusses a primary focus on re-developing the existing footprint to avoid the need for additional buildings. However, it appears unlikely considering the 59 new dwellings plus other mixed uses, would fall within the redevelopment area and we have no confirmation this would be the case. 85% (0.55ha) of the site falls within the design flood event extents, so it is very likely that level for level compensation will be required for any new developments within this area. Considering the scale of the works proposed, it appears difficult to accommodate all the development without the loss of floodplain storage area. In turn this development as proposed is likely to cause an increase in flood risk to the surrounding areas.	This development as proposed is likely to cause an increase in flood risk to the surrounding areas, contrary to paragraph 181 of the NPPF. We would need to see the scale reduced significantly and for compensation to be undertaken/possible before this site before we would consider it deliverable and compliant with national policy.	As per our earlier response in respect of Land South of Frideswide Square, we would like to reiterate that the Island Site is one of three parcels that forms this site allocation. The minimum allocation of 59 dwellings is across ALL three parcels, not just this one. The policy requires a site-specific FRA to be undertaken and states that *"a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding."* This applies to all three parcels and the Level 2 SFRA clearly shows that a large part of the Worcester Street Car Park lies in Flood Zone 1, even accounting for climate change and that the area of highest surface water flood risk mirrors a similar area. In addition, most of this parcel, the Island Site is already covered in built development, therefore there is an opportunity to significantly improve flood mitigation here as part of any redevelopment.
Policy SPCW8: Osney Mead	The site is 17.8ha and considering the high portion of the site that falls	Confirmation on the total scale of the development at this stage is required	This allocation is a large and complex brownfield site involving several parties who have been

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	within FZ3b (6.94ha or 39%), we have concerns that any proposed development within this area would be considered inappropriate (both less and more vulnerable). We appreciate that a sequential approach will be undertaken and that no development other than open space and/or water compatible development will be undertaken within FZ3b. Confirmation on the total scale of the development at this stage is required. Currently we have only been given the number of dwellings that are proposed within the site at 247 (4.12ha) while the development also includes mixed less vulnerable uses as well (scale n/a). 86% of the site lies within the design flood event (15.31ha). The proposed dwellings alone would exceed the remaining space available outside of this extent (4.12ha) and therefore there does not appear to be suitable space available on site to provide level for level compensation at the scale required to avoid a reduction in flood storage capacity. This would be considered to increase flood risk to the surrounding areas and therefore unacceptable at the	to confirm that no development will be within FZ3b and that development can be appropriately compensated for. As currently proposed, unless there is a significant reduction in the scale of development at this site, we will object to the proposal at the planning stage in line with paragraph 181 of the NPPF.	working together to bring it forward for redevelopment. Detailed design work has been undertaken and reviewed but it is an ongoing process. It is therefore not feasible at this stage to provide more detail in respect of the scale of the total development proposed. At present, this site is predominantly in employment use and suffers significantly from a lack of comprehensive flood risk mitigation across the whole site. Its redevelopment provides an opportunity to significantly improve the management of flood risk both on and off-site. The allocation policy states It is expected that "*a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding, with car parks and other ancillary uses in higher risk areas where possible."* Any housing on site will therefore be sited in the areas of lowest flood risk on the site and given that it is likely to be student accommodation, this can be built at a higher density than perhaps the EA is anticipating. The Level 2 SFRA highlights that development is already present on the site and that during the 1.0% AEP + 26% climate change design event, the existing development is estimated to displace 10,200 m^3 cubed of water. Therefore, depending on its design, it's feasible that the redevelopment of the site could displace less than this amount of water, together with other opportunities to improve flood risk on site. The SFRA acknowledges that significant ground raising may be required due

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	planning stage (also does not consider the mixed use less vulnerable developments in that scale). Ground level raising may also be required to raise the development above the required design flood event finished floor level, which would again increase the amount of compensation required. Therefore, unless there is a significant reduction in the scale of development at this site, as currently proposed, we will object to the proposal at the planning stage.		to the amount of the site that would lie below the appropriate floor level but that would need to be assessed through as site-specific FRA once the quantum and design of the scheme is known.
Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel 613 - Sites adjacent to Osney Bridge	For the sites adjacent to Osney Bridge, concerned that there will not be enough space on site to deliver the proposed allocation without increasing flood risk elsewhere. The sites combined are 0.3ha in size and 20 dwellings are proposed across them at 0.33ha of space. Currently this would only leave 0.01ha available for flood waters/ compensation. The scale of development would therefore exceed the available space available on site outside of the design flood event and would not have suitable space to undertake appropriate level for level compensation to avoid increasing the flood risk to the	As currently proposed, it appears unlikely that this site will have suitable space to carry out the required amount of level for level compensation in accordance with paragraph 181 of the NPPF. Require confirmation of most of the site being re-developed with appropriate FFLs, and in turn a reduction in the scale of development with the design flood event for this site to be acceptable at the planning stage.	This site allocation comprises of the following three parcels: *3-15 Botley Road and The River Hotel – 0.34ha *Land to the South of Cripley Place – 0.31ha *Westgate Hotel, Botley Road and 3 - 7 Mill Street – 0.19ha with a total area of 0.84ha. All three parcels are predominantly brownfield sites that contain a mix of more vulnerable and less vulnerable uses. The site allocation policy states that *"a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk."* Therefore, it is expected that the more vulnerable use of the mixed-use development such as the dwellings will be located in the areas of lowest flood risk within the allocation area. It is also considered that there is adequate room on site for the development to not

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	surrounding areas. Re-developments and new developments would also need to accommodate an appropriate Finished Floor Level (FFL) above the design flood event. The Level 2 SFRA discusses that most of the proposed development would be undertaken using the re-development of existing development and any new developments would be located within the areas of lowest flood risk. However, no final confirmation on how this will be split. 48% (0.16ha) of the site falls within the design flood event (of which is using the 26% when the 41% should be used for more vulnerable developments).		increase flood risk on and off-site, especially due to the amount of existing development. Apart from The River Hotel parcel (located to the north of Botley Road), the other sites predominantly lie within Flood Zone 2, (even accounting for climate change), so we believe the 26% climate change allowances were the correct ones to use for the Level 2 SFRA. A site-specific FRA can assess this and the floor levels in more detail once a planning application is submitted and the layout of the scheme is known.
SFRA	**Level 1 and 2 Strategic Flood Risk Assessment (SFRA):** In the most recent versions of the Level 1 and 2 SFRAs we note that no updates were made following our previous comments made on 5 December 2025. Therefore, many of our previous comments regarding the sites and general SFRA wording remains. We have therefore reattached these comments and have also provided further information for each SFRA below: **Level 1 SFRA:**		**Level 1 and 2 Strategic Flood Risk Assessment (SFRA)** - Updates were made to both the Level 1 and Level 2 SFRA reports after the 5th December. In particular, appendices 2 and 3 were added to the Level 2 SFRA report which addresses some of the previous comments made in earlier discussions prior to and after the Regulation 18 consultation. **Flood Zone 3b** - Appendix 3 of the Level 2 SFRA contains the data review for the Flood Map for Planning and Modelling Data Review. This also provides further explanation on the 3.3% AEP event and how it has been applied. For two of the site allocations – SPS1 (474 Cowley Road) and SPS4 (Cowley Marsh Depot), we have

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	We do still have some concerns with the Level 1 SFRA as currently proposed. We have provided additional comments for the sections we are concerned with and have also provided additional wording that could be used to inform and overcome our concerns. **Flood Zone 3b** – the definition provided has been updated to use the 3.3% AEP event from any detailed modelling, and then when this is not possible to undertake applicant modelling. We consider this acceptable. However, we previously requested that additional wording in the form of a definition is added to include a definition to cover the scenario where local detailed modelling is not available and needs to be undertaken. A precautionary approach would then need to be applied by using the FZ3 from the Flood Map for Planning (FmFP) as a proxy for FZ3b where local modelling is not available/feasible. **Cumulative impacts** – there is no section currently proposed to cover cumulative impacts apart from a brief coverage, within section 4.1. We were looking for a section to cover the potential cumulative impact of developments within Oxford City, particularly as many of		proposed a Main Modification seeking an amendment to ensure that any site-specific FRA submitted for those two sites is informed by updated modelling of Boundary Brook. (These two proposed modifications have been set out earlier in this Appendix.) **For all other site allocations (and relevant planning applications submitted), we are happy to propose a modification by adding a final bullet to the 'Policy Implementation' section of the supporting text of Policy G7 (Flood Risk and Flood Risk Assessments (FRAs)) as follows:** - *Site-specific Flood Risk Assessments should apply Flood Zone 3 from the Flood map for Planning as a proxy for Flood Zone 3b to ensure a precautionary approach is taken where local detailed modelling is not available or feasible.* **Cumulative impacts -** We think there is enough detail in both the relevant site allocation policies as well as Policy G7 as it is clear that flood risk cannot be increased either on or off site. **However, for clarity, we are happy to propose a modification to explicitly refer to level for level compensation at the end of the last sub-bullet of bullet three of the 'policy implementation' section of the supporting text as follows:** - *Thirdly, once avoidance has been fully explored, mitigation measures will be required, these could include:*

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	the proposed sites include works within the floodplain. This can include potential mitigation methods and approaches to offering floodplain compensation. We would emphasise the need for level for level compensation, as the main method of flood storage compensation. Cumulative impacts of voids could lead to significant losses in floodplain storage across Oxford City should these voids become blocked/silted and from impedance of flows from the supporting structures. **Site Specific FRA – Guidance** – There is lack of information to support applicants when completing their FRAs. The following bullet points cover more specific sections of concern. **Freeboards/Finished Floor Levels (FFLs)** – there is no section proposed to cover the requirements for FFLs/Freeboards within proposed developments. We are looking for minimum recommendations of suitable finished floor levels against the appropriate design flood event levels, i.e. expectation of 600mm above design flood event, with 300mm as the minimum recommendation. This is important		o *flood resistance measures (dry-proofing) e.g. barriers or raised floor levels to keep water out at times of flood;* o *flood resilience measures (wet-proofing) - using materials that can quickly dry out, helping buildings to be habitable again quickly;* o *Sustainable Drainage Systems (SuDS) to reduce surface water run off by slowing and storing water (see Policy G8); and* o *flood compensation measures e.g. creating new flood storage to mitigate any loss of storage through development (i.e. level for level should be the main method of flood storage compensation).* We consider that it is preferential for the modification to be made in the Local Plan rather than the SFRA. In terms of voids, national policy already does not support this approach, and we have not referred to it in the Policy G7 or the supporting text – no further action required. **Site Specific FRA – Guidance** – whilst we agree that there is a lack of guidance in the SFRA, this does repeat national guidance, therefore it will already be considered when applicants submit an FRA – no further action required. **Freeboards/Finished Floor Levels (FFLs)** – point noted but we feel this is already sufficiently covered in Policy G7 which was informed by national guidance – no further action required. **Floodplain compensation/storage – voids** – point noted but national policy and guidance doesn't

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	to ensure future developments are safe for their lifetime. **Floodplain compensation/storage – voids** – there are no sections covering floodplain compensation/storage requirements and the appropriate methods of providing floodplain compensation. We would recommend providing some wording regarding avoiding building new developments within the floodplain, but where this is not possible, floodplain compensation is undertaken to ensure available flood storage capacity is not lost. The compensation method should be level for level. Voids should be avoided, with additional wording to confirm this. Floodplain compensation/storage is another section that should be included as it will have a direct impact on the safety of not just the development but the surrounding area in terms of flood risk. We understand that this is site dependent, and in turn acknowledge the wording being shaped around the scale of the development. However, it is important to have a section which discusses this and should be included as it will be directly checked in consultation reviews.		support the creation of voids for flood storage, therefore we feel that this point is already covered, even if it is not explicitly stated in the Level 1 SFRA – no further action required. **Safe access/egress and emergency planning** – we consider that the individual Level 2 SFRAs have assessed the best route for each allocation, including the potential hazard of the route but that this would be explored in more detail in a site-specific FRA, particularly where updated modelling is required – no further action required. The Council agrees that some of these points raised in respect of the Level 1 SFRA could have been included as best practice. However, they do all already need to be considered as they form either part of the relevant national policy or guidance and to amend the SFRA would not fundamentally change any of the site allocations. If necessary, some of these details could be included in a Technical Advice Note (TAN) to assist applicants.

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Policy/section	Summary of EA Reg 19 comment	EA Reg 19 suggested change	Oxford City Council response/proposed modification
	Safe access/egress and emergency planning – there is no direct section covering the issue of safe access and egress to and from proposed development sites and the information that should be used to support it. We would recommend in turn including a section that covers not just emergency planning (4.4) and flood warnings (2.4) but an additional section that includes the use of hazard ratings for sites where detailed modelling is available (or proxy alternates) to best inform the most suitable access/egress routes to and from the site. This again is another SFRA section that is covered during review and would be expected to at least be considered.		

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Sport England

Policy/ Para	Sport England summarised comments	Sport England suggested changes	Council response
C3	Policy C3 cannot be applied effectively to built sports facilities. A separate policy for protecting (and encouraging the improvement and new types of) these type facilities is needed. The emerging NPPF reaffirms that there is a separation between the policies for sport and recreational facilities and other types of community facilities. The policy also states that the location of new facilities must be 'easily accessible by walking, cycling and public transport' and 'not result in an unacceptable environmental impact or loss of amenity.' Often sports and community facilities are built on or adjacent to playing fields which will not be in town centre locations and may not be easily accessible by public transport. Also, strongly object to the paragraph in draft policy C3 [criteria d and e] that allows for the loss of sports facilities if there are other facilities in the area that can be enhanced or the proposal is for an alternative community facility for which there is greater need or demand. This does not comply with paragraph	A separate policy for indoor and built sports facilities should be developed in order to protect these from loss and support improvements to them. The new draft policy should be consistent with national planning policy. See paragraph 104 of the NPPF and our comments on G1.	Whilst Policy G1 protects outdoor spaces in many instances within the wider GI network (see also our responses under G1), Policy C3 addresses Use Class F.2, which covers a few types of indoor sports use that we can have some control over. It is acknowledged that it does not apply to the majority of indoor sports uses because most indoor sports facilities are within Use Class E. This is a very wide-ranging use class, but planning cannot distinguish between the various uses within it or control changes between uses within that Use Class. This limits what more the Local Plan, or an additional policy, can do unfortunately In relation to comments on criterion c, the purpose of this is to help ensure that replacement provision is not located in areas with less accessibility than that being lost. The Local Plan seeks to promote active and sustainable transport in the first instance. Whilst we accept that facilities can often be located away from town centre locations, we feel it is important to seek to secure

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	104 of the NPPF as sports facilities could be lost that are needed by the community for sport to other uses such as education and health. National planning policy does not permit this and it could allow more school and health buildings to be built on community sports sites.		accessible replacement provision that does not rely on private vehicle ownership this in the first instance and do not propose to amend this. In relation to criteria d and e, this covers a broader range of uses than just sports provision. When it comes to impacts on sports facilities, however, the NPPF tests would still apply as you point out, and it is not necessary to repeat these verbatim in the policy. It is also unlikely applicants are going to be able to demonstrate these are surplus to requirements in most incidences, thus we do not currently think there is justification for further modifying them.
C4	The policy must be clear that any playing fields on education sites (use class F1) are protected from development otherwise the policy is not compliant with national policy.	School playing fields should be protected from development and assessed against the relevant tests set out in national policy and Policy G1.	School playing fields are generally protected by the standards that schools need to follow, separate to the planning system. Loss of playing fields needs permission from the Secretary of State. Yet there may be cases where there is a surplus of space and use of part of a playing field for an alternative use could be justified and is beneficial. It is not considered necessary for the Local Plan to intervene in this.
G1	Whilst acknowledging that amendments have been made, it has still not been positively prepared. The	The policy and the plan do not plan any new sport and recreation facilities or identify new	*Comments in relation to finalising the PPS are addressed separately further down the table.*

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	Council has not completed its Playing Pitch Strategy and therefore does not have the evidence to inform Policy G1 and ensure that the requirements of NPPF para 103 are met, including that ancillary facilities, such as changing rooms, artificial pitches and sports courts and MUGAs on playing field sites are also protected from development. The Council is continuing to include playing field sites within the site allocations that Sports England continue to object to, rather than protecting them through policy as both the adopted and emerging NPPF require. Playing fields should be protected from development, change of use etc. Development should only be accepted where the tests in paragraph 104 of the NPPF are met. For example, we object to the words 'whether alternative sports might better suit the local community'. The policy provides no explanation of how this might be assessed.	opportunities to meet needs. Concerned that the plan is being brought forward without appropriate evidence being presented for review so we conclude that the Plan has not been positively prepared with regard to sports facilities. The Council should also update its strategy for built sports provision and there is no policy adequately protecting indoor sports facilities. The Council will need to complete the PPS to ensure that all playing fields and their ancillary facilities are correctly identified and these will then need to be recorded. The plan should include supportive policies for new sport facility developments e.g. - *Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance.* - *The Council will seek to protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields to ensure their*	In relation to protection of playing fields – the Council has sought to protect a significant number of playing fields through its protected green infrastructure network. These are typically protected as supporting GI (G1B spaces) as a minimum – which assigns the protections of the NPPF for open space as you set out, but also requires reprovision of any lost green infrastructure. It should be noted that, whilst the GI network is primarily made up of 'green' spaces, it can include other open spaces linked with recreation, including artificial surfaces. We would be happy to propose a modification to the glossary under the definition for green infrastructure to make this clearer in terms. **Modification to be proposed to the glossary as follows:** *Green Infrastructure: A network of spaces and features including parks, playing fields, woodland, allotments, private gardens, green roofs and walls, street trees. The term also incorporates 'blue infrastructure' such as streams, ponds, canals, and the rivers and can include other types of open space that contribute to*

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		continued contribution to the health and well-being of the community.' Proposals affecting sports facilities should be considered against the tests set out in the NPPF para 104.	*health and leisure, such as artificial pitches and play spaces for children/young people.* Additionally, we agree that some extra wording setting out our support for new sport and recreation facilities could be helpful and are happy to put forward a mod, though we would suggest a better place for it would be as part of Policy S1. **We propose the following mod to add an additional criterion under policy S1 as follows:** *To help achieve this it will aim to ensure development is located to: ...* *j) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision.* The protection-related wording of your second proposed bullet is not considered necessary, as this is already carried out through Policy G1, C3 and the NPPF.
Evidence - PPS	More evidence is required for sport to consider the needs of the existing and new residents for existing, expanded and new sports facilities in Oxford. Tennis and padel should be included.	The Playing Pitch Strategy should be completed to inform the Local Plan and Infrastructure Delivery Plan. Tennis and padel also need to be covered within the Council's evidence base.	As soon as the Local Plan 2040 was withdrawn and we began working on the new Local Plan 2045, we identified the need for an updated Playing Pitch Strategy and have worked hard to commence this work as quickly as possible. Earlier

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	It is welcome that the Council is progressing a playing pitch strategy (although this should have been commissioned much earlier to properly inform the plan). However, strongly object to the inclusion of the KKP interim report Oxford City Playing Pitch Strategy Local Plan Interim report within the evidence base. This includes premature conclusions, (some of which Sports England disputes), as the data has not been checked and signed off by the national governing bodies, nor has the demand from all of the sports been assessed – e.g. Stage B has not yet been completed. Sport England is concerned that the emerging Playing Pitch Strategy is being used to justify a loss of playing field rather than providing an independent assessment of the need for playing pitches within Oxford City in line with Sport England's recommended methodology and the NPPF. The Playing Pitch Strategy is also required to inform the Council's Infrastructure Delivery Plan.	The interim report should not be relied upon as its findings are premature.	commissioning was not possible, and speeding up the work is equally impractical due to the seasonal nature of some survey work, as Sports England will be aware. The scope of the PPS work, including sports covered, was agreed with the steering group as part of the Stage A meeting, and Sport England were a part of this. As discussed in our catch up, it is not considered reasonable to have delayed preparation of the Local Plan entirely whilst waiting for the PPS to be finalised, we have however tried to ensure the preparation of the two documents are as aligned as possible and that emerging analysis is informing our approach as it emerges. The rationale for publishing the interim note was to share as much as we could to inform the Reg 19 consultation, whilst acknowledging that this picture can still change as the PPS continues to develop. **We intend to ensure the PPS informs future updates of the IDP (which is a live document) in due course.** In relation to concerns about the new PPS being used to justify losses in pitches, we strongly disagree. The city

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			is indeed under immense pressure to explore all areas of land for potential housing, including pitches, as is well documented. However, whilst securing more housing is an important objective of the Local Plan, another is to protect a network of green spaces for health and wellbeing, and this includes pitches. We see an updated PPS as not only an important tool in helping to identify current/future needs for pitches and associated facilities, but also in helping to justify the balance we are trying to strike in maximising land for housing whilst also protecting spaces like pitches through policies such as G1.
G2	The information that has been collected for the Council's new Playing Pitch Strategy (and as highlighted in its existing PPS) identify that there is a need to improve existing playing field and other sports facilities in Oxford City. For example, there are playing fields with in Oxford City that have no toilet facilities on site which can discourage women and girls from taking part in sport. Whilst Policy G2 mentions many other types of open space, it is silent on seeking to improve playing fields and	Please also see comments on Policy G1. The Council needs to complete its evidence base for sports facilities and update its policies accordingly, responding to the recommendations flowing from that work. As a minimum the policy text should include text to explain that the Council will protect, maintain and where possible enhance existing open space, sport and recreation, play facilities and land including playing fields to ensure their continued contribution to the health and well-being of the community.	Criteria b) of the policy sets out that one of the benefits applicants should seek to secure is *Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities...* This would include improving formal and informal pitches as well as providing new or enhanced facilities that are intrinsic to the function of those spaces. **We are happy to propose a mod to make this clearer as follows:** *b) Health and wellbeing, including facilitating recreation and play for*

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	other sports facilities which does not accord with NPPF para 103.		*people of all age groups and abilities, particularly children and teenagers (e.g. play equipment, pitches and associated facilities);* It is acknowledged that the policy is covering a broad range of considerations. Our intention would be to bring forward a Technical Advice Note (TAN) that supports this policy. The Green Infrastructure and Biodiversity TAN could expand on various criteria in the policy such as this one and lay out various examples of how applicants might fulfil it including some additional focus on ways to improve associated sports facilities. As highlighted elsewhere in this table, we also intend to update our IDP as and when the PPS is finalised. This is where we can identify specific improvements to facilities that are needed of the plan period, based on the PPS findings. We can also continue to keep this updated where needs change in future as the IDP is intended to act as a live document.

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G6	Concerned about what this policy means for any playing fields or other sports facilities within these designated areas. It is not unusual for grass pitches to be located next to or within local wildlife sites (or similar designations). With reference to the playing pitch strategy and other documents that record playing fields and recreation facilities, the Council must carefully balance any new policies that could prevent Oxford's residents from enjoying the outdoors and keeping physically active. Often natural areas can benefit humans and nature so encouraging policies that support but must be given appropriate consideration in an urban environment.	Amendments are required to Policy G1 (please see other comments) or this policy to confirm that the City Council will support proposals for sport/rec, and that any proposals for new pavilions or improvements to existing sports facilities will be supported e.g. *Proposals for sport and recreation facilities will be encouraged and supported in line with other policies in the Plan and Sport England guidance'*	The comments here seem to be looking for a level of certainty in decision making which we are unable to be explicit about at plan-making stage. Particular issues in relation to biodiversity impacts or health and wellbeing, and which one weighs heavier than the other, will be different with every site and location. Policy G6 sets out a hierarchy of protection which aligns with the level of designation that different sites have in the city. Some of these protections exist regardless of the local plan (e.g. national designations), some are assigned through the Local Plan because sites have locally significant biodiversity value. Our proposed mod set out earlier to add to Policy S1 would introduce more explicit support for sport and recreation facilities, which we believe would respond to your concern here, however.
R8	Where new sports facilities are proposed this may mean additional traffic. But there is no explanation of 'unacceptable transport impact' is.	The plan does not acknowledge the benefits lighting can bring to active travel and outdoor sports facilities, or considers agent of change. This could be rectified with additional wording to acknowledge the benefits	The requirements of the policy are of relevance both to protecting the amenity of the new development (the occupiers) as well as the amenity of existing development nearby (communities and neighbours). It

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	Concerned that the policy applies to applications for sports lighting, yet the policy gives no acknowledgement of the benefits of outdoor sports lighting or street lighting to providing health communities. The policy strongly favours 'the amenity of communities, occupiers, neighbours and the natural environment' (see bullet point a). Not clear how the policy will be applied. The same applies for new outdoor sports facilities. The policy offers no context for applicants as to when a noise assessment will be needed, so it may be required for very minor planning applications. Sport England's planning guidance on 'Artificial Grass Pitches Acoustics Planning Implications may be helpful, though it needs updating. The agent of change principle also works the other way, for example, housing development should not be located near existing 'noisy' uses such as existing MUGAs, artificial pitch facilities or playing fields with sports lighting. There does not appear to be a policy that takes into account the themes of paragraph 200 of the NPPF so it is recommended that this is also developed.	that these types of proposals can bring to the health and wellbeing of the community.	does not favour one over the other and we have tried to make this clearer in response to your previous comments on the Reg 18 through the policy context bullets before the policy box. Therefore, the example you flag, about a proposal for housing being located near noisy uses, would engage these considerations, in the same way that a proposal for a 'noisy' use near an existing residential area would also. The supporting text also references the Agent of Change. The definition of what is an unacceptable transport impact will vary depending on the local context including what is proposed, what the current transport network is like etc. It is not possible to define what will be considered unacceptable at the plan-making stage. This is also true of requirements for noise assessment. **We would be happy to look at whether there is a way to incorporate some additional helpful guidance/considerations to assist applicants into the design checklist that sits in Appendix 1.1 if you think this would be helpful, though this will still need to be high-level.**

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			In relation to lighting, the policy needs to set out the broad considerations that may need to be factored into decisions when it comes to impacts on amenity. Considerations about appropriate levels of lighting for the needs of occupiers and the impact on neighbours are an important element of the design process regardless of what use is proposed. Of course, the needs of the proposed use are an important factor in helping to determine what is an appropriate level of lighting and we accept that a sports facility could have quite different needs than other uses. **Again, we would suggest that a good place to expand on considerations for lighting would be the design checklist in Appendix 1.1 of the Plan and we would be happy to propose something if you think this would be helpful?**
NEOAOF	Sport England objects to this policy text and advises amendments should be made to acknowledge the sport and recreation facilities within this area and their importance to the local community for sport. Sport England is concerned that the policy does not acknowledge that sports facilities are within the Area of Focus and does not include any requirements to protect	The policy should be updated to seek improvements to Five Mile Drive Recreation Ground, the Oxford University Press sports ground and other playing fields and sports facilities within this area of focus. For example, Five Mile Drive is an important site for youth football with improvements need to the quality of the pitches. In its current form Sport	In practice, each AoF covers a broad range of uses and we have not sought to acknowledge all of these exhaustively. Other overarching policies protect pitches (e.g. policy G1) and community facilities (e.g. policy C3). Relevant allocations within the AoF also set out their own specific requirements where proposals could impact a sports site.

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	them or improve them. Planning permission should not be granted for development that will affect existing sport and recreation facilities (including playing fields). The NPPF (paragraph 103 and 104) expects local authorities to set policies within their development plan that will protect and improve their open spaces, sport and recreation facilities regardless of ownership.	England considers the policy is not consistent with national policy and it is not justified or effective with regard to sport and recreation.	The AoF policy does not need to repeat these requirements as the Local Plan needs to be read as a whole. We don't agree that particular improvements to sites and facilities need to be identified through the AoF policies to be consistent with national policy. The need for enhancements to existing facilities is likely to change and evolve over the lifetime of the Local Plan. It will also need to be informed by the PPS (and future iterations). We would suggest the better place for identifying these needs is through the Infrastructure Delivery Plan – which is intended to be kept as a live document. As the PPS continues to emerge, we will ensure the IDP is updated to reflect any key improvements to facilities that are identified as part of future updates.
SPN4 OUP Sports Ground	This site is actively used by local community sports teams, including Oxford Cricket Club. It has a cricket pitch and 2 adult pitches. These community clubs will be displaced if this site is allocated for development. The Council has not completed its Playing Pitch Strategy and it cannot be concluded that this site is surplus to requirements, please see also Sport	This site allocation should be removed from the Plan.	This site has been allocated since the Sites and Housing Plan, and is a current allocation in the OLP36. For the new Local Plan, as part of our capacity assessment informing the minimum housing number for the allocation, we have assumed the retention of cricket onsite. The allocation then sets out clearly that:

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	England's comments on the evidence base. The proposal to develop a playing field is not consistent with national policy (paragraph 104) or the policies in the draft NPPF and is not justified.		*a) The capacity of the sports provision must be retained unless it can be demonstrated that it is surplus (which is not the case at the current time) or the loss of the sports provision can be otherwise compensated for (Policy G1).* We feel that the allocation as worded sets out an appropriate framework of requirements to ensure any potential impact arising from development on the sports uses of the site are fully considered and mitigated.
CBLAOF	This site area includes a number of sport and recreation facilities that are important to the local community. For example, the playing fields at Sandy Lane are still used by the local community (in spite of its allocation in the past Local Plan). The NPPF (paragraph 103 and 104) expects local authorities to set policies within their development plan that will protect and improve their open spaces, sport and recreation facilities regardless of ownership. Sport England considers the policy is not consistent with national policy and it is not justified or effective with regard to sport and recreation.	The policy should be updated to seek improvements to the playing fields and sports facilities within this area. The policy mentions seeking new public open space but instead the Council should consider identifying within the plan those existing open spaces. Infrastructure contributions should be collected to improve these existing community spaces.	Please see our response above, against your comments on NEOAOF, which is of relevance to these comments also. In relation to Sandy Lane specifically, the allocation sets out expectations for how impacts on the existing pitches should be approached and these do not need to be repeated in the broader AoF.
SPS4 Cowley Marsh Depot	Sport England requests amendments are made to this policy to protect use of adjacent community playing field.	The following wording is suggested; 'The adjacent site is used for sport including cricket. The proposed	The adjacent green space to the north is protected as core green infrastructure under Policy G1

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		development (including proposals for connection to the adjacent recreation ground) support the continued use of the site for sport. Appropriate mitigation (such as ball stop fencing) should be provided to ensure use of the site for cricket can continue.'	already, which affords a high-level of protection to the green space. Policy discusses the adjacent cowley marsh rec ground but **further mods could be made to criterion b as follows**: *b) Public open space will be required onsite **(Policy G2)**. The location of the public open space should take into account opportunities to provide connections and enhancements to the adjoining Cowley Marsh Recreation Ground including supporting the existing sports uses accommodated there.* **And an additional criterion under 'additional details' as follows**: *XX) The site is adjacent to a playing field used for sports including cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.*
SPS6	Planning permission for this site has been submitted (25/00813/OUT). This site could provide an extension to the	Pending the outcome of the Playing Pitch Strategy, it is recommended that the opportunity for this site to	This site is currently allocated in the OLP36. On submission of that plan, the policy required compensation for

Former Iffley Mead Playing Field	adjacent community playing field to meet the increase in demand from that site.	provide community playing field is reconsidered. For example an area of the site could provide for an extension to the adjacent community playing fields.	loss of the pitch. At hearings, Oxfordshire County Council as landowner argued that this was not justified as the site had not been needed as a playing field for some time. The City Council and Sport England attempted to justify the requirement, but the Inspector agreed with the county that the site was surplus and that requirement had to be removed as a mod. There is no relevant change in circumstance. However, new public open space is required, and it is noted that this could be an extension of the adjacent playing field.
SPS7 Kassam Stadium	The Kassam stadium has an existing playing field and this will need to be addressed in the policy. The stadium cannot be redeveloped until a new stadium for Oxford United has been provided. Whilst the replacement Oxford United ground has been permitted in Cherwell, it will take time for a new ground to be constructed. It is therefore important that the Council retains its existing local plan requirement to protect the stadium (Policy SP14);	The following text could be added to the policy; 'Development of the Kassam Stadium football pitch, stands and access shall not be commenced until the replacement stadium (insert Cherwell planning application reference) has been implemented and made available foruse.' Otherwise the football team could have a period of years without a stadium, other examples where this has occurred include Truro City (returning to their ground this year after a period of 3-4 years) and Newport FC on the Isle of Wight	Policy SPS7 currently says: *The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected.* It is not considered justified to go as far as your suggested amendment, however, we would be happy to propose a mod that adds a requirement for the applicant to show consideration for how existing users of the stadium could be accommodated should there be a delay in a new venue coming forward if this would help to alleviate your concerns, for example:

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		(whose plans for a new ground have stalled).	*XX) Proposals should include details setting out how existing users of the stadium site could be accommodated elsewhere if alternative facilities are not yet available.*
SPE7 Lincoln College Sports Ground (And SPE4 Jesus College Sports Area)	This site is adjacent to Jesus College sports area (SPE4). Sport England also objects to the inclusion of these playing fields within the Local Plan, particularly as the Council has not completed its Playing Pitch Strategy (see also comments on evidence base under G1) and the PPS document currently does not cover tennis.	The policy is not consistent with national planning policy, positively prepared or justified (NPPF paragraph 103) and should be removed from the plan.	As we mentioned in our catch up, the Policy assumes replacement on site, and currently says: *c) There is potential to consolidate and share sports provision with the neighbouring Jesus College Sports Area (Policy SPE4). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s).* We feel this appropriately responds to your concerns.
SPE16 Thornhill Park	This site is adjacent to Risinghurst Cricket Club and there is potential for ball strike from cricket balls used on the playing field. The proposals also appear to support the loss of the pavilion used by the sports clubs on adjacent playing field (d) https://risinghurstandsandhills-pc.gov.uk/wp-content/uploads/2025/09/RPFCIO-Annual-Report-and-Accounts-24-25.pdf	Criteria (d) should be amended to; 'Proposals for development must include a replacement pavilion for the adjacent playing fields' The policy should also include; 'Consideration be given to any issues resulting from ball strike from the adjacent cricket ground if ball stop fencing is required along the site boundary this should form part of the planning application'.	The site does contain a disused playing field although Sports England comments on the previous planning application for the site (21/01695/FUL) were that the site is not considered to form part of, or constitute a playing field as defined by the Town and County Planning Order and had not raised an objection.

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	It is not clear from aerial images but the proposal site may be existing playing field and its existing use should be reviewed through work on the Council's playing pitch strategy. Sport England objects to criteria (d) as this has not been evidenced by the Council and is not compliant with paragraphs 103 or 104 of the NPPF.	Currently Sport England considers the policy does not meet the soundness tests.	When the previous permission was granted for the site, a contribution towards a replacement pavilion for the pitch to the south of the site was agreed in order to satisfy requirements of LP2036 policy G5 on outdoor sports which protects the open space at present. Criteria d of the LP2045 policy carries forward this requirement and we are therefore unclear on the justification for the alternative wording you propose, but are happy to discuss further. In relation to your other points, we suggest an additional criterion could be added under the 'additional requirements' to respond to your point about ball strikes. **Additional criterion to be proposed through a mod as follows:** *n) The site is adjacent to a playing field used for cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.*
SPE18 Warneford Hospital	This site contains a former playing field that may be needed by the community. A planning application is in progress on the site. The national planning policy	As new housing is being proposed within this location, the Council should work with the applicant to retain the playing field within the	LP2036 established (and LP2045 carries forward) that: *loss of the former sports facility is considered justified only due to the need for and*

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	framework is clear that playing fields should be protected from loss.	wider site to provide a sports facility that will benefit the wider community.	*benefits of new hospital development.* Nevertheless, the open space is identified as supporting GI through Policy G1 and that policy sets out requirements for mitigating losses more generally which would come into effect.
SPCW10 Oxpens	Sport England objects to this policy as whilst it refers to granting permission for leisure development it does not reference retaining the ice rink and should be amended to make it clear in the text that the ice rink will be retained. Sport England is further concerned about the impact of this development on the ice rink. This is a regionally important facility and parking may therefore be required to support events. The viability of the ice rink as a venue may also be adversely impacted by development adjacent to it (for example, construction). The impact could potentially be so significant that these considerations should be explored and evidence presented before such a large allocation is made. As currently drafted, Sport England considers that the policy does not adequately protect the ice rink facility. The proposed wording as written also appears to suggest that development on the existing open space in this	The following text should be added with the following heading – 'Existing sports facilities': 'Development proposals for the site should ensure that the ice rink is retained within the site and information should be provided by the applicant to demonstrate that the operation of the ice rink will not be adversely affected by the proposals.' The existing open space that will be retained should be shown on the proposals map if it is affected by the development.	The ice rink is an in use facility and other policies protect this use (although there is no justification for protecting it as it is and on the site). The other policies could be cross-referenced if that would be helpful, although this is not considered necessary. **Proposed mod would be to add an additional criterion as follows:** *XX) The ice rink is a regionally important facility and proposals which could impact upon this venue will need to accord with the requirements of* ***Policy C3.***

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	location is acceptable. Policy is contrary to NPPF paragraphs 103 and 104 and therefore fails the relevant soundness test and the lack of evidence provided in relation to indoor sports facilities within the plan means that it has not been positively prepared or adequately justified.		
General planning for sports infrastructure	The Council has not undertaken any new work looking at existing (or the need for new) indoor sports facilities in Oxford. This work is needed to inform the Council's infrastructure delivery plan and decisions about the community infrastructure levy in Oxford. There will also be needs arising from city residents for indoor sports facilities and to support policies such as SPCW10: Oxpens. Iti is recommended that with the increase in residents expected in Oxford, this important work is started without delay.		As touched upon earlier, the Local Plan has limited control over many types of indoor sports facilities, however, where we can, the approach is to seek to protect what we have through policies such as Policy C3. Where a particular allocation could impact a use – the impact has been considered and wording incorporated into the allocation to deal with any reprovision requirements. Whilst there is not a specific new study focused solely on indoor sports, the evidence base includes the Oxford Retail, Leisure and Town Centre Needs Study and this did look at a high level at commercial leisure needs including indoor sport.
SPE2 East Oxford Bowls Club	It is proposed to develop this former bowls club site. The Council has not provided evidence within the local plan to demonstrate that the bowls site is no longer needed for bowls but also to investigate whether alternative sport	Evidence should be provided that considers whether the bowls provision is still needed in this area and if not then what alternative sports and recreation provision could be accommodated on this site.	This site is considered to meet the test of being surplus to requirements. The bowls club folded over 20 years ago due to lack of interest and there as been no use of the site since. The pavilion it once housed burnt down It

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	and recreation could be accommodated on the site.		has been entirely closed off and unused during this time.
SPS3 Bertie Place	This recreation ground has amenity and play value for the local community, it's place on the site allocations list should be reviewed. The planning application 23/00988/FUL remains undecided.	In light of the community representation on planning application 23/00988/FUL, the Council may wish to consider whether to deallocate this site.	Policy sets out that a public playground and MUGA should be re-provided on site at Bertie Place. The open space is also designated as supporting GI through policy G1 and as such any proposal that results in loss/harm will need to be mitigated in line with that policy's requirements.
SPS15 Sandy Lane Recreation Ground	Sport England objects to the allocation of these community playing fields which are actively used by local sports teams (principally football) and Sport England has had a number of residents contact us raising concerns about the allocation of this site who weren't aware of its allocation in the previous Local Plan. Sport England welcomes the inclusion of criteria (a) and (c) but these are insufficient to secure the protection of these playing fields from development which provide for community sport in the city in addition to recreation use. If the Council means that the playing field will be moved and replaced elsewhere then the policy should state this and an alternative site should be allocated within this Local Plan. Sport England does not support criteria (b). The current site functions as one whole with the ability to move pitch layouts within it and support multiple	Sport England recommends that the site is removed as an allocation in the Local Plan unless a new allocation can be introduced that shows where the community playing field can be replaced in Oxford.	The policy has been drafted on the assumption that pitches are to be relocated, however, the requirements are worded in a way that allows both situations to be addressed (pitches are relocated or retained) and sets out what is expected (specifically that reprovision of pitch capacity on or offsite will be needed where existing pitches are lost). An allocation for new pitches is not considered necessary to ensure that these requirements are carried out, the policy includes the requirements which will need to be demonstrated by the applicant through the application. On your point about retaining quantity and the concerns about the wording of criterion b, we have generally worked to date on the understanding that in our constrained context, the key requirement in looking for any

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	teams from the same club (different age groups) on site together. Whilst Sport England would support quality improvements to the existing playing field this would not be sufficient compensation for the loss to community football. Improving quality without retaining the same quantity means that there is less space for play to take place on. It is preferable to have a large site playing field rather than a single pitch site as these are expensive to maintain. Page 25+ of our Playing Fields Policy contains more information about what to consider when seeking to replace playing field.		reprovision is about ensuring existing capacity of a site's pitches is not lost, rather than a like for like replacement in terms of size/number of pitches. That is the rationale behind the criterion setting out that there could be opportunities to enhance quality to improve capacity where the overall quantity of pitches is consolidated (though it does not state this is the only way the pitches could be addressed). Of course, the applicant would need to explore this further through the planning application process and demonstrate that their approach to reprovision sufficiently mitigates any losses. We're happy to discuss this further however if Sports England disagree with this stance.

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Oxfordshire County Council

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
S1	General comment highlighting the County's expectation to agree developer contributions in respect of development proposed in the plan.	Policy S3 sets out more information about developer contributions.	No change proposed
S3	Policy should be strengthened to ensure proportionate contributions can be adequately secured for the delivery of the line, stations and placemaking elements that unlock new development.	Policy S3 already includes a bespoke reference to the Cowley Branch Line and how contributions are expected to be sought. The County's proposed amendment is in a different part of the policy, which relates to infrastructure contributions more widely. The County Council Representation does not accurately reflect the existing text in policy S3. The correct articulation of the County Council Reg. 19 representation is set out below (the underlined text below shows the full extent of the Couty's proposed amendment). *Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development through an appropriate financial contribution prior to, or in conjunction with new development.* This additional text would appear to seek financial contributions only from new development. It is unnecessary and potentially confusing to include this additional text as the policy is already clear that the granting of planning permission is subject to the	Add the following additional text to the second sentence of the second bullet point of the supporting text of Policy S3 under the "Policy context" heading. *...Developer contributions and the delivery of infrastructure will be sought through the most appropriate mechanism available, ~~using the Community Infrastructure Levy (CIL) and planning obligations (e.g., Section 106 (S106) or S278 agreements).~~ including through the use of pooled contributions and/or forward-funding, where appropriate.* Then insert the following text and create a new (3rd) bullet point within the "Policy context" section. *Developer contributions are currently secured in Oxford using the Community Infrastructure Levy*

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		provision of the required infrastructure (or an appropriate financial contribution) to support the level of development proposed. However, the City Council acknowledges that S106 contributions can be secured through a variety of mechanisms and as such is proposing an amendment to the supporting text to clarify that position.	*(CIL) and planning obligations (e.g., Section 106 (S106) or S278 agreements).*
S4	The County Council does not support this policy as it is not in line with the County Council's policies on low carbon and the LTCP objectives in relation to reducing car trips. The County Council would like to see developers encouraged to make the best use of land, creating sustainable buildings at good densities and not using land wastefully on car parking. Although discussions with the City Council have taken place, it is the County Council's view that this policy undermines County policies and this matter should be left to specific negotiations between developers and Councils on a case-by-case basis.	Policy S4 introduces a cascade for housing sites and for employment generating uses. The County Council response is only concerned with the housing viability cascade. Policy S4 is included in the Plan to ensure that (in accordance with the NPPF, paragraph 35), the policies for contributions do not undermine the deliverability of the Plan. The supporting text for Policy S4 sets out that that it provides the basis for negotiations relating to viability, the City Council's priorities for contributions, and the evidential expectations required to demonstrate the viability of an individual scheme. The cascade approaches provide a standardised approach to ensuring development viability. The supporting text of the policy highlights that the viability assessment prepared for the Local Plan 2045 identifies a suite of policies likely to have the greatest potential impacts on site viability.	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		As such, the cascade approaches would seek to reduce a scheme's offsetting payments in the first instance, followed by, in the case of residential schemes, the low car element of the policy (low car development is defined in Appendix 7.6 as follows: *0.2 car parking spaces per 20 units should be provided on site for working drivers, service and delivery vehicles, pooled cars/car clubs and visitor spaces.* As such, where viability issues exist for residential schemes, Policy S4 provides an approach to firstly increase allocated spaces, and then increasing the number of spaces incrementally up to the maximum parking standards (as set out in Appendix 7.6). The Local Plan Viability Assessment Update (BNP Paribas, December 2025) provides evidence to support the viability cascade involving car parking as set out in this Policy.	
H1	<u>General comment</u> The County Council has an interest in understanding how the city is meeting its housing need (and any unmet housing need arising) as any new strategic housing allocations are likely to have transport, education and other implications for the County's statutory functions.	<u>General comment</u> General comment noted.	<u>General comment</u> No action required

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	General comment: Infrastructure costs The County Council is particularly concerned about growth leading to increased vehicle trips (counter to LTCP targets) and whether the cost of necessary infrastructure to serve housing growth can be met as it may be unaffordable to developers and government and therefore lead to a reduction in quality of life or services. General comment; location of sites for Oxford's unmet housing need The County Council's position is that any site allocations should be well-located in relation to the people they are intended to accommodate. Oxford's unmet housing need should be met on sites close to Oxford, either with good existing walking cycling and public transport links or the ability to provide such links funded from development. Density/ site capacities The County Council is also of the view that the housing capacity of the city needs to be carefully reviewed. This is to ensure the maximum level of housing provision within the city boundary. In particular, areas such as Cowley	General comment: Infrastructure costs General comment re: infrastructure costs noted. General comment; location of sites for Oxford's unmet housing need General comment re: location of sites to meet Oxford's unmet housing need noted. Density/ site capacities The City Council has done extensive work looking to maximise densities of residential developments and the residential component of mixed-use developments within the city. Site allocation policies contain minimum numbers of dwellings, all of which have been confirmed with landowners that they are deliverable. We are confident that our density assumptions are realistic and deliverable. The Background Papers BGP 015 Developing Site Allocations and BGP 016 Efficient Use of Land set out the approach to identifying sites	General comment: Infrastructure costs No action required General comment; location of sites for Oxford's unmet housing need No action required Densities/ site capacities No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Templars Square (Cowley Centre) and Headington where environmental and heritage constraints are less than in other areas. Policies HD1 and HD2 and relevant Areas of Focus must be reviewed to ensure maximum densities can be achieved. <u>Housing at employment sites</u> A number of proposed site allocations (e.g., SPS12 Oxford Science Park) recognise a level of housing could be acceptable however no capacity study or indicative minimum has been undertaken. This comment is repeated later in the representation. <u>Kassam Stadium assumed density</u> Another site allocation, where the minimum density is questioned is the Policy SPS11 Overflow Car Park at Kassam Stadium (allocated for a minimum of 100 homes). The County questions the assumed density of 80dph and suggests that, given the urban nature of the site's location should be applied, in order to maximise the use of the site under Policy HD2,	involving residential development and provide the methodology for identifying appropriate density typologies and for identifying site capacities. <u>Housing on Employment sites</u> See response below for Policy SPS12/E1 <u>Kassam Stadium assumed density</u> Background Paper 016 Efficient Use of Land sets out the methodology for identifying appropriate density typologies and for identifying site capacities. We are confident in our density typologies and the evidence that has underpinned them. It would not be appropriate to simply apply an alternative density assumption to this site.	<u>Housing on employment sites</u> See response below for SPS12/E1 <u>Kassam Stadium assumed density</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	thereby reducing the amount of housing need in Oxford.		
H2	Oxford's need for affordable housing is well-known and it is disappointing that the requirement is proposed to be reduced to 40%. Various sites adjoining the city (in neighbouring district council areas) have a requirement for 50% affordable housing, which aligned with the plan requirement at the time they were allocated (i.e., extant Local Plan 2036). Would the current requirement for 50% affordable housing on sites in neighbouring districts be undermined by having a lower (i.e., 40%) affordable housing requirement in Oxford?	The Local Plan viability study provides evidence for affordable housing and other proposed policy requirements.	No changes proposed
H4	The County Council welcomes the recognition of the need for employer-linked affordable housing for key workers.	General comment noted.	No change proposed
E1	(Strategic Planning) Policy E1 indicates the circumstances in which new employment uses will be favourably considered. It also includes a part which provides for residential development on employment sites subject to criteria. The criteria include matters of particular interest to the	General comment noted	No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	County Council such as being well connected to public transport and active travel opportunities.		
E1	(OCC Estates and Property) Policy objective (para.1) Paragraph 1 and definitions The County Council supports the objective of the first paragraph of the policy. Employment site categories (paragraph 3/ supporting text) The County Council considers the phrase *Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class)* to be lengthy and consequently, impractical and confusing. The County Council suggest re-wording this phrase both within the policy and supporting text as follows: *Existing Non-Key employment sites* Paragraph 3 The County Council supports the aims of paragraph 3, however has proposed some minor modifications to improve clarity and overall application of this paragraph in line with the above suggested changes.	Policy objective (para.1) Support noted. Employment site categories (paragraph 3/ supporting text) The City Council does not support this proposed modification. The suggested phrase 'Non-Key employment sites" could be open to a very wide interpretation. For instance, it could be interpreted that the phrase 'non-key employment site included any other site in the city that was not a Key Employment site. This would mean that any site in the city could be a potentially suitable location for new employment generating uses. While the phrase is lengthy, the City Council considers that it is one which benefits from being precisely worded so as not to create unnecessary loopholes which could be used to deliver increased floorspace for employment-generating uses, when the identified needs for these uses can be met through the current policy approach.	Policy objective (para.1) No change proposed Employment site categories (paragraph 3/ supporting text) Suggest the following modification to Policy E1 (paragraph 3 Amend 3rd paragraph of the policy as follows: ~~Outside these locations:~~ On existing employment sites or those in lawful uses for the proposed employment use class, which are outside the city or district centres, and which are not designated as Key Employment sites, proposals for regeneration and/or additional floorspace with employment-generating uses will only be supported if: a) ~~Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class),~~

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		The City Council has put forward a modification, to highlight that the phrase should be read as a singularity, and to make it less confusing for the County Council.	~~can only be regenerated with employment generating uses if~~ better and more intensive use is made of the site through the redevelopment, up-grading or re-use of existing under-used buildings; and b) ~~Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow~~ the sequential approach is followed for new town centre uses as set out in Policy C1. No change proposed for supporting text
E1	(OCC Property) Paragraph 2: *Planning permission will be granted...* The County Council has previously expressed their concerns about the use of the phrase "*planning permission will be granted*", as it could confuse the decision-maker by giving them the impression that proposals should be permitted without taking into account	Paragraph 2: *Planning permission will be granted...* The City Council notes that it is only within Policy E1 where the County Council has expressed concern about the use of the phrase "*planning permission will be granted*", causing potential confusion to decision-makers. The City Council does not accept any of the proposed changes from the County Council, which we believe	Paragraph 2 No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	instances where material considerations could exist that substantially outweigh the benefits of permitting such a use. The word 'support' is considered more appropriate as it would provide a greater level of flexibility. The County Council proposes that all references to "Planning permission will be granted" within Policy E1 (only) be replaced with general supportive/non-supportive statements to be applied to development proposals.	would serve to undermine the plan's focus to support housing delivery. The suite of proposed changes by the County Council to Policy E1 serve collectively to weaken the plan's Employment Strategy by enabling employment-generating uses to come forward across a wider range of sites than the Reg. 19 version of the policy allows for. Whether or not the plan supports or does not support a planning application does not give a clear steer to planning officers in making their report recommendations or elected members when determining planning applications. The County Council's proposed changes could enable employment-generating uses to proliferate across the city.	
E1c	Paragraph 4 The County Council considers the fourth paragraph to be confusing due to repeating matters addressed in earlier paragraphs and therefore does not add value to this policy. Accordingly, it is recommended to be deleted. Proposed amendment to paragraph 4 is as follows: ~~Planning permission will not be granted for~~ **Development** proposals for employment generating uses outside	Paragraph 4 ***Original Reg. 19 Plan policy text*** *Planning permission will not be granted for proposals for employment generating uses outside the following locations:* *c) Key Employment Sites;* *d) the city and district centres;* *e) existing employment sites not designated as Key Employment sites (or those in lawful use for the proposed employment use class).*	Paragraph 4 No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	the following locations **will not be supported**: c) Key Employment Sites; d) the city and district centres; e) existing **non-Key** employment sites ~~not designated as Key Employment sites (or those in lawful use for the proposed employment use class)~~.		
E1d	Paragraph 5 The clarification given in the fifth paragraph is also not considered appropriate for inclusion in the policy text, as the classification of employment sites is provided in the supporting text. The County Council suggests retaining the first sentence and deleting the rest of the text. *Proposed modification* *Key Employment Sites are listed in Appendix 3.1 and are shown on the Policies Map.* ~~*All other employment sites are existing employment sites not designated as Key Employment Sites.*~~	Paragraph 5 ***Original text as follows:*** *Key Employment Sites are listed in Appendix 3.1 and are shown on the Policies Map. All other employment sites are existing employment sites not designated as Key Employment Sites.* It is unclear which test of soundness this proposed modification is based on as the representation in relation to this paragraph suggests that this distinction is covered in the supporting text. While the supporting text frames the categorisation of the two types of employment sites, it does not provide the level of detailed differentiation provided within the policy itself. The City Council does not accept the proposed modification as the policy text provides clear articulation about the specific types of employment sites.	Paragraph 5 No change proposed
	Paragraph 6 The sixth paragraph highlights that development proposals for the	Paragraph 6 *Original policy text*	Paragraph 6 No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	conversion of Key Employment sites to residential will only be permitted when the employment use can be maintained and the number of jobs be retained. The County Council raised significant concerns about this part of the draft policy in the Regulation 18 stage, as it was considered too restrictive and lacking the necessary proportionality to ensure there is consistency in decision-making. The Council's position to not permit any loss of jobs is acknowledged and respected. Nonetheless, it is essential to consider adding a degree of proportionality to ensure that this draft policy is effective, and decision-makers make consistent decisions. As previously suggested, a "percentage" instead of number of jobs is considered a more appropriate metric as different economic circumstances and needs apply to small, medium and large businesses. Given the aspiration of the Council to retain most, if not all of the jobs, a high percentage could be justifiable and help with unlocking Key Employment Sites for development	***Loss of employment floorspace and the use of employment sites to support housing delivery*** *Planning permission will not be granted for development that results in a net loss of employment floorspace on Key Employment Sites unless it can be fully justified where:* *f) The employment use can be maintained; and* *g) The number of jobs in employment generating uses is retained.* The County Council has not suggested a precise percentage of jobs that should be retained or lost should there be a corresponding loss of employment floorspace at Key Employment Sites. Neither was a precise percentage expressed previously. The City Council's position is that the number of jobs in employment generating uses should be retained.	

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	proposals that deliver similar levels of employment. Proposed modifications: ***Loss of employment floorspace and the use of employment sites to support housing delivery*** *Planning permission will not be granted for d**D**evelopment **proposals** that results in a net loss of employment floorspace on Key Employment Sites **will not be permitted/supported** unless it can be fully justified where:* *f) The employment use can be maintained; and* *g) ~~The number~~ **At least x%** of jobs in employment generating uses is retained.*		
	Paragraph 7 The seventh paragraph refers to objectives c) and f) which are currently absent from the draft policy. Accordingly, this will need to be corrected. This paragraph echoes the requirements set out in paragraph eight. It is therefore considered to result in unnecessary duplication. Therefore, it is	Paragraph 7 Original text of paragraph 7 is as follows: *Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).* The City Council agrees that there was a drafting error in this paragraph and proposes a minor modification to overcome it.	Paragraph 7 Update Paragraph 7 to reflect the correct objectives (i.e., objectives h) to m)) Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	recommended that it is merged with paragraph eight. County Council suggest deleting paragraph 7 in its entirety. ~~Planning permission will be granted for the loss of any existing employment sites not designated as Key Employment Sites to other uses, including proposals for housing which, will be supported (subject to a satisfactory assessment of objectives c) to f)).~~	This paragraph does not unnecessarily duplicate paragraph eight of the policy. Instead, it sets out that planning permission will be granted for the loss of any existing *employment sites not designated as Key Employment Sites* to other uses, while proposals for housing will be supported subject to a satisfactory assessment of specified objectives (see proposed minor modification to correctly reference these objectives).	assessment of objectives h) to m)~~c) to f)~~).
	Paragraph 8 Paragraph eight sets out the material planning considerations that will be taken into account when considering development proposals for the redevelopment of Key and non-Key employment sites. OCC recommends a number of modifications to improve clarity, usability of each objective, and make the decision-making test more transparent. **Development P**~~p~~roposals involving housing **and other uses** at Key Employment Sites and on existing **non-Key** ~~employment sites not designated as Key Employment Sites~~ **will only be permitted where they can**	Paragraph 8 Original text of Paragraph 8 sets out that: *Proposals involving housing at Key Employment Sites and on existing employment sites not designated as Key Employment Sites will be assessed by a balanced judgement which will take into account the following objectives:* *h) Meet as much housing need as possible in sustainable locations....* Objectives h) to m) of the policy are specifically tailored towards supporting housing delivery and ensuring the continued operation of existing businesses and employment sites. The objectives have been specifically drafted to ensure that, where housing is proposed across the city's employment site network,	Paragraph 8 No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	demonstrate that they have regard to ~~will be assessed by a balanced judgement which will take into account~~ the following objectives: h) Meet as much housing need as possible in sustainable locations...	this results in an appropriate living environment for future residents. The phrase "will be assessed by a balanced judgement..." was introduced by the Local Plan 2036, Planning Inspector to ensure that consideration was given to a suite of objectives which would deliver a suitable environment for any future residents. The LP2045 has retained this extant phrasing to ensure that proposals involving housing across the city's existing employment site network are considered consistently. Paragraphs 6-8 of Policy E1 work together to establish the conditions where employment floorspace can be lost on Key Employment Sites (para.6), and on existing *employment sites not designated as Key Employment Sites* (para.7). The policy finally sets out a suite of objectives specifically drafted for proposals involving housing that come forward on sites within the city's exiting employment site network. The policy, as originally drafted, establishes the principle that the complete loss of existing *employment sites not designated as Key Employment Sites* is allowed, while proposals for housing are supported (subject to a satisfactory assessment of specified objectives). The County Council's proposed changes would effectively make it harder to redevelop existing	

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		employment sites not designated as Key Employment Sites for housing (and also introduce unnecessary requirements for other uses proposed on these sites). For Key Employment sites, the County Council's proposals would serve to support "other uses" on Key Employment Sites while making it harder to bring forward "proposals involving housing" at Key Employment Sites. The County Council's proposal to delete paragraph seven and merge its contents with paragraph eight would result in 'in principle' support for "other uses" on Key Employment Sites.	
G1	(Landscape and Nature Recovery – Biodiversity / Landscape) <u>G1 layer extends beyond city boundary</u> The G1 layer appears to cover some designated wildlife sites both inside and outside the city boundary but not all, for example Littlemore Brook Oxford City Wildlife Site which connects multiple areas currently designated within the green infrastructure network.	<u>G1 layer extends beyond city boundary</u> The example given is of an "Oxford City Wildlife Site" - Littlemore Brook. This is an Oxford City Council local ecological designation. As such, its extent does not extend beyond the City Council administrative boundary – in fact no G6 Oxford City Wildlife Site extends beyond the city's administrative boundary. There are two instances where the G1 layer extends beyond the City Council's administrative boundary. In both instances, part of the site is located within the city council boundary, and part of the site is located within a neighbouring district council's administrative boundary. This is a mapping error. The Core GI network	<u>G1 layer extends beyond city boundary</u> Amend policies map to accurately reflect the extent of coverage of sites in the city.

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		policies only apply in Oxford city and not outside our administrative boundary.	
	Inclusion of all designated wildlife sites in Core GI network The inclusion of all designated wildlife sites in the core area of the green infrastructure network is encouraged to help ensure the aims of this policy are realised.	Inclusion of all designated wildlife sites in Core GI network The Core GI network includes sites which meet specific GI criteria (as set out in the GI Study). All sites in the city were assessed and included within the Core GI network when sites met specific criteria. Designated sites (i.e., the SAC, SSSIs, LWSs, OCWSs, LNRs) are included within the core GI network.	Inclusion of all designated wildlife sites in Core GI network No change proposed
	Connecting GI features A focus on connecting green infrastructure features not currently mapped would be welcomed.	Connecting GI features Supporting text to Policy G2 makes reference to strengthening linkages between areas to enhance network connectivity.	Connecting GI features No change proposed
	Mitigation hierarchy Reference to the mitigation hierarchy within this policy regarding G1B and G1C areas would be welcomed where avoidance and mitigation are currently mentioned.	Mitigation hierarchy Policy G6 (supporting text) sets out that the mitigation hierarchy needs to be followed when considering Policy G6 ecological designations.	Mitigation hierarchy No change proposed
	Trees and woodland With regards to impacts on trees and woodland, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may also be important to refer to onsite	Trees and woodland Ecological enhancements are covered in Policy G2.	Trees and woodland No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	compensation in advance or as soon as possible after the impact being preferable in this section through following the mitigation hierarchy including temporal and spatial considerations. Canopy cover (net gain) Inclusion of the requirement for a net gain in canopy cover, over a no net loss, is encouraged where it can be demonstrated that this is ecologically appropriate. Right tree in the right place Urban settings can present challenges for new planting with the right species and habitat choice and ongoing management are crucial. The principle of the right habitat in the right place should be applied and reflected in this policy.	Canopy cover (net gain) The policy approach broadly aligns with national policy. We have sought a broader green surface cover target through the UGF policy (G3) which could include new trees but also other types of greening depending on what is best for the site. Right tree in the right place The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy. Policy G2 sets out maintenance and management requirements.	Canopy cover (net gain) No change proposed Right tree in the right place No change proposed
G1	(OCC Property) General comment The County Council manages a large number of school playing fields and other sites used for recreational purposes, which are currently designated as "Supporting Green and Blue spaces" under this draft policy.	General comment General comment noted.	General comment No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	G1b requirements The County Council is concerned that the requirement for the reprovision of similar or higher quality green infrastructure on site can restrict the County Council from discharging its public protection and education duty by improving and expanding recreational spaces and school fields. Paragraph 104 of the NPPF already sets out the circumstances when development proposals for the loss of existing open space, sports and recreational buildings and land will be considered acceptable. These criteria are also currently being proposed to be retained in the draft version of the NPPF, which is currently in consultation. Therefore, and for the sake of enabling sustainable development and adopting a Local Plan that is in general compliance with national policy, the following minor modification is recommended to ensure the tests of soundness are met. Proposed modification:	G1b requirements Original text of Policy G1 – G1B: Supporting spaces, states: *Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. These spaces are designated G1B on the policies map.* It is important to replace GI/ BI that needs to be re-provided close to where it was lost – the wording guides applicants towards this in the first instance but does not force them to do this. We are not proposing to change this part of the policy.	G1b requirements No change proposed

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	"G1B: Supporting spaces Planning permission will only be granted for proposals which affect spaces identified a part of the Supporting GI Network where any harm/loss is mitigated by ensuring sufficient reprovision, ~~ideally onsite,~~ and to the same standard or higher. These spaces are designated G1B on the policies map."		
G2	<u>LNRS Reference</u> Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform design and decisions is considered key for this policy. <u>Maintenance and management</u> The maintenance and management arrangements of this policy also link to biodiversity net gain. It may be useful to clarify that the management period of 5 years would be a minimum with longer encouraged and if BNG is being delivered a minimum of 30 years would be required. <u>Right tree in the right place</u> Urban settings can present challenges for new planting with the right species and habitat choice and ongoing	<u>LNRS Reference</u> Policy G4 Delivering Mandatory Net Gains in Biodiversity and its supporting text refer to the LNRS. <u>Maintenance and management</u> BNG is discussed in detail in Policy G4. <u>Right tree in the right place</u> The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy.	<u>LNRS reference</u> No change proposed <u>Maintenance and management</u> No change proposed <u>Right tree in right place</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	management are crucial. The principle of the right habitat / tree in the right place should be applied and reflected in this policy. <u>General comment</u> Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term. <u>Additional percentage targets</u> Targets such as percentage canopy cover and a net increase in green infrastructure should be considered for inclusion and would be welcomed.	<u>General comment</u> General comment noted <u>Additional percentage targets</u> Consideration was given to the inclusion of a canopy cover target within the plan. The difficulty for Oxford is that tree canopy cover is not evenly spread across the city, with some areas benefitting from more cover than others. Setting a percentage canopy cover target for a city with such diverse tree canopy cover would mean that some areas exceeded the target and others fell below it. Given the diverse range of existing tree canopy cover it was considered more appropriate to ensure no net loss of trees. A policy target for a net increase in GI (in addition to the mandatory 10% net gain in biodiversity and the 10% public open space requirements for qualifying residential developments), was not considered	<u>General comment</u> No change proposed <u>Additional percentage targets</u> No change proposed

3277

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		appropriate for Oxford given its constrained nature and the inherent difficulties	
G3	General comment The County Council believes that the Urban Greening Factor (UGF) has potential to deliver benefits in delivering green infrastructure across the city, and we welcome its inclusion in the policy framework. UGF mandatory for all developments We note however that the policy is that the UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments, especially if located in areas of existing GI deficiency unless particular circumstances and reasoning are demonstrated. Definition of major development Major development should be defined.	General comment General comment noted UGF mandatory for all developments It is a requirement for larger developments and encouraged on smaller ones. Larger (major) developments can offer the most scope for a wide variety of improvements. Definition of major development Major development is defined in the NPPF (10 or more homes or 1,000 sqm non-residential floorspace). It was also included in the Glossary of the Reg. 19 version of the Oxford Local Plan 2045 following comments from Oxfordshire County Council made at the Reg. 18 consultation stage.	General comment No change proposed UGF mandatory for all developments No change proposed Definition of major development No change proposed

3278

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	UGF for non-major developments The application of UGF for non-major developments should be considered here as a way for smaller developments to demonstrate a measurable net gain in biodiversity to satisfy NPPF and local planning policy when they are exempt from the mandatory BNG requirement.	UGF for non-major developments Policy G3 already encourages smaller (minors/ householders) to apply the UGF.	UGF for non-major developments No change proposed
G4	20% BNG A minimum BNG requirement of 20% is encouraged in line with other emerging local plans in Oxfordshire. Alternative prioritisation It is recommended that prioritisation should be given to delivering ecological habitat enhancement and creation within the LNRS before delivering habitat enhancement and creation outside of the LNRS within Oxford. Encouragement should also be given to using offsite offset areas outside of the LNRS mapped areas within Oxfordshire as a step before considering sites further afield. It should be clarified that	20% BNG Oxford is a small, constrained city with limited opportunities to deliver the mandatory 10% net gains. Increasing the requirement to 20% would not result in more biodiversity net gain in the city but rather an increase in delivery outside of Oxford. District Plans already propose 20% BNG across Oxfordshire. It is important that BNG impacts are received locally. Alternative prioritisation See response above.	20% BNG No change proposed Alternative prioritisation No change proposed

3279

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	purchase of BNG units from a habitat bank is preferred to the purchase of statutory credits. It is considered that this approach would be more aligned to the LNRS. The encouragement of delivering more technically offsite difficult habitats that may deliver lower BNG units (due to the application of the difficulty multiplier within the metric) where feasible is welcomed and this approach should also be considered for onsite habitats where feasible.		
G5	<u>Reference to LNRS</u> Reference to the use of Oxfordshire's Local Nature Recovery Strategy (LNRS) to inform appropriate ecological enhancements is considered key for this policy. <u>Encourage native tree planting</u> The requirement to include an element of native planting is encouraged.	<u>Reference to LNRS</u> Reference to the LNRS is made in individual site allocations and within Policy G4 and supporting text. <u>Encourage native tree planting</u> Fourth paragraph of Reg. 19 policy includes a reference to "native planting".	<u>Reference to LNRS</u> No change proposed <u>Encourage native tree planting</u> No change proposed
G6	<u>Application of LNRS</u> Consideration should be given to how regard will be given to Oxfordshire's LNRS and in particular safeguarding of the priorities of the LNRS within this policy including how the LNRS interacts	<u>Application of LNRS</u> Reference to the LNRS is made in individual site allocations and within Policy G4 and supporting text. The background paper (005b Biodiversity) that was published for Reg 19 includes a full section on how we have had regard for the LNRS.	<u>Application of LNRS</u> No change proposed

3280

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	with the ecological network currently referred to. SSSI buffer zone 'Development proposed on land immediately adjacent to any SSSI **designated wildlife site or priority habitat** must be designed with a buffer to that site **or habitat'** Local sites Similarly, the text 'Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest features for which the site was selected' could be expanded to ensure other types of designated site are included. Road Verge Nature Reserves Reference to Road Verge Nature Reserves (RVNRs) as a type of designated wildlife site would be welcomed within this policy, particularly as RVNRs are present within Oxford. Further information regarding RVNRs and RVNRs within Oxford city can be found at	SSSI buffer zone The SSSI buffer zone was developed and evidenced through the Source Pathway Receptor Analysis (SPRA). The City Council does not consider that it is appropriate to arbitrarily widen its application to all designated sites/ priority habitats. The considerations for mitigating impacts from development will vary with every site (based on species and habitats present). Local sites No alternative text provided for consideration. City Council considers that the policy is sound as drafted. Road Verge Nature Reserves Supporting text already includes a link to Oxfordshire County Council biodiversity guidance.	SSSI buffer zone No change proposed Local sites No change proposed Road Verge Nature Reserves No change proposed

3281

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	https://www.oxfordshire.gov.uk/sites/default/files/file/countryside/RVNRSurveyReport.pdf.		
G8	**Urban design** Design guide The policy refers to the City's Design guide and other standards, it is not clear if these are already in place or are part of this Local plan and will subsequently be adopted. **Landscape and Nature Recovery – Biodiversity** Biodiversity and SuDS It should be clearly stated that SUDS design should aim to maximise biodiversity value as far as feasible.	Design guide The policy wording simply relates to the most recently published standards (and future proofs them for when new standards are published). Biodiversity and SuDS Policy already references green infrastructure and the supporting text highlights additional benefits including... "providing habitats to support wildlife".	Design guide No change proposed. Biodiversity and SuDS No change proposed
R6	Highest quality soils It would be useful to define what is considered 'highest quality soils' in the context of this policy. For example, nutrient poor soils would have a high value for biodiversity and creating species rich grassland habitats but a lower value for activities such as agriculture that would value a high nutrient soil content.	Highest quality soils This policy seeks to protect soils. The highest quality soils are often considered to be those in the higher categories of the Agricultural Land Classification system (i.e., grades 1-3a) - but it could vary depending on the specific context of the site (e.g. the profile of soils will look quite different in more rural parts of the city compared to more urban areas). Consideration was given to including a definition however it was considered that using a narrow definition (such as the above), may not provide contextually specific support for a range of soil types.	Highest quality soils No change proposed.

3282

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
HD7	<u>Definition of major development should be included in policy</u> It is supported that Policy HD7: Health Impact Assessment contains the wording that HIA is 'required' for major planning applications, although it would be strengthened by making it clear in the policy wording exactly how Oxford City Council defines 'major'. Other local authorities are increasingly using quantifiable thresholds in their HIA policies. Appendix 6.2 contains further information on how to complete an HIA, directing the user to OCC's HIA Toolkit as well as specifying the thresholds for an HIA to be undertaken (10 or more dwellings or 1000m2 or more of non-residential development. This is strongly supported in principle, but would be more enforceable if this advice were included within the wording of Policy HD7 in the main body of the Local Plan. The County Council requests that the term 'major development' is defined	<u>Definition of major development should be included in policy</u> Major development is defined in the Glossary of the Reg. 19 version of the Oxford Local Plan 2045 and in National Policy (NPPF, December 2024). There is no need to re-define the term major development in this policy.	<u>Definition of major development should be included in policy</u> No change proposed

3283

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	within Policy HD7 itself (rather than just in Appendix 6.2)		
C1	Mobility hubs The first bullet point under the 'Policy context' section states: "The city and district centres are highly accessible mobility hubs that include a broad range of facilities including shops, hospitality, community and leisure facilities." The opening sentence is not clear on the definition of mobility hub. It reads that the city and district centres as a whole are mobility hubs. This sentence should be reworded and provide clearer language. One example could be: The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible. Modification: clarify definition of mobility hub. For example: "The city and district centres include a range of mobility hubs (refer to Mobility Hub Strategy) helping to create places which are highly accessible."	Mobility hubs The intention is to set the context that district centres and the city centre are all highly accessible locations. Without adding a long (and potentially convoluted) explanation in the plan setting out the different types of hubs (major interchange hubs, linking hubs, suburban hubs), we consider that it might actually be more confusing to amend the supporting text in the manner that has been suggested. This is because it would not necessarily be obvious that there are different types of hubs, and it is not necessary for understanding that the city and district centres are highly accessible locations. However, a modification is proposed to add additional explanation to the Glossary.	Mobility hubs Amend the definition of Mobility hub in the glossary as follows: *Mobility Hub: An area in which a variety of transport modes and community assets are co-located for seamless interchange. In Oxford these vary from major interchange hubs, to linking hubs to suburban hubs. These facilities provide added benefit to communities and combined they make up an easy-to-use transport network*
C2	The County Council requests the following modifications to Policy C2: Modifications:		

3284

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	OCC's Street Design Code • At the end of the first paragraph of Policy C2, after the phrase "[...] and this should be low car" please add "and have incorporated OCC's Street Design Code." Delete "well-located from bullet point e) • In sub-paragraph 'e)', please remove the word "well-located". It could be interpreted in a variety of ways. Include references to cycle parking in bullet point f) •In sub-paragraph 'f)' please add the following after "Public realm improvements for cyclists: "-by providing cycle parking in convenient locations which benefit the public realm using thoughtful inclusive design and materials, catering for standard and non-standard bikes, including children's bikes." Public space • While the text mentions tree planting, including incorporation of small greenspaces, it is important to still ensure there is some big open/public	OCC's Street Design Code As the County's most recent Street Design standards is not yet published, we have not referenced it in the plan. However, Policy C6 includes a reference to the published Street Design standards. Delete "well-located from bullet point e) This change weakens the policy as it does not support "well-located" public car parking. Include references to cycle parking in bullet point f) The amendments proposed seem to prioritise public realm improvements for cycling only focusing solely on cycle parking and neglecting other users, i.e., pedestrians and public transport users. Policy C7 already covers cycle parking requirements. Public space Bullet point h) states: *h) Enhancement and new opportunities for public realm and landscaping such as tree planting, including incorporation of small green spaces where people can stop, dwell, socialise and play;*	OCC's Street Design Code No change proposed (as agreed at Reg. 18) Delete "well-located" from bullet point e) No change proposed (as agreed at Reg. 18) Include references to cycle parking in bullet point f) No change proposed (as agreed at Reg. 18) Public space No change proposed

3285

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	space for people to dwell, rather than expect everyone to pass through.	Bullet point h) already provides advice about the enhancement of existing and the creation of new public realm and landscaping in the city and district centres.	
C4	Local Education Authority reference In the first bullet point under 'Policy context' in Policy C4, the text makes reference to the 'Local Education Authority' which is no longer in use. Please update the term to 'Local Authority with responsibility for Education'.	Local Education Authority reference We have proposed the following changes to the supporting text of Policy C4 and the Glossary to accommodate this terminological clarification.	Local Education Authority reference Amend second sentence of first bullet point as follows: *The City Council has worked closely with partners including the County Council as the Local Authority with responsibility for Education Local Education Authority to plan the educational needs of the city...* The phrase "Local Education Authority" also appears in the Glossary within the definition of "Keyworker". Bullet point ii) of the Key worker definition to be amended as follows: *ii) Schools: qualified teachers in any Local Authority with responsibility for Education Local Education Authority school....*

3286

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	General comment re: joint user agreements Policy C4 states that planning permission will be granted for new / redeveloped learning institutions if (inter alia) where possible, joint user and shared use agreements are made. This is an appropriate phrasing: as set out previously, in the case of new schools it will not be possible at the point of granting planning permission to make joint use agreements, as there is not at that time a responsible body in place. Redevelopment projects at existing schools vary greatly, and will not necessarily result in any change in facilities which could be made available to the community. Accessibility requirements for new learning and non-residential institutions The requirement that school developments will be accessible to those who will use it by walking, cycling and public transport should allow for some flexibility as a matter of equality of access, as, for example, if the project is an expansion of a special school, depending on the needs of the pupils it	General comment re: joint user agreements General comment re: joint user agreements noted. Accessibility requirements for new learning and non-residential institutions The policy itself applies to all schools and not just SEND schools. Both new SEND schools, and the expansion of existing SEND schools should be accessible by a range of different modes of transport including public transport (which includes taxis). Given the accessible nature of Oxford, most schools in the city are accessible by a range of different modes.	General comment re: joint user agreements No change proposed Accessibility requirements for new learning and non-residential institutions No change proposed

3287

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	may not be possible for them to travel by walking, cycling and public transport. Loss of learning institutions The restriction that the loss of learning institutions will only be permitted where (inter alia) it can be demonstrated that the use can no longer feasibly be provided in its location could be changed to "feasibly and viably", to the financial viability of provision is one element of feasibility.	Loss of learning institutions We don't see that there is a need to explicitly reference viability as stated in the representations, it is already one element of feasibility.	Loss of learning institutions No change proposed
C6	(Transport Policy) Reference to improving health outcomes In the first bullet point under 'Policy context' it would be positive to add a reference to improving health outcomes along with the other outcomes mentioned here. Reference to County policies/strategies The County Council suggests Policy C6 references the following County policies: the County's Freight Strategy and the OxRail 2040: Plan for Rail. It is also worth recognising the County are working on delivering an integrated transport policy which will be	Reference to improving health outcomes Policy HD7: HIA already focuses on Health outcomes and requires a Health Impact Assessment. Reference to County policies/strategies The IDP and other policies in the Plan (e.g., West End and Botley Road Area of Focus - WEBRAOF) already include references to OxRail 2040: Plan for Rail. Having reviewed the County's Freight Strategy in relation to the sphere of influence for the Local Plan 2045, the Freight Strategy appears to be concerned more with freight movements and routing rather than with specific land use planning issues. Given the city's location in	Reference to improving health outcomes No change proposed (as agreed at Reg. 18) Reference to County policies/strategies No change proposed

3288

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	incorporated into LTCP, this will build upon the Oxfordshire Metro Concept. Vision Led Transport Planning The County Council recommends that C6 incorporates Vision Led Transport Planning as a requirement to ensure Oxford City has the highest quality developments, showing how developers have used Vision Led Transport Planning to achieve sustainable transport infrastructure. Paragraph f) In paragraph 'f)' please replace "Street Design Guide" with "Street Design Code".	relation to the SRN, it is unlikely that sites exist within the city boundary that are likely to meet road/rail freight distribution centre requirements. As such, we do not consider that a reference to it within Policy C6 is required. Vision Led Transport Planning The NPPF (December 2024) already sets out that a vision-led approach to transport planning should be considered. Having considered whether to make a reference to this in the plan, the City Council considers that National Policy and existing Policy contained within the LTCP is sufficient and does not need to be repeated in the city's Local Plan. Paragraph f) It is our understanding that the Street Design Code has not yet been published. However, when it is it will replace the adopted Street Design Guide. Suggest a minor modification to clarify that any equivalent future standards" should be followed.	Vision Led Transport Planning No change proposed Paragraph f) Update references to Oxfordshire County Council Street Design Guide to future-proof to ensure the most up-to-date standards are referred to. Policy C6 para. f) *...and respond to local character and design standards as set out in the Oxfordshire County Council Street Design Guide (or future equivalent standards);*

3289

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Paragraph h) Within Draft Policy C6, outcome h) including e-bike/e-cargo bike charging would support the growth of e-bikes and e-cargo bikes. LTCP policy reference It would be helpful in Draft Policy C6 if it also references how this policy will support LTCP policy to remove 1 in 4 car trips by 2030 and 1 in 3 by 2040 and reduce vehicle mileage. Travel Plans and TA's should actively show how they will be supporting this policy, this will also support the monitoring of Travel Plans. Travel Plans and health benefits The County Council recommends the following addition to Draft Policy C6: "Travel Plans should incentive sustainable travel and support the delivery of cycle training for children, adults and families to support positive travel choices and provide health benefits to local communities."	Paragraph h) The plan already includes a policy which references electric vehicle charging. LTCP policy reference The LTCP is the statutory transport plan for Oxfordshire. As such, there is no need to duplicate its content. Especially as this may be subject to change/ review as and when future iterations are delivered. Travel Plans and health benefits The Plan already includes Policy HD7 – Health Impact Assessment to assess impacts of development proposals. The proposed text does not impact the soundness of the plan.	Paragraph h) No change proposed (as agreed at Reg. 18) LTCP policy reference No change proposed (as agreed at Reg.18) Travel Plans and health benefits No change proposed.
C6	**Place Planning and TDM Teams (Central)** General comment	General comment	General comment

3290

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	The County Council fully supports the requirement for transport assessments to assess the multi-modal impacts of development proposals. The County Council's LTCP includes a transport user hierarchy to ensure future schemes consider walking, cycling, public and shared transport before the private car. It is important that development proposals also consider development impacts and any mitigation in this order too. <u>Inclusion of reference to LTCP Policies</u> The County Council notes "*The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments.*" Whilst this is helpful, it doesn't include this text in the policy wording itself. We think it would be incredibly helpful if specific reference to the County's Implementing Decide and Provide was included and worded as follows: *All major development proposals must demonstrate that the methodology in Oxfordshire County Council's Implementing Decide and Provide:*	General comment noted <u>Inclusion of reference to LTCP Policies</u> The LTCP is the statutory transport plan for Oxfordshire. As such, no need to duplicate its content. Especially as this may be subject to change/ review when the next iteration is delivered.	No change proposed (as at Reg. 18) <u>Inclusion of reference to LTCP Policies</u> No change proposed (as at Reg. 18)

3291

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Requirements for Transport Assessments document has been used to assess the need for infrastructure and provision of transport services. Vision-led approach to transport planning Further to this, the glossary at Annex 2 (p.80) of the NPPF describes a vision-led approach as: *…an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as 'predict and provide').* When these changes to the NPPF were initially proposed it was stated in the supporting text for the accompanying consultation that (Chapter 8, paragraph 7, MHCLG), "*To support the implementation of this updated policy, we will publish updated guidance alongside the policy coming into effect.*" At the time of writing, this guidance remains forthcoming. Thus, in the	Vision-led approach to transport planning The NPPF (December 2024) already sets out that a vision-led approach to transport planning should be considered. Having considered whether to make a reference to this in the plan, the City Council considers that National Policy and existing Policy contained within the LTCP is sufficient and does not need to be repeated in the city's Local Plan.	Vision-led approach to transport planning No change proposed.

3292

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	context of this description of the vision-led approach and in lieu of the updated guidance, the Implementing Decide & Provide document should be seen as the methodology that development proposals within Oxfordshire must follow in order to meet the requirement set out in paragraph 118 of the NPPF. However, it is expected that, once the updated guidance is made available, the County's Implementing Decide & Provide will be complementary to the national guidance and will remain necessary in setting out local requirements to ensure that a vision-led approach to transport planning has been followed.		
C7	**County Councillors** County Parking Standards The County Council welcomes the reference to the Oxfordshire County Council parking standards however we would like to request that the wording of the policy is such that it can reflect that these standards will be reviewed on a regular basis. Therefore, we encourage the City Council to make reference to the	County's Parking Standards As the city's parking standards are required to support decision making, it is helpful for them to be included within an adopted Local Plan. While standards do change from time to time, we need to produce a new local plan every five years so we would be review and update the standards as appropriate.	County's Parking Standards No change proposed (as agreed at Reg. 18)

3293

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
3294	County Council parking standards with an open wording, noting the need to refer to the County as the Highway Authority for the latest standards, instead of including them as an Appendix to the City Plan. **Transport Policy** <u>Importance of well-lit and inclusive cycle parking</u> Incorporating the importance of lighting should be added. The paragraph relating to bicycle parking ("Cycle parking should be well designed and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street.)" should also include that cycle parking must be "inclusive" and "well lit". Modification: add the following text (in bold) to the policy: *"Cycle parking should be well designed,* ***<u>inclusive</u>*** *and well-located, convenient, secure,* ***<u>well-lit,</u>*** *covered (where possible enclosed) and provide level,*	<u>Importance of well-lit cycle parking</u> The policy already makes reference to "well designed", "well-located", and "secure" cycle parking. We consider that the addition of the phrase "well-lit" to the policy is superfluous. Well-lit cycle parking, along with a range of other cycle parking design considerations such as natural surveillance and overlooking are key components of well designed, well-located and secure cycle parking facilities. As such the policy does not need to explicitly make reference to "well-lit" cycle parking. It is worth noting that the County Council's Street Design Guide also highlights that not all streets require street lighting, providing examples of where the provision of lighting may be detrimental. Examples relevant to Oxford city relate to wildlife and/or bat corridors. <u>Importance of inclusive cycle parking</u> Policy C7 already sets out that cycle parking should be designed to accommodate cycle parking for a wide	<u>Importance of well-lit cycle parking</u> No change proposed <u>Importance of inclusive cycle parking</u> No change proposed

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	unobstructed external access to the street".	range of users. There is no need to include the word "inclusive" in the preceding paragraph given the range of user groups to which the policy already applies.	
C8	General comment The current car parking policy for non-residential uses within LP 2036 (policy M3), in the case of the redevelopment of an existing or previously cleared site, was that: *"there should be no net increase in 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".* Increase of Parking This requirement, in the case of the redevelopment of an existing or previously cleared site, appears to no longer remain with the level of car parking to be demonstrated through the TA. Retain current policy The County Council fully supports no net increase in car parking in the case of the redevelopment of an existing or previously cleared site and given these can often be in locations which are	General comment General comment noted. Increase of Parking Any increase in parking would need to be justified in accordance with a submitted TA. Retain OLP2036 policy The principles set out within Policy C8 (i.e., no additional car parking (except for blue badge and servicing) and to seek a reduction in car parking at accessible sites) apply to all non-residential sites (and factor in their accessibility). We could include a reference to a TAN to provide further technical advice for this policy.	General comment No proposed changes (as at Reg. 18) Increase of Parking No proposed changes (as at Reg. 18) Retain OLP2036 policy We proposed the following minor modification to the supporting text. Create new (final) bullet point under Policy Implementation Heading:

3295

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	congested and sensitive to changes in traffic flow. Therefore, the existing policy should be retained. Modification: Retain existing policy that requires no net increase in car parking and for this to be demonstrated through the TA.		• *Further details may be provided in a Technical Advice Note.*
I2	Support of this Policy	Support noted	No change proposed
CBLAOF	Typos/ Clarifications/Syntax etc. Amend the following bullet points as follows: c) A reduction of car parking in line with Policy C8 o) Financial contributions from trip-generating uses within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) towards achieving public transport enhancements in this area, including, among other sustainable transport measures, **and** the delivery of the CBL.	Re: bullet point c), this looks like a missing word. We will update with an appropriate word. o) the addition of the word "and" in this context is not an acceptable change as it seems to unintentionally disaggregate CBL from "other sustainable transport measures…" Change not accepted in this instance	Minor modification proposed to clarify the syntax of bullet point c): *c) A reduction of car parking in line with Policy C8* No proposed change to bullet point o)
SPS3	**Policy SPS3 – Bertie Place Recreation Ground** LNRS mapping extent It is noted that only part, rather than all, of this site is within the mapped area of the LNRS.	LNRS mapping extent Having reviewed both the extent of the site allocation and the LNRS mapping, the whole of the Bertie Place LP2045 Site Allocation area is contained within the	LNRS mapping extent No change proposed

3296

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Modification: update policy box to reflect that part of site is included within the LNRS <u>Consistency with published LNRS</u> Reference to the LNRS should be reviewed now it has been published and updated as appropriate across all allocation sites. <u>Site-specific ecological considerations</u> Suitability for slow worms has been identified for this site. Bats may also be present within the buildings present along with other species such as otters due to the close proximity of a number of watercourses. It is requested that all sites are assessed in this way for their suitability to support protected species if this approach is used here for consistency.	mapped area of the LNRS mapping. As such, the policy box is accurate. <u>Consistency with published LNRS</u> All site allocations have been reviewed against the final published version of the LNRS. Appropriate references have been included within relevant policies in the Plan. This was done as part of the preparation for Reg. 19. <u>Site-specific ecological considerations</u> All sites were reviewed by relevant city council specialist officers as part of the site allocation process, and their findings incorporated as part of the policy drafting process. We are confident in our approach.	<u>Consistency with published LNRS</u> No change proposed <u>Site-specific ecological considerations</u> No change proposed
SPS7	<u>Policy SPS7 Kassam Stadium</u> Reference should be made to all documents that make up the LNRS as well as the mapping tool for all sites, including this one, where applicable.	We consider that the references to the LNRS contained within the site allocation policies to be sufficient.	No change proposed
SPS11	<u>SPS11 Overflow Car Park at Kassam Stadium</u>	See response to H1 (above)	No change proposed

3297

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	The Overflow Car Park at Kassam Stadium (Policy SPS11) refers to a minimum capacity of 100 new homes however this is based on a capacity study which assumes as density between 60–80dph. Given the site's location and urban nature, the County questions if a density of 80dph on the overall should be applied, in order to maximise the use of the site in line with Policy HD2, thereby reducing the amount of housing unmet need.		
SPS12/ E1	SPS12 Oxford Science Park It is noted that a number of the proposed allocations in the plan, such as SPS12 (Oxford Science Park) recognises that a level of housing could be acceptable within the site however no capacity study or indication of minimum capacity has been undertaken.	Housing at employment sites Some site allocations (e.g., SPS12 Oxford Science Park), are allocated for employment-generating uses. However, Policy E1 – Employment Strategy introduces a permissive approach to residential development across the city's employment site network. While landowners of employment sites generally welcomed the ability to deliver residential uses at their sites, they also supported the flexibility that the permissive approach provided. The City Council considers that the permissive approach to housing on employment sites is the correct approach. This is because it allows landowners to respond quickly to changing economic circumstances (NPPF para. 86(e)). Where housing numbers are included within site allocation policies,	No change proposed

3298

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		these have been through a process in accordance with national policy to ensure that the homes are deliverable within the plan-period. The Housing Requirement already includes a "windfall" allowance for additional homes that are delivered on sites outside of those specifically identified for residential development in the plan. In terms of the anticipated supply calculations for the plan-period, any new homes coming forward on sites identified within the city's employment site network would be captured as windfalls. The Strategic Housing Land Availability Assessment (SHLAA) sets out how the windfall housing allowance has been factored into the overall capacity calculations. Both small (1-9 dwellings) and large (10+ dwellings) sites make up the overall windfall allowance. The windfall allowance is based on past trends, which have been extrapolated forward. One source of housing within the windfall allowance is conversions from commercial land to housing (including permitted development rights for office to residential conversions). The assumption therefore is that a portion of the windfall housing allowance, both from small and large sites, will come from commercial conversions. We consider that this approach is defensible, justified, and PPG compliant.	

3299

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
SPS16	Site capacity Although the capacity study prepared for this site acknowledges that there is possibility for additional heights within the site, it is unclear if the defined capacity reflects this potential. Policy should contain a reference to supporting a library In addition, consideration should be given to the explicit mention of supporting a library relation into this site as part of the required "Community facilities". Modification: *"Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:* *• Retail;*	Site capacity The capacity assessment for this site sets out how site capacity (no. of dwellings) has been arrived at. In calculating the residential capacity of the site, higher residential density assumptions have been used than those contained within Policy HD2 (i.e., 100dph for city/district centres). The capacity assessment clearly sets out the assumptions for block heights and massing that have been used in coming to the residential capacity for the site. Given the site is less than 4ha and is allocated for a mix of uses including residential, the 500 dwelling (net gain) in residential dwellings at the site represents a very high-density development. Policy should contain a reference to supporting a library The Infrastructure Delivery Plan (IDP) sets out the required infrastructure needed to support the growth identified in the plan. We question the need for library provision on-site, especially given the proximity of the site to Cowley Library (less than 800m away). If improvements to Cowley Library are needed to mitigate the impacts of new development, these should be costed (and identified) in the IDP. However, we can suggest a modification to Policy SPS16 to include the phrase 'and services', to the Community facilities bullet point, if this would be helpful.	Site capacity No change proposed Policy should contain a reference to supporting a library Amend Policy SPS16 to include the phrase 'and services' in relation to the community facilities use: *"Development should include residential development and town centre uses that provide active frontages at ground floor level. The range of town centre uses could include the following:* *• Retail…* *• Community facilities and services;*

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	• *Commercial leisure;* • *Financial and professional services;* • *Learning and educational uses;* • *Evening economy uses such as cafes, restaurants and pubs;* • *Community facilities;* ***including the potential for library provision****.* Policy should cross-reference Policy HD2 *The minimum number of dwellings to be delivered is 500 (net gain)".* ***Maximised densities, including for higher buildings, should be demonstrated in line with policy HD2.***	Policy should cross-reference Policy HD2 There is no need to cross reference Policy HD2 in this policy.	Policy should cross-reference Policy HD2 No change proposed
SPE2	It is stated that this site has potential for conservation interest. Further detail should be provided to explain this.	A phase one habitat survey was carried out for this site in 2025 and is included in Oxford City Biodiversity Surveys 2025 document. The initial survey found limited biodiversity interest of low distinctiveness. There seem to be no showstoppers to prevent allocation or to influence design, but a more detailed survey will be needed to support any application.	No change proposed
SPE3	A biodiversity survey is stated as required for this site, but this has not been stated as a requirement for all sites. For consistency and in compliance with policy G6, without knowing the details of what is proposed and present at each site allocation, all site allocations may have the suitability	For the draft plan we need to be satisfied that a development is likely to be able to come forward in a way that meets the requirements of the site allocation policy. Ecology officers have carried out a desktop survey of all the site allocations and flagged things that may affect how the sites are delivered, and also cases where further survey work may be needed.	No change proposed

3301

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	to support protected and notable species. It is therefore requested that an ecological assessment is undertaken for all site allocations.		
SPCW6	It is stated that the site contains 'Section 41 (Priority/Principal) habitats'. An ecological assessment of will therefore be required to determine the extent of these habitats and help determine whether the target minimum number of dwellings is achievable in line with policy G6.	We are satisfied that we have understood the constraints on this site in drafting the policy. To accompany an application, a detailed ecological assessment will be required.	No change proposed
SA	Potential for legally protected species Regarding SA objective 10 criteria included in Table 3.14 it is noted that 'Potential for legally protected species to be present' is included in the minor negative section. It should be assumed that all site allocations have the potential to support legally protected species until detailed ecological surveys have been undertaken. This would mean that almost all sites would fall in at least the minor negative category. Individual SA site assessment scoring (SA Objective 10) It is noted that a number of site allocations including SPN1 have been	Potential for legally protected species As part of the plan-making process, proposed site allocations have been reviewed by specialist officers at the City Council. Where specialist officers considered that sites had the potential for legally protected species to be present, these sites were highlighted, along with a rationale as to why certain species could be present. Individual SA site assessment scoring (SA Objective 10) The scoring system (SA Framework) that was developed to inform the SA site assessments was	Potential for legally protected species No change proposed Individual SA site assessment scoring (SA Objective 10) No changes proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	assessed as a minor positive impact regarding SA10 despite it being identified that the site may have suitability to support protected species.	consulted on at Reg. 18. (See Interim SA Report – Part One (Scoping) for further details. Table 5.11 of the Interim SA Report sets out the SA decision-making criteria supplements this with site scoring criteria in relation to SA Objective 10. The County Council made no comments on the proposed SA Framework for sites at Reg.18. At the Reg. 19. Consultation Stage, the Reg. 19 SA Report references the SA Framework for sites at Section 3.4.2. The Reg. 19 SA Framework for sites relates decision-making criteria to each SA Objective and then provides scoring criteria that are in turn related to the decision-making criteria. Section 5.3 of the Reg. 19 SA Report includes an account of the SA process involved in the allocation of sites in the plan. Not all sites fall neatly into one of the SA Scoring criteria (e.g. there may be some potential for protected species on a site, but also opportunities for improving wildlife linkages to neighbouring sites). As such, in some instances, City Council planning officers have needed to apply a degree of professional judgement when assessing each site against the decision-making criteria. In fact, the pro-formas were specifically designed to enable City Council planning officers to be able to set out a short narrative to accompany the scores attributed to relevant SA objectives.	

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
		The SA site assessment scoring undertaken by City Council planning officers, was informed by additional information from a range of sources. This included in-house advice from specialist officers (including archaeology, land contamination, ecological features and biodiversity potential). The scores, in some instances were also informed by more detailed site-specific information, where this was publicly available.	
	Reference to priority and irreplaceable habitats Reference to priority and irreplaceable habitats as well as priority species would be welcomed when defining the criteria included in Table 3.14 regarding SA10.	Reference to priority and irreplaceable habitats As set out above, the pro-forma was consulted as part of the Reg. 18 Interim SA Report. We are not proposing to update the SA Framework at this stage. It should be noted that these forms are intended to support developing the policies alongside other tools such as the site capacity assessments. Where particular areas of recorded habitat/biodiversity value were identified on sites as drafting of the allocations took place, officers have sought to flag this through the allocation's requirements as something applicants will need to consider.	Reference to priority and irreplaceable habitats No changes proposed
	Reference to LNRS Reference to the LNRS would be welcomed when defining the criteria included in Table 3.14 regarding SA10 and consideration should be given as to whether inclusion of developments within mapped areas of the LNRS are considered positive or negative.	Reference to LNRS The individual site allocations policies were reviewed to take account of the LNRS opportunity areas. These have been highlighted in relevant site allocation policies. We do not consider that a site's location within an opportunity area would significantly alter a site's SA score in relation to this objective. Elements of the LNRS layer (i.e., designated ecological sites which	Reference to LNRS No changes proposed

3304

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Where site allocations fall outside of the mapped areas of the LNRS, the unmapped measures within the LNRS still present an opportunity for ecological enhancements to be delivered in line with strategies' priorities. <u>Various site scores questioned:</u> <u>Policy SPS8</u> It should be clarified whether SPS8 allocation is a proposed Local Wildlife Site and/or Oxford City Wildlife Site. <u>Policy SPS14</u> SPS14 is located within 100m of a nationally designated wildlife site and should therefore be assigned minor negative impact regarding SA10. <u>Policy SPE3</u> SPE3 is located within 200m of a Local Wildlife Site and should therefore be assigned neutral impact regarding SA10. <u>Policy SPE5</u> It is noted that the extent of priority lowland deciduous woodland habitat is	are identified as existing sites of biodiversity importance) have already been captured within the assessment process. We are not proposing to alter the SA Framework. <u>Various site scores questioned</u> On various sites, the County Council appears to be disputing the scores attributed through the SA site assessment process. This is not something that is normally debated through the examination process. As such, we acknowledge the response made on this issue however, no changes are proposed.	<u>Various site scores questioned</u> No changes proposed

3305

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	not yet known within the SPE5 allocation site. This should be confirmed. Clarification should also be provided to explain the phrase 'The site boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty'. <u>Policy SPE16</u> Under site allocation SPE16 a number of ecological enhancements are listed which appear to be from the LNRS. A consistent approach outlining suitable/possible mapped and unmapped priority measures from the LNRS for each site would be welcomed.		
HRA	<u>Pollutants</u> While it is appreciated that nitrogen oxides and ammonia are important pollutants affecting vegetation, it is requested that other pollutant gases such as sulphur dioxides, ozone and particulates are also acknowledged and considered. This approach also applies to water quality pollutants where only two pollutant types have listed. <u>West Oxfordshire District Council Plans</u> Justification should be provided to explain how West Oxfordshire plans	<u>Pollutants</u> The HRA Screening Report sets out the rationale for assessing the identified pollutants (both in relation to air and water quality). <u>West Oxfordshire District Council Plans</u> In terms of air quality (traffic modelling) impacts, as the County Council is aware, the development proposed in	<u>Pollutants</u> No change proposed <u>West Oxfordshire District Council Plans</u> No change proposed

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Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	have been considered when assessing in combination effects of air quality and water quantity.	the extant West Oxfordshire Local Plan is already contained with the Oxfordshire County Council Transport Model. A detailed explanation is provided in the HRA Screening Report (published at Reg. 18 and Appendix A of the Reg. 19 HRA Report). In terms of water quality, the most recent publicly available water cycle studies for all surrounding districts were reviewed as part of the Reg. 19 HRA Report.	
	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> Further justification should be provided to explain the scoping decision regarding Cothill Fen SAC and Little Wittenham SAC.	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> The HRA Screening Report already provides evidence as to why these two SACs have been screened out from further assessment.	<u>Further Justification – Screening Decisions – other SAC's with 10km</u> No change proposed
	<u>Further evidence – Recreational impacts buffer zone</u> Further evidence should be provided to justify the scoping decisions made regarding recreational impacts and the distance used of 1,900m, particularly considering how residents may choose to travel to greenspaces through other types of transport other than walking from within Oxford.	<u>Further evidence – Recreational impacts buffer zone</u> The 1,900m buffer zone is considered suitably precautionary. It was based on a historic study which suggested that people in Oxford were willing to travel to large greenspaces on foot. As *A. repens (creeping marshwort)* is not sensitive to trampling but is sensitive to increased nutrification associated with dog-fouling, it was considered that most dog-walkers associated with new development choose to walk their dogs (rather than to take their dogs on other modes of transport). This is all set out in the Reg. 19 HRA Report.	<u>Further evidence – Recreational impacts buffer zone</u> No change proposed
	<u>Further evidence – visitor numbers</u>	<u>Further evidence – visitor numbers</u>	<u>Further evidence – visitor numbers</u> No change proposed

Policy/ para	Summary of Oxfordshire County Council Representation (Reg. 19)	Oxford City Council Response	Change proposed
	Further evidence should be provided to justify the conclusion made that 'There is no indication that current visitor numbers are having a detrimental effect on the condition of Apium repens at the Oxford Meadows SAC'. <u>Section 8.22 - conclusions</u> Justification and explanation should be provided for the conclusion made in section 8.22.	We consider that the evidence provided in the HRA is sufficient to justify these conclusions. <u>Section 8.22 - conclusions</u> Paragraph 8.22 considers the water quality 'in-combination' effects and provides a high-level review of published Water Cycle Studies for each of the other Oxfordshire districts. While WWTW capacity issues are noted in all districts, each Oxfordshire district authority has been working with Thames Water to resolve development constaints. <u>Final note on HRA</u> We have involved Natural England at every stage of our HRA and we have a signed statement of common ground with Natural England to support the conclusions presented in the Reg. 19 HRA Report that the Oxford Local Plan 2045 is not likely to have significant effect on the integrity of the Oxford Meadows SAC, either 'alone' or 'in-combination' with other relevant plans and programmes.	<u>Section 8.22 - conclusions</u> No change proposed

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South Oxfordshire District Council and Vale of White Horse District

Summary of Comment in South Oxfordshire DC and Vale of White Horse's representation	Oxford City Council response
Policy S1 Criteria e says "Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere". 'Prioritising housing elsewhere' is quite ambiguous. Also as written this criterion could apply to all current employment sites, whereas Policy E1 which distinguishes between the two types of employment sites, and it permits some housing on Key Employment sites. Also, we believe that a criterion for delivering housing is an omission within the policy. Change from "e) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere". To "e) Focus new employment development on Key Employment sites, redeveloping and intensifying to make best use of those sites and permit housing delivery where justified". Add new criteria "x) Prioritise housing across the city, redeveloping and intensifying centres and densifying the suburbs, to make best use of land".	Modifications are proposed to S1 to make it clearer that housing is prioritised. A new bullet point (e) is proposed that says 'prioritise new homes in all suitable and sustainable locations'. The last part of bullet point (e) (that will become f)) was intended to make this clear, but we agree on reflection that it would be clearer as its own bullet point. Proposed modifications as follows: ...To help achieve this it will aim to ensure development is located to: ... e) Prioritise new homes in all suitable and sustainable locations; ~~e~~f) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere; ...
Policy S3 At the Preferred Options stage we raised concerns about the lack of justification for the 1,500m buffer zone for collecting financial contributions related to the Cowley Branch Line. No new justification has been provided. The policy is also not effective because it does not state clearly that it applies within	It is agreed that a change to the wording of S3, to bring it in line with the CBLAOF Policy wording, would be helpful. Proposed Modification to S3: Supporting existing public transport and the reopening of the Cowley Branch Line to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) will be expected in order to achieve public transport

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the City administrative boundary, which leads to uncertainty. To make the policy effective, the clarity contained within Policy CBLAOF (Cowley Branch Line Area of Focus) "where it falls within the city's boundaries" should be added to Policy S3 as follows: "... Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL."	enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL.
Chapter 1 Vision and Strategy The Vision is generally positive, however it provides limited support for delivery new homes and affordable housing within the city. As a result, the protection of assets appears to be prioritised over delivery of homes.	The very start of the Vision talks about healthy and inclusive communities and access to housing. Furthermore, the first two objectives are: • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all. Therefore, the City Council does not agree that there is limited support for delivery of new homes and affordable housing or that protection of assets is 'prioritised' over delivery of new homes. It is acknowledged that there are many elements of creating a successful city, some of which will involve protections. The City Council proposes no modifications in response to this comment.
Policy H2 Delivering Affordable Homes At the Preferred Options stage, we raised several concerns with the Specialist Housing Needs Assessment. The consultation statement dismisses many of our requests for data and sources. As a result, we have a number of concerns about the transparency of data sources and methodology used in the assessment which remain unresolved.	South Oxfordshire and VWHDC have confirmed that their concerns raised at Regulation 18 largely still stand. The concerns are set out in a separate table for South Oxfordshire and VWH DC in the 'Supporting documents, general and other comments' section of the Regulation 18 Consultation Report, with responses to each listed concern from the City Council. The City Council does not propose further changes to this piece of evidence.

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Policy H1 Page 2 of this chapter includes some policy implementation bullet points. The final bullet point should be amended to reflect that the City Council and neighbouring authorities are working together to deliver housing, rather than the sites themselves. We recommend the following modification: Change from "The council is continuing to work with adjoining authorities to deliver sites in adjoining districts to help meet Oxford's housing needs to address the unmet housing need." To "The Council is continuing to work with adjoining authorities to deliver housing in adjoining districts to help meet Oxford's housing needs to address the unmet housing need."	The City Council continues to think the reference to sites is relevant and appropriate. In most cases, unmet need is intended to be delivered on specific and known sites. The City Council liaises with district councils about those sites. Reference to sites in this context is not considered unsound.
To make the map effective, no policy designations should appear outside the Local Plan area. The plan's policies do not apply outside the plan area. Currently, both the interactive and PDF maps indicate that policies I2 (East West Rail) and I2 (Oxford Flood Alleviation Scheme (OFAS)) are safeguarded in neighbouring districts and that Policy G6 (Local wildlife sites) applies outside Oxford's boundary. The map shows significant tracts of land within the Vale of White Horse district between Kennington, South Hinksey, and North Hinksey safeguarded for OFAS, as well as numerous local wildlife sites in both South Oxfordshire and Vale of White Horse.	A modification is proposed to the Policies Map to cut layers off at the city boundary.
In the Infrastructure Delivery Plan, the section related to water supply and wastewater ends abruptly at paragraph 7.57, which appears to be a publishing error. The missing information may be relevant to our districts as we share the same Oxford Sewage Treatment Works catchment. We ask that this	The last sentence from paragraph 7.57 of the IDP should read as follows: However, should rates of house-building increase in the area serving the Oxford WWTW (in line with national Government ambitions to deliver 1.5million homes), this could result in a need

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section is reviewed and shared with us as soon as is possible.	for the "additional upgrades" (i.e., the upgrades that are required to accommodate the level of growth proposed after 2041) to be delivered sooner.

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Cherwell District Council

Summary of Comment in Cherwell District Council's representation	Oxford City Council response
Housing need and requirement We would welcome a clear table with the number of homes to be delivered and when. The capacity-based context of the OLP should also be explained within the Local Plan, including delivery or the housing requirement and the housing trajectory.	This trajectory was included in the Plan in support of H1 . This will be updated as the SHLAA is updated, ahead of submission. Considering some additional text about unmet. The SHLAA does provide greater details on delivery, not all of which need to be in the Plan. A mod is proposed to add information about unmet need to the 4th bullet of the Context section of H1, as follows: Oxford's unmet housing need is therefore 12,473. The surrounding Oxfordshire districts have formally agreed to meet this need, with the following distribution:

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Employment need Policy E1 would benefit from greater clarity in the interest of usability and to ensure that appropriate opportunities are not overlooked. The approach to B8 in Policy E2 should be more flexible to sustainably support logistics operations within the city boundary to meet Oxford's needs.	A modification is proposed to Policy E1 to make it clearer (no change to meaning, just presenting it differently): ~~Outside of these locations:~~ On existing employment sites or those in lawful use for the proposed employment use class, which are outside the city centre or district centres, and which are not designated as Key Employment Sites, proposals for regeneration and/or additional floorspace with employment-generating uses will only be supported if: a. ~~Existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), can only be regenerated with employment generating uses if~~ better and more intensive use is made of the site through the redevelopment, upgrading or re-use of existing under-used buildings, and b. ~~Proposals for additional floorspace for employment generating uses on existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class), outside the city and district centres must follow~~ the sequential approach is followed for new town centre uses as set out in Policy C1.
Employment Land Needs Assessment (ELNA)	We will update the dates of the ENA in the ELNA.

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It should be noted, for accuracy, that in Table 2.1 of the ELNA the period which is covered by Cherwell's ENA is 2020-2042, rather than 2021-2042. The ELNA recognises that may of Oxford's employees travel in from neighbouring authorities and this pattern will be exacerbated, and community will increase unless significant residential development is delivered within the city and land suitable for housing development is not unreasonably lost for employment. The large pipeline of R&D (recognised in the ELNA) in advance of housing will impact commuting levels. Paragraph 5.60 suggests that industrial/warehousing space is accommodated outside the city and refers to locations within Cherwell. It is not clear if it is being indicated that Oxford's warehousing need is being met by these locations, but we anticipate that Policy E2 will address this.	Paragraph 5.60 is in the Property Market Analysis section. This paragraph is simply noting the current situation, which is that there is not demand in the city and the because the city does not see any large strategic warehousing, due to the lack of available suitable sites, with these requirements accommodated outside of the city in places such as Symmetry Park, Bicester and Central M40 at Banbury. Paragraph 5.88 concludes this section and notes that the city's industrial/warehouse market is relatively small. Paragraph 8.21 summarises the overall need for employment floorspace in the city as follows: *we do not recommend a need to identify land for the modest office, industrial and warehousing need because growth in these uses can be absorbed in the existing portfolio. The considerable minimum need for R&D/lab space (the 345,000 sq m) can be met from within the committed and potential supply that has been promoted to the Council.* The City Council is therefore making no request for any neighbouring district to take any kind of employment need.
Areas of Focus (NEOAOF) We would welcome greater clarity on the sites within Cherwell that are allocated in the Cherwell Local Plan Partial Review to meet Oxford's housing needs (PR6a, PR6b, PR7a, PR7b, PR8 and PR9). A correction is also needed to the supporting paragraph to Policy NEOAOF as site PR6c (Land at Frieze Farm) is not a housing site	Modification suggested to the reference to Frieze Farm in the supporting text of Policy NEOAOF: The area adjoins several large housing allocation sites, which fall within Cherwell District (PR6a Land East of Oxford Road, and PR6b Land West of Oxford Road ~~and PR6c Land at Frieze Farm~~) but nonetheless adjoin existing communities in Oxford...

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is reserved only for the potential construction of a golf course should this be required as the result of the residential development of Land to the West of oxford Road under Policy PR6b (North Oxford Golf Course). A criterion should be added to make clear that any development within the AoF will be expected to support (and not undermine) the delivery of nearby sites PR6a, PR6b, PR7a and PR7b and not delay their delivery in meetings Oxford's housing needs.	Amendment to bullet point f of Policy NEOAOF **High quality design which capitalises opportunities for growth** e. Good urban design and place making across the AoF, including the introduction of new public open space; f. Successful integration of new development into the existing built environment, consideration of longer-term potential for integration with unmet need sites in Cherwell (without harming their delivery) and enhanced facilities for both new and existing communities.
Open space, recreation and playing pitches It is not clear how the assessment of open space, recreation and playing pitch needs within the city has been used to inform the assessment of sites in the HELAA 2026 and the allocation of sites in the OLP2045. Further clarity may be helpful. We note that there is not evidence on golf needs in the interim PPS 2026. It is important that this gap in the evidence is addressed considering the allocation of the North Oxford Golf Course by Cherwell for housing development and the reservation of Frieze Farm for an	It is not considered that the lack of golf in the PPS means there is a gap in the evidence that needs to be addressed. The PPS focuses on pitches, which host sports with various associations and clubs, and in some case may be able to be turned over to alternative pitch use depending on demand. Golf is very different. The City has only one golf course and one driving range that is not within a private school or college. At the current time, the landowners have not put these site forward for development and there is no intention for them to be lost and therefore to need to be reprovided elsewhere (or shown to be surplus). It is also highly unlikely that there could be potential within the City for another golf course.

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alternative golfing facility should this be required to meet need.	The Playing Pitch Strategy does not suggest an excess of sports pitches, and these sites are not considered surplus. They are allocated for housing because a detailed consideration of the site and discussion with landowners suggests that there is potential to re-provide sports provision (in nearly all cases within the site, intensifying it into a smaller area) allowing housing to come forward on the remaining space that has been freed up. At the current time the landowners of the OUP sports ground and Jesus and Lincoln College do not have alternative, suitable off-site provision that they have identified. However, this could potentially be identified over the course of the plan, which would increase the capacity of the sites. The capacity assumptions for the plan though need to be on the basis of what is known to be achievable and deliverable, rather than what it may be hoped could happen by the end of the plan period.
Green Belt The Green Belt assessment of additional sites 2025 carried out by LUC and published alongside the consultation focuses on whether any of the previously assessed sites meet the criteria for 'grey belt' The starting point for this study appears to be the earlier work, also undertaken by LUC. Therefore, there might be other opportunities within your area of the Green Belt (e.g. to	It is not the case that the 2025 Green Belt assessment of additional sites focuses on sites previously assessed by LUC. The latest assessment does revisit previously assessed sites, to ensure the assessment is up-to-date according to the revised NPPF, and it identifies which of these previously assessed sites are grey belt. In addition, there are also a number of new sites assessed, which had not previously been assessed. New sites were included to ensure compliance with the intention of the NPPF- sites were only

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provide affordable housing). Bearing in mind the development pressure on adjoining authorities, it would be helpful if the circumstances in which Oxford would consider meeting its development needs within its parts of the Green Belt could be clearly set out.	excluded from review if they were greenfield sites where the amount of Flood Zone 3b means they are intrinsically not developable, or where they have national biodiversity protections, which also makes them intrinsically not developable. Sites with local wildlife protection or other designations were not excluded from review, as they had been previously, and so there are additional sites assessed. A few sites were identified where development may have the potential to have a fundamental impact on the Green Belt purposes. A number of parcels (some newly assessed and some revisited) were found to be grey belt. Whatever the outcome of the Green Belt assessment, all sites (other than those already identified as having intrinsic constraints) were still considered further. However, on application of the plan's strategy and other further considerations, such as landowner interest, very little potential was found in the Green Belt, with only one site being allocated. The Evidence Base has been assessed but this does seem to be set out in the Green Belt Assessment 2025 and this is set out clearly in Background Paper BGP006: Green Belt, which says in paragraph 3.2: *The first stage of the most recent assessment required Oxford City Council to determine the location, scale and most appropriate parcel size as set out in the Paragraph 003 (Reference ID: 64-003-20250225) of the PPG. All green sites including those in the Green Belt are already in the Council's Strategic Housing Land Availability Assessment (SHLAA), therefore it was considered that any SHLAA*

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	site which contained any Green Belt would be looked at in the first instance. This resulted in an initial 121 parcels of or including Green Belt (one was subsequently split into two for allocation purposes), which can be found in Appendix 1 of this background paper

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Summary of Comment in West Oxfordshire District Council's representation	Oxford City Council response
Policy S1- spatial strategy and presumption in favour of sustainable development Whilst generally supportive of Policy S1, we suggest that the Local Plan should avoid unnecessary repetition of national policy regarding the presumption in favour of sustainable development. This will also avoid Policy S1 becoming quickly out-of-date against the new NPPF. Also concerned Policy S1 does not reference the importance of maximising the delivery of new homes in suitable and sustainable locations. Given the capacity-based housing requirement, there must be explicit commitment to maximising delivery of new homes.	Modifications are proposed to S1 to avoid repetition of the presumption in favour of sustainable development. Also, a new bullet point (e) is proposed that says 'prioritise new homes in all suitable and sustainable locations'. The last part of bullet point (e) (that will become f)) was intended to make this clear, but we agree on reflection that it would be clearer as its own bullet point. Proposed modifications as follows: Amend policy title on page 10 and heading on page 9 as follows: Spatial Strategy ~~and Presumption in Favour of Sustainable Development~~ Policy S1: Planning permission will be granted where development proposals accord with the policies of the Plan taken as a whole. Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city The City Council, through its policies and decisions, will positively pursue sustainable development and achieve sustainable growth in the delivery of homes, jobs and services to create a network of healthy, well-connected, high-quality areas where people want to live, play, learn and work in line with the vision and objectives of the Local Plan. To help achieve this it will aim to ensure development is located to: ... e) Prioritise new homes in all suitable and sustainable locations;

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	~~e~~f) Focus new employment development on existing sites only, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere; [Re-number what were criteria f, g, h, i and add new criterion j:] j) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision. When determining development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). ~~The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city.~~ ~~All new proposals for development must conform with the principles of securing sustainable development, which ensures that the city is ready for a net zero carbon future, natural resources and raw materials are used prudently and considerately, the air quality of the city is improved, and human health is safeguarded.~~ ~~Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise.~~ ~~Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, considering whether:~~ ~~i) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or~~ ~~j) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.~~

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Policy H1- Housing requirement No concerns with the principle of a capacity-based housing requirement, but note that the per annum supply assumptions fell from 481 homes per year in the withdrawn OLP2040 to 463 homes per annum in the OLP2045. The supporting text should be expanded to make the position on overall need, including why the assumed supply has fallen, and in turn the 'unmet need' much clearer. The level of unmet need, and that it is lower than 2011-2031, should be explained. The Plan should be unequivocal in terms of the quantum of unmet need and the period that applies to. Acknowledgment of provision previously made for Oxford's unmet need (e.g. in Salt Cross and West Eynsham) should also be referenced.	We do not think that it is appropriate in the emerging plan to compare the housing capacity to that in a previously withdrawn plan. We think that it does need to be clear how the capacity has been assessed, and we consider this is set out clearly in the SHLAA. We do agree that the context section above policy H1 could be used to set out the unmet need position and we propose modifications to include this information, with an additional 4th bullet point: Oxford's unmet housing need is therefore 12,519. The surrounding Oxfordshire districts have formally agreed to meet this need, with the following distribution: .
Policy H2- Delivering Affordable Homes Whilst we are largely supportive of the proposed approach to delivering affordable housing, including the priority being given to social rented tenures, we note the reference to the provision of 'genuinely affordable' housing and would simply observe that there is no such definition within the NPPF.	Comment noted. The City Council considers that affordability and housing costs in Oxford are such an issue that this approach is necessary in order to assure affordable housing needs are being met by the products provided as affordable.

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Oxford Health NHS Foundation Trust

Appendix 2: Detailed comments and responses

Summary of Comment in ICB's representation	Oxford City Council response	Final position
NEOAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. A new bullet point should be added to require the commissioning of a feasibility study looking at extension or reconfiguration of the existing practices in the area. A second bullet point should require a further feasibility study around the onsite delivery of healthcare provision. A turnkey facility is expected to be delivered by the developers for the ICB (or other relevant body). If the outcome of either feasibility study sets out that provision of a medical centre is not viable the offsite mitigation measures should be funded by developer contributions, to ensure the primary healthcare provision can support the new population growth.	There are six Primary Care Networks (PCN) serving Oxford, which cover 26 GP practices, and these practices are generally well distributed across the city. These PCNs are more relevant to healthcare than the infrastructure areas or indeed areas of focus in the Local Plan. In our research for the IDP we found that surgeries in this infrastructure area are accepting new patients. We are aware that there are capacity issues preventing expansion of some GP surgeries, but this does not seem to be universally the case. Whilst most infrastructure providers are able to indicate what infrastructure is required to support development, we realise this is harder for primary care. The Local Plan does not generally set out exactly how CIL receipts will be prioritised and spent. CIL will be collected, and there will be opportunities to spend it on a variety of infrastructure projects. This may well include primary healthcare projects if any have been identified. It is not considered appropriate therefore to specifically mention primary healthcare in relation to CIL in this Area of Focus. Similarly, no particular healthcare project has been identified for this area that S106 agreements could be required for. It would not be appropriate for the Local Plan to	ICB's objection remains.

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	set out a blanket requirement for S106 for primary healthcare within this Area of Focus, when firstly it is within a wider infrastructure area and indeed PCN, secondly there are surgeries accepting patients, thirdly there is no evidence that capacity can't be increased at existing sites (many seem to be on relatively large sites at low densities), fourthly, there is no identified infrastructure project these S106 agreements would be funding (including because the ICB has said that there is limited capacity at many GP surgeries for expansion, and has not identified any that could be expanded, so wording to ask for contributions towards an possible extensions or reconfigurations (specifically in this AOF) would not have a sound basis). It should be noted as well that the Area of Focus is not a development site itself, but an area in multiple ownerships, with multiple expected developments.	
CBLAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. Two bullet points should be added to say infrastructure needed includes a feasibility study looking at extension or reconfiguration of GP practices in the area and another bullet requiring provision of onsite healthcare	See response in relation to NEOAOF.	ICB's objection remains.

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provision bringing forward a 'turnkey' facility delivered by developers to the ICB. If 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 funded by developer contributions.		
WEBRAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. One bullet points should be added to require commissioning of a feasibility study looking at extension or reconfiguration of GP practices in the area.	See response in relation to NEOAOF.	ICB's objection remains.
SPN1 Diamond Place and Ewert House The ICB welcomes the provision of an onsite medical centre. However, the policy does not provide any details of the medical centre provision, including the site area and whether parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to submit a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows these to come forward on this site, and the developer supports the positive wording the Plan. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre	ICB's objection remains.

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ICB expects that a 'turnkey' facility can be delivered for the ICB at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.	
SPS16 Templars Square There is an identified opportunity to merge the existing provision and to provide new medical premises at Templars Square. However, the policy does not provide any details of the medical centre provision, including the site area and whether parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to fund a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The ICB expects that a 'turnkey' facility can be delivered for the ICB	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows these to come forward on this site, and the developer supports the positive wording in the policy. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care	ICB's objection remains.

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at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.	
Chapter 8 omission policy There is a missed opportunity to set out the provision of health infrastructure. The recently published NHS 10-year Health Plan is introducing neighbourhood health centres to provide a 'one stop shop. For patients. There is a need to include this in the draft Local Plan as this will be a major infrastructure as set out in the NPPF, and the NPPF emphasises that local plans should set out the contributions expected from development. Clearly, the current draft OLP2045 does not provide any details as required by the NPPF about the contributions expected from development towards health. There should be a draft policy on Health Infrastructure in Chapter 8, that says (amongst other things) that development proposals will be supported if they comprise a new GP facility funded by developer	Policy S3 in Chapter 1 relates to 'Infrastructure Delivery in New Development' This policy refers to the Infrastructure Delivery Plan, say that that is where projects required to support the Local Plan strategy are identified. The IDP can be reviewed and updated more frequently and easily than a Local Plan and is therefore more responsive to changing needs. Policy S3 also says that developers will be expected to engage early with the City Council and infrastructure service providers to discuss their requirements. It is wholly unrealistic that a policy could be included that says development proposals should include a new GP facility/neighbourhood health centre unless a feasibility study is carried out that shows onsite provision is not viable or the scale of proposals to do not merit an onsite facility.	ICB's objection remains.

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contributions or CIL and that development proposals that are not providing a neighbourhood health centre will only be supported if the onsite provision is not viable or the scale of the proposals do not merit an onsite facility.	Presumably this would apply to residential accommodation only, although that is not clear in the rep. Nearly all development that comes forward in Oxford is small, and too small to generate the need for additional health facilities by itself, or even any discernible need for any improvements. This is especially the case when nearly all facilities in Oxford are accepting new patients. Once the likely implications of a change in how primary health care is delivered is worked through an applied to Oxford, then the IDP can be updated to reflect this, but at the current time there is no certainty about what this means that can be reflected in the IDP (or Local Plan itself).	

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ICB (NHS Thames Valley)

Summary of Comment in Cherwell District Council's representation	Oxford City Council response
NEOAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. A new bullet point should be added to require commissioning of a feasibility study looking at extension or reconfiguration of Cutteslowe Surgery and Wolvercote Surgery in the area. A second bullet point should require a feasibility study for onsite delivery of healthcare provision. A turnkey facility is expected to be delivery by developers to the ICB (or other relevant body). If the outcome of the feasibility study sets out that provision of a medical centre is not viable the other offsite mitigation measures should be provided funded by developer contributions, to ensure the primary healthcare provision can support the new population growth.	There are six Primary Care Networks (PCN) serving Oxford, which cover 26 GP practices, and these practices are generally well distributed across the city. These PCNs are more relevant to healthcare than the infrastructure areas or indeed areas of focus in the Local Plan. In our research for the IDP we found that surgeries in this infrastructure area are accepting new patients. We are aware that there are capacity issues preventing expansion of some GP surgeries, but this does not seem to be universally the case. Whilst most infrastructure providers are able to indicate what infrastructure is required to support development, we realise this is harder for primary care. The Local Plan does not generally set out exactly how CIL receipts will be prioritised and spent. CIL will be collected, and there will be opportunities to spend it on a variety of infrastructure projects. This may well include primary healthcare projects if any have been identified. It is not considered appropriate therefore to specifically mention primary healthcare in relation to CIL in this Area of Focus. Similarly, no particular healthcare project has been identified for this area that S106 agreements could be required for. It would not be appropriate for the Local Plan to set out a blanket requirement for S106 for primary healthcare within this Area of Focus, when firstly it is within a wider infrastructure area and indeed PCN, secondly there are surgeries accepting patients, thirdly there is no evidence that capacity can't be increased at existing sites (many seem to be on relatively large sites at low densities), fourthly, there is no identified infrastructure project these S106 agreements would be funding (including because the ICB has said that there is

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	limited capacity at many GP surgeries for expansion, and has not identified any that could be expanded, so wording to ask for contributions towards an possible extensions or reconfigurations (specifically in this AOF) would not have a sound basis). It should be noted as well that the Area of Focus is not a development site itself, but an area in multiple ownerships, with multiple expected developments.
CBLAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. Two bullet points should be added to say infrastructure needed includes a feasibility study looking at extension or reconfiguration of GP practices in the area and another bullet requiring provision of onsite healthcare provision bringing forward a 'turnkey' facility delivered by developers to the ICB. If 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 funded by developer contributions.	See response in relation to NEOAOF.
WEBRAOF The usage of health care services in this infrastructure area is 100%. Therefore, it is appropriate to explore the opportunity to create additional capacity at or near existing facilities by the use of developer contributions or CIL fundings. One bullet points should be added to require commissioning of a feasibility study looking at extension or reconfiguration of GP practices in the area.	See response in relation to NEOAOF.

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SPN1 Diamond Place and Ewert House The ICB welcomes the provision of an onsite medical centre. However, the policy does not provide any details of the medical centre provision, including the site area and whether parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to submit a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The ICB expects that a 'turnkey' facility can be delivered for the ICB at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows these to come forward on this site, and the developer supports the positive wording the Plan. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.
SPS16 Templars Square There is an identified opportunity to merge the existing Donnington Medical Centre and Temple Cowley Health Centre and to provide new medical premises at Templars Square. However, the policy does not provide any details of the medical centre provision, including the site area and whether	The policy is supportive of the potential for new medical facilities in this location, and the developer is supportive of this. However, it does not seem reasonable to expect the developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. If a need to combine the facilities and a way of doing this is identified, then the policy allows

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parking will be provided to support the facility, although the ICB fully understands it is not feasible to have such details during the plan-making stage. Developers should be required to submit a feasibility study of provision, which primary healthcare service providers can be involved in commissioning, and which should include size of facility, project costing and delivery timescale. The ICB expects that a 'turnkey' facility can be delivered for the ICB at nil cost and the facility would have similar contractual and rental arrangements to the existing premises. If the feasibility study shows the facility is not viable then other offsite mitigation should be required to ensure the primary healthcare provision can support the new population growth.	these to come forward on this site, and the developer supports the positive wording in the policy. Details such as parking will be guided by other policies of the plan, although it should be noted that this site is in a district centre with public car parking available. However, the feasibility needs to be led by the body that oversees primary health care provision and understands how this fits together within the wider context of the city and beyond. Furthermore, it will need to be led by the body that understands mechanisms for these facilities both coming forward and being run, which is complex and likely to be depended on the interest and ability of GPs to take risks and bring this forward. Furthermore, it is not proportionate for the developer of this site to have the burden of the feasibility study, simply because their site has been identified as a potential opportunity site to enable the closure of two GP surgeries to be merged into one.
Chapter 8 omission policy There is a missed opportunity to set out the provision of health infrastructure. The recently published NHS 10-year Health Plan is introducing neighbourhood health centres to provide a 'one stop shop. For patients. There is a need to include this in the draft Local Plan as this will be a major infrastructure as set out in the NPPF, and the NPPF emphasises that local plans should set out the contributions expected from development. Clearly, the current draft OLP2045 does not provide any details as required by the NPPF about the contributions expected from development towards health. There should be a draft policy on Health Infrastructure in Chapter 8, that says (amongst other things) that development proposals will be supported if they comprise a new GP facility funded by developer contributions or CIL and that development proposals	Policy S3 in Chapter 1 relates to 'Infrastructure Delivery in New Development' This policy refers to the Infrastructure Delivery Plan, say that that is where projects required to support the Local Plan strategy are identified. The IDP can be reviewed and updated more frequently and easily than a Local Plan and is therefore more responsive to changing needs. Policy S3 also says that developers will be expected to engage early with the City Council and infrastructure service providers to discuss their requirements. It is wholly unrealistic that a policy could be included that says development proposals should include a new GP facility/neighbourhood health centre unless a feasibility study is carried out that shows onsite provision is not viable or the scale of proposals to do not merit an onsite facility. Presumably this would

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that are not providing a neighbourhood health centre will only be supported if the onsite provision is not viable or the scale of the proposals do not merit an onsite facility.	apply to residential accommodation only, although that is not clear in the rep. Nearly all development that comes forward in Oxford is small, and too small to generate the need for additional health facilities by itself, or even any discernible need for any improvements. This is especially the case when nearly all facilities in Oxford are accepting new patients. Once the likely implications of a change in how primary health care is delivered is worked through an applied to Oxford, then the IDP can be updated to reflect this, but at the current time there is no certainty about what this means that can be reflected in the IDP (or Local Plan itself).

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Lincoln College

Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
Policy H1: Housing Requirement	Policy is considered sound - support efforts to maximize the deliverability and capacity of suitable housing sites in the City.	N/A	Support is noted, no further action proposed.	None
Policy H3: Affordable Housing from other development types	Policy is considered to be unsound as not justified (criterion b). Lincoln College do not agree that affordable housing contributions should be required from the redevelopment of existing university sports pitches.	Amend the wording of Policy H3/ the Glossary to include sports pitches within the definition of an "existing or proposed university or college campus site".	In order to be considered a university or college campus some form of academic uses would also need to be present on the site. These uses are set out in the Glossary. An isolated sports pitch would not meet the requirements to demonstrate wider academic use and therefore cannot be considered to meet the criteria set out in Policy H3. As such, the proposed amendment will not be taken forward.	None
Policy H8: Location of new Student Accommodation	Policy is considered sound. Additionally, Lincoln College comments that it is essential that the Local Plan	N/A	Support is noted, no further action proposed.	None

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Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
	2045 fully recognises, supports and builds upon the vitally important economic and educational role of the Colleges, Universities and other educational institutions in the City, whilst managing the requirements of students in Oxford along with the considerable needs of other groups in the City for general market and affordable housing.			
Policy SPE7: Lincoln College Sports Ground	Policy is considered to be unsound as not justified (criterion b). In order to ensure that suitable access can be provided to the site, and to respond to the surrounding heritage and urban design constraints, an	Extend the red line site area to include the land running along Barracks Lane edge to the corner with Bartlemas Close.	Extend the red line site area to include the land running along Barracks Lane edge to the corner with Bartlemas Close as per the drawing attached at Appendix B.	Main

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Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
	amendment to the red line site area plan would be required.			
	Policy is considered to be unsound as not justified (criterion b). In order to ensure that suitable access can be provided to the site, and to respond to the surrounding heritage and urban design constraints, an amendment to the red line site area plan would be required.	Extend the red line site area to include the land running along Barracks Lane edge to the corner with Bartlemas Close.	Add the following wording (underlined) to the site allocation policy SPE7 under paragraph e) to provide clarity about the sensitivities along the extended site boundary on Bartlemas Close: The Crescent Road View Cone crosses the south of the site; proposals should be designed in a way that responds to this protected view (Policy HD6). This could be achieved by creating a graduation of height, lower on the southern edge and increasing in height towards the north, as well as appropriate massing and considering variations in roof forms. Development proposals located on the eastern corner of the site between Bartlemas Close and Barracks Lane should be designed in a way that integrates sensitively with the existing street scene, landscape character and neighbouring residential context, whilst	Minor

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Policy/section	Summary of Lincoln College Reg 19 comment	Lincoln College Reg 19 suggested change	Oxford City Council response/proposed modification	Type of modification or action
			respecting the character, appearance and significance of the Conservation Area. Gaps between buildings should be sufficient to retain the sense of openness and views of the green backdrop which enhance the setting of the Conservation Area (Policy HD3).	

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Network Rail

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed
Policy S1: Spatial Strategy	Support for Spatial Strategy Network Rail supports the Local Plan Spatial Strategy, notably the reference that seeks to locate development in areas well served and close to public transport, including rail. Detailed comments re: Criterion f) Amed criterion f) as follows: *f) Ensure new uses are in locations where they will not harm the amenity **or operation** of existing neighbouring uses.* This will help to ensure that development, including residential uses, close to the railway does not restrict existing or likely future operational rail requirements in line with the 'agent of change' principle established in Paragraph 200 of the NPPF.	Support for Spatial Strategy Support noted Detailed comments re: Criterion f) Paragraph 200 of the NPPF establishes the 'Agent of Change; principle. While Policy R8 - Amenity Impacts of Development and its supporting text does embody the Agent of Change principle within the plan itself, we do acknowledge that bullet point f) of the Spatial Strategy could also refer to the continued operation of existing neighbouring uses as well as their amenity. As such, a modification is proposed to criterion f) of Policy S1.	Support for Spatial strategy No change proposed Detailed comments re: Criterion f) Insert the following words into criterion f) *f) Ensure new uses are in locations where they will not harm the amenity or continued operation of existing neighbouring uses;*
Policy S3: Infrastructure Delivery in New Development	Support for Policy S3 We welcome the Plan's recognition of the critical role of rail in supporting sustainable growth, particularly through the safeguarding of land for East West Rail, improvements to	Support for Policy S3 Support Noted	Support for Policy S3 No change proposed

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	Oxford Station, and the reopening of the Cowley Branch Line (Policy S3). Network Rail supports the intent of Policy S3 which outlines how the Council will work with infrastructure providers to support the delivery of infrastructure. <u>Rail infrastructure narrative within the Plan</u> A key concern is that the rail infrastructure narrative as set out within the Oxford Local Plan 2045 appears to stop at the completion of currently defined schemes (notably East West Rail Phase 2 and Cowley Plus), despite the Plan itself clearly anticipating continued population, employment and visitor growth beyond these interventions. The supporting text refers to longer-term growth pressures and endorses initiatives such as OxRail 2040, yet the implications of this ambition for rail infrastructure within Oxford are not fully articulated. While it is understood that this Local Plan is not the appropriate document for detailed station masterplans or full route alignments, there is a notable absence of acknowledgement that further rail capacity enhancements within	<u>Rail infrastructure narrative within the Plan</u> The (introductory) supporting text to the West End and Botley Road Area of Focus section of Chapter 8 (page 246, CSD001), highlights that the "transformation of Oxford Station is fundamental, not just to improve user experience, but to facilitate additional capacity to help deliver East West Rail and the re-opening of the Cowley Branch Line to passenger services". Policy WEBRAOF bullet point k) in the infrastructure section of the policy includes a direct reference to OxRail 2040: Plan for Rail (see page 248, CSD001) While the Local Plan 2045 captures the most important rail infrastructure projects, the Infrastructure Delivery Plan (IDP) includes a range of infrastructure projects that have been identified by stakeholders	<u>Rail infrastructure narrative within the Plan</u> No change proposed <u>Supporting growth beyond the mid-2030s</u> No change proposed <u>Future enhancements</u> No change proposed

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	Oxford will be required beyond currently committed schemes. Given repeated engagement with both City and County Councils on the constraints of the existing rail corridor and station capacity, this omission risks creating a strategic disconnect between growth aspirations and infrastructure realism. We consider it important that the Plan explicitly recognises that: <u>Supporting growth beyond the mid-2030s</u> • Supporting growth beyond the mid-2030s will require additional rail infrastructure interventions within Oxford itself, not solely at its periphery.	as being required to support the plan's delivery. The IDP represents a snapshot in time and is updated throughout the plan-making process. This is to ensure that it captures the most up-to-date infrastructure projects. If Network Rail considers there are any specific infrastructure projects that should be included and are not, these can be added to the delivery schedule when the IDP is next updated. <u>Supporting growth beyond mid-2030s</u> The County Council's adopted Rail Plan - OxRail 2040 supports wider rail-related growth in the county. Oxford's Local Plan 2045 makes appropriate references to OxRail 2040. There is no need to duplicate its contents. The City and County have worked and continue to work closely on rail-related plans. In the specific example, city and county colleagues worked closely to ensure an appropriate level of coverage commensurate to each respective document was contained within it. Discussions have been on-going since 2021 about re: the Oxford Station redevelopment and the	

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	Future enhancements • Future enhancements may necessitate changes to existing rail alignments, junctions, station layouts and operational land, some of which could have implications for land use, heritage assets and environmental designations. These requirements should be acknowledged now to avoid future conflicts with policies that otherwise seek to constrain development in sensitive locations.	city's Infrastructure Delivery Plan (IDP) appropriately references known publicly available delivery timescales. Future enhancements Where future enhancements require planning permission, these will need to be assessed against, the Policies in the Plan as a whole. Finally, it is worth noting that (introductory) supporting text for the West End and Botley Road Area of Focus highlights that "there is likely to be a degree of tension in delivering development that protects and enhances Oxford's iconic dreaming spires and the ambitions of delivering certain development types".	
Policy WEBRA OF: West End and Botley Road Area of Focus	Network Rail supports the identification of the West End and Botley Road as an 'Area of Focus'. However, we note that the Draft Local Plan no longer refers to the Area's "significant opportunity to create high density urban living with good provision and access to open space and a vibrant mix of uses, and also to make a significant contribution to the knowledge economy."	The plan does refer to these aspects however, they are now set out as "key considerations for infrastructure and design across the wider Central and West Infrastructure Area, which contains two Areas of Focus – the University Areas North of the City Centre Area of Focus; and the West End and Botley Road Area of Focus.	No change proposed

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	These qualities were previously set out as key reasons for designating this area as an Area of Focus, and we consider it important that future policy continues to acknowledge this potential and actively support the area in realising it.	These exact phrases are now found in the (introductory) supporting text to the *Central and West Infrastructure Area* section of Chapter 8 of the Plan. (See page 242 of CSD001).	
Policy I2: Safeguarding Land for Infrastructure	<u>General comment</u> Policy I2 aims to safeguard the land required to deliver the specific strategic infrastructure schemes in the Plan to support their delivery. Notably, land has been safeguarded to deliver the East West Rail (Oxford) railway link. The East West Rail Safeguarding Directions (November 2025) confers specific requirements in relation to development proposals involving the land safeguarded for East West Rail (Oxford). <u>Latest operational requirements</u> Whilst the safeguarding of land is supported by Network Rail, the safeguarded boundary shown may not reflect the latest operational and construction requirements, particularly given that East West Rail's safeguarding limits continue to evolve as the project progresses. <u>Re: construction compounds, etc.</u>	<u>General comment</u> General comment noted <u>Latest operational requirements</u> We have had separate discussions with EWR. We can update to inform the progression of EWR as the plan progresses. Any changes to the land contained within the EWR Project that take place while the Oxford Local Plan 2045 is being progressed can be updated. Policy I2 already sets out the following (**bold text** highlights future proofing within policy itself) *Planning permission involving land safeguarded for East West Rail (Oxford) will not be granted until the East West Rail Company has been consulted and the procedure set out in the East West Rail Safeguarding Directions **(or the***	<u>General comment</u> No change proposed <u>Latest operational requirements</u> No change proposed <u>Re: construction compounds, etc.</u> No change proposed

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	The current safeguarding boundary may not fully account for temporary and permanent construction compounds, access arrangements, and ancillary infrastructure, and this is something that will need to be considered.	***requirements of any future equivalent or consenting legislation)*** *has been followed.* <u>Re: construction compounds, etc.</u> We have consulted with EWR and they are content with the extent of the safeguarding.	
Policy I2 – Safeguarding Land for Infrastructure	There appears to be a potential land use conflict in the Oxford Parkway area, specifically involving agricultural land between the A34 and Oxford Parkway Station (postcode OX2 8JQ). The land is identified within the Plan as having development potential and is also understood to be of interest or potential importance to East West Rail for operational or construction-related purposes. Without clearer policy alignment, there is a risk that development proposals could come forward that compromise rail infrastructure delivery, or that safeguarding requirements could undermine allocated development sites. This issue would benefit from clearer cross-referencing between site allocation policies and rail safeguarding policies to ensure consistency and certainty.	We have discussed the potential implications of site allocations within Oxford's administrative boundary which included land that is included within the provisions of the EWR Safeguarding Direction November 2025. In the area described in the representation from Network Rail, the nearest site allocation within Oxford city is SPN5 Pear Tree Farm. Where development sites that are allocated in Oxford city are impacted by the Safeguarding Direction, text has been included both with Policy I2 and the relevant site allocation policy. It is worth noting that the Safeguarding Direction applies irrespective of whether there is a local development plan policy in place.	No change proposed

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		It is also worth noting that policies contained within Oxford's Local Plan only apply within the city's administrative boundary.	
Policy WEBRA OF: West End and Botley Road Area of Focus	<u>Support for OxRail2040</u> The Plan's support for OxRail2040 is welcomed. <u>General comment</u> However, there is a possible conflict between the aspiration for OxRail2040 and some of the protections within the document. <u>Scale of service enhancement (OxRail 2040)</u> Delivering the scale of service enhancement associated with OxRail 2040 is likely to require increased railway land take in certain locations, potentially including areas currently within floodplain or protected environmental designations, as well as possible construction within Oxford's protected view cones including views of the historic skyline. While the protection of Oxford's landscape and heritage is fully recognised and supported, it is important that risk to future rail schemes necessary to deliver the Plan's growth and sustainability objectives are not conflicting with policy.	<u>Support for OxRail2040</u> Support noted <u>General comment</u> General comment noted. <u>Scale of service enhancement (OxRail 2040)</u> OxRail 2040 recognises that the 'transformation' of Oxford Rail Station is a longer-term ambition (circa. 2037). Given the heritage significance of the location of the railway station, design considerations will be key to delivering a successful scheme See response to Policy S3 for more details however it is important to re-iterate that where development proposals require planning permission, these will need to be assessed against, the Policies in the Plan as a whole.	<u>Support for OxRail2040</u> No change proposed <u>General comment</u> No change proposed <u>Scale of service enhancement (OxRail 2040)</u> No change proposed

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Omission Policy:	<u>Rail Freight</u> We strongly support a policy approach that protects existing rail freight facilities, infrastructure and operational capability within Oxford and its immediate areas. While the Plan safeguards land for East West Rail and other strategic infrastructure, it does not explicitly protect existing rail-served sites, sidings or rail freight access arrangements from being compromised by adjacent development. We recommend that the Plan acknowledges safeguarding of existing rail freight facilities and rail-served sites to ensure development does not prejudice their continued and future use.	<u>Rail Freight</u> Policy I2 specifically highlights infrastructure schemes which are delivered through consenting regimes that lie outside the Local Plan's jurisdiction. The purpose of the policy is not to safeguard existing facilities but rather to acknowledge that the two named infrastructure schemes (i.e., OFAS/ EWR Project) are coming forward in parallel with the Oxford Local Plan 2045. Any development proposals that are within 10m of existing railway infrastructure must consult NR and are advertised in a different way to standard planning applications. We consider these existing requirements to be sufficient.	<u>Rail Freight</u> No change proposed
Policy SPCW9: Oxford Railway Station and Becket St Car Park	Network Rail are supportive of the works to Oxford Railway Station and proposed mixed use development for Becket Street Car Park with a number of residential, retail and commercial uses proposed. However, we believe the policy should also incorporate the need for education facilities and this should be reflected in the policy wording. Proposed	We do not accept the proposed inclusion of "education facilities" within the suite of named primary uses which are supported within this policy. Following a meeting with Network Rail and the City Council on 30 March 2026, Network Rail clarified that there may be an opportunity to bring forward some Use	No change proposed

	Modifications to the first paragraph of Policy SPCW9 are set out below: *Planning permission will be granted for a new station and associated public realm alongside a mix of uses including residential and/ or student accommodation, employment* ***and education uses*** *(Use Class E), and complementary town centre uses including retail, cafés and evening economy uses, which activate ground floor frontages and help to create a vibrant city quarter.*	Class E(f) uses (e.g., day nursery), as complementary uses at the site. The City Council considers that the policy, as drafted, already enables complementary uses to come forward at the site. The final sentence in the third paragraph of the policy states: *"Other complementary uses will be assessed on their merits".* As such, there is no need to make a specific reference to Use Class E(f) uses within this policy.	
Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel	With the potential inclusion of the western side of the station and the proposed allocations set out in SPCW2, consideration should be made for the subsequent impact of the proposals on one another. The proposal for residential development should consider compatibility with the aspirations of the station's redevelopment.	The City Council acknowledges that this site is in close proximity to the railway and other potential noise sources. Given the site's location nearby to sources of noise, Policy R8 would apply. Where other sites are located near a potential noise source, this information is highlighted in other site allocation policies. Therefore, to ensure a consistent approach, a minor modification has been proposed (see "change proposed" column for details).	Create an additional heading in bold font under bullet point k) and then create an additional bullet point which states: ***Additional requirements*** *l) Due to the potential impacts of noise from a number of sources (including the railway), development proposals should be informed by an acoustic design statement that addresses the*

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			*potential for significant environmental noise (**Policy R8**).*
Policy SPCW7: Nuffield Sites	The parcel of land adjacent to Beckett Street which is identified within Policy SPCW7 lies opposite the station redevelopment allocation and can easily be impacted by the forthcoming proposals subject to what is proposed within the Nuffield site. Consideration within this policy should be made against the station redevelopment proposals. The allocation allows a mix of uses across the three sites that delivers residential and/or student accommodation, employment uses, and appropriate other uses including retail, cafés/restaurants and other uses that support the evening economy. A minimum number of 59 dwellings (net gain) (or if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). These could conflict with the Becket Street proposals on an amenity harm basis.	The City Council acknowledges that part of the site (Land South of Frideswide Square) is in close proximity to the railway and other potential noise sources. Given the site's location nearby to sources of noise, Policy R8 would apply. Where other sites are located near a potential noise source, this information is highlighted in other site allocation policies. Therefore, to ensure a consistent approach, a minor modification has been proposed (see "change proposed" column for details).	Create a new bullet point under the "additional requirements" heading which states: *r) Due to the potential impacts of noise from a number of sources (including the railway), development proposals should be informed by an acoustic design statement that addresses the potential for significant environmental noise (**Policy R8**).*
Policy CBLAOF: Cowley Branch Line Area of Focus	Network Rail welcomes the inclusion of the Cowley Branch proposal and policy to maximise development value in and around the two proposed stations.	Support noted.	No change proposed

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	Network Rail supports the approach set out in this policy in favour of sustainable travel modes. NR notes that any offsite works will need to be promoted and delivered by the Local Authority. In order the proposed stations (as referenced in the policy) to be delivered, NR set out that Mallams footpath level crossing must be formally closed. It currently forms part of the PROW network, and the nearby Spring Lane Level Crossing requires upgrades as an alternative to Mallams (as part of the Cowley Branch project). The closure of these level crossings is acknowledged within the plan document which is supported by Network Rail.		

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Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls				
							I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
Project Delays	*The timetable for the Local Plan production is very tight- any delay will result in the council not having an upto date development plan for longer*	*Threat*	*Delays could result from lack of agreement at Council*	*Lack of agreement would result in delay to consultation and submission of the Plan*	*09/06/2026*	*Director of Planning and Regulation*	*3*	*3*	*3*	*2*	*3*	*2*	*Reduce risk by ensuring portfolio holder and lead cabinet members making all parties aware of timetable and key dates well in advance and monitor progress, meeting with portfolio holders, group leaders and members in advance of council meetings to identify issues*	*Reduce*				*Director of Planning and Regulatory*
External delays: delays to process	*There is potential for unanticipated delays in document production owing to evidence base gathering not being completed or ready to support examination.*	*Threat*	*Delays may be a result of a number, or combination, of factors (for example, external agencies or consultants maybe unable to fit in with timescales, issues may be more complex to understand/resolve than anticipated, or there may be a lack of resources available to complete the programme).*	*Lack of agreement would result in delay to consultation and submission of the Plan*	*09/06/2026*	*Director of Planning and Regulation*	*3*	*3*	*3*	*2*	*1*	*1*	*Reduce risk by ensuring all parties are aware of the timetable and key dates for Plan's submission in advance, and anticipated date of hearings. Deal with issues in a timely manner.*					*Director of Planning and Regulatory*
Opposition and Plan being found unsound by the Inspector	*If the Plan is found to be unsound or to have failed legal tests, it will either need time spent to make it sound or it will need to be withdrawn and re-started. This would result in considerable delays to adoption and the council would have to determine applications in the absence of an up to date develpment plan for longer, resulting in reliance on the NPPF and the presumption in favour of sustainable development.*	*Threat*	*The legal process may not have been fully followed or the Plan failing against one of the tests of soundness.*	*Plan production would need to be restarted which would be costly and delay implementation of the Plan's strategy*	*09/06/2026*	*Director of Planning and Regulation*	*3*	*3*	*3*	*2*	*3*	*1*	*Follow procedures as with Plans found sound and seek legal adive through the Plan preparation process, look to apply best practice principles and advice on soundness issues and only submit when confident that all the proper plan preparation process has been followed and the correct evidence gathered to inform the plan strategy.*	*Reduce*				*Director of Planning and Regulatory*

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	6. **Race & Ethnicity**
2. **Disability**	7. **Religion or Belief**
3. **Gender Reassignment**	8. **Sex**
4. **Marriage & Civil Partnership**	9. **Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

3352	7. Provides clear **justifications** for your decisions. 8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	Oxford Local Plan 2045	**2.**	**The implementation date of the activity under consideration:**	The plan is expected to be formally adopted in May 2027.
3.	**Directorate/Department(s):**	Planning and Regulation	**4.**	**Service Area(s):**	Planning Services, Planning Policy
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Gabriella Barnes gbarnes@oxford.gov.uk Tara Sutherland Tsutherland@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	Gabriella Barnes gbarnes@oxford.gov.uk Tara Sutherland Tsutherland@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	Ongoing	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	N/A
9.	**Date this EqIA started:**	09/06/2026			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	Will be attached to the cabinet report and therefore published.	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	N/A

Section 2: About the activity, change, or policy that is being assessed.

12.		☐ Budget	☐ Decommissioning	☒ Commissioning	☐ Change to an existing activity

	Type of activity being considered: Check the most appropriate.	☒ New activity		☐ Others. Please specify:		
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	☒ Good, affordable homes	☒ Strong, fair economy	☒ Thriving Communities	☒ Zero Carbon Oxford	☒ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	☒ Understanding and working with our communities.	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	The Oxford Local Plan 2045 (the 'Local Plan') will be the fundamental development framework for the city of Oxford. The Local Plan will have a material effect on the amount and type of housing (including affordable housing); the number and type of jobs; the location and nature of future development; and the protection of open space; across the city, among other aspects. The scope of the Local Plan and the 20-year time span mean that this document will have a significant impact on the lives of those who live and work in or visit the city. Important choices will be made between competing demands, and limited resources will be allocated. The Local Plan will seek to address inequalities, but the policies will need to be assessed for unintended consequences regarding equality issues.				

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16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	Producing a Local Plan is a statutory requirement. The Local Plan 2036 is still in place as the statutory development plan, but it will become more out of date over time, especially 5 years after adoptions, which was in June 2025. That makes it easier to argue that nation planning policy should be relied upon, rather than the locally set policies that attempt to address issues in Oxford.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	Early Engagement Survey (17/03/2026-28/04/2026) - Short questionnaire published on Oxford City Council's consultation portal regarding the new Local Plan. Preferred Options Consultation (27/06/2026-08/08/2026) - A leaflet questionnaire was distributed to all households and businesses through the city to gain people's views on the First Draft Oxford Local Plan 2045 Consultation Document. - In addition, there were two online questionnaires (one short form and one long form). - Representations were also accepted by direct email. - Multiple face-to-face sessions and online sessions were held with officers of the Planning Policy team, including drop-ins and sign-ups.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports, -briefs.	The policies of the Local Plan are based on an evidence base comprised of studies on topics such as housing and employment (e.g. the Housing and Economic Land Availability Assessment), transport (e.g. the Central Oxfordshire Travel Plan and advice from the County Council as the Highway Authority), site analysis (e.g. the Green Infrastructure Assessment and the Green Belt Study update) and others including conversations with, and the strategic plans of, infrastructure and service providers. In addition, the most up-to-date available demographic information was taken from sources such as the Census data 2011 and 2021 releases, population estimates (Office for National Statistics), 2019 Indices of Multiple Deprivation (DCLG), Experian data, Oxford City Council Housing Information System Database and other national, regional, and local sources of data.

		The process for producing a Local Plan places great weight on the quality of the evidence supporting policy decisions. The evidence base will be tested through public examination by a Planning Inspector before the Local Plan can be adopted.
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	N/A

Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	Yes ☒	No ☐	Don't Know ☐
		Members of staff	Yes ☒	No ☐	Don't Know ☐
		General public	Yes ☒	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☒	No ☐	Don't Know ☐
		City Councillors	Yes ☒	No ☐	Don't Know ☐

	Council suppliers and contractors	Yes ☒	No ☐	Don't Know ☐	

21.	**Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**					
Protected Characteristic	**Positive**	**Negative**	**Neutral**	**Don't know**	**Data/information/evidence supporting your assessment**	**Analysis & insight** **Mitigations**
Age	☒				Several of the policies in Chapter 2 (which specifically deals with housing) of the Local Plan explicitly address the diverse needs of the different age groups in Oxford. In the preparation of the Local Plan, the Council has considered the housing requirements of many different age groups (students, young people, families, adults, elderly people, etc.). Chapter 2 includes specific policies relating to student accommodation (H9 and H10), boarding school accommodation (H16), shared housing/Houses in Multiple Occupation (H8), family-sized housing (H6) and older persons and other specialist accommodation (H13), as they relate specifically to different age groups. These policies are considered to have positive impacts upon the cohorts for which they are relevant, without costing others or negatively affecting other demographic groups, as they all strive to contribute towards establishing a	

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					Overall, the effect of the Local Plan on the age equality strand is considered to be positive.	
Disability **(Visible and invisible)** 3359	☒				The thrust and ambition of the Local Plan strives to focus development in locations which are accessible by public transport & non-car modes to make the city more accessible to people of all abilities. This ambition forms one of the overarching threads within the document, which seeks to foster a liveable city in which residents have access to the basis of their daily needs within an easy walking distance of their homes. In doing so, the document works to protect provision of to community and recreational facilities. In the preparation of the Local Plan, the Council has considered the need for accessible and adaptable dwellings, and the need to ensure that services and facilities are accessible to all. Chapter 6 on design includes Policy HD14 - Accessible and Adaptable Homes - which adopts optional Building Regulations requirement M4(2) to provide enhanced accessibility and adaptability for all new affordable dwellings and for a minimum of 15% of new general market dwellings. This policy also adopts Building Regulations requirement M4(3) for dwellings for wheelchair users, for a minimum of 5% of all dwellings for which the City Council is responsible for allocations or nominations, on sites of more than 20 dwellings. It is considered that this policy will result in some positive effects for housing quality for people with disabilities.	

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					Furthermore, the policies contained in Chapter 7 focus on movement and work to support a range of sustainable transport modes, which will provide residents and users of Oxford with a greater range of movement options and make the city more accessible to people of all abilities. Overall, the effect of the Local Plan on the disability equality strand is considered to be positive.	
Gender re-assignment			☒		No equalities impact identified.	
Marriage & Civil Partnership			☒		No equalities impact identified.	
Race, Ethnicity and/or Citizenship			☒		No equalities impact identified.	
Pregnancy & Maternity			☒		No equalities impact identified.	
Religion or Belief			☒		No equalities impact identified.	
Sex			☒		No equalities impact identified.	
Sexual Orientation			☒		No equalities impact identified.	

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☒				The Local Plan attempts to address some inequalities directly, for example by protecting a diverse range of employment sites, through requiring Community Employment and Procurement Plans and Affordable Workspace.	
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local authority of sanctuary in			☒		No equalities impact identified.	

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December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.						
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members			☒		No equalities impact identified.	

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Section 5: Conclusion(s) of your Full Impact Assessment

22.	**Conclusions.** The Local Plan seeks to deliver specific types of development and at specific locations. As such, there is the potential for the policies to have differential impacts on different equalities groups. Development at any site could have equality implications both for new residents and users/workers within the site, and for communities in adjacent areas. The extent to which control over these potentially different impacts can be exercised varies. Overall, Local Plan policies have been designed to attempt to improve the relevant equality strands where possible, and to otherwise have a neutral impact. More specifically, it is not anticipated that there will be a direct impact on equality issues related to gender reassignment, sex, sexual orientation, pregnancy and maternity, or

		religion and beliefs as a result of the policies and development proposed in the Local Plan; whilst it is considered that the policies and resulting development patterns of the Local Plan are likely to have some positive effect on the age, disability and socio-economic equality strands.						
	☐	Stop and reconsider the activity.	☐		Adjust activity before beginning the activity and continue to monitor.	☒	No major change(s) or adjustments and continue with activity but continue to monitor.	☐	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**	The conclusions have been reached by careful consideration of the equality strands against the Local Plan policies.	**Benefits of Implementation**: Morally the right thing to do; Enhance social cohesion; Identify and eliminate biases. **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: Encourages mixed and balanced communities. **Improves Representation**: Enables different voices to be part of decision-making.

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-** - team, -directorate, -service area, -Equalities Steering Group,etc.		Planning and Regulation.		
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**		Planning Policy.		
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.		N/A	**27.** **Date when the EqIA will be reviewed again.**	N/A

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Section 7: Sign-off

Name: Tara Sutherland	Name:	Name: Full Name
Job Title: Assistant Planner	Job Title:	Job Title: Type here
Signature: T Sutherland ----------	Signature: ----------	Signature: ----------

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.

Name: Gail Malkin	Name: Full Name	Name: Full Name
Job Title: Head of People	Job Title: Type here	Job Title: Type here
Signature: GMalkin ----------	Signature: ----------	Signature: ----------
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature: ----------	Signature: ----------	Signature: ----------

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You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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To:	**Cabinet**
Date:	**8 July 2026**
Report of:	**Director of Housing**
Title of Report:	**Local Authority Housing Fund - Round 4**

Summary and recommendations	
Decision being taken:	The report seeks the required budget provision and the necessary project approval and delegations to enable the Council to proceed with entering into the national Local Authority Housing Fund Round 4.
Key decision:	Yes
Cabinet Member:	Councillor Linda Smith, Cabinet Member for Housing and Communities and Councillor Mike Rowley, Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness
Corporate Priority:	Deliver good, affordable homes and thriving communities
Policy Framework:	Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028

Recommendation(s): That Cabinet resolves to:

1. **Approve** receipt of the Local Authority Housing Fund Round 4 (LAHF R4) funding of £1,719,354 to deliver 4 temporary accommodation units and 4 units for resettled Afghan families
2. **Recommend** to Council, to approve the allocation of £808,000 of the LAHF R4 grant funding in substitution of approved HRA borrowing for the delivery of the temporary accommodation element of LAHF R4.
3. **Recommend** to Council, to approve the allocation of £898,500 of the LAHF R4 grant funding to a new General Fund capital budget for the payment of a capital grant of 898,500 to a Registered Provider to deliver the 'resettlement' element of LAHF R4.
4. **Delegate** authority to the Director of Housing in consultation with; Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness, the Group Finance Director and the Director of Law Governance and Strategy, to select a Registered Provider delivery partner and enter into a grant agreement with them to part fund the purchase of 4 units for resettled Afghan families.

Appendices	
Appendix 1	Risk Register

Appendix 2	Equality Impact Assessment (EqIA)

Introduction

1. The Ministry of Housing, Communities and Local Government (MHCLG) has launched a national £950m Local Authority Housing Fund - Round 4 (LAHF R4), to support local authorities to increase the supply of good quality temporary accommodation to reduce homelessness pressures and provide accommodation to Afghan families settling in the UK legally under the government resettlement scheme following the Taliban takeover of Afghanistan.
2. The Council has seen a significant increase in demand for homelessness services in recent years and this in turn has increased the demand for emergency temporary accommodation (TA) including expensive hotel accommodation, required to meet the Council's statutory duties. Cabinet received a report in April 2026, which confirmed that in financial year 2025-26 the Council had placed over 500 households into TA and has currently around 320 households in TA, with a substantial number in hotels and nightly charged accommodation, as of April 2026.
3. The UK has welcomed around 37,000[1] Afghans nationally who have fled the country following the Taliban takeover, due to the risk they will be persecuted for supporting the former government and the British presence in the country.
4. Locally, Oxford City Council has now directly supported 65 families under refugee resettlement schemes from Syria, Afghanistan, and other countries and in doing so those families have successfully made Oxford their home. Supporting refugee resettlement is aligned to the Council's strategy, and taking part in these government schemes helps ensure grant funding is received to adequately house and support these families as they settle in the city.
5. Oxford City Council have previously received funding for Local Authority Housing Fund (LAHF) – Round 1,2 and 3 and progress to date has been very positive. As part of the previous rounds of LAHF, the Council purchased 15 properties (6 under R1,4 under R2 and 5 under R3) through a combination of central government grant funding and Council investment. In total 22 properties have been delivered through Rounds 1-3 of LAHF, exceeding the central government target with the programme delivery now complete.
6. The Government announced the creation of LAHF R4 and gave an initial allocation offer to Local Authorities who were in scope for a grant allocation in November 2025.

Local Authority Housing Fund Round 4 investment

7. Oxford City Council have been allocated further grant funding for LAHF Round 4 to purchase 8 properties. There are two elements to the grant, the temporary accommodation ('TA') element for 4 units, with properties used for homeless households and the 'resettlement' element for 4 units to support Afghan households in need of resettlement under the Afghan Resettlement Programme (ARP). As a prerequisite to enter the fund, Council officers were required to sign a Memorandum of Understanding (MoU) with MHCLG.
8. The 8 properties will be acquired from the local housing market through a combination of Council led delivery for the TA element, and in partnership with a local Registered Provider of Social Housing, for the resettlement element. MHCLG has approved this proposal and agreed to release the grant funding, subject to the Council and delivery partner making the necessary part investment and meeting the terms of the fund.

[1] https://www.gov.uk/government/publications/afghan-resettlement-programme-operational-data/afghan-resettlement-programme-operational-data

9. Cabinet has agreed the acquisition of up to 150 additional TA units via £32m investment in March 2026 and this report proposes that the four 4 ‘TA’ units are delivered under the wider TA programme. The properties purchased for the ‘TA’ element will be good quality self-contained accommodation and let at temporary accommodation rent charges. Officers are proposing to utilise the grant funding for the ‘TA’ element to support the delivery of the wider TA programme reducing the demand on the Housing Revenue Account (HRA), providing value for money for the Council. For the ‘TA’ element the government grant will be £808,000 and will replace some HRA borrowing.

10. In regard to delivery of the four ‘resettlement’ properties, the proposal is to work with a local Registered Provider rather than direct deliver through additional HRA borrowing. This partnership approach will deliver the same benefits of new social housing, without adding further borrowing burden on the Housing Revenue Account (HRA) which can instead be used on other priorities like more general needs housing. As part of the terms of the partnership arrangement, it is proposed the Council will be entitled to nomination rights.

11. Access into the private rented sector will be the most important option for many refugee households and work across Oxfordshire is underway to support access into the sector with support with deposits and rent in advance, but the opportunity from LAHF R4 is that it will allow the Council to work with deliver partner to offer affordable housing at an affordable rent for Afghan refugees from the ‘resettlement’ element of the fund, which also reduces homelessness demand.

12. The fund guidance sets out that if a resettlement property becomes available within a 3 year period of the home coming into use, the government expects that home to be offered to another resettled family. Beyond that the fund brings the benefit that the homes can be available to support wider housing and homelessness responsibilities after the needs of the eligible cohort have been addressed.

13. LAHF R4 will help the Council achieve its corporate priorities, to deliver good, affordable homes and support thriving communities, and allow the Council to access funding to both increase the supply of good quality temporary accommodation, address the immediate pressures of supporting refugee communities to find accommodation, as well as adding to our stock of council housing for the future.

14. Regarding the properties the government have directed that 6 properties should delivered in year 1 (2026-27) and 2 properties in year 4 (2029-30) of the programme. Due to the gap between delivery years, Officers have sought dispensation from central government to deliver the 2 units for year 4 (2029-30) at an earlier point. See Table 1 for a breakdown of the programme’s delivery as per the current delivery timetable:

Table 1

Property type	Year 1 delivery target (2026-27)	Year 2 delivery target (2027-28)	Year 3 delivery target (2028-29)	Year 4 delivery target (2029-30)	Total delivery target
TA element (2-4+bed)	3	0	0	1	4
R4 resettlement element (2-3 bed)	2	0	0	0	2

R4 large resettlement element (4+bed)	1	0	0	1	2
All property types	6	0	0	2	8

Alternative Options

15. Deliver the resettlement properties directly through the HRA – This would result in additional Housing Revenue Account borrowing as the grant money is insufficient on its own to acquire the required units.

16. Do nothing – Under this option, the Council would not accept the grant funding that has been made available and therefore would not be able to deliver the properties, for the eligible cohort, with substantial contribution by the government and this would not support the existing TA deliver programme and would not reduce pressure on the HRA. Under the 'do nothing' option, the potential benefits referenced in this report will not be realised. The Council would need to consider other accommodation offers to support refugee groups.

Implications of Local Government Reorganisation

17. Government guidance concerning LGR has been considered in relation to this report. Entering into the fund will ensure the Council receives grant funding to deliver additional housing to reduce homelessness which will continue to be required post LGR, ensuring that essential service delivery continues as well as providing value for money.

Carbon and Environmental

18. There are few environmental considerations arising directly from this report. Any property purchased into the HRA or by an RP will need to comply with the Decent Homes Standard, Housing Health & Safety Rating System (HHSRS) and meet EPC rating of C or above. The properties will go through voids process to ensure they are brought up to a lettable standard in line with other allocations of housing.

19. Officers will ensure through agreement that the RP will independently maintain and apply its own stock standards and that the approach meets the terms of the MHCLG prospectus. Appropriate governance and regular reporting arrangements will be put in place to provide assurance that these requirements are being met on an ongoing basis.

Financial implications

20. The total approved grant to be received from government is £1,719,354 which comprises a capital grant of £1,706,500 and a revenue grant of £12,854. This is to be received in the tranches as per the LAHF R.4 prospectus.

21. As stated earlier in this report, the 'TA' element will be delivered as part of the wider TA programme to deliver 150 units via £32m investment which was approved by cabinet in March 2026. Therefore, the grant received for the 'TA' element of £808,000 will reduce HRA borrowing and no additional HRA borrowing is requested as part of this report.

22. For the 'resettlement' element, the Council will receive £898,500 in grant and the Council will enter in an agreement that will allow for the transfer of grant to a RP to purchase the required resettlement properties with RP funding a portion which the grant does not cover. Officers will create a new budget line in the General Fund so the grant of £898,500 can be received from central government and then paid out to the RP, the delivery overall will be cost-neutral to the Council. This report seeks delegated approval to enter into an agreement with a RP in line with the government guidance for the programme.

23. It should also be noted that delivery and payment timings will remain subject to MHCLG agreement and approval. As such, timescales and funding drawdown profiles may be subject to change, including in circumstances where the acquisition programme is completed earlier than currently anticipated.

Legal issues

24. Under Parts 4.5 (4) and 4.5 (26) of the Constitution Cabinet is responsible for the decisions set out in the recommendation. Under section 9E (3) (c) of the Local Government Act 2000 Cabinet is empowered to delegate its functions to officers.

25. Any delegated decision to award a grant of £750,000 or greater will be a Key Decision and will need to comply with the procedure for taking Key Decisions set out in the Council's Constitution.

26. The MOU between the Council and the Ministry of Housing, Communities and Local Government has not been referred to legal for review and has already been signed by the Council. Whilst it states it is not intended to create legal or binding obligations this does not automatically prevent MHCLG being able to recover the grant. The Council should ensure it complies with the obligations set out within it. The Council also needs to be confident that the proposed use of the grant for an already existing TA scheme is acceptable to MHCLG.

27. Legal advice must be sought in respect of the proposal partnership working with a Registered Provider including how a partner is chosen and to draft the agreement between the Council and its chosen partner.

Level of risk

28. See Risk Register attached, under Appendix 1

Equalities impact

29. A EQIA can be found in Appendix 2

Report author	Stephen Cohen
Job title	Refugee and Resettlement Manager
Service area or department	Housing Services
Telephone	07889 172942
e-mail	scohen@oxford.gov.uk

Background Papers: None
1

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Risk Register

Local Authority Housing Fund Round 4

As at: (DATE)

									Gross		Current			Target						
Ref	Title	Risk Description	Opp / Threat	Cause	Consequence	Risk Treatment	Date Raised	Owner	P	I	P	I	Score	P	I	Comments	Control / Mitigation Description	Date Due	Action Status	% Progress	Action Owner
1	Under performance to specification	Under deliver target of 8 properties and brought up to a letable standard	Threat	Inability to source and purchase suitable properties from open market by deadline	Not meeting the terms of the funding prospectus, as well as reputational damage.	Reduce	28/04/26	Stephen Cohen	3	3	2	3	6	2	2		Established team to deliver properties who have been involved in planning for fund application and working with deliver partner to agree clear grant agreement to meet government timetable.	31/03/27	Not yet started	0%	Nerys Parry
2	Insufficient capital	Additional pressure on Housing Revenue Account (HRA)	Threat	Inability to fund capital element to purchase properties.	Inability to purchase properties, as well as reputational damage	Avoid	28/04/26	Stephen Cohen	1	1	1	1	1	1	1		The grant funding will support an existing approved TA deivery programme where financial modelling completed in consultation with Council's financial services team and HRA provision planned for and this will reduce pressure on the HRA. The agreement with an RP partner ensures the Councils delivery partner will delivery one element of the programme which also reduces pressure on the HRA.	31/03/27	Ongoing	50%	Nerys Parry
3	Market fluctuations	Property market prices / interest rate rises	Threat	Property price rise due to reduction in supply, chain sale delayed	Local property prices increase beyond budgeted allowance, property purchase takes longer	Accept	28/04/26	Stephen Cohen	3	3	3	2	6	3	2		For Council delivered properties, financial modelling builds in contingency allowances for market increases, pipieline builds in possible chain sale delays.	31/03/27	Not yet started	0%	Nerys Parry
4	Adverse public opinion/media intervention	Negative publicity generated from investing in properties	Threat	Negative publicity from OCC entering into Fund	Reputational damage	Avoid	28/04/26	Stephen Cohen	2	3	2	1	2	2	1		National awareness of Afghan resettlement & wider homelessness issues and detailing in report the level of financial benefit from this investment	31/03/27	Not yet started	0%	Nerys Parry
5	Not entering into fund	Decision to not enter into the fund	Opportunity	Deciding not enter fund	Not realising beneftis of property acquisition & reputational damage	Avoid	28/04/26	Stephen Cohen	4	3	3	3	9	1	1		Report sets out rational for entering into fund	31/03/27	In Progress	50%	Nerys Parry
3	Local Government Re-organisation	Changes relating to the implentation of Local Government Organisation	Threat	Central Government are reforming local government structures where there are two tier Authority's (such as within Oxfordshire) which have a County Council and District Councils to create bigger unitary Authority's.	The consequence of future Local Government Re-organisation will be significant as Council's statutory responsibilites are merged and Local Authourity boundaries are re-drawn also existing programmes could be reviewed.	Reduce	28/04/26	Nerys Parry	3	3	3	3	9	3	2		The Council has a dedicate team working on Local Government Re-organisation. Officers are in regular contact with government, who have indicated that the earliest date for reorganisation for councils in Oxfordshire will be in 2028 and therefore at present Officers are monitoring this risk but do not believe it will have an immediate impact on the aims of the programme	31/03/28	Ongoing	20%	Nerys Parry

THE RISK REGISTER IS FORMATTED AS A TABLE. PRESS TAB ON THE LAST TABLE CELL TO INSERT A NEW ROW.

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. Age	**6. Race & Ethnicity**
2. Disability	**7. Religion or Belief**
3. Gender Reassignment	**8. Sex**
4. Marriage & Civil Partnership	**9. Sexual Orientation**
5. Pregnancy & Maternity	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents,

3376	employees, partners, council suppliers & contractors, and Council Members 5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact. 6. Offers **mitigations or adjustments** if a PSED has been impacted. 7. Provides clear **justifications** for your decisions. 8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	Entering into Local Authority Housing Fund ("LAHF") – Round 4	**2.**	**The implementation date of the activity under consideration:**	13 July 2026
3.	**Directorate/Department(s):**	City and Citizens' Service	**4.**	**Service Area(s):**	Housing Services
5.	**Who is (are) the assessment lead(s):**	Stephen Cohen, scohen@oxford.gov.uk	**6.**	**Contact details, in case there are queries:**	Stephen Cohen, scohen@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	New X	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	n/a
9.	**Date this EqIA started:**	5 June 2026			
10.	**Will this EqIA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?**	N/a	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	n/a

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:**	X **Budget**	☐ Decommissioning	☐ Commissioning	

					☐ Change to an existing activity.	
		☐ New Activity	X **Others – project approval**			
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?**	X **Good, affordable homes**	☐ Strong, fair economy	X **Thriving Communities**	☐ Zero Carbon Oxford	☐ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?**	X☐ **Responsive services and customer care.**	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	X **Understanding and working with our communities.**	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	Oxford City Council have been allocated grant funding for LAHF Round 4 to purchase 8 properties. There are two elements to the fund, the temporary accommodation ('TA') element for 4 units, with properties used for homeless households and the 'resettlement' element for 4 units to support Afghan households in need of resettlement under the Afghan Resettlement Programme (ARP). LAHF R4 will help the Council achieve its corporate priorities, to deliver good, affordable homes and support thriving communities, and allow the Council to access grant funding to both increase the supply of good quality temporary accommodation, address the immediate pressures of supporting refugee communities to find accommodation, as well as adding to our stock of council housing for the future.				

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		The objectives of the fund and delivery plan are set out in the attached cabinet report.
16.	**Please outline the consequences of not implementing this activity.**	If the Council did not implement this activity, it would not be able to take advantage of the grant funding available and not support wider corporate objectives regarding increasing affordable supply and supporting households who are seeking sanctuary.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?**	LAHF R.4 is a governmental grant programme for Local Authorities to deliver housing. Central government prescribe the delivery timeline alongside property type and the Council must follow the fund's guidance and prospectus rules. The delivery of housing will add to the Council housing stock for homeless households in need and also support resettlement families.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.**	The Council has seen a significant increase in demand for homelessness services in recent years and this in turn has increased the demand for emergency temporary accommodation (TA) including expensive hotel accommodation, required to meet the Council's statutory duties. Cabinet received a report in April 2026, which confirmed that in financial year 2025-26 the Council had placed over 500 households into TA and has currently has around 320 households in TA, as of April 2026. Delivering temporary accommodation units will help to support homeless households needs by delivering good quality self-contained accommodation. The UK has welcomed Afghans who have fled the country following the Taliban takeover, due to the risk they will be persecuted for supporting the former government and the British presence in the country. Supporting refugee resettlement is aligned to the Council's strategy, and taking part in these government schemes helps ensure funding is received to adequately house and support these families as they settle in the city.

		Access into the private rented sector will be the most important option for many refugee households and work across Oxfordshire is underway to support access into the sector with support with deposits and rent in advance, but the opportunity from LAHF R4 is that it will allow the Council to work with a delivery partner to offer affordable housing at an affordable rent which also reduces homelessness demand.
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?**	n/a

Section 4: Impact analysis.

20.	**Who does the activity impact?**	**Service Users**	**Yes** X	No ☐	Don't Know ☐
		Members of staff	**Yes** X	No ☐	Don't Know ☐
		General public	**Yes** X	No ☐	Don't Know ☐
		Partner / Community Organisation	**Yes** X	**No** ☐	Don't Know ☐
		City Councillors	**Yes** X	**No** ☐	Don't Know ☐
		Council suppliers and contractors	**Yes** X	No	Don't Know ☐

21.	Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age	X	☐		☐	In financial year 2025-26 the Council placed over 500 households into TA and currently has around 320 households in TA, with a substantial number in nightly paid accommodation as of April 2026. There is a significant need for good quality self-contained accommodation. The government has committed to supporting Afghans arriving on the government backed resettlement scheme and entering into the fund will help to support this aim by utilising grant funding and working with an RP partner with the benefit of increasing the supply of social housing.	The activity is about improving outcomes for homeless household and resettled refugees through utilisation of government grant funding to deliver accommodation. No negative impacts of these proposals have been identified and the proposal seeks to have a positive impact.

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Disability	X	☐	☐	☐	As above	As above
Gender re-assignment	X	☐		☐	As above	As above
Marriage & Civil Partnership	X	☐		☐	As above	As above
Race, Ethnicity and/or Citizenship	X	☐	☐	☐	As above	As above
Pregnancy & Maternity	X	☐		☐	As above	As above

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Religion or Belief	X	☐		☐	As above	As above
Sex	X			☐	As above	As above
Sexual Orientation	X	☐		☐	As above	As above

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	X	☐		☐	As above	As above
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed	X	☐		☐	As above	As above

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inclusive practices and share efforts to create a culture of welcome and safety for all.						
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members	☐	☐		☐		

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
	☐	Stop and reconsider the activity.	☐	Adjust activity before beginning the activity and continue to monitor.	☐	No major change(s) or adjustments and continue with activity but continue to monitor.	**X**	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.

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23.	**Please explain how you have reached your conclusions above.**		Entering into the fund ensure the Council receives grant funding to deliver temporary accommodation and helps meet a corporate commitment on support government backed resettlement schemes

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**?		All temporary accommodation properties will be let according to general policies on temporary accommodation allocation for households the Council has a homelessness duty towards (under Housing Act 1996, Part 7). Data is collected by central government (MHCLG) quarterly for all homelessness cases and this includes equalities data which is then monitored by the Housing Service. All resettlement properties are let in conjunction with the Home Office and the South East Strategic Partnership for Migration (SESPM). The Council will record these cases as part of the corporate refugee resettlement commitment, monitored by Housing Services.
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**		Housing Services

26.	**How often will the equality impact be reviewed for this activity?**	No planned review	**27.**	**Date when the EqIA will be reviewed again.**	x

Section 7: Sign-off

Name: Stephen Cohen	Name:	Name: Full Name
Job Title: Refugee and Resettlement Manager	Job Title:	Job Title: Type here
Signature: Stephen Cohen----------	Signature: ----------	Signature: ----------
Name: Gail Malkin	Name: Full Name	Name: Full Name
Job Title: Head of People	Job Title: Type here	Job Title: Type here
Signature: G Malkin ----------	Signature: ----------	Signature: ----------
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.
4) EDI Lead.
5) EDI Specialist.
6) For joint projects, please consider the following:
    1. Other project leads
    2. Other service area and/or team lead/managers.

This is not an exhaustive list.

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You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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To:	**Cabinet**
Date:	**8 July 2026**
Report of:	**Director of Housing**
Title of Report:	**Annual review of the Council of Sanctuary Framework, 2025-2028**

Summary and recommendations	
Decision being taken:	To provide an update on the progress made in Year 1 of the Council of Sanctuary Framework 2025-28 and to seek approval for the implementation of the Year 2 Action Plan
Key decision:	No
Cabinet Member:	Councillor Linda Smith, Cabinet Member for Housing and Communities
Corporate Priority:	Support Thriving Communities
Policy Framework:	Thriving Communities Strategy 2023-27, Council of Sanctuary Framework 2025-2028

Recommendation(s): That Cabinet resolves to:	
1.	**Note** the progress made in Year 1 to implement the Council of Sanctuary Framework and Action Plan and the emerging risks and challenges for delivery over the next year and beyond
2.	**Approve** the adoption of the new Framework Action Plan for Year 2 (26-27); and
3.	**Delegate authority** to the Director of Housing, in consultation with the Cabinet Member for Housing and Communities, to update the Action Plan when required to respond to emerging risks and challenges.

Information Exempt from Publication
None

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Council of Sanctuary Framework	No

Appendix 2	Risk Register	No
Appendix 3	Equalities Impact Assessment (Updated)	No
Appendix 4	Year 1 Action Plan with rag rating	No
Appendix 5	Year 2 Draft Action Plan	No
Appendix 6	KPI table	No

Introduction and background

1. The Council has a proud track record of welcoming people seeking sanctuary who make Oxford their home and achieved Local Authority of Sanctuary award status in November 2024 which delivered a key action within the Council's Thriving Communities Strategy 2023-27. The *Sanctuary Awards* are provided by the network of local groups and City of Sanctuary UK, to recognise and celebrate the commitment by institutions to the charity's values and vision and enable those institutions to be become active participants in the City of Sanctuary network.
2. Officers presented the Council of Sanctuary Framework and Action Plan 2025-2028 to Cabinet in January 2025 for approval. The Framework was developed with residents, staff and external partners and sets out how the Council will seek to support people seeking sanctuary over the next 3 years.
3. It was agreed by Cabinet that officers would report back annually on progress made against the action plan. This report sets out progress and challenges against the planned actions over the past year. The report also seeks approval for the updated action plan to be approved for year 2, updated to address emerging challenges.
4. The Council continues to provide support to people arriving on government backed refugee resettlement schemes through its corporate commitment, as well as visa schemes such as Home for Ukraine to settle and rebuild their lives. The Council has developed additional programmes to facilitate move on for people residing in and exiting from Home Office accommodation, supporting wider corporate aims to prevent homelessness.
5. To ensure this report is inclusive of the broad range of legal statuses, living circumstances and experience of migration, the Council has chosen to use the interchangeable term 'people seeking sanctuary' in this report which represents people that are from a forced displacement background including asylum seekers, refugees and vulnerable migrants.

Council of Sanctuary Framework and Action Plan

6. The Framework committed the Council to work in collaboration with the sanctuary community to inform and develop a Local Authority City of Sanctuary Action Plan and ensure the Council meets its commitment to become an accredited local authority of sanctuary.
7. As part of the process to achieve the *Council of Sanctuary Award*, the Council developed an Action Plan and commissioned a needs assessment which was produced in early

2024 which engaged over 100 people seeking sanctuary and support agencies and can be found via this web link. The full Framework document and action plan can be found at **Appendix 1.**

8. Whilst there have been challenges, most acutely linked to nation-wide protests and community cohesion in summer 2025, there has been a lot of progress towards meeting the Year 1 actions embedded within the Action Plan which could be found in **Appendix 4** with a full rag rating**.**
9. Below is a summary of the thematic Action Plan areas and Year 1 progress and updates:

- **Wellbeing, Education and Employment**

10. Employment is a key driver in improving financial and housing prospects and the Council have been involved in several work strands to boost employability prospects for people seeking sanctuary. The Council's Youth Ambition Team is delivering employability advice for people moving on from Home Office accommodation including a drop in service and one to one support including CV writing, confidence building and job searches with at least 40 people engaging with the service which will continue into financial year 2026/27.
11. Addressing structural barriers has also been a clear objective. The Council has worked with the Oxfordshire Inclusive Economy Partnership (OIEP) which has developed its webpage to include improved guidance for employers when hiring refugees and are also working with an Oxford based academic (from the University of Southampton) to produce a policy briefing for the evaluation for the Refugee Employment Support Project (RESP).
12. Health and wellbeing is a key area of focus, with the Council utilising grant funding to support improved health outcomes. Examples include the Resettlement Team providing support for households who have arrived under government backed schemes to access therapeutic counselling for individuals via local health charity Refugee Resource.
13. The Council is also part funding an Oxfordshire Asylum Seeker Care Co-ordinator (ASCC) whose role supports improved early intervention for asylum seekers in Oxfordshire with 277 individuals supported in 2025/26 on key areas such as GP registration, vaccination catch up, health checks, NHS app registrations and advocacy to support access to required health care.
14. English for Speakers of Other Languages (ESOL) is a programme that addresses critical need and supports access to employment, volunteering and other education courses. All families resettled by Oxford City Council (in Oxford through the government backed resettlement schemes) are offered ESOL support under the commissioned wraparound support contract that Oxford City Council commissions with Asylum Welcome which is in its 3rd Year, delivering over 200 hours of ESOL to resettlement families. The City Council has also worked closely with Oxfordshire County Council to promote ESOL helping to facilitate learning across Oxford.
15. The Council has supported the Schools Advocacy Programme (delivered by Asylum Welcome) since 2021 which provides support for families to engage with local schools, helping children thrive and empowering parents to participate meaningfully in their children's education using volunteer mentors who work with families to help them navigate the UK school system. Below is a case study from a participant in the programme demonstrating the impact that it can have:

Case Study – Parent participating in the programme

"The Schools Advocacy Programme has given us the gift of hope and opportunity, by helping us to support our children's education and wellbeing in school. Every week, we are greeted with welcoming smiles and taken through the doors of the schools to meet mentors and teachers; people and surroundings that in the beginning were scary and unfamiliar, soon felt welcoming and safe."

- **Housing and Homelessness**

16. The Council continues to utilise grant funding to support the prevention of homelessness in line with the Council Strategy and the Housing, Homelessness and Rough Sleeping Strategy. The Council's Housing Services provides support for households to move on from Homes for Ukraine hosting, transitional accommodation and Home Office contracted contingency and dispersal accommodation, accepting homelessness duties in 100 cases.

17. The Council has supported at least 54 households in year 1 to move on successfully into independent housing from Home Office managed accommodation. This has been supported by the Council's Procurement and Placement Team and Voluntary and Community Sector (VCS) partners who work with private landlords to increase the supply of private sector housing and also provide support to homelessness applicants the Council have a duty towards, who self-find private sector accommodation and the Council provides support via the first month's rent and deposit.

18. Work is on-going to improve the quality of information provided to Oxford's residents to assist them to navigate the UK housing system. For example housing advice leaflets that have been translated into 9 languages and produced alongside videos with translation; this can be found via the Council's Youtube channel: Finding a home if you are homeless

19. The Council has delivered the Local Authority Housing Fund (LAHF) which, in the last 3 years has delivered 22 properties through direct purchases for temporary accommodation usage for homelessness households and resettlement groups including Ukrainian and Afghan households, adding to the Council's wider housing portfolio and helping to prevent homelessness.

20. There has been a strong focus by the Council on rough sleeping with work to better track individuals who may come from a sanctuary background and are found to be rough sleeping by the Council's commissioned outreach team. The Council's Rough Sleeping Team is now recording this information in monthly reports, with overall reported numbers remaining low however spikes have occurred over the past year. Officers plan to analyse this data in year to understand if any further mitigations can be put in place.

- **Building Communities & Amplifying Voices**

21. A key objective of the Framework Action Plan has been to work in partnership to build community resilience and amplify voices. To facilitate this aim, the Council has continued to hold internal and external stakeholders group meetings quarterly to provide accountability to the Action Plan and improve the reach of the Action Plan across the Council and partner organisations.

22. Improved communication from updates to the refugee, asylum seeker and migrant web pages on the Council's website, and an enhanced translation tool has been implemented to aid navigation. There here have been intranet updates and lunch and learn interactive

sessions for staff where people with lived experience have shared their experiences, including at the recent all staff conference.

23. Supporting residents to access positive activities has led to strong engagement with Council backed projects. For example, over 1000 people have accessed sporting sessions led by the Council's Communities Team to improve wellbeing, foster friendships and engagement with the local community. The Resettlement Team has worked with the Dancing Oxford project (organised by the Culture and Community Development Team) working with Pegasus Theatre company, Chameleon, to bring a refugee led dance show to Oxford with the focus on young sanctuary seekers.

24. The Museum of Oxford has several semi-permanent exhibitions which bring to life various groups' journeys to Oxford. Big Ideas grants have also recently been awarded to various sanctuary seeking support organisations e.g. Asylum Welcome, EMBS, Oxford Community Action, Oxford Hub, Refugee Resource, whilst recent small grants went to Damascus Rose Kitchen, Iranian Community Network, Oxfordshire Asian Women's Voice, Syrian Community Oxfordshire, Syrian Sisters, Iraqi Women Art and War and Tandem Oxford

Shaping Services

25. A key area within the needs assessment was to encourage people with lived experience to be more involved in the development of Council policy. Officers have undertaken several initiatives to put this into practice. A dedicated co-production section was incorporated into the new Citizen Engagement Policy. Several teams are actively involved in co-producing policies and initiatives, including the No Recourse to Public Fund (NRPF) protocol with Oxfordshire County Council and partners to develop a toolkit for advice if staff are working with individuals who have the NRPF condition which can be a significant barrier to accessing services. It is expected that this protocol will be finalised in autumn 2026.

26. Other key programmes include the NRPF Co-Production Group, which brings together residents who have the NRPF immigration condition to help create a resource for other residents. This is currently in development and expected to conclude in autumn 2026.

27. The Community Champion programme, made up largely of individuals who have sought sanctuary in Oxford, demonstrates exceptional expertise in co-production. It has been instrumental in amplifying underrepresented voices through achievements such as creating multilingual resources (including a GP receptionist animation in six languages and a Healthwatch video on language support), leading community events like Black History Month and a Men's Health football tournament, and producing a Community Cookbook showcasing lived experiences. In addition, it has influenced key consultations on NHS plans, the Council's anti-social behaviour policy, and citizens' experience surveys, contributing 223 insights into health barriers and engaging 2,845 individuals across diverse communities.

Supporting Integration

28. The Council continues to support resettlement from government backed resettlement schemes namely the United Kingdon Resettlement Scheme (UKRS) and Afghan Resettlement Programme (ARP). In 2025, the Council resettled 8 new families (15 adults

and 21 children). A total of 32 families were supported during the year. Delivery includes end-to-end coordination, procuring suitable and affordable accommodation, which is predominantly in the private sector, to commissioning intensive wrap-around support through Asylum Welcome.

29. The Council continues to support residents under the Homes for Ukraine scheme. There are now around 44 hosting arrangements and many other households have moved onto independent accommodation. A specialist Early Intervention and Triage Officer delivers statutory housing support alongside upstream prevention and post-tenancy sign-up assistance. The Homes for Ukraine Rematching Team works county-wide to prevent homelessness and ensure residents are connected to appropriate, holistic support.

30. The Council continues to commission holistic support for people granted refugee status and moving on from dispersal accommodation. For example, from January – March 2026, the Council's commissioned partner saw 221 clients (including 56 new arrivals) across 24 drop-in sessions to support with upstream housing advice, health and wellbeing referrals, signposting to legal advice and practical support. The Council attends drop-in sessions to support homelessness applications and housing advice for people moving on from Home Office contracted accommodation and saw 219 individuals in 25/26.

31. The Helping Hands initiative is a regular litter pick around the contingency hotel, which houses people claiming asylum and managed by Home Office contractor, increasing engagement with the local community. Volunteers at the Oxford Homeless Project Hotel have regularly served meals, packed food parcels, and offer services such as free haircuts. The Council has also commissioned. The Sundial Centre has also undertaken cultural awareness workshops for people seeking sanctuary.

Working in Partnership & Innovating

32. A key element of the Action Plan is to work in partnership with local organisations, leveraging skills and capacity to widen reach and outcomes for people seeking sanctuary. The Council is currently working with Oxford Brookes University and the University of Oxford on two research projects with a focus on welcoming

33. The Council is developing a "*Basics of Sanctuary"* e-learner module, in partnership with Oxfordshire County Council and Oxford Brookes University, and the aim is for it to be a stand-alone training module on the county wide Oxfordshire Safeguarding Board platforms in perpetuity. This can then be accessed by all agencies within Oxfordshire.

34. The Council continues to engage with local partners via the county-wide Oxfordshire Migration Partnership. It is noted that other local authorities in Oxfordshire such as Oxfordshire County Council and West Oxfordshire District Council have passed Council motions and have also committed to becoming Local Authorities of Sanctuary and grow the sanctuary movement locally. The partnership includes statutory partners such as the NHS and Thames Valley Policy and other voluntary and community sector partners such as Connection Support which deliver the Homes for Ukraine wraparound support contract commissioned by Oxfordshire County Council.

Sanctuary KPI's

35. One of the accepted recommendations from the Scrutiny Committee when it considered the Framework, was to set clear performance measures as part of the Action Plan. Officers have developed individual measures of success against the actions and created overarching KPI's for this Action Plan. These can be found in **Appendix 6**.

Year 2 Framework Action Plan

36. In light of progress against the Year 1 Action Plan, and respond to new challenges, a new Year 2 Action Plan has been developed, updating the current Action Plan after consideration of progress and to ensure the priorities are adapted to the emerging challenges. The new Action Plan for Year 2 can be found in **Appendix 5 and cabinet are asked to adopt the new Action Plan to progress the work for the financial year 26/27.**

37. The Action Plan will be reviewed regularly to monitor and report on progress against commitments in the Framework. To ensure it can respond quickly to emerging priorities and risks, approval to revise the plan throughout the Year as required in consultation with the Cabinet Member for Housing and Communities is sought.

Financial implications

38. This report is not requesting any additional budget allocation to deliver the Framework and funding has been set aside to support this from a historic grant programme which support migrants and this will be used alongside other existing government grants to the Council to support people seeking sanctuary to deliver the direct aspects of the Framework over 3 years.

39. The Council estimates that the grant funding mentioned above will be sufficient for the direct delivery of aspects of the Framework that the Council is responsible for. If additional costs are forecast, through regular financial management and monitoring or otherwise, then these will be considered as part of the normal Council budget governance process. Other elements of the Framework may require applications to be made for external investment from partnership organisations from other parts of the public sector.

Legal issues

40. The Council is committed to upholding the principles of the Public Sector Equality Duty (PSED) as outlined in the Equality Act 2010. To fulfil this commitment, the Council will have due regard for the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
- Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

41. The Council of Sanctuary Framework document and Action Plan aim to fulfil the principles set out in the Equality Act relating to the PSED. Any required improvements to

the Framework or the Action Plan will be implemented to ensure the Council creates a supportive environment where all residents can feel secure, respected, and empowered to thrive.

42. The proposed Framework and Action Plan aim to support individuals of all backgrounds, collaborate with local organisations and communities, and the Council will actively consider the diverse needs of all residents to foster a city that is inclusive, welcoming and supportive.

Level of risk

43. See Risk Register attached under **Appendix 2**.

Equalities impact

44. An equality impact assessment was completed as part of the Council of Sanctuary Framework 2025-2028, and this has been updated for this cabinet paper and can be found in **Appendix 3**.

45. A number of actions in the Year 2 Action Plan were set in relation to improving the delivery of the Strategy and in relation to individuals or groups with a protected characteristic and in relation to delivering actions related to equalities, diversity and inclusion (EDI).

Implications of Local Government Reorganisation

46. Government guidance concerning LGR has been considered in relation to this report and there are no significant implications noted at this time. In future, strategy and framework documents will need to be considered by the successor Council to ensure alignment with Council priorities and requirements

Carbon and Environmental Considerations

47. There are few environmental considerations arising directly from this report. There is a need to continue to support residents to reduce their carbon imprint and support the corporate ambition to become a zero carbon Oxford. Any households that are resettled or helped into accommodation within private rented properties within the city which will be registered with the Council's selective licensing scheme which takes into consideration environmental impact.

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Background Papers: None

Table 1: Glossary of terms:

Term	Description
Migrant	A person who moves from one country to another, for the primary purpose of work or study, or to reunite with family
Asylum Seeker	Individual who applies for protection as a refugee and who is still waiting for a decision on their claim for refugee status
Refugee	Someone who has had a positive decision on their asylum claim; they have been recognised as a refugee under the United Nations Convention. This means that they are recognised to have a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion in their country and are entitled to protection.
Resettled Refugee	a refugee who has been offered a permanent home in a country while still outside that country. The United Nations High Commissioner for Refugees (UNHCR) identify vulnerable refugees, who they deem in need of resettlement. Local authorities and community sponsors assist in resettlement.
Undocumented Migrant	Someone who does not possess the required (and correct) documents to enter, or remain, in the country
UASC or Unaccompanied Asylum-Seeking Child	A child who is outside their country of origin to seek asylum. They are separated from parents and relatives and are not in the care of someone who has parental responsibility. Locally, they are looked after by Oxfordshire County Council.
A Person on No Recourse to Public Funds (NRPF)	Someone who is not entitled to benefits because of their immigration status, e.g. an international student, someone on a spousal visa, a visa overstayer.
A Person Seeking Sanctuary/ Sanctuary seeker	A collective term that we use refer to everyone who is a refugee, asylum seeker, undocumented migrants, survivors of modern slavery or a person with a precarious immigration status e.g. on No Recourse to Public Funds (NRPF) and others who may not fit into any of these categories but are seeking safety and a place to rebuild their lives. In Oxford, we use this more inclusive term when talking about our sanctuary work.

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COUNCIL OF SANCTUARY AWARD
WELCOMING PEOPLE SEEKING SANCTUARY

OXFORD CITY COUNCIL

COUNCIL OF SANCTUARY FRAMEWORK 2025 - 2028

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Photograph by Keiko Ikeuchi, courtesy of Iraqi Women Art and War (IWAW)

FOREWORD BY COUNCILLOR LINDA SMITH

Oxford is a global City which has a proud history of migration adding a rich diversity to the City and I am proud that Oxford has been a *City of Sanctuary* for various groups over many years. There is a sense of solidarity and community, and the Council works tirelessly to create a thriving community which is inclusive and welcoming.

Since the first Council motion in 2019 where Councillors pledged support to make Oxford a *City of Sanctuary*, the Council has been on a journey to become an accredited Local Authority of Sanctuary. This has culminated in this framework and action plan which sets out the Council's plan for the next 3 years.

Our goal is to build on the Council's strengths while proactively identifying areas of need and addressing any gaps with effective solutions alongside our partners. The Council is fortunate to receive support and work in partnership with statutory and non-statutory partners from across the County via the Oxfordshire Migration Partnership.

A key aim of the Thriving Communities Strategy is the ethos of 'doing with, not to' residents. This framework builds on this philosophy, aiming to develop solutions alongside people with lived experience of seeking sanctuary, statutory services, voluntary and community partners as well as a range of Council services. We have identified the actions laid out in the action plan, across six priority areas. The priorities reflect both key areas of need and opportunities to empower people seeking sanctuary in line with our local strengths and existing strategies.

Unfortunately, in recent times, global conflict, and instability in places like Syria, Afghanistan and Ukraine has led the Council to redouble our efforts to provide an inclusive and welcoming environment to people seeking a safe place to call home. As the need has increased, so have issues such as central government asylum processing backlogs, and the block booking of budget hotels by the Home Office to provide basic accommodation for asylum seekers.

The Council has consistently supported programmes to support vulnerable groups in Oxford including refugees who have been resettled, ensuring that we play our part to support households in need. Whilst there is much more to do, I hope you will see from reading through this framework that there are many stories of success.

Cllr Linda Smith - Cabinet member for Housing and Communities

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INTRODUCTION AND BACKGROUND

This framework document has been developed through engagement with residents and key stakeholders, drawing on real-life experiences and learning from commissioned research. Our aim is to shape a comprehensive plan that enables Oxford City Council to work with partners to improve the outcomes for local people seeking sanctuary and the wider community. The document is organised into key sections, offering insights into the Council's efforts to support this area of work and the journey the Council has been on.

Many people come to Oxford in search of sanctuary, support, or a warm welcome. To ensure we are inclusive of the broad range of legal statuses, living circumstances and experience of migration held by these residents we choose to use the term 'people seeking sanctuary' throughout this framework. Where certain conditions, criteria or experiences only apply to subsections of this population we include specific reference to this in the pages below.

Our vision for Oxford City Council as a local authority of sanctuary is to create a welcoming and safe environment where those seeking sanctuary feel supported, accepted, and embraced as part of the broader community. A city where all residents can thrive, contribute, and actively participate in the community, helping to shape the future and enrich the life of Oxford for all.

Windows painting created by the residents of local asylum hotels, supported by Iraqi Women Art and War, hosted by the Museum of Oxford and displayed at Oxford Town Hall for Refugee Week, 2024

Oxford has long been a destination for international migrants, be it for work or study, bringing valuable skills and knowledge and making the city diverse and global. Two world reputed universities, globally renowned science parks, sizeable teaching and practicing hospital systems, and large technology and automobile industries provide opportunities for economic and social mobility for many far and wide.

Oxford has also been a place where people have settled after seeking safety and security. Oxford City Council has consistently supported refugee resettlement and integration against a backdrop of growing need both locally and internationally. **Oxford City Council passed the first motion to be a *City of Sanctuary* in 2019, followed up in 2022 when the Council passed a further motion to consider the support on offer to people seeking sanctuary in the light of recent global conflicts.**

Oxford City Council committed to becoming a local authority of sanctuary in 2023 and develop an action plan to set out how it will work with people seeking sanctuary over the next three years. This is set out in this framework document alongside key areas of progress, challenge, as well as quotes from community voices detailing their experience of sanctuary in Oxford.

OUR PROGRESS - KEY HIGHLIGHTS

Oxford City Council has made notable progress and reached significant milestones on its journey to becoming a local authority of sanctuary in recent years, achievements made possible through the continued support from partners as outlined below:

2016

In 2016 Refugee Resource was commissioned to provide additional mental health support for resettlement families, offering specialised counselling and therapeutic mentoring. This vital service has been continuously maintained to ensure ongoing support for those in need.

2017

In 2017 The Museum of Oxford hosted the Journeys to Oxford exhibition telling migrants' tale of how they got here. This included the testimonies of about 115 Oxford City residents of 45 different nationalities, from Poland to Pakistan and China to the Caribbean.

2018

In 2018 the Council secured funding through the Controlled Migration Fund which led to a number of projects including commissioning local charities to establish a local mentoring and volunteering program for people seeking sanctuary, work based-ESOL classes, further human trafficking and modern slavery research and a project supporting rough sleepers.

2020

The **Schools Advocacy Programme**, run by Asylum Welcome and funded by Oxford City Council since 2020, helps families and schools by improving engagement, access to educational services, and understanding of the UK school system. So far, 105 children from 35 families across 25 schools have benefited, with schools describing the service as "invaluable" and "pivotal."

Oxford is the most welcoming place for people seeking sanctuary, and we are lucky to have very rich and wide cultures. Also, I feel very fortunate to be hosting those people in need. I have learnt a lot from them, and I admire their resilience

Community Voice: Kate has hosted and supported 25 sanctuary seekers in her home since 2015 under a charity run hosting scheme

For me Oxford is a place of safety and empowerment

Community Voice: Lubna, a mother from Iraq who came to Oxford in 2022 with her children to join her husband who was already in the UK. Since then, alongside bringing up her family, she has volunteered tirelessly in the community and become a community artist.

2022

The Oxfordshire Migration Partnership was established in 2022 in response to the Ukraine crisis to coordinate the Homes for Ukraine (HfU) scheme across local stakeholders. Oxford City Council collaborated with Oxfordshire County Council, along with district authorities and other partners. Key successes include pooling resources to expand housing options, preventing homelessness and commissioning projects for people seeking sanctuary and local residents.

2023

In 2023, Oxford City Council commissioned Aspire Oxford, Asylum Welcome, Refugee Resource and EMBS college to run the **Refugee Employment Support Programme** (RESP). Since then, 24 refugees have been supported and 51 employers engaged.

2022

Since 2022, around 200 resettled individuals have undertaken ESOL tuition as part of the resettlement programmes and many more have been signposted to local mainstream community provision.

2022

In 2022, the City Council, in partnership with NHS services, launched the Community Health Champions initiative to support COVID-19 vaccination rollout for vulnerable communities. Ten people seeking sanctuary have been trained as Community Health Champions to improve healthcare access and promote wellbeing.

2024

In 2024 the Council funded the **Health Access Project**, run by Asylum Welcome, which has supported people seeking sanctuary with health and dental services and has developed a multilingual healthcare hub.

Photograph by Keiko Ikeuchi, courtesy of Iraqi Women Art and War (IWAW)

KEY CHALLENGES

Oxford has a resilient economy, world renowned higher education, science and research sector. However, there are high levels of inequality and Oxford has several areas of high deprivation where most local people seeking sanctuary reside. People seeking sanctuary face many barriers and challenges as they endeavour to rebuild their lives and make a new home. These challenges are exacerbated by global or national policies and pressures and are summarised below:

Global conflict / increased migration

United Nations statistics estimate over 120 million people were forcible displaced by 2024. The majority are displaced internally or flee to neighbouring countries. A small percentage make their way to the UK. People seeking sanctuary arriving in Oxford are fleeing conflicts and persecution as well as environmental disasters, driven by climate change, alongside economic challenges, worsened by the COVID-19 pandemic.

National policy challenges

In 2022, Oxford became an expanded asylum dispersal area, leading to the use of temporary housing for asylum seekers. Government legislation has sought to act as a deterrent for people arriving through irregular routes and increased the requirements for an individual to claim asylum. There is variation in how the UK's responds to different crises, which has led to the creation of bespoke visa and resettlement schemes affecting rights and entitlements.

Cost of Living crisis

People seeking sanctuary in Oxford are deeply affected by the cost-of-living crisis, with rising energy costs pushing many into "fuel poverty." Limited income forces choices between essentials like heating and food. Language barriers and unrecognised qualifications make it hard to find stable jobs, while competition for low-wage work increases hardship. Children face difficulties as families struggle with school expenses whilst local charities struggle to meet the growing need.

Housing demand & supply/homelessness

Oxford is one of the least affordable UK cities, with high rents and a shortage of affordable housing. People seeking sanctuary, with limited financial resources, struggle to secure housing due to long social housing waitlists, lack of credit history, and private rental market access issues. After receiving refugee status, they must leave asylum support accommodation within 56 days, often risking homelessness.

For this initiative, I will hire refugees with limited experience and support them in starting their careers and improving their language skills. From my experience, language barriers are their biggest challenge. It's crucial to raise awareness of these issues and create more job opportunities so they can become self-sufficient and give back.

Community Voice: Hamza is keen to empower refugees by opening doors to work, language, and a brighter future.

Health inequalities

People seeking sanctuary face unique health challenges and barriers to healthcare due to lack of documentation, language difficulties, and confusion about eligibility. This limits access to primary care, mental health services, and preventive healthcare. Language barriers can lead to miscommunication, misdiagnoses, and inadequate treatment, especially for mental health needs. Poor housing and food insecurity contribute to health problems and women and children, particularly, face additional challenges.

No Recourse to Public Funds (NRPF) / vulnerable migrants

People with No Recourse to Public Funds (NRPF) in Oxford face severe challenges due to high living costs and limited support. Unable to access public housing or benefits, many risk homelessness or live in unsafe conditions, relying on overstretched charities. Employment can be restricted due to immigration status which can lead to exploitation in low-paying jobs without labour protections. Financial hardship is common, often leading to debt. Children in NRPF families also face barriers to accessing school meals and educational resources, affecting their well-being.

PARTNERSHIPS AND GOVERNANCE

The Council has set clear objectives outlined in the *Taking Action* section below. However, it remains impacted by broader financial challenges, as constrained local government finance has been impacted by tight central government settlements and rapidly rising costs. It is clear that the Council is not able to deliver on all its aspirations without working in partnership. This is very much the model the Council aspires to, as Oxford is fortunate to have a thriving voluntary and community sector and the Council also works in close collaboration with other statutory agencies including local Oxfordshire County Council, District Councils, and other partners such as the NHS via the Oxfordshire Migration Partnership.

Partnership work via the Oxfordshire Migration Partnership has increased the level of inter-agency working and allowed a more co-ordinated response to tackle emerging issues related to migration within Oxfordshire. The Council is keen to work in partnership with other agencies such as Oxfordshire County Council who have recently become an accredited Local Authority of Sanctuary and who lead on co-ordination for the Oxfordshire Migration Partnership.

Strong partnerships with different organisations like Asylum Welcome, Refugee Resource, Aspire Oxford and Connection Support and other community groups, have helped Oxford City Council widen its impact as it works together with its partners on new and innovative projects. The action plan embedded within this framework identifies key actions for the Council, other statutory agencies and the voluntary and community sector. It has been developed in partnership and reflects the understanding that better outcomes will be achieved if we work together to pool resources, knowledge, and expertise.

Based on close collaborations with lived experience organisations the Council has been actively involved in providing more inclusive and holistic support for people seeking sanctuary. We are proud to celebrate refugee experiences through Refugee Week celebrations and the annual Sanctuary Fair. So, while we aim to do better with regards to our statutory duty, our overall approach and plan is to go beyond business as usual.

Oxford Sanctuary Fair 2025: Community as a Superpower.

Photograph courtesy of Refugee Resource

The Council will continue to show leadership by using grant funding to invest in staffing and new projects to support people seeking sanctuary. Alongside the Council's operational role, Oxford City Council officers will also advocate for a fair funding settlement from central government and seek to influence the direction of national policy.

Accountability for this action plan is important and Oxford City Council officers will be reporting back to Oxford City Council Cabinet on yearly progress. Progress will be tracked routinely through the Council's internal governance structures, reporting to the Communities Change Board monthly. Officers have developed internal and external sanctuary partnership groups who will also be meeting periodically to jointly assess progress and identify new key actions.

Photograph courtesy of Refugee Resource

TAKING ACTION

Oxford City Council has explored the views of people seeking sanctuary and the local community and what the Council can do to improve their experience. We began with the Thriving Communities Strategy Consultation where the voices of many local people sanctuary were recorded. The following year in October 2023, we commissioned Asylum Welcome to deliver a needs assessment for our Council of Sanctuary project and more recently carried out community engagement work, meeting local residents.

The needs assessment and our research explored the views of people seeking sanctuary including their experiences, and opinions on Oxford City Council services. Many positives were highlighted including the safety, beauty and reputation of the city, alongside the availability of cultural activities, outdoor space and friendly communities.

However, a number of barriers emerged, often linked to an individual's immigration status and support needs, but they were connected by the common thread of trying to settle and rebuild lives in a new environment and place with different cultural, legal and societal norms.

The report grouped the key areas of challenge into four key themes: transport; health and wellbeing; education and employment; and accommodation. As the Council is not a unitary authority, some issues raised in the research fall within the remit of other partners we will work with partners to address these.

Where work cuts across other organisations provision, we have indicated in the action plan how we will work together to action the recommendations in the ethos of the partnership model. We have identified the actions across 6 priority areas, to be reviewed regularly with partners. The priorities reflect both key areas of need and opportunities to empower people seeking sanctuary in line with our local strengths and existing strategies and are listed below:

- Wellbeing, Education & Employment
- Housing and Homelessness
- Building Communities & Amplifying Voices
- Shaping Services
- Supporting Integration
- Working in Partnership & Innovating

1. Wellbeing, Education and Employment

What are we going to do?	*Service*	*By end of year*
Educate and empower Oxford City Council teams and local businesses about opportunities to employ people seeking sanctuary and how to offer placements and apprenticeships, including through myth-busting on migrant entitlements with businesses as well as job brokers.	Regeneration and Economy	2025-2026
Evaluate the Refugee Employment Support Programme (RESP), its findings and respond to the recommendations. Explore opportunities for further work around employment, business support and social enterprise.	Housing Services	2025-2026
Work with the anti-slavery coordinator and local modern slavery network to promote understanding around rights and safeguarding risks faced by people seeking sanctuary locally.	Community Safety	2026-2027
Work with key partners to develop and extend the existing schools advocacy project, subject to project viability.	Housing Services	2025-2026
Improve access to wellbeing and leisure facilities for local people seeking sanctuary to improve health outcomes and reduce health inequalities.	Community Services	2026-2027
Work with partners including Refugee Resource to improve therapeutic outcomes for people seeking sanctuary.	Housing Services	2026-2027

2. Housing and Homelessness

What are we going to do?	*Service*	*By end of year*
Expand education and support for local people seeking sanctuary to help them navigate the housing system, especially for those experiencing homelessness, those at risk of homelessness, and those with limited experience of independent living (including UASC) in line with the Housing, Homelessness and Rough Sleeping Strategy.	Housing Services	2026-2027
Provide training as appropriate for housing colleagues on how to support people seeking sanctuary, e.g. residents with varying immigration status including victims of domestic abuse with no recourse to public funds.	Housing Services	2026-2027
Develop further training on working with refugees (cross cultural communications and trauma informed practice) and offer it to colleagues.	Housing Services	2026-2027
Increase engagement and support for landlords who wish to house people seeking sanctuary, including information and communication on the Oxford City Council's private rented housing access schemes.	Housing Services	2026-2027
Provide appropriate support to sustain tenancies as part of the Oxford City Council's approach to homelessness prevention and in line with the Housing, Homelessness, and Rough Sleeping Strategy.	Housing Services	2025-2026
Improve monitoring of the number of people seeking sanctuary who are sleeping rough and use intelligence to target support.	Housing Services	2025-2026

3. Building Communities and Amplifying Voices

What are we going to do?	*Service*	*By end of year*
Empower and support local institutions to become registered places of sanctuary including libraries, surgeries, arts organisations, community groups, colleges, and faith organisations.	Housing Services	2027-2028
Act as a lead Local Authority on joined-up campaigning for migrant rights, share learning and expertise through sanctuary networks at a local, regional, and national level including the City of Sanctuary Local Authority Network.	Housing Services	2027-2028
Continue to convene the Oxford City Council of sanctuary internal and external stakeholders' meetings to meet regularly to facilitate the Thriving Communities vision of "Doing with, not to" and advocate for an ethos and practice of 'Co-production'	Housing Services	2025-2026
Support refugee partners and community groups to access opportunities in arts, culture, and community activity via the use of our facilities, grants, and external funding. • Collaborate with the local voluntary and community sector to build capacity and participation of local lived experience groups via funding advice and support. • Develop effective pathways into volunteering and participation via social and cultural activities.	Community Services	2026-2027
Build capacity of local sanctuary seeking community via Sanctuary Ambassadors programme and access to the Sanctuary in Politics course.	Housing Services	2027-2028
Support refugee community groups to access spaces and places where they can come together to enjoy common interests and create new friendships.	Community Services	2026-2027

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4. Shaping Services

What are we going to do?	*Service*	*By end of year*
Develop/co-produce and share a sanctuary framework to support people seeking sanctuary and promote independent living for those staying in the City and beyond.	Housing Services	2025-2026
Review incorporation of sanctuary principles into services when strategies, policies or services are changed.	Corporate Strategy	2026-2027
Develop online resources to be more accessible for people seeking sanctuary including the Council's web page, the Communities Toolkit and information regarding accessing housing and other support	Housing, Communities and Customer Services	2026-2027
Create opportunities and space for people seeking sanctuary to have their voices heard and their stories told, so that their experiences can inform how services are delivered in the city. Ensure people seeking sanctuary can feed into Council activity through existing mechanisms.	Housing Services	2025-2026
Promote sanctuary informed practice across local strategic partnerships where Oxford City Council is key stakeholder.	Housing Services	2025-2026
Via the community health champions programme improve advocacy for people seeking sanctuary and access to primary health care for vulnerable and undocumented migrants.	Community Services	2025-2026

5. Supporting Integration

What are we going to do?	*Service*	*By end of year*
Grow and publicise wider migrant-specific information, advice and guidance for all residents such as a Sanctuary Door initiative (Single Point of Contact), embedding opportunities for people with lived experiences to lead on service support.	Housing Services	2025-2026
Continue to support local people seeking sanctuary who settled under government schemes including UK resettlement scheme (UKRS), Afghan Resettlement schemed (ARAP, ACRS), Asylum Dispersal Scheme and Homes for Ukraine scheme in line with statutory duties, corporate objectives and viability requirements.	Housing Services	2025-2026
Support the Council's ambition to achieve the Domestic Abuse Housing Alliance (DAHA) accreditation and feed in from sanctuary seeking groups perspective.	Regulatory Services and Community Safety	2027-2028
Via sanctuary ambassadors programme and the external stakeholders group review availability of legal advice services for people seeking sanctuary. Alongside community partners, explore opportunities to support expansion of provision as well as pathways to access, and to provide residents with information about their rights.	Housing Services	2026-2027

What are we going to do?	Service	By end of year
Work alongside the Oxford Food Hub and other local charities to raise awareness of free or low-cost food options for people seeking sanctuary, in relation to accessing food, and engaging in the wider local food system and increasing communication to ensure people seeking sanctuary are aware.	Housing services supported by Communities	2026-2027
Produce a joint calendar of events which promote integration and support sanctuary events such as during Refugee week.	Housing services supported by Communities	2025-2026

Photograph courtesy of Refugee Resource

6. Working in Partnership and Innovating

What are we going to do?	*Service*	*By end of year*
Support local research bodies to (a) create and develop a body of evidence demonstrating the positive impact of people seeking sanctuary locally and (b) analyse the benefits and opportunities they bring.	Council of Sanctuary external stakeholders' group	2027-2028
Support Oxfordshire County Council and other key partners to increase English language provision (ESOL) accessibility to those with different immigration status, ages, childcare provision needs or access needs in a wide range of both statutory and community settings across the City.	Oxfordshire County Council	2026-2027
Support the Getting Oxfordshire Online Digital Inclusion network, to bring together partners to identify digital barriers for refugees and asylum seekers in the City / county and promote greater digital inclusion for this group.	Oxfordshire County Council supported by the CoS external stakeholders' group.	2025-2026
Collaborate with local partners and individuals seeking sanctuary to develop culturally appropriate and accessible health initiatives, with a strong focus on expanding access to mental health support. Engage with relevant charities and public services to explore and enhance support networks and resources.	Council of Sanctuary external stakeholders' group	2027-2028

What are we going to do?	Service	By end of year
Review existing support available to people with No Recourse to Public Funds (NRPF) via the establishment of an NRPF working group with Oxfordshire County Council and local VCS.	Council of Sanctuary external stakeholders' group	2025-2026
Alongside partners, work to ensure asylum seekers have access to low affordable public transport and travel around the city.	Oxfordshire County Council	2026-2027

If you hardly speak English and you are a stranger in a foreign culture it's like being blind and deaf when you want to talk to someone. Before they helped me, I felt powerless and invisible. Now I have a voice, and I can help others like me.

Community Voice: HB from Syria

Photograph courtesy of Oxford School of English

SANCTUARY DATA

The 2021 Census showed that 35% of Oxford's population was born outside the UK, compared to 28% in the 2011 Census. Most of the foreign-born population have come to Oxford for work or study. There have been significant changes in the demographic population of Oxford City recently especially since 2022. A combination of wide-ranging changes to national policy and external factors (e.g., the war in Syria and Ukraine, political unrest in Afghanistan and Hong Kong) have facilitated this.

As a Council we have had to respond quickly not only to an increasing number of people seeking sanctuary living locally, but also to understand how the different immigration statuses these individuals hold affect their experiences and their entitlements. We have had to adapt our services accordingly and we have recorded some key sanctuary data for Oxford:

Data on people seeking sanctuary in Oxford can be limited or held by different authorities. People seeking sanctuary are not continuously tracked or recorded in the wider system beyond their initial grant of status, making their needs as trauma-affected, newly arrived individuals often unrecognised and unmet. For those who work with them, gathering reliable information is challenging due to instability in their lives, long asylum processing times, frequent relocations, and homelessness.

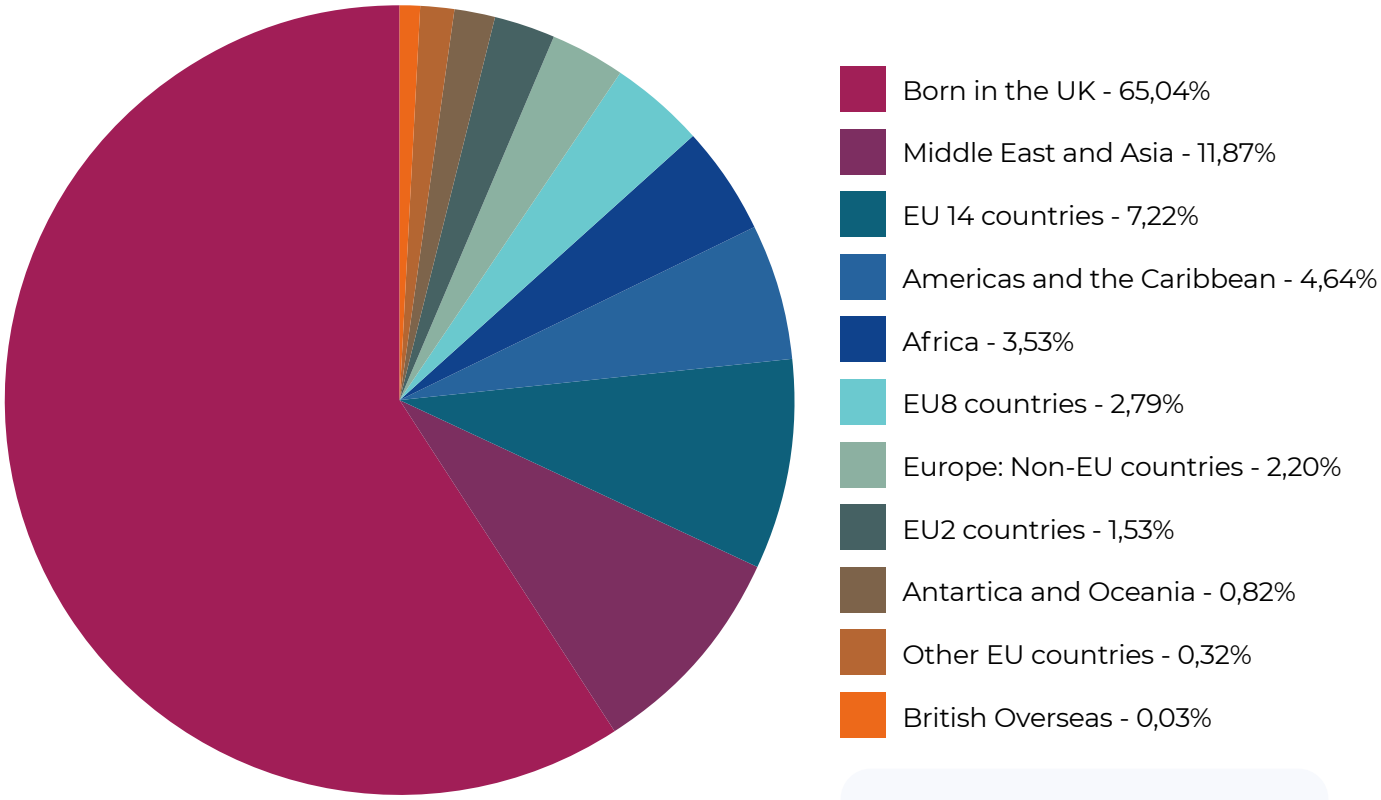
Some groups are particularly under-documented, including no recourse to public funds (NRPF) women on spousal visas, students claiming asylum because of a well-founded fear of persecution, and those trapped in domestic servitude or debt bondage. This lack of data hampers effective support, service provision and requires work with other agencies to understand data on marginalised groups residing in Oxford which we intend on progressing as part of the council's action plan.

Photograph courtesy of Refugee Resource

Oxford City Council has access to general data sets and the below information was compiled by the council's Business Intelligence Unit for this framework document taken from the Census 2021, Office for National Statistics (ONS).

Oxford Resident's Country of Birth

A way of understanding the composition of Oxford's residents, regarding ethnicity and nationality is the resident's place of birth. The following graph shows the distribution of countries of birth.



Source: Census 2021, ONS.

Note: The EU14 includes the member countries of the European Union before the 2004 expansion: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, and Sweden. The EU8 refers to the countries that joined the EU in 2004, which are Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, and Slovenia. Lastly, the EU2 consists of Bulgaria and Romania, which joined the EU in 2007.

Considering only the 34.92% of people that was not born in the UK and British Overseas (taking aside the 65.04% and 0.04% respectively), the following visual shows the distribution among the rest of the countries where Oxford Residents were born.

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KEY TERMS

- **Asylum seeker:** In the UK, a person who is seeking asylum or sanctuary is known as an asylum seeker because they have:
  - fled their home
  - arrived in another country, whichever way they can
  - made themselves known to the authorities
  - submitted an asylum application
  - a legal right to stay in the country while waiting for a decision
- **Refugee:** Refugees are people who have fled war, violence, conflict or persecution and have crossed an international border to find safety in another country. The 1951 Refugee Convention is a key legal document and defines a refugee as: "someone who is unable or unwilling to return to their country of origin owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion."
  In the UK a refugee:
  - has proven that they would be at risk if returned to their home country
  - has had their claim for asylum accepted by the government
  - has permission to stay in the UK either long term or indefinitely
- **Migrant:** A migrant is a person who moves from one country to another, this could be for several reasons, for example to work, study or to reunite with family.
- **No recourse to public funds:** This is a condition for a person that is subject to immigration control, and it means that they are not entitled to most public benefits due to their immigration status, for example a student, someone on a spousal visa or a visa overstayer.
- **Separated or Unaccompanied children:** Separated children and young people seeking sanctuary is an alternative to using the acronym UASCs (Unaccompanied Asylum-Seeking Children) or UAM (Unaccompanied Minors).
  Unaccompanied can imply a deliberate decision to send lone children into danger and does not reflect the fact that many lose their families in the chaos of fleeing war and other dangers. In the UK, they are usually looked after by the local authority.

- **Indefinite Leave to Remain:** This is an immigration condition that gives a person the right to live indefinitely and is also called 'settlement'. It gives a person the right to live, work and study and apply for benefits. It can also be used to apply for British citizenship.
- **Forced migrant:** A term commonly used for a person subject to a migratory movement in which an element of coercion exists, including threats to life and livelihood, whether arising from natural or man-made causes, e.g. movements of refugees and internally displaced persons as well as people displaced by natural or environmental disasters, chemical or nuclear disasters, famine or development projects or those who have been trafficked or enslaved.
- **A Person Seeking Sanctuary:** An umbrella term for someone seeking safety irrespective of immigration status.

Photographs by Keiko Ikeuchi, courtesy of Iraqi Women Art and War (IWAW)

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COUNCIL OF SANCTUARY AWARD

WELCOMING PEOPLE SEEKING SANCTUARY

OXFORD CITY COUNCIL

Town Hall
St Aldate's
Oxford
OX1 1BX

Call 01865 249 811 or use the online form or live webchat at:

www.oxford.gov.uk/contact-us/webchat

Risk Register

Council of Sanctuary Framework

As at: (DATE)

									Gross		Current			Target							
Ref	Title	Risk Description	Opp / Threat	Cause	Consequence	Risk Treatment	Date Raised	Owner	P	I	P	I	Score	P	I	Comments	Control / Mitigation Description	Date Due	Action Status	% Progress	Action Owner
	Insufficient funding to resource project	Inability to provide adequate resources & funding required for partnership working	Threat	Unrealistic & inadeqate planning for delivery of project	Insufficient staffing resources, incorrect skills & knowledge, over burdened existing staffing.	Reduce	18/05/26	Stephen Cohen	3	4	2	2	4	2	2		Clear planning, consultation with senior management & key stakeholders of resource requirements. Funding allocated and proactive approach to applying for additional grant funding	31/03/27	In Progress	60%	Stephen Cohen
	Adverse general public opinion/media intervention	Negative publicity & reputational damage	Threat	Generated from missmanagement of public facing contact and partnerships	Reputational damage	Avoid	18/05/26	Stephen Cohen	3	4	2	2	4	2	2		Support from Members and commitment to deliver as action in thriving communities strategy. On-going engagement with comms team and partners	31/03/27	In Progress	50%	Stephen Cohen
	Community relations	Damage to trust from people seeking sanctuary and local stakeholders	Threat	Inability to engage and communicate effectively as well as raising expectations alongside challenges generated from missinformation and dissinformation	Reputational damage, decline in trust in Council	Avoid	18/05/26	Stephen Cohen	3	4	3	3	9	2	2		Engagement with target audience and local stakeholders from the start of the project, building trust in the project development and objectives	31/03/27	In Progress	60%	Stephen Cohen
	Equality Act 2010	Not complying with the Act or taking account of the PSED & protected characteristics	Threat	Lack of planning & understanding of the requirements of the Act	Breaching equalities legislation. Not adhering to Council's own policies on equalities	Avoid	18/05/26	Stephen Cohen	3	4	2	2	4	2	3		Equalities Impact Assessment updated as part of the cabinet report considering and ensuring compliance with the EA2010	31/03/27	In Progress	50%	Stephen Cohen
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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **Foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	6. **Race & Ethnicity**
2. **Disability**	7. **Religion or Belief**
3. **Gender Reassignment**	8. **Sex**
4. **Marriage & Civil Partnership**	9. **Sexual Orientation**
5. **Pregnancy & Maternity**	

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	**Council of Sanctuary Framework** • To assess the impact of adopting the Council of Sanctuary framework on different protected characteristics and ensure it promotes equality and inclusivity. • **Objectives**: o Identify and remove potential discrimination. o Advance equality of opportunity. o Foster good relations between different community groups.	**2.**	**The implementation date of the activity under consideration:**	April 2025-March 2028 (3 years)
3.	**Directorate/Department(s):**	City and Citizens' Directorate	**4.**	**Service Area(s):**	Housing Services
5.	**Who is (are) the assessment lead(s):**	Stephen Cohen Refugee and Resettlement Manager Housing Services scohen@oxford.gov.uk	**6.**	**Contact details, in case there are queries:**	Stephen Cohen Refugee and Resettlement Manager Housing Services scohen@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	**New** Extension to existing EqIA X	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	Web link to previous EQIA: Equality Impact Assessment
9.	**Date this EqIA started:**	18 October 2024 (Updated 18/05/2026)			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	No	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	Not applicable

Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:**	☐ Budget	☐ Decommissioning	☐ Commissioning	☐ Change to an existing activity.
		☐ New Activity	☒ **Others. To seek the Cabinet's approval of the Council of Sanctuary Framework annual update.**		
13.	**Which priority area(s) does this activity fulfil?** [within Oxford City Council's Corporate strategy (2024-2028)]	☐ Strong, fair economy.	☐ Good, affordable homes.	☒ **Thriving communities**	☐ Zero Carbon Oxford.	☐ Well-run council.
14.	**Which priority area(s) within does this activity fulfil?** [Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)]	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☒ **Leadership & organisational commitment.**	☒ **Understanding and working with our communities.**
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	**Aims:** The Council of Sanctuary Framework sets out how the Council will support local people seeking sanctuary and work with stakeholders and the local community in line with the Thriving Communities Strategy, The Thriving Communities Strategy 2023-27 committed	**Objectives:** Within the Thriving Communities Strategy, the Council committed to work in collaboration with local residents including refugees, asylum seekers and the migrant community to inform and develop a Local Authority City of Sanctuary Action Plan and ensure the City Council meets its commitment to become an accredited local	**Priorities:** • Working in partnership with communities, organisations, and agencies to reduce inequalities and create thriving communities • Championing diversity and inclusion in our own work and community partnerships	

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		Oxford City Council to champion Equality, Diversity and Inclusion and engage with and facilitate conversations about equality throughout the city, and work to make Oxford an anti-racist city through the Council's Anti-Racism Charter. The Thriving Communities Strategy outlined the Council's approach to coordinating preventative services, reducing inequalities and improving residents quality of life. This activity is intrinsically linked to Oxford City Council's corporate strategy as laid out in the three key corporate priorities which fall within the *Thriving Communities* section.	authority of sanctuary which is achieved in November 2024. As part of this commitment, the Council has developed the Council of Sanctuary Framework and action plan to be implemented over a 3 year period and also a plan that is publicised. The Plan is currently at the beginning of year 2 and the linked cabinet report sets out year 1 progress.	• Helping people live healthily by providing services, support, and facilities to prevent and manage physical and mental health conditions[1]
16.	**Please outline the consequences of not implementing this activity.**	If the Council of Sanctuary Framework is not implemented: 1. There may be an adverse impact on some of the most vulnerable members in the city. 2. The Council's commitment within the Thriving Communities to support refugees and asylum seekers establish successful lives in Oxford would not be met.		

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?**	A key objective was to engage key stakeholders (internal and external), as far as reasonably practical, in the development and implementation of a Council of Sanctuary framework. Officers set up an internal officer's project group in 2023, overseen by senior managers and an internal and external sanctuary group set up in 2024 and are now established groups meeting at least 3 times per year. In 2026 the external group will merge with Oxfordshire County Council's group, reducing duplication and

[1] https://www.oxford.gov.uk/policies-plans-strategies/strategy/6

extended reach to all partners. The internal and external group meets regularly to review the action plan progress and routine updates will report into the Community Change Board which sits under the Thriving Communities section.

An email address (COS@oxford.gov.uk) is now established for feedback and communications to and from residents and stakeholders.

In terms of key historic interactions in June 2023 the Council of Sanctuary Award, process and task and finish group arrangements were taken to the internal Policy Officers Group as a key agenda item.

In October 2023, the Council commissioned a local refugee support charity with experience of policy and research, Asylum Welcome, to conduct a needs assessment for local residents in Oxford. The survey aimed to engage residents with lived experience and stakeholder groups who were working with local residents.

Sixty-six interviews were conducted between October and December 2023 with research conducted face-to-face, either in English or using translation, either one-to-one or in pairs.

The individuals interviewed were of different immigration status including:

- 27 asylum seekers who live in asylum accommodation
- 10 people with refugee status
- 7 people on resettlement schemes (ARAP, ACRS or UKRS).
- 8 Ukrainians on specific Ukraine visas
- 3 unaccompanied asylum seeking children
- 4 EU migrants with indefinite leave to remain in the UK
- 5 naturalised British citizens.

Eighteen different nationalities participated with two thirds of respondents identifying as male and one third female with the majority falling with the 25-34 age category. Asylum Welcome reported back in February 2024 and detailed their findings including the needs, barriers, and opinions of residents within a report.

Alongside the above individuals, thirty service providers also contributed to the needs assessment research either through one-to-one interviews or by attending two group-based virtual interview sessions. The stakeholders work in a range of context in the city including faith-based, youth work, health and medical provision, education and employment support, hosting arrangements and other services.

The Council was able to use the first-hand experience alongside other stakeholder engagement work to help inform the development of the Council's action plan and framework document.

The Council of Sanctuary project team has sought to consult and engage internal staff from across the Council. Staff were therefore informed of the project objectives through internal communications including lunch and learn engagement meetings, Council newsletter, leadership briefings through the Council's staff conference attended by over 200 staff and there has been a number of further internal stakeholder communications including within the 2026 staff conference attended by over 300 staff, sanctuary newsletter, intranet and website updates and through lunch and learn events.

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		There have also been extensive discussions with external stakeholders including group discussions with representatives from statutory and non-statutory agencies such as from the voluntary and community groups. The sanctuary project team have also engaged the general public and local businesses via spontaneous interviews and documented case studies of people seeking sanctuary and local residents.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.**	Data has been collected from a number of sources including commissioning and subsequent analysis of primary research and data between October and December 2023 which local residents with lived experience and external stakeholders were interviewed. Analysis has taken place of internal Council policies including key linked policies; the Thriving Communities Strategy, Equalities Diversity and Inclusion (EDI) Strategy, Housing, Homelessness and Rough Sleeping Strategy and the Council Strategy. Other data sources including internal Council data bases, data from the Office of National Statistics, Census data, published data from central government including Home Office migration statistics and other national policies to analysis the information. **Other strategic/ equalities considerations** • Safeguarding/ Welfare of Children and Vulnerable adults • Mental Wellbeing/ Community Resilience • The Council Strategy 2024 to 2028 • Thriving Communities Strategy 2023 to 2027 • Equality, Diversity and Inclusion Strategy • Housing, Homelessness and Rough Sleeping Strategy • The Council's voluntary adoption of the socio-economic duty.
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?**	Not applicable, please see section 17.

Section 4: Impact analysis.

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20.	Who does the activity impact?	Service Users	Yes ☒	No ☐	Don't Know ☐
		Members of staff	Yes ☒	No ☐	Don't Know ☐
		General public	Yes ☒	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☒	No ☐	Don't Know ☐
		City Councillors	Yes ☒	No ☐	Don't Know ☐
		Council suppliers and contractors	Yes ☐	No ☒	Don't Know ☐

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21.	Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?					
Protected Characteristic	**Positive**	**Negative**	**Neutral**	**Don't know**	**Data/information/evidence supporting your assessment**	**Analysis & insight** **Mitigations**

Age	☒	☐	☐	☐	Refugees and asylum seekers often experience similar issues upon arrival in the UK but have come from many different cultures, backgrounds and countries of origin. Taking a person-centered approach will ensure that individuals are supported to achieve integration regardless of their background or circumstances. There is anecdotal evidence that a large proportion of local people seeking sanctuary are in the 25-34 age bracket. The Council of Sanctuary framework seeks to put in increased support for this group alongside the wider cohort.	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. No negative impacts of these proposals have been identified and seeks to have a positive impact.
Disability	☒	☐	☐	☐	Refugees and asylum seekers often experience similar issues upon arrival in the UK but have come from many different cultures, backgrounds and countries of origin. Taking a person-centered approach will ensure that individuals are supported to achieve integration regardless of their background or circumstances. There is anecdotal evidence that people seeking sanctuary have an increased risk of being diagnosed with a disability (visible and invisible) with higher reports of mental health conditions based	See above

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					on historic and current experiences. The Council of Sanctuary framework seeks to put in increased support for this group alongside the wider cohort	
Gender re-assignment	☒	☐	☐	☐	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. Some asylum seekers may have fled areas which were less tolerant of difference including gender re-assignment and will be better able to live as themselves in the UK.	See above
Marriage & Civil Partnership	☒	☐	☐	☐	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
Race, Ethnicity and/or Citizenship	☒	☐	☐	☐	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. Some asylum seekers may have fled areas which were less tolerant of difference and will be better able to live as themselves	See above

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					in the UK.	
Pregnancy & Maternity	☒	☐	☐	☐	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
Religion or Belief	☒	☐	☐	☐	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. Some asylum seekers may have fled regimes which did not tolerate religious freedoms.	See above
Sex	☒	☐	☐	☐	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. A higher proportion of asylum seekers are males. Women are likely to experience greater equality in the UK than some of the regimes they have fled from.	See above
Sexual Orientation	☒	☐	☐	☐	The proposal is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK	See above

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					Immigration law) and promoting good relations between groups. Some asylum seekers may have fled regimes which did not afford rights to people in same sex relationships and they will benefit from different social attitudes living in the UK.	
Other (voluntary consideration) **For example:** Migrant, refugee, or asylum seekers	☒	☐	☐	☐	The data on this group is confounding mostly because this is a highly mobile group. However, it is estimated that 1 in 3 people in Oxford are some form of migrants. Refugees and asylum seekers are particularly vulnerable groups who often face significant barriers to accessing services and opportunities. These barriers can include language difficulties, lack of recognition of qualifications, and trauma from past experiences. Ensuring their inclusion in the City of Sanctuary framework involves: • Providing tailored support services to address specific needs. • Promoting access to education, healthcare, and employment. • Ensuring that policies do not inadvertently discriminate against these groups.	This framework seeks to positively improve the service offer to residents who are affected by war and conflict and it aims to improve integration of local communities and therefore will have a positive impact on groups from backgrounds which contain a protected characteristic. The Council through the internal and external partnership groups will seek to mitigate any concerns raised by stakeholder groups. Adopting a Council of Sanctuary framework in Oxford involves creating a welcoming environment for all, particularly those seeking refuge. This includes: • Building community awareness and understanding of the challenges faced by refugees and asylum seekers. • Encouraging local businesses and services to become more inclusive. • Developing partnerships with organisations that support refugees and

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						asylum seekers to enhance service provision. The ongoing work will have a positive impact on this group if the actions take on a targeted, strategic, informed and joined-up approach.
Other (voluntary consideration) **For example:** Socio-economic status (income, wealth, etc.)	☒	☐	☐	☐	Census 2021 Inward migration is likely to place increased pressure on an already limited housing supply. The socio-economic duty under Section 1 of the Equality Act 2010 requires public bodies to consider how their decisions can reduce the inequalities of outcome caused by socio-economic disadvantage. This is particularly relevant for refugees and asylum seekers, who often experience higher levels of poverty and social exclusion. Research shows that Migrant workers make important contributions to the labour market in both high- and low-skilled occupations. However, those seeking asylum have limited rights, do not have access to full benefits and will be surviving on low incomes. The Council of Sanctuary framework can help overcome some of the disadvantage experienced by increasing access to networks and advocacy as well	Adopting a City of Sanctuary framework in Oxford involves creating a welcoming environment for all, particularly those seeking refuge. This includes: • Building community awareness and understanding of the challenges faced by refugees and asylum seekers. • Encouraging local businesses and services to become more inclusive. • Developing partnerships with organisations that support refugees and asylum seekers to enhance service provision. The ongoing work will have a positive impact on this group if the actions take on a targeted, strategic, informed and joined-up approach.

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					as support from things like foodbanks.	

Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
	☐	Stop and reconsider the activity.	☐		Adjust activity before beginning the activity and continue to monitor.	☒	**No major change(s) or adjustments and continue with activity but continue to monitor.**	☐	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**	This framework and actions seeks to positively improve the service offer to residents who are affected by war and conflict, and it aims to improve integration of local communities and therefore will have a positive impact on groups from backgrounds which contain a protected characteristic and the Council to not expect any negative impacts on residents with individual protected characteristics. Its primary focus has therefore been to try to gain further insight into the relevant needs of local residents with lived experience and to work with them and builds on the key aim of the Thriving Communities Strategy to design programmes in conjunction with local residents and not to them. The Council has been working closely with local stakeholders including internal staff, the voluntary and community sector, inter-faith groups, business and education organisations and other key stakeholders to harness the skills and knowledge, show leadership and work together to provide the most impact and incorporate their views into the final framework document.

Overall, this has led to a comprehensive framework and action plan to be implemented over 3 years (2025-2028) which incorporates the EqIA.

The Council's plan to work with colleagues and external stakeholders across the life of the framework implementation period to deliver on the Council's commitments as set out in the Equalities, Diversity and Inclusion Strategy[2]:

- *providing inclusive services: understanding and addressing barriers to accessing our services, community assets and community engagement*
- *promoting partnership working: use our relationships to work together and connect different communities so that we can jointly address issues and celebrate strengths; this approach is embedded in our new Community Impact Fund*
- *empowerment: building community capacity to lead and participate in projects that benefit or affect their communities. In practice, this means doing "with" rather than "to" and, where possible, focusing on what is strong in communities rather than what's wrong- this approach is often termed **asset-based community development** (ABCD). ABCD approaches show that connecting people and creating more resident-to-resident relationships builds interdependence and reliance on each other. Connecting people to their shared interests, and enabling them to exchange skills and resources, helps communities identify and take action on the issues that are most important to them.*

The Council plan to ensure information and communication is accessible, using a range of mediums both written and verbal and utilising translation services where required.

There are plans within the framework document to improve data collection so the Council can better understand some cohorts issues where there is limited public data and use this data to inform service development.

There are plans and on-going work to address gaps in understanding regarding marginalised groups such as individuals with no recourse to public funds (NRPF), who face acute barriers to accessing housing, money and other basic provisions. This can be especially problematic for women who are dependent on their spouses for their immigration status e.g. spousal's visa's or where they are sponsored by a family member. This will involve working with key partners to leverage support, especially for cases where the Council does not have a statutory duty. Overall, this framework seeks to positively improve the Council's service offer in this regard.

The framework outlines plans to ensure all staff are upskilled to deliver services and improve accessibility to services in a trauma informed and culturally sensitive way and to work with People Team partners to have a workforce that as a whole reflects Oxford's diverse population. The Council through the internal and external partnership groups will seek to mitigate any concerns raised by the stakeholder groups.

[2] https://www.oxford.gov.uk/equality-diversity-inclusion/oxford-equality-diversity-inclusion-edi-strategy/6#:~:text=The%20Council's%20Strategy%20for%202020,the%20opportunities%20for%20disadvantaged%20groups.

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**?	The Council of Sanctuary Cabinet report was approved in January 2025 and the report committed to an annual review to report back to Council members regarding the progress of the framework including a review of equalities considerations which has been completed as part of this updated EQIA. Two sanctuary partnership forums with internal staff and external partners and residents with lived experience have been set up to provide accountability to the action plan and meet quarterly from 2025-2028. Individual action owners report back on progress via automated Smart Sheet reporting functions set up by the Council of sanctuary project team. The framework action plan can be updated regularly and informed by what data tells us and if there any changing circumstances. Routine updates will report into the Community Change Board which sits under the Thriving Communities section. The Council will monitor related data where we have access to it and seek to work with partners organisations where we don't have access to the data to see trends and put in place mitigations if we discover that any measures introduced under this framework is adversely affecting certain groups in Oxford's communities.
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	Stephen Cohen Refugee and Resettlement Manager Housing Services scohen@oxford.gov.uk
26.	**How often will the equality impact be reviewed for this activity?**	Annually
27.	**Date when the EqIA will be reviewed again.**	May 2027

Section 7: Sign-off

Name: Stephen Cohen Job Title: Refugee & Resettlement Manager Signature:	Name: Job Title: Signature: ----------	Name: Job Title: Signature: ----------
Name: Job Title: Signature: ----------	Name: Job Title: Signature: ----------	Name: Job Title: Signature: ----------

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Taking Action

This report provides an overview of progress against the Year 1 (April 2025 – March 2026) actions set out in the Council of Sanctuary Action Plan 2025- 2028, as approved by Cabinet in January 2025. The programme was originally designed as a phased three-year plan, with actions allocated across Years 1 to 3. The Action Plan is structured around six priority areas, reflecting the key themes identified through engagement, research, and partnership working. These priorities (see below) provide a clear framework to guide delivery and ensure a coordinated approach to supporting people seeking sanctuary across the city.

Since adoption, a number of actions have been brought forward into Year 1 (2025-26) in response to emerging business needs and local priorities. In such cases, actions may be recorded as year 2 or 3 within the overall programme; however, progress relevant to Year 1 delivery has been assessed using the standard RAG rating to ensure transparency.

A small number of Year 1 actions have not yet commenced due to competing operational priorities, but these have been reviewed and are being actively prioritised for delivery in Year 2. More detailed operational commentary and live progress tracking for all actions is maintained within the programme's dedicated Smartsheet.

Oxford City Council, Local Authority of Sanctuary

Action Plan Priorities

1. Wellbeing, Education & Employment

2. Housing and Homelessness

3. Building Communities and Amplifying Voices

4. Shaping Services

5. Supporting Integration

6. Working in Partnership & Innovating

1. Wellbeing, Education and Employment

What are we going to do?		Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
1.1.	Educate and empower Council teams and local businesses about opportunities to employ people seeking sanctuary and how to offer placements and apprenticeships, including through myth-busting on migrant entitlements with businesses as well as job brokers.	Regeneration and Economy	Year 1	A number of employment projects on-going, see cabinet report for further details.
1.2.	Evaluate the Refugee Employment Support Programme (RESP), its findings and respond to the recommendations. Explore opportunities for further work around employment, business support and social enterprise.	Housing Services	Year 1	RESP evaluation to be produced in Year 2, minor delays due to developing evaluation project work.
1.3.	Work with the anti-slavery coordinator and local modern slavery network to promote understanding around rights and safeguarding risks faced by people seeking sanctuary locally.	Community Safety	Year 2	
1.4.	Work with key partners to develop and extend the existing schools advocacy project, subject to project viability.	Housing Services	Year 1	Schools Advocacy Project extended into 26/27
1.5.	Improve access to wellbeing and leisure facilities for local people seeking sanctuary to improve health outcomes and reduce health inequalities.	Community Services	Year 2 *(brought forward to Year 1 because of local need)*	A number of wellbeing and community projects implemented, see cabinet report for further details.
1.6.	Work with partners including Refugee Resource to improve therapeutic outcomes for people seeking sanctuary.	Housing Services	Year 2 *(brought forward to Year 1 because of local need)*	A number of health related projects supported, see cabinet report for further details.

2. Housing and Homelessness

What are we going to do?		Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
2.1.	Expand education and support for local people seeking sanctuary to help them navigate the housing system, especially for those experiencing homelessness, those at risk of homelessness, and those with limited experience of independent living (including UASC) in line with the Housing, Homelessness and Rough Sleeping Strategy.	Housing Services	Year 2 *(brought forward to Year 1 because of local need)*	A number of housing projects on-going, see cabinet report for further details
2.2.	Provide training as appropriate for housing colleagues on how to support people seeking sanctuary, e.g. residents with varying immigration status including victims of domestic abuse with no recourse to public funds.	Housing Services	Year 2	
2.3.	Develop further training on working with refugees (cross cultural communications and trauma informed practice) and offer it to colleagues.	Housing services	Year 2	
2.4.	Increase engagement and support for landlords who wish to house people seeking sanctuary, including information and communication on the Council's private rented housing access schemes.	Housing Services	Year 2	
2.5.	Provide appropriate support to sustain tenancies as part of the Council's approach to homelessness prevention and in line with the Housing, Homelessness, and Rough Sleeping Strategy.	Housing Services	Year 1	A number of housing projects on-going, see cabinet report for further details
2.6.	Improve monitoring of the number of people seeking sanctuary who are sleeping rough and use intelligence to target support.	Housing Services	Year 1	Improved monitoring now in place working in partnership with the rough sleeping team.

3. Building Communities and Amplifying Voices

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
3.1. Empower and support local institutions to become registered places of sanctuary including libraries, surgeries arts, community, colleges, and faith organisations.	Housing Services	Year 3 *(brought forward to Year 1 because of local need)*	The Council is supporting a number of partners including Local Authorities and a local University to being registered places of sanctuary
3.2. Act as a lead Local Authority on joined-up campaigning for migrant rights, share learning and expertise through sanctuary networks at a local, regional, and national level including the City of Sanctuary Local Authority Network.	Housing Services	Year 3	
3.3. Continue to convene the Oxford City Council of sanctuary internal and external stakeholders' meetings to meet regularly to facilitate the Thriving Communities vision of “Doing with, not to” and advocate for an ethos and practice of ’Co-production’	Housing Services	Year 1	Stakeholder meeting groups successfully launched and convened.
3.4. Support refugee partners and community groups to access opportunities in arts, culture, and community activity via the use of our facilities, grants, and external funding. • Collaborate with the local VCS to build capacity and participation of local lived experience groups via funding advice and support. • Develop effective pathways into volunteering and participation via social and cultural activities.	Community Services	Year 2 *(brought forward to Year 1 because of local need)*	See progress update in cabinet report – action on-going
3.5. Build capacity of local sanctuary seeking community via Sanctuary Ambassadors programme and access to the Sanctuary in Politics course.	Housing Services	Year 3	
3.6. Support refugee community groups to access spaces and	Community	Year 2	See progress update in cabinet

places where they can come together to enjoy common interests and create new friendships.	Services	*(brought forward to Year 1 because of local need)*	report – action on-going

4. Shaping Services

What are we going to do?		Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
4.1.	Develop/co-produce and share a sanctuary framework to support people seeking sanctuary and promote independent living for those staying in the City and beyond.	Housing Services	Year 1	Action complete, updated framework completed and updated onto OCC website.
4.2.	Review incorporation of sanctuary principles into services when strategies, policies or services are changed.	Corporate Strategy	Year 2 *(brought forward to Year 1 because of local need)*	The Council has incorporated sanctuary principles into a number of strategies
4.3.	Develop online resources to be more accessible for people seeking sanctuary including the Council's web page, the Communities Toolkit and information regarding accessing housing and other support.	Housing, Communities and Customer Services	Year 2 *(brought forward to Year 1 because of local need)*	The OCC website has been updated and made more accessible for example through enhanced translation icon to aid navigation
4.4.	Create opportunities and space for people seeking sanctuary to have their voices heard and their stories told, so that their experiences can inform how services are delivered in the city. Ensure people seeking sanctuary can feed into Council activity through existing mechanisms.	Housing Services	Year 1	A number of co-production projects implemented, see cabinet report for further details.
4.5.	Promote sanctuary informed practice across local strategic partnerships where Oxford City Council is key stakeholder.	Housing Services	Year 1	OCC continue to promote sanctuary informed practice across a number of partnerships

			including the Oxfordshire Migration Partnership.
4.6. Via the community health champions programme improve advocacy for people seeking sanctuary and access to primary health care for vulnerable and undocumented migrants.	Community Services	Year 1	Programme completed, see cabinet report for further details

5. Supporting Integration

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
5.1. Grow and publicise wider migrant-specific information, advice and guidance for all residents such as a Sanctuary Door initiative (Single Point of Contact), embedding opportunities for people with lived experiences to lead on service support.	Housing Services	Year 1	See progress update in cabinet report – action on-going
5.2. Continue to support local people seeking sanctuary who settled under government schemes including UK resettlement scheme (UKRS), Afghan Resettlement schemed (ARAP, ACRS), Asylum Dispersal Scheme and Homes for Ukraine scheme in line with statutory duties, corporate objectives and viability requirements.	Housing Services	Year 1	Resettlement activities successfully met corporate commitment in 2025.
5.3. Support the Council's ambition to support the Domestic Abuse Housing Alliance (DAHA) accreditation and feed in from sanctuary seeking groups perspective.	Regulatory Services and Community Safety	Year 3 *(brought forward to Year 1 because of local need)*	Action completed
5.4. Via sanctuary ambassadors programme and the external stakeholders group review availability of legal advice services for people seeking sanctuary. Alongside community partners, explore opportunities to support expansion of provision as well as pathways to access, & to provide residents with information about their rights.	Housing Services	Year 2	
5.5. Work alongside the Oxford Food Hub and other local charities to	Housing	Year 2	

	raise awareness of free or low-cost food options for people seeking sanctuary, in relation to accessing food, and engaging in the wider local food system and increasing communication to ensure people seeking sanctuary are aware.	services supported by Communities	*(brought forward to Year 1 because of local need)*	
5.6.	Produce a joint calendar of events which promote integration and support sanctuary events such as during Refugee week	Housing services	Year 1	To be produced in Year 2, delays due to prioritisation of other action plan objectives

6. Working in Partnership and Innovating

What are we going to do?		Organisation/ Group	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
6.1.	Support local research bodies to (a) create and develop body of evidence demonstrating the positive impact of people seeking sanctuary locally and (b) analyse the benefits and opportunities they bring.	Council of Sanctuary (CoS) external stakeholders' group	Year 3	
6.2.	Support Oxfordshire County Council and other key partners to increase English language provision (ESOL) accessibility to those with different immigration status, ages, childcare provision needs or access needs in a wide range of both statutory and community settings across the City.	Oxfordshire County Council (OCC)	Year 2	
6.3.	Support the Getting Oxfordshire Online Digital Inclusion network, to bring together partners to identify digital barriers for refugees and asylum seekers in the City / county and promote greater digital inclusion for this group.	OCC supported by the CoS external stakeholders' group.	Year 1	Action delayed to Year 3 due to prioritisation of other action plan objectives
6.4.	Collaborate with local partners and individuals seeking sanctuary to develop culturally appropriate and accessible health initiatives, with a strong focus on expanding access to mental health support. Engage with relevant charities & public	Council of Sanctuary external stakeholders' group	Year 3	

	services to explore and enhance support networks/resources.			
6.5.	Review existing support available to people with No Recourse to Public Funds (NRPF) via the establishment of an NRPF working group with Oxfordshire County Council and local VCS.	CoS external stakeholders' group	Year 1	The Council is working on a number of key projects related to NRPF individuals, see cabinet report for further details.
6.6.	Alongside partners, work to ensure asylum seekers have access to low affordable public transport & travel around Oxford	Oxfordshire County Council	Year 2	

Summary of Year 2 Action Plan Refresh

This report presents the refreshed Year 2 priorities for Oxford City Council's Local Authority of Sanctuary Action Plan (2025–2028), building on progress made during Year 1 and responding to emerging needs across the city.

Between January and May 2026, the Council of Sanctuary undertook a structured review process, gathering feedback from internal services, external partners, voluntary and community organisations, and people with lived experience of seeking sanctuary. This reflects the Council's commitment to co-production and ensuring that its approach is informed by both internal operational experience and city-wide lived realities.

The review identified strong progress to date, particularly in partnership working, community engagement especially co-production activities, and increasing awareness of sanctuary principles across services. However, it also highlighted a need to strengthen delivery in several key areas. As a result, the Action Plan has been updated to place greater emphasis on:

- Improved coordination and system-wide working
- More equitable access to provision across all parts of the city
- Stronger progression routes, particularly in employment, housing and skills
- Increased involvement and leadership of people with lived experience
- Greater sustainability, moving from pilot activity to longer-term delivery models
- Enhanced communications and community cohesion, including positive narrative and myth-busting work

The refreshed plan also streamlines completed actions and introduces targeted new actions, including a coordinated Sanctuary Pathway and a strengthened approach to community cohesion. Overall, Year 2 represents a shift from initial framework development to a stronger focus on delivery, impact, and system change, ensuring that Oxford continues to be a welcoming, inclusive city for people seeking sanctuary.

Oxford City Council, Local Authority of Sanctuary

Action Plan Priorities

1. Wellbeing, Education & Employment

2. Housing and Homelessness

3. Building Communities and Amplifying Voices

4. Shaping Services

5. Supporting Integration

6. Working in Partnership & Innovating

1. Wellbeing, Education and Employment

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
1.1. Educate, engage and partner with Council teams, local businesses, and anchor institutions to expand employment opportunities for people seeking sanctuary, including promoting placements and apprenticeships, addressing misconceptions about migrant entitlements, and developing sustainable pathways into sector-based roles and long-term employment.	Regeneration and Economy	Year 2	On-going action
1.2. Evaluate the Refugee Employment Support Programme (RESP), its findings and respond to the recommendations. Explore opportunities for further work around employment, business support and social enterprise.	Housing Services	Year 2	On-going action
1.3. Work with the anti-slavery coordinator and local modern slavery network to promote understanding around rights and safeguarding risks faced by people seeking sanctuary locally.	Community Safety	Year 2	

2. Housing and Homelessness

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
2.1. Expand education and support for local people seeking sanctuary to help them navigate the housing system, especially for those experiencing homelessness, those at risk of homelessness, and	Housing Services	Year 2	On-going action

	those with limited experience of independent living (including UASC) in line with the Housing, Homelessness and Rough Sleeping Strategy.			
2.2.	Provide training as appropriate for housing colleagues on how to support people seeking sanctuary, e.g. residents with varying immigration status including victims of domestic abuse with no recourse to public funds.	Housing Services	Year 2	
2.3.	Develop further training on working with refugees (cross cultural communications and trauma informed practice) and offer it to colleagues.	Housing services	Year 2	
2.4.	Increase engagement and support for landlords who wish to house people seeking sanctuary, including information and communication on the Council's private rented housing access schemes.	Housing Services	Year 2	
2.5.	Provide appropriate support to sustain tenancies as part of the Council's approach to homelessness prevention and in line with the Housing, Homelessness, and Rough Sleeping Strategy.	Housing Services	Year 2	On-going action
2.6.	Continue to monitor the number of people seeking sanctuary who are sleeping rough and use intelligence to target support.	Housing Services	Year 2	Updated*

3. Building Communities and Amplifying Voices

What are we going to do?	**Service**	**By end of year** **1- 2025 - 2026** **2- 2026 - 2027** **3- 2027 - 2028**	**Notes**
3.1 Empower and support local institutions to become registered places of sanctuary including libraries, surgeries arts, community, colleges, and faith organisations.	Housing Services	Year 3	On-going action
3.2 Act as a lead Local Authority on joined-up campaigning for migrant rights, share learning and expertise through sanctuary networks at a local, regional, and national level including the City of Sanctuary Local Authority Network.	Housing Services	Year 3	

3.3 Work in partnership with Oxfordshire County Council to convene a joint Council of Sanctuary stakeholder group, bringing together shared external partners to improve coordination, reduce duplication, and strengthen a collective approach to delivery, while continuing to promote co-production and the Thriving Communities vision of “doing with, not to.” Internal stakeholder group will continue to meet.	Housing Services	Year 2	New*
3.4 Support refugee partners and community groups to access opportunities in arts, culture, and community activity via the use of our facilities, grants, and external funding. Collaborate with the local VCS to build capacity and participation of local lived experience groups via funding advice and support. Develop effective pathways into volunteering and participation via social and cultural activities.	Community Services	Year 2	
3.5 Build capacity of local sanctuary seeking community via Sanctuary Ambassadors programme and access to the Sanctuary in Politics course.	Housing Services	Year 3	
3.6 Support refugee community groups to access spaces and places where they can come together to enjoy common interests and create new friendships.	Community Services	Year 2	

4. Shaping Services

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
4.1 Review incorporation of sanctuary principles into services when strategies, policies or services are changed.	Corporate Strategy	Year 2	On-going action
4.2 Develop online resources to be more accessible for people seeking sanctuary including the Council's web page and information regarding accessing housing and other support.	Housing, Communities and Customer Services	Year 2	On-going action
4.3 Create opportunities and spaces for people seeking sanctuary to have their voices heard and their stories shared, ensuring their experiences inform service design and delivery, while also supporting community cohesion through positive storytelling, myth-busting, and greater understanding across communities. Ensure people seeking sanctuary can feed into Council activity through existing mechanisms and co-production approaches.	Housing Services	Year 2	Updated*
4.4. Increase the visibility and understanding of the Council of Sanctuary approach across Oxford, communications campaigns, and partnership promotion to ensure residents, organisations, and businesses understand and engage with the initiative.	Housing Services	Year 2	New*
4.5. Strengthen the collection and use of data on people seeking sanctuary across council services, including housing, homelessness, employment, and community engagement, to better understand needs, track outcomes, and inform service design and policy decisions.	Housing Services	Year 2	New*

5. Supporting Integration

What are we going to do?		Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
5.1.	Grow and publicise wider migrant-specific information, advice and guidance for all residents such as a Sanctuary Door initiative (Single Point of Contact), embedding opportunities for people with lived experiences to lead on service support.	Housing Services	Year 2	On-going action
5.2.	Facilitate a co-production process with sanctuary-seeking groups to gather insights on their unique experiences and needs related to domestic abuse and ensure learning informs council working practice which will improve response to other women	Regulatory Services and Community Safety	Year 3	New*
5.3.	Via sanctuary ambassadors programme and the external stakeholders group review availability of legal advice services for people seeking sanctuary. Alongside community partners, explore opportunities to support expansion of provision as well as pathways to access, & to provide residents with information about their rights.	Housing Services	Year 2	
5.4.	Work alongside the Oxford Food Hub and other local charities to raise awareness of free or low-cost food options for people seeking sanctuary, in relation to accessing food, and engaging in the wider local food system and increasing communication to ensure people seeking sanctuary are aware.	Housing services supported by Communities	Year 2	On-going action
5.5.	Produce a joint calendar of events which promote integration and support sanctuary events such as during Refugee week	Housing services	Year 2	On-going action

6. <u>Working in Partnership and Innovating</u>

What are we going to do?		Organisation/ Group	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
6.1.	Support local research bodies to (a) create and develop body of evidence demonstrating the positive impact of people seeking sanctuary locally and (b) analyse the benefits and opportunities	Council of Sanctuary (CoS) external	Year 3	

they bring.	stakeholders' group		
6.2. Support Oxfordshire County Council and other key partners to increase English language provision (ESOL) accessibility and employment opportunities to those with different immigration status, ages, childcare provision needs or access needs in a wide range of both statutory and community settings across the City.	Oxfordshire County Council (OCC)	Year 2	Updated*
6.3. Support the Getting Oxfordshire Online Digital Inclusion network, to bring together partners to identify digital barriers for refugees and asylum seekers in the City / county and promote greater digital inclusion for this group.	OCC supported by the CoS external stakeholders' group.	Year 3	Action year updated*
6.4. Collaborate with local partners and individuals seeking sanctuary to develop culturally appropriate and accessible health initiatives, with a strong focus on expanding access to mental health support. Engage with relevant charities & public services to explore and enhance support networks/resources.	Council of Sanctuary external stakeholders' group	Year 3	
6.5. Review existing support available to people with No Recourse to Public Funds (NRPF) via the establishment of an NRPF working group with Oxfordshire County Council and local VCS.	CoS external stakeholders' group	Year 2	Action year updated*
6.6. Alongside partners, work to ensure asylum seekers have access to low affordable public transport & travel around Oxford	Oxfordshire County Council	Year 2	
6.6 Support the development of a coordinated "Sanctuary Pathway" offer across Oxford, which maps out the relevant support required i.e. housing, employment, ESOL, health, and community support into a clear, accessible and equitable pathway for people seeking sanctuary	CoS external stakeholders' group	Year 2	New*
6.7 Develop a coordinated approach to responding to community tensions related to migration and sanctuary, including cross-council collaboration, communication planning, and engagement with local communities to promote safety, cohesion, and trust.	CoS external stakeholders' group	Year 2	New*

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Priority Area and Key Performance Indicator (KPI)	Measure of success (if applicable)	Rag rating 25/26 EOY	Measure outcome
1.Wellbeing, Education and Employment		Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays	
Support to access employment	50 people benefiting from support		• 15 people leaving Home Office accommodation supported with employability support through the Council's Youth Ambition Team • 20 people leaving Home Office accommodation supported with employability support through the Council's Community Team • 16 people supported who have been resettled via government backed resettlement schemes by commissioned parter
Support access to wellbeing, leisure facilities and therapeutic outcomes	100 people accessing wellbeing & leisure activities. At least 100 people supported to access counselling or other health services		• Over 1000 people attended wellbeing and sport sessions residing in Home Office accommodation supported by the Council's Community team • 6 people who have been resettled by the Council accessed counselling • 277 people residing in Home Office accommodation accessed health support through the Asylum Seeker Care Co-ordinator role
2. Housing and Homelessness			
Support access to housing advice	Deliver 100 face to face housing advice drop in sessions		• 219 people seen by the Council at the Home Office housing advice drop in

Improve housing outcomes for people seeking sanctuary	Deliver 50% positive housing outcomes for prevention & relief cases		• 42.5% successful outcomes for prevention & relief cases for households under HFU & leaving Home Office accommodation. • Move on period increases challenges to help resolve cases, the Council has plans to increase % success rate through increased homeless prevention activities in 26/27
3. Building Communities and Amplifying Voices			
Working with residents to co-produce information	Co-produce at least 5 housing advice leaflets and translated housing information videos		• 9 translated leaflets produces and translated videos available via the Council's YouTube channel giving guidance and housing advice
Lead and bring together stakeholders	Hold at least 3 internal and external stakeholder meetings		
4. Shaping Services			
Increase accessibility of information available	Make updates to the OCC website and produce sanctuary newsletters		• The Council's website updated, newsletter produced and produced Council of Sanctuary Framework document
Increasing resident feedback and co-production work	At least 50 people sanctuary seekers to participate in co-production groups or feedback on Council services through surveys, groups or interviews		• Engagement activities include: ○ Lunch & Learns (6) / Staff conference (4) / External stakeholder groups (12) / Sanctuary Fair planning (6) / Sanctuary Door planning and training (12) / Lived experience groups (16)
5. Supporting integration			
Support successful resettlement work	Support resettlement of 8 families		
Work with resident to co-	Hold at least 2 co-produced		

produce events	events		
6. Working in Partnership and Innovating			
Supporting access to English classes	At least 100 people participating in ESOL classes		• 31 people supported who have been resettled via government backed resettlement schemes by commissioned parter • 55 ESOL learners supported through partnerships with colleges • 14 learners supported via Oxfordshire County Council supported schemes
Improving outcomes for people with No Recourse to Public Funds (NRPF)	Co-produce a County wide NRPF protocol		• Currently in production and aim to deliver in 2026 • NRPF co-production group on-going and will produce a resource for other people with NRPF condition

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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	8 July 2026
Report of:	Director of Housing
Title of Report:	HRA Property Services Policies

Summary and recommendations	
Decision being taken:	To request that Cabinet recommend that Council approve the following policies: complaints, lifting equipment and lifting operations, voids.
Key decision:	Yes
Cabinet Member:	Councillor Linda Smith – Housing and Communities
Corporate Priority:	Good, affordable homes
Policy Framework:	HRA Asset Management Strategy 2025 -2028

Recommendation(s): That Cabinet resolves to:

1. **Recommend** full Council to approve the draft Complaints Policy
2. Recommend full Council to approve the draft Lifting Equipment and Lifting Operations Policy
3. **Recommend** full Council to approve the draft Voids Policy

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Complaints Policy	No
Appendix 2	Equality Impact Assessment – Complaints Policy	No
Appendix 3	Lifting Equipment and Lifting Operations Policy	No
Appendix 4	Equality Impact Assessment – Lifting Equipment and Lifting Operations Policy	No
Appendix 5	Voids Policy	No

Appendix 6	Equality Impact Assessment – Voids Policy	No
Appendix 7	Risk Assessment	No

Introduction and background:

1. Further to the Cabinet and Council approving a series of Housing Revenue Account (HRA) policies, further policies are being presented to the Cabinet to ensure the safety of residents and ensure the good management of the housing stock.

2. The policies being presented to the Council fall into two broad categories – ensuring the safety of all residents and secondly, ensuring the good management of the housing stock and the need to treat residents with dignity and respect when, in extreme circumstances, tenants have to leave homes temporarily for urgent maintenance work to be undertaken.

3. Making sure residents have a safe, affordable and decent place to call home is the core purpose of this work. Successive Governments have been working to strengthen the voice of residents and introduce legislation to ensure the quality of homes.

4. In 2018, the then Government published the Social Housing White Paper to ensure residents of social housing are safe, listened to, live in good quality homes and have access to help when things go wrong. Consequently, the Social Housing Regulation Act ("the Act") received Royal Assent in July 2023. The Act forms a new regulatory framework for the social housing sector, aiming to give residents greater powers and improve access to quick and fair solutions to problems.

5. The Act aims to ensure Registered Social Landlords (RSLs) are compliant with the consumer standards by giving the Regulator of Social Housing new powers to address RSLs who are not meeting their commitments to residents.

6. The Social Housing Charter detailed what social housing residents should expect from their landlords, including feeling safe in their homes, knowing how their landlords are performing and having their complaints solved quickly.

7. The Act sets out to deliver against each of these commitments:

- Residents to be safe in their home.
- Residents to know how their landlord is performing.
- Residents to have their complaints dealt with promptly.
- Residents to be treated with respect.
- Residents to have their voice heard by their landlord.
- Residents to have a good quality home and neighbourhood to live in.

8. Technical policies are therefore required to adhere to this regulatory regime. They are also key to ensure the effective operation of the Housing Revenue Account (HRA) property service as it ensures that asset management services and the development of the social housing programme are set within a sound operating framework such as meeting key performance criteria, as well as ensuring sustainability objectives are met and monitored.

9. The ability to refresh policies ensures key KPIs can be refined to meet the contemporary needs of tenants and of the wider city in respect of the role of housing in attaining economic growth.

10. At the same time, the need to ensure high standards are maintained, such as guaranteeing gas safety standards are met and there is constant action to monitor and act on radon levels, can be attained by clear technical policies which ensures consistent follow through with operational work in addressing health and safety objectives.

11. The Council recognises its compliance responsibilities as well as the critical need to listen and act on the lived in experiences of our residents. There has been a series of meetings with the Residents Policy Review Group and survey work with residents which has amended and approved the policies which are being presented to Cabinet for approval with this report.

12. There is a need for a suite of other policies to be considered and approved by the Cabinet to meet these regulatory standards. It is envisaged that further policies, once they are considered by residents, will be presented to the Cabinet for approval.

Complaints Policy

13. This policy sets out the Council's approach to delivering an effective complaint handling service that meets both the regulatory requirements set out in the Regulator of Social Housing's Transparency, Influence and Accountability Standard and the Housing Ombudsman's Complaint Handling Code 2024.

14. This policy aims to:

- Provide residents with a clear, accessible and efficient complaints process.
- Ensure residents understand how to make a complaint and their right to access the Housing Ombudsman Service.
- Ensure complaints are investigated fairly, consistently and impartially.
- Promote a positive culture of learning from complaints to improve landlord services provided by or on the behalf of the Council.
- Ensure compliance with all relevant legislation and regulatory requirements.

15 The Social Housing (Regulation) Act 2023 empowered the Housing Ombudsman to issue a code of practice about the complaints procedures that social housing providers should follow.

16. The policy stipulates a two-stage process where complaints are assessed and considered impartially in the interests of providing a good service to all residents.

17. The Council will look beyond the circumstances of individual complaints and consider whether service improvements can be made as a result of any learning from complaints. Using the complaint process in this way enables the Council to learn from the issues that arise for customers and to take steps to improve the services it provides.

18. The drafting of this policy has been undertaken in partnership with the Housing Ombudsman Service who have provided detailed guidance which has led to this draft policy being tabled to the Cabinet for consideration.

19. The Cabinet is asked to approve the draft Complaints Policy and commend the policy for approval to Full Council.

Lifting Equipment and Lifting Operations Policy

20. The Council is responsible for maintaining passenger lifts and for carrying out examinations and inspections to ensure those lifts operate safely. In addition to lifts, the Council has a responsibility to maintain stair lifts and hoists to ensure the safety of their tenants in their homes.

21. The Council must establish a policy which meets the requirements of the Health and Safety at Work Act 1974. In addition to this, the policy must provide assurance that measures are in place to ensure compliance with the Lifting Operation and Lifting Equipment Regulations 1998 (LOLER) and to identify, manage and/or mitigate risks associated with relevant lifting equipment.

22. The Council will endeavour to ensure that all lifts and lifting equipment in properties it owns and manages will be in full working order at all times. Where the Council becomes aware that lifts or lifting equipment are not operating as they should, emergency repairs orders will be issued to remedy faults as quickly as possible within the timescales as stated below:

Repair Type	Target response times following work order issued	Target fix time following work order issued	Comments
Emergency	Entrapment 1 hour	Fix where possible or make safe within 24 hours	Repairs needed to avoid danger to health, or that pose a risk to the safety of the safety service users.

			“Make safe” repairs may require a follow up visit to complete the repair.

Repair Type	Target response times following work order issued	Target fix time following work order issued	Comments
Emergency	Breakdown Within 4 hours during between 8am – 8pm – Monday to Sunday	Fix where possible or make safe within 24 hours For stairlifts where there is not a complete breakdown but faults are appearing, the response time is within the first 48 hours of the report of the fault having been made	Repairs that are a major cause of discomfort or inconvenience. “Make safe” repairs may require a follow up visit to complete the repair.
Emergency	Breakdown Within 4 hours – Out of Hours	Fix where possible or make safe within 24 hours	Repairs that are a major cause of discomfort or inconvenience. “Make safe” repairs may require a follow up visit to complete the repair.
Urgent	Within 24 hours	Fix within 5 days	These repairs do not cause immediate damage to the building, its occupiers, or neighbouring properties or user inconvenience
Routine	Appointment to be confirmed within 24 hours	Timescale to be agreed with the Council	This is for further works that may be required following a repair, Thorough Examination or Planned Preventative Maintenance (PPM) where the Council will advise of the target fix time

23. The Cabinet is asked to approve the draft Lifting Equipment and Lifting Operations Policy and commend the policy for approval to Full Council.

Voids Policy

24. This policy outlines our approach to managing empty properties ('voids'), to minimise the length of time a property stays empty. This will consequently reduce the loss of rental income and maximise income for the Housing Revenue Account (HRA), while ensuring that applicants in housing need are allocated a suitable property as soon as possible.

25. A property is defined 'void' when no tenancy exists following vacation by the previous occupant, and no rental income is being received. The 'void period' exists between a tenancy ending and a new tenancy beginning.

26. The Council recognises the importance of working to specific timescales in handling voids as part of performance monitoring and ongoing review of operations. The contractor work targets are as follows:

- Minor works (assessed at inspection stages): 5 working days
- Standard Void: 15 working days
- Major Void: 25 working days
- Exceptional Voids; 90 working days

27. These contractor works targets do not represent the full end-to-end void turnaround target. The overall end-to-end relet period includes all stages of the void process, including tenancy termination, key return, inspection, specification, compliance checks, works, advertising, allocation, viewing, acceptance and tenancy sign-up.

28. The Council's indicative end-to-end standard void relet target is 35 calendar days, measured from the previous tenancy end date to the start of the new tenancy, excluding properties formally classified as major, exceptional, complex, or deliberately held for operational reasons. This target will be monitored alongside stage-based performance indicators to ensure that delays are identified and addressed across the full process.

29. A minor void is defined when minimal work such as minor cleaning, compliance checks and minor and or internal works lasting no more than 5 working days are required.

30. A standard void is defined a property requiring cleaning and routine repairs with no capitalised elements. This is distinct from a major void which requires significant work such as structural repairs, electrical rewiring, installation of kitchens and bathrooms or major adaptations as well as disability adaptations.

31. A major void refers to a vacant property that cannot be easily or quickly re-let, often requiring extensive, long-term, or specialised intervention before it can be brought back into use. Unlike a standard void (routine turnover), these properties are generally not habitable in their current condition, leading to higher maintenance, security, and renovation costs.

32. A major void includes:

- Structural repairs – these are works that are essential to maintain stability and weather resistance in the main structural elements of a dwelling ie floors, walls and roofs as determined by the surveyor. Major works to these elements will involve replacement or substantial reconstruction of the component or element.
- Site works – this is work around and specific to the dwellings involved and is essential to the safety, security and protection of tenants (eg the replacement or substantial reconstruction of unstable boundary walls, footpaths etc)
- Consequential and other works – these are works that are required as a consequence of major repairs such as reinstatement or making good finishes and fittings.
- Any works that significantly improve the dwellings (ie capitalised repairs) should only be classified as major repairs if they could not reasonably be carried out with a tenant in occupation.
- Emergency repairs constitute any defect that puts the health, safety or security of the tenant or a third party at immediate risk; or that affects the structure of the building adversely. These would qualify as reasons for classifying the property as needing major repairs.
- Asbestos removal – Notifiable asbestos works should be counted as major works. Non-notifiable asbestos works should be counted as standard void works.

33. An exceptional void refers to a property that is vacant but is excluded from standard re-letting performance targets due to specific, long-term, or non-routine circumstances. Unlike standard voids (short-term turnovers), these properties are often undergoing major, complex, or strategic work that prevents them from being occupied. This includes installation of components such as, for example, air source heat pumps.

34. The Cabinet is asked to approve the draft Voids Policy and commend the policy for approval to Full Council.

Financial implications

35. There are no financial implications for these policies, any work required under these policies will be funded from existing budgets and monitored in accordance with current financial management processes.

Legal issues

36. The policies being presented for approval are required under the Consumer Standard as set by legislation and the Regulator for Social Housing.

Level of risk

37. The failure of the Council to have these asset management policies would go against the Corporate Plan to keep residents safe and could lead to regulatory

infringements further to the requirements of the Regulator for Social Housing, the Health and Safety Executive and the Building Services Regulator.

Equalities impact

38. Equality Impact Assessments (EqIA) has been carried out to determine whether the policies being presented to the Cabinet for approval would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010.

39. Whilst the EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by these policies, it is identified that there are certain groups at increased risk from safety infringements. These groups are:

- children
- adults with learning difficulties
- oxygen users
- people taking certain medication
- those suffering the effects of drugs and alcohol
- adults aged 65 and older
- people with disabilities
- Individuals being supported by the Community Safety team and related support services

40. These policies aim to reduce the risks to these groups of people through proactively identifying these risk factors, raising awareness and education further to the Public Sector Equality Duty (s.149).

Conclusion

41. By approving these policies, this will help establish the framework to maintain the housing stock and further ensure the safety of our residents. This approval would also help meet the expectations of the Regulator of Social Housing that the Council is meeting its regulatory obligations. Further HRA policies will be presented to the Cabinet for its consideration after residents have been able to assess and, if necessary, amend draft proposals.

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Background Papers:
List the background documents and, if possible, link to them.

All background papers must be listed in accordance with the Local Government (Access to Information) Act and The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. This includes, any material which discloses facts or matters on which the report or an important part of it is based and which have been relied on in the preparation of the report Each document must be listed and a copy of each document made available to members and the public on request, (or they should be directed where to find it if it is already published on the Council's website). All confidential, exempt, copyrighted and published works are EXCLUDED from this requirement.
1 Consumer Standard – Regulator of Social Housing - Regulatory standards for landlords - GOV.UK 2 Social Housing (Regulation) Act 2023 - Landmark Social Housing Act receives Royal Assent to become law - GOV.UK

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Council Housing Complaints Policy

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Policy statement

1.1 This policy sets out the Council's approach to delivering an effective complaint handling service that meets both the regulatory requirements set out in the Regulator of Social Housing's Transparency, Influence and Accountability Standard and the Housing Ombudsman's Complaint Handling Code 2024.

1.2 This policy aims to:

- Provide residents with a clear, accessible and efficient complaints process.
- Ensure residents understand how to make a complaint and their right to access the Housing Ombudsman Service.
- Ensure complaints are investigated fairly, consistently and impartially.
- Promote a positive culture of learning from complaints to improve landlord services provided by or on the behalf of the Council.
- Ensure compliance with all relevant legislation and regulatory requirements.

Policy scope

1.3 This policy applies to complaints about the Council's housing services in its role as a landlord.

1.4 This policy applies to complaints from any person defined as a 'resident' below, and their representatives.

1.5 This policy will be published on the Council's website.

Definitions

2.1 For the purposes of this policy, the term 'residents' means any of

(i) Applicants for social housing,
(ii) Tenants of any type,
(iii) Shared owners,
(iv) Leaseholders,
(v) Former tenants,
(vi) Anyone else affected by the landlord services provided by or on the behalf of the Council, including those delivered by third parties.
(vii) Representatives of any of the above (please see paragraph 5.3 for more information on representatives).

Complaint:

3.1 A complaint is defined as 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'

3.2 A resident does not have to use the word ‘complaint’ for it to be treated as one. Where a resident expresses dissatisfaction, they will be given the choice to make complaint. Where they choose to do so, it will be recorded as a stage on complaint in line with this policy. Complaints submitted by a third party or representative will be handled in line with this policy.

3.3 We will presume any expression of dissatisfaction as defined is 3.1 above is a ‘complaint’ unless the resident or representative explicitly declines the choice to engage the complaints policy.

Service request:

4.1 A service request is defined as ‘a request from a resident to the Council requiring action to be taken to put something right’. Examples of service requests include:

- raising a repair for the first time
- asking for information or clarification about their home or tenancy
- reporting an incident of anti-social behaviour.

4.2 Where a resident expresses dissatisfaction with how a service request has been handled or the response they received, they will be given the choice to make a complaint. Where they choose to do so, it will be recorded as a stage one complaint in line with this policy even if the service request is ongoing. The Council will continue its efforts to address the service request alongside the complaint.

4.3 An expression of dissatisfaction shared through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be informed how they can make a complaint if they wish to do so. Where the Council asks for wider feedback about its landlord services, details of how to complain will be provided.

Exclusions

5.1 The Council will accept complaints that fall within its definition in this policy unless there is a valid reason not to do so. Circumstances where a complaint will not be accepted may include:

- If the matter being raised is considered as a service request.
- Where the issue giving rise to the complaint occurred over twelve months ago, if it is fair and reasonable to do so.
- Where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- Matters that have previously been considered under this policy, unless there is substantially new information that may warrant further consideration.

- Reports of anti-social behaviour which will not be treated as complaints, however, the Council will accept complaints about the handling of such reports.
- Complaints relating to the Council's wider housing services that do not relate to its role as a landlord, for example, homelessness applications, housing allocations, housing benefit or private sector housing.
- Complaints relating to non-housing services.
- Complaints about councillors, which are subject to a different process and should be reported to standards@oxford.gov.uk.
- Complaints about the outcome of a Freedom of Information request, Subject Access Request, or Environmental Information request which have a separate review process with escalation to the Information Commissioner's Office.
- Objections to planning applications.
- Complaints raised by employees (unless they are raising it as a qualifying resident), which will be dealt with under the relevant employment policy.
- Complaints about other local authorities or organisations that are not acting on behalf of Oxford City Council.

5.2 Some complaints from leaseholders relating to service charges are better suited to being handled through the First Tier Tribunal, although the Council will always try to resolve these concerns in the first instance.

5.3 Each complaint will be considered on its own merits, taking account of the individual circumstances. The Council will not take a blanket approach to excluding complaints.

5.4 Where the Council does not accept a complaint, a response will be provided to the resident setting out the reasons why the matter is not suitable and inform them of their right to take that decision to the Housing Ombudsman Service.

5.5 Where a matter falls outside the scope of this policy, the Council will explain why and, where appropriate, direct the resident to the relevant service, process or procedure. If the matter meets the definition of a complaint but is not about the Council's housing services in its role as a landlord, the resident will be referred to the Council's corporate complaints procedure.

Making a complaint

6.1 Complaints can be made in any way and with any member of staff by:

- completing the online customer feedback form on the website
- phoning the Customer Service Centre on 01865 249811
- writing to Complaint HUBs, Oxford City Council, Town Hall, St Aldate's, Oxford, OX1 1BX
- emailing OCCLSComplaints@oxford.gov.uk
- in person.

6.2 The Council is committed to treating everyone fairly. Where a resident requires support to make or pursue a complaint, they are advised to let the Council know and state what assistance is required. This may include providing information in alternative formats such as large print, interpretation or translation services or communication through a representative.

6.3 Residents may authorise a representative to deal with a complaint on their behalf and to be represented or accompanied at any meeting with the Council. A representative maybe a friend, family member, carer or a third party such as a voluntary organisation, councillor or Member of Parliament. The Council will require appropriate consent before sharing information with a third party in line with data protection requirements.

6.4 Anonymous complaints will be considered in line with this policy, however there may be limits where there is insufficient information or where the complainant cannot be contacted.

6.5 Where a complaint is received via social media, the Council will contact the resident requesting them to re-submit the complaint via the complaints process set out in this policy. Complaints will not be dealt with on public social media platforms.

Complaint process and timescales

7.1 Information about the complaints process will be made available in the Council's Residents Voice quarterly magazine and on the Council's website. This will include how to contact the Housing Ombudsman Service and information about the Housing Ombudsman Service's Complaint Handling code.

Stage one:

7.2 Stage one complaints will be acknowledged, defined and logged within five working days of the complaint being received. The acknowledgement letter will include the outcome the resident is seeking and what aspects of the complaint Oxford City Council are and are not responsible for. A full response will be issued within ten working days of when the complaint was acknowledged.

7.3 Where a complaint is complex, additional time may be required to fully investigate a complaint. Where this is the case, the resident will be informed of the expected timescale for response and receive regular updates. Any extension will be no longer than ten working days without good reason, and the reason will be clearly explained to the resident. When an extension has been agreed the resident will be provided with the contact details of Housing Ombudsman Service.

7.4 A complaint response will be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address

the issue are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident.

7.5 Where a resident raises additional complaints during the investigation, these will be incorporated into the stage one response if they are related and the stage one response has not been issued. Where the stage one response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.

7.6 All responses will confirm the following in writing to the resident at the completion of stage one in clear, plain language:

- the complaint stage
- the complaint definition
- the decision on the complaint
- the reasons for any decisions made referencing the relevant policy, law and good practice where appropriate
- the details of any remedy offered to put things right
- details of any outstanding actions
- details of how to escalate the matter to stage two if the resident is not satisfied with the response including details of the Housing Ombudsman Service.

7.7 Where complaints relate to repairs and maintenance carried out by Oxford Direct Services (ODS), these complaints are referred ODS who will undertake stage one of the complaints process in line with this policy. Where a resident is not satisfied with the response at stage one and escalates the matter to stage two, the Council will investigate the matter at stage two.

Stage two:

7.8 Stage two complaints are an escalation from stage one, where all or part of the complaint is not resolved to the resident's satisfaction at stage one.

7.9 Requests for stage two will be acknowledged, defined and logged within five working days of the escalation request being received. The acknowledgement letter will include the outcome the resident is seeking and what aspects of the complaint Oxford City Council are and are not responsible for. A full response will be issued within 20 working days of when the complaint was acknowledged.

7.10 Residents will not be required to explain their reasons for requesting a stage two consideration. The Council will make reasonable efforts to understand why a resident remains unhappy as part of its stage two response.

7.11 The person considering the complaint at stage two must not be the same person that considered the complaint at stage one. Stage two is the Council's final response and will involve a review of the stage one

investigation and response, alongside an assessment of any additional information and further investigation with appropriate staff.

7.12 Where a complaint is complex, additional time may be required to fully investigate a complaint. Where this is the case, the resident will be informed of the expected timescale for response and receive regular updates. Any extension will be no longer than 20 working days without good reason, and the reason will be clearly explained to the resident. When an extension has been agreed the resident will be provided with the contact details of Housing Ombudsman Service.

7.13 A complaint response will be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident.

7.14 All responses will confirm the following in writing to the resident at the completion of stage one in clear, plain language:

- the complaint stage
- the complaint definition
- the decision on the complaint
- the reasons for any decisions made referencing the relevant policy, law and good practice where appropriate
- the details of any remedy offered to put things right
- details of any outstanding actions
- details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.

External escalation:

7.15 Residents with a tenancy agreement, lease agreement, license to occupy, or similar agreement to live within a Council property can contact the Housing Ombudsman Service at any time for advice on complaint handling while a complaint is going through the Council's complaints process outlined in this policy. The Housing Ombudsman Service will not normally accept a complaint for formal investigation until the Council's internal process has been completed. The Housing Ombudsman Service contact details are:

- Telephone: 0300 111 3000
- Address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
- Email: info@housing-ombudsman.org.uk
- Web: www.housingombudsman.org.uk

7.16 Complaints relating to building safety may be directed to the Building Safety Regulator. The Building Safey Regulator contact details are:

- Telephone: 0300 790 6787

- Address: Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS
- Web: https://www.gov.uk/guidance/contact-the-building-safety-regulator

7.17 Complaints about our landlord function from residents without a tenancy or lease with the Council, or complaints relating to our homelessness duty, allocations and other local authority functions not covered by the Housing Ombudsman Service can be referred to the Local Government and Social Care Ombudsman

- Telephone: 0300 061 0614
- Address: Local Government & Social Care Ombudsman, PO Box 4771, Coventry, CV4 0EH
- Website: https://www.lgo.org.uk/how-to-complain

Putting things right

7.18 The Council will work collaboratively with residents, where something has gone wrong, the Council will acknowledge this and set out the actions already taken, or those it intends to take, to put things right. Potential remedies can include:

- apologising
- acknowledging where things have gone wrong
- providing an explanation, assistance, or reasons
- taking action if there has been delay
- reconsidering or changing a decision
- amending a record or adding a correction or addendum
- providing a financial remedy
- changing policies, procedures, or practices.

7.19 Any remedy offered will reflect the impact on the resident as a result of any fault identified. The remedy offer will clearly set out what will happen and by when, in agreement with the resident where appropriate.

7.20 The Council will follow Housing Ombudsman Service guidance when deciding on appropriate remedies.

Roles and responsibilities

Member Responsible for Complaints:

7.1 A member of the governing body will be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').

7.2 The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.

Senior Lead:

8.3 The Director of Housing is the senior lead person accountable for complaint handling. The Director of Housing will oversee the assessment of complaint data, including identifying themes and trends to highlight potential systemic issues, serious risks, and any policies or procedures requiring review or revision.

Complaint Officers:

8.4 The Council's Housing Customer Care & Complaints Team will take responsibility for complaint handling, including liaison with the Housing Ombudsman and ensuring complaints are reported to the governing body.

8.5 The Council's Housing Customer Care & Complaints Team will have access to staff at all levels to facilitate the prompt resolution of complaints. They will also have the authority and autonomy to act to resolve disputes promptly and fairly.

8.6 Where complaints relate to repairs and maintenance carried out by Oxford Direct Services (ODS), staff at ODS will undertake stage one complaints in line with this policy.

8.7 All relevant staff will be suitably trained in the importance of complaint handling.

All staff:

8.8 The Council will have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:

- have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments
- take collective responsibility for any shortfalls identified through complaints, rather than blaming others
- act within the professional standards for engaging with complaints as set by any relevant professional body.

8.9 All staff will be aware of the complaints process and be able to pass details of the complaint to the Council's Housing Customer Care & Complaints Team.

Continuous learning and improvement

9.1 The Council will look beyond the circumstances of individual complaints and consider whether service improvements can be made as a result of any learning from complaints. Using the complaint process in this way enables

the Council to learn from the issues that arise for customers and to take steps to improve the services it provides.

9.2 The Council will publish an annual complaints performance and service improvement report, which will be made available to residents on its website. The Council will also share learning from complaints with residents through forums such as the Tenant and Leaseholder Board and on its website.

9.3 The Member Responsible for Complaints ('the MRC') and the governing body will receive:

- regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance
- regular reviews of issues and trends arising from complaint handling
- regular updates on the outcomes of the Housing Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings
- the annual complaints performance and service improvement report.

9.4 Oversight measures for complaint handling include quality checking cases handled by the Council and ODS, and regular performance reporting, as well as in depth reviews of the complaint handling and decision making of any cases that escalate to stage two.

Equalities Assessment

10.1 An Equality Impact Assessment (EqIA) has been carried out to determine whether the policy would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010. The EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by this policy.

Related Legislation and Regulation

11.1 The Council will adhere to all relevant legislation and regulatory obligations as they apply, including but not limited to:

- Localism Act 2011
- Housing Act 1996
- Equality Act 2010
- Data Protection Act 2018
- Building Safety Act 2022
- Social Housing (Regulation) Act 2023
- The Housing Ombudsman Service Complaint Handling Code (a statutory code that the Council is required to comply with.

ford.gov.uk

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

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A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	**6. Race & Ethnicity**
2. **Disability**	**7. Religion or Belief**
3. **Gender Reassignment**	**8. Sex**
4. **Marriage & Civil Partnership**	**9. Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

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7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	HRA Complaints Policy	**2.**	**The implementation date of the activity under consideration:**	May 2026
3.	**Directorate/Department(s):**	Housing	**4.**	**Service Area(s):**	Housing
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	James Watkins jwatkins@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	James Watkins jwatkins@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	New ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	No
9.	**Date this EqIA started:**	May 2026			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	Yes	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	May 2026

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐	☐ Decommissioning	☐ Commissioning	☐
		☐	x Others. Policy		
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	X Good, affordable homes	☐ Strong, fair economy	☐ Thriving Communities	☐ Zero Carbon Oxford	☐ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	x Understanding and working with our communities.
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	The policy sets out the Council's commitment to providing tenants with a good customer experience by the operation of the HRA Complaints process. The aim of the Policy is to deliver the Council's HRA Complaints process in line with legislation and the relevant guidelines.			

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		This policy aims to: • Provide residents with a clear, accessible and efficient complaints process. • Ensure residents understand how to make a complaint and their right to access the Housing Ombudsman Service. • Ensure complaints are investigated fairly, consistently and impartially. • Promote a positive culture of learning from complaints to improve landlord services provided by or on the behalf of the Council. • Ensure compliance with all relevant legislation and regulatory requirements.
16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	The HRA Complaints process need to be carried out in line with legislation and statutory guidance. The Council will adhere to all relevant legislation and regulatory obligations as they apply, including but not limited to: • Localism Act 2011 • Housing Act 1996 • Equality Act 2010 • Data Protection Act 2018 • Building Safety Act 2022 • Social Housing (Regulation) Act 2023 • The Housing Ombudsman Service Complaint Handling Code (a statutory code that the Council is required to comply with.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?**	Yes – Residents Involvement Programme The Council recognises its equalities responsibilities as well as the critical need to listen and act on the lived in experiences of our residents.

	Please provide details— -when, -how many, and -the approach taken.	
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports, -briefs.	- Legislation - Risk assessment for vulnerable groups - Equalities assessment exercise - Engagement with residents
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	N/A

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Section 4: Impact analysis.

20.	**Who does the activity impact?**	**Service Users**	Yes x	**No**	Don't Know ☐

	Check as needed. The impact may be positive, negative or unknown.	**Members of staff**	**Yes** x	No ☐	Don't Know ☐
		General public	**Yes** x	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☐	**No** x	Don't Know ☐
		City Councillors	Yes x	**No** ☐	Don't Know ☐
		Council suppliers and contractors	Yes x	No	Don't Know ☐

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21.	**Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age		☐	x	☐		

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Disability **(Visible and invisible)**	x	☐		☐	Aimed at tenants who may need, for various reasons, to be supported to access the complaints process.	The Council will provide additional and reasonable support to tenants, if appropriate, with the complaints process. This may include: • Access to a computer • Explaining how the complaints service works
Gender re-assignment		☐	x	☐		
Marriage & Civil Partnership	☐	☐	x	☐		
Race, Ethnicity and/or Citizenship		☐	X	☐		
Pregnancy & Maternity	☐	☐	x	☐		

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Religion or Belief	OBJ	☐	X	☐		
Sex			x	☐		
Sexual Orientation	☐	☐	X	☐		

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☐	☐	X	☐		
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local authority of sanctuary in December 2024, thereby committing	☐	☐	x	☐		

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to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.						
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members	☐	☐		☐		

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
	☐	Stop and reconsider the activity.	☐	Adjust activity before beginning the activity and continue to monitor.	☒	Enhanced service delivery to be delivered by the implementation of this policy	X	Monitoring of performance in respect of the implementation of the policy is required.
23.								

	Please explain how you have reached your conclusions above.		**Benefits of Implementation**: Enables healthy livinng for all tenants **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: **Improves Representation**:

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact?** **For example-** - team, -directorate, -service area, -Equalities Steering Group,etc.	Landlord Services
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	Landlord Services

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26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	Yearly	**27.**	**Date when the EqIA will be reviewed again.**	June 2027

Section 7: Sign-off

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Name: James Watkins	Name:	Name: Full Name
Job Title: Housing Projects and Policies Officer	Job Title:	Job Title: Type here
Signature:	Signature:	Signature:
----------	----------	----------

Name:	Name: Full Name	Name: Full Name
Job Title:	Job Title: Type here	Job Title: Type here

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.
4) EDI Lead.
5) EDI Specialist.
6) For joint projects, please consider the following:
    1. Other project leads
    2. Other service area and/or team lead/managers.

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Signature: ----------	Signature: ----------	Signature: ----------
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature: ----------	Signature: ----------	Signature: ----------

You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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Lifting Operations and Lifting Equipment Policy

Purpose of the Policy

1.1 The Council owns and manages properties that have passenger lifts. It also owns and lets a number of domestic properties adapted with lifting equipment and assisted living aids such as stairlifts and hoists to enable tenants to continue to live independently within their homes.

1.2 The Council is responsible for the inspection and maintenance of passenger lifts to ensure they operate safely. This duty also extends to stairlifts and hoists, which the Council must maintain and inspect to ensure the safety of their tenants within their homes.

Policy Objectives and Scope

2.1 The Council must establish a policy which meets the requirements of the Health and Safety at Work Act 1974. In addition to this, the policy must provide assurance that measures are in place to ensure compliance with the Lifting Operation and Lifting Equipment Regulations 1998 (LOLER) and to identify, manage and/or mitigate risks associated with relevant lifting equipment

2.2 The Council must also ensure that compliance with lift safety legislation and performance against this policy is formally reported to the Council's Corporate Leadership Team and Cabinet (where appropriate), including details of any non-compliance, associated risks and planned corrective actions.

2.3 This policy is relevant to all Council employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by the Council's lifs.

2.4 This policy should be used to ensure all relevant stakeholders understand the Council's obligations to maintain a safe environment within the home of each tenant and within all non-residential premises or communal buildings.

Key terms and definitions

Thorough Examination	A systematic and detailed examination of the equipment and safety critical parts, carried out at specified intervals by an independent competent person who must then complete a written report

Competent Person	Person with appropriate knowledge, experience and training
LOLER	Lifting Operations and Lifting Equipment Regulations 1998 Lifting accessories Items used to attach a load (or person) to a lift and lifting equipment, e.g., ropes, chains, hooks, in-situ, and transfer slings etc.
Lifting Equipment	Equipment for lifting or lowering loads (including people) and includes its attachments used for anchoring, fixing or supporting it. It includes any lifting accessories that attach the load to the equipment in addition to the equipment which carries out the actual lifting function
Lifting Operation	The lifting or lowering of a load, including a person

Legal/Regulatory Framework

3.1 The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing.

3.2 The principal legislation applicable to this policy is the Health and Safety at Work Act 1974 and the Lifting Operation and Lifting Equipment Regulations 1998 (LOLER).

3.3 The principal codes of practice applicable to this policy are:

- ACoP L113 - Safe use of lifting equipment: Lifting Operations and Lifting Equipment Regulations 1998
- INDG422 - Thorough examination of lifting equipment: A guide for employers
- INDG339 - Thorough examination and testing of lifts: Simple guidance for lift owners

3.4 The Council acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health and Safety Executive under the Health and Safety at Work etc Act 1974, and/or prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.

3.5 In addition, the Regulator of Social Housing has powers to proactively intervene where landlords are performing badly on consumer issues (including non-compliance with building safety measures) and may conduct routine inspections to investigate systematic issues.

3.6 The Council will use the legal remedies available to it, including seeking an access injunction from the Court, should any tenant, leaseholder or shared owner refuse access to carry out essential lift safety related inspection and remediation works.

3.7 This policy also operates in the context of the following additional legislation:

• The Management of Health and Safety at Work Regulations 1999
• The Provision and Use of Work Equipment Regulations 1998 (PUWER)
• The Workplace (Health Safety and Welfare) Regulations 1992
• The Building Regulations 2004 – Part M • Construction (Design and Management) Regulations 2015
Control of Asbestos Regulations 2012
• Equality Act 2010
• Housing Act 2004
• Landlord and Tenant Act 1985
• Data Protection Act 2018
• Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
• Homes (Fitness for Human Habitation) Act 2018

3.8 This policy is in also in accordance with the (LEIA) Lift and Escalator Industry Association (LEIA) – Asbestos Safety Information Sheet, in relation to lift motor rooms, brake pads, which if containing asbestos and are left in place wear down and release asbestos fibres. This policy will follow LEIA advice that asbestos will be removed rather monitored to achieve high standards of compliance.

Obligations

4.1 The Council is responsible for maintaining passenger lifts and for carrying out periodic thorough examinations and inspections to ensure those lifts operate safely. Section 3 of the Health and Safety at Work Act 1974 requires employers, such as landlords, to take responsibility for the health and safety of employees and other people using or visiting their premises so far as reasonably practicable.

4.2 Passenger lifts in workplaces (for example, offices and communal blocks), which are primarily used by people at work, are subject to the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and the Provision and Use of Work Equipment Regulations 1998 (PUWER) as well as the 1974 Act referenced above.

4.3 The Council is required to ensure that all passenger lifts, when in use, are thoroughly examined after substantial and significant changes have been made, at least every six months if the lift is used to carry people (or in accordance with an examination scheme) and following “exceptional circumstances” such as damage to, or failure of, the lift, long periods out of use or a major change in operating conditions which is likely to affect the integrity of the equipment.

4.4 Where stairlifts, hoists or through floor lifts have been provided in communal areas, the Council has responsibilities for the safety of all users under Section 3 of the Health and Safety at Work Act 1974. These may be adequately discharged by undertaking regular maintenance and inspection, (6-monthly, done to the standard of a thorough

examination). LOLER (thorough examination) and PUWER (maintenance and inspection) apply only to stairlifts provided as work equipment for use by employees.

4.5 Stairlifts in domestic properties are not subject to LOLER inspections, however, the council will ensure that these are maintained and inspected, at a minimum, every 6 months, subject to the condition of an individual stairlift, where the Council has installed the stairlifts.

4.6 Insurers may impose demands for similarly stringent levels of risk management to cover public liability

Statement of Intent

5.1 The Council acknowledges and accepts its responsibilities with regard to lift safety and the inspection and maintenance of lifts, stairlifts and hoists.

5.2 All lift, stairlift or hoist equipment in communal areas and any equipment in tenant's homes that was installed by the Council is the responsibility of the Council.

5.3 The Council will hold accurate records against each property it owns or manages, identifying where there is a lift, stair lift or hoist together with the written examination scheme for each installation.

5.4 The Council will appoint/train competent 'responsible persons' who will be responsible for the operation, condition and compliance with all relevant statutory requirements. This includes taking action (within the advised timescales) to remedy any faults or defects identified through routine inspections or insurer's thorough examinations.

5.5 The Council will ensure that it meets all of its legal requirements in regard to lift safety operations through a combination of regular inspections, thorough examinations (in conjunction with the organisation's insurers) and periodic routine maintenance of all relevant lifting equipment within properties it owns and manages.

5.6 The Council will ensure that all lifts in properties it owns and manages will be fully accessible for disabled users (as per the requirements of the Equality Act 2010, and to the specifications outlined in Part M of the Building Regulations 2004). The Council will work to remove asbestos from old lift motor rooms and brake pads.

5.7 The Council will endeavour to ensure that all lifts and lifting equipment in properties it owns and manages will be in full working order at all times. Where the Council becomes aware that lifts or lifting equipment are not operating as they should, emergency repairs orders will be issued to remedy faults as quickly on the timescales as stated below:

Repair Type	Target response times following work order issued	Target fix time following work order issued	Comments
Emergency	Entrapment 1 hour	Fix where possible or make safe within 24 hours	Repairs needed to avoid danger to health, or that pose a risk to the safety of the safety service users. “Make safe” repairs may require a follow up visit to complete the repair.
Emergency	Breakdown Within 4 hours during between 8am – 8pm – Monday to Sunday	Fix where possible or make safe within 24 hours For stairlifts where there is not a complete breakdown but faults are appearing, the response time is within the first 48 hours of the report of the fault having been made	Repairs that are a major cause of discomfort or inconvenience. “Make safe” repairs may require a follow up visit to complete the repair.
Emergency	Breakdown Within 4 hours – Out of Hours	Fix where possible or make safe within 24 hours	Repairs that are a major cause of discomfort or inconvenience. “Make safe” repairs may require a follow up visit to complete the repair.
Urgent	Within 24 hours	Fix within 5 days	These repairs do not cause immediate damage to the building, its occupiers, or neighbouring properties or user inconvenience
Routine	Appointment to be confirmed within 24 hours	Timescale to be agreed with the Council	This is for further works that may be required following a repair, Thorough Examination or Planned Preventative Maintenance (PPM) where the Council will advise of the target fix time

5.8 All lift repairs should be carried out in accordance with approved standards and the manufacturer’s instructions. Thorough Examinations should be undertaken by engineers who are UKAS accredited to ISO/IEC17020 standard. All lift and lifting equipment work will be undertaken by engineers with a minimum of a Level 3 industry

recognised qualification in lift servicing and repair, supported by appropriate practical and theoretical knowledge and experience.

5.9 Where it is not possible to return the equipment to working order or it must be turned off for safety reasons, the contractor will inform the Council immediately. For lifts in communal areas used by multiple residents Property Services will advise the Director of Housing and site staff so that residents can be kept informed.

5.10 The Council will ensure that all prescribed maintenance and relevant inspections is carried out on all known aids and adaptations designed for lifting operations, including platform lifts, stairlifts and hoists, in properties it owns and manages. These checks will take place every six months across all lifting equipment types and may be carried out more frequently where required in line with manufacturers' recommendations or following any void works which may impact the installation (provided the lift is not to be removed prior to a new tenancy commencing).

5.11 The Council will respond and take remedial action for any defects to aids and adaptations designed for lifting operations identified during routine use in line with the standard provisions for repairs and maintenance. All requests of this nature will be addressed.

5.12 Where access is required to a residential dwelling to carry out an inspection or planned preventative maintance (PPM) visit (such as, for example, a stairlift or hoist or through floor lift) this will be managed in accordance with the Council's No Access policy.

5.13 Access attempts will start 8 weeks ahead of the due date for the inspection to ensure all reasonable and practical efforts have been made to complete the examination/maintenance visit before the due date, with a full and detailed audit trail maintained.

5.14 Access efforts will include appointment letters, phone calls and property visits by the contractor and their Tenant Management Officer, with further support from Landlord Services if required. The procedure should allow sufficient flexibility to accommodate residents' needs and circumstances.

5.15 The Council will ensure that there are clear procedures in place and these procedures are communicated to, and understood by, all relevant staff for appropriate action in the event of any persons becoming trapped in lifts the Council owns or manages.

5.16 The Council staff cannot release any persons trapped in lifts, as they are not competent to do so safely, but may provide reassurance until such time as the relevant lift maintenance contractors and/or emergency services arrive, as appropriate.

5.17 The Council will have a service level agreement with lift maintenance service providers that ensures an emergency response in cases of entrapment.

5.18 The Council will aim to ensure all passenger lifts have an intercom fitted that dials directly to a dedicated call centre. In cases of entrapment, call handlers will follow a

scripted risk assessment to determine the medical condition of any persons trapped. If there is an urgent concern for a person's welfare the emergency services will be called and asked to attend immediately.

5.19 The Council will ensure that all lifting equipment used on sites it owns or manages is thoroughly examined by a competent person before it is commissioned into use and is then subject to periodic examination in accordance with the equipment's examination scheme.

5.20 The Council will ensure that only suitably competent consultants, and engineers undertake works for the organisation in respect of lifts, stairlifts and hoists. Consultants will be employed to undertake visual inspections and audits, for quality assurance purposes, and liaise with the engineers as appropriate.

5.21 The Council will ensure that robust processes and controls are in place to ensure that all remedial works identified through routine maintenance, inspections and insurer's inspections are completed within a reasonable timescale commensurate with the risk identified. This will include removing asbestos from old lift motor rooms and brake pads.

5.22 The Council will ensure robust processes and controls are in place to ensure that any health and safety incident relating to lift safety is properly reported as required under RIDDOR. These include defects classed as 'immediately dangerous'.

5.23 The Council will ensure that robust processes and controls are in place to manage works to void and occupied properties that may affect existing lifts, stairlifts or hoists.

5.24 The Council will implement a robust process to deal with all changes to housing stock, including new property acquisitions, disposals and stock transfers, in order to ensure that properties are not omitted from the compliance programme, and to ensure that records remains up-to-date.

5.25 The Council will ensure contracts and service level agreements are in place with the contractors delivering the compliance service and ensure that all contractors' employee and public liability insurances are up to date on an annual basis..

Compliance Risk Assessment/Inspection Programmes

6.1 The Council will establish and maintain a risk assessment for lift safety operations. This risk assessment will set out all of the organisation's key lift safety risks together with appropriate mitigations.

6.2 To comply with the requirements of the Construction (Design and Management) Regulations 2015 (CDM) a Construction Phase Plan will be completed for all repairs work to void and tenanted properties (at the start of the contract and annually thereafter), component replacement works and refurbishment projects. This plan will detail any lift installations that may be affected by the works and detail all necessary work required to make safe and reinstate lift installations to ensure that they are safe to use and continue to comply with all relevant legislation and any relevant written examination scheme, including any testing and maintenance.

6.3 The Council will carry out a programme of maintenance visits by competent persons to all properties that have a lift, stairlift or hoist and a written examination scheme in place where the Council has installed the stairlifts. These programmes will ensure that all maintenance and testing set out in the written examination scheme is fully completed at the times and intervals stated. This will include the removal of asbestos from old motor rooms and brake pads.

6.4 The Council will oversee a programme of thorough examinations of passenger lifts by competent contractors appointed by the Council's insurers. This is to ensure that the organisation's responsibilities towards lift safety are being discharged and provide its insurers with adequate assurance around the quality of lift safety management.

6.5 The Council will carry out a programme of independent third-party quality assurance audits annually to 10% of written examination schemes for lifts (where not included within the insurer's inspection programme). This is to ensure that all examinations and planned maintenance activities are being fully and robustly implemented and completed. This is additional to inspections carried out by the Council's insurers.

Compliance

7.1 The Council will ensure there is a robust process in place for the management of any follow-up works required following the completion of routine maintenance inspections, or where identified by a competent person, when undertaking required maintenance activities.

7.2 The Council will ensure there is a robust process in place for the management of any follow-up works required following the completion of inspections by the organisation's insurers.

7.3 The Council will ensure that there is a robust process in place to collate and record details of all remedial works completed against individual installations.

7.4 The Council will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regard to lift safety.

7.5 The Council will maintain a core asset register of all properties with lifts, stairlift or hoist and written examination scheme in place. This register will also hold data against each property asset of the type, age and condition of lift plant in place.

7.6 The Council will establish and maintain accurate records of all written examination schemes and any associated remedial works completed and keep these for a period of not less than 5 years. Records should include the person or people responsible for conducting the inspection; any significant findings of inspections; the written examination scheme and its implementation; and the results of any inspection, test or check carried out, together with the dates. This should include details about the state of operation and condition of the installation.

7.7 The Council will establish and maintain accurate records of all inspections carried out by its insurers, the findings of these inspections, and records of completed remedial works, where identified by insurer's inspections; including dates.

7.8 The Council will ensure that records of all inspections and thorough examinations will be available to the Competent Person at all times and that hard copies of records can be produced, if required by the local enforcement authority.

7.9 The Council will keep a record of any entrapment incidents and will use these to inform future revisions of Examination Schemes.

7.10 The Council will hold and maintain accurate records on the qualifications of all consultants and engineers undertaking lift inspection and maintenance works for the organisation.

7.11 The Council will ensure robust processes and controls are in place to provide and maintain appropriate levels of security for all lift safety related data.

7.12 Robust performance indicator measures will be established and maintained to ensure the Council is able to report on performance in relation to lift safety.

7.13 Performance measures will be produced and provided at Corporate Leadership Team (CLT) as part of the reporting cycle, as required. As a minimum these measures will include reporting on:

• Compliance with written examination schemes for lift plant;
• The number of entrapments within lifts (in month and year to date);
• The number of outstanding high- and medium-level risk actions as identified in insurer's inspection reports;
• The number of RIDDOR notices issued with regards to lift safety.
• Communal (passenger) lifts with a valid insurance check (LOLER).

7.14 Performance will be monitored by Property Services and may also include:

• lifts with a completed service;
• Communal (passenger) lifts with a valid insurance check;
• Domestic (individual) lifts with a completed service.

7.15 In addition, performance reporting may also include (where necessary) written narrative on the current position, mitigating circumstances and/or progress on corrective action. The standard operating procedure for out of office hours maintenance can be found in Annex A to this policy.

7.16 The Council will carry out independent third-party quality assurance audits annually to a minimum of 10% of written examination schemes for lifts (where not included within the insurer's inspection programme) to ensure that all examinations and planned maintenance activities are being fully and robustly implemented and completed. This is in addition to inspections carried out by the Council's insurers.

7.17 The Council will carry out an independent audit of lift safety at least once every two three years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction action.

Non-Compliance/ Escalation Process

8.1 The definition of non-compliance in relation to this policy refers to any incident which results in a potential breach of legislation or regulatory standard, or which causes or has the potential to cause a significant risk to health or safety.

8.2 Any non-compliance issue identified at an operational level will be formally reported to the Council's Director of Housing.

8.3 The Council's Director of Housing will agree an appropriate course of corrective action to address the non-compliance issue and report details of the same to the Corporate Leadership Team.

8.4 The Director of Housing will ensure Corporate Leadership Team (CLT) and the Council's Cabinet Member for Housing is made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

8.5 In cases of a serious non-compliance issue the Corporate Leadership Team and the Council's Monitoring Officer will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation, or any other relevant organisation such as the HSE, as part of the Regulatory Framework.

Training

9.1 The Council will ensure that all operatives working for, or on behalf of, the organisation have the relevant training required for their role which will include asbestos awareness training. This policy and the procedures that support it will be subject to a range of training across the Council and will involve all relevant stakeholders. The training will be bespoke and tailored to the individual stakeholders and refresher training will be provided as appropriate.

9.2 Training will include team briefings for those employees who need to have a basic understanding and awareness of lift safety but who may not be directly involved in the delivery of the lift safety policy. This will be basic lift safety awareness training.

9.3 On-the-job training will be provided to those employees who will be responsible for managing the programme of lift inspections, planned maintenance and repair works as part of their daily job. The Council will have a designated lead Officer responsible for operational delivery who would have undertaken appropriate training and have sufficient experience to meet the criteria of a 'competent person' as stated by the Health and Safety Executive (HSE).

Equality, diversity, inclusion, and vulnerability (including most at risk groups)

10.1 An Equality Impact Assessment (EqIA) has been carried out to determine whether the policy would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010.

10.2 Whilst the EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by this policy, it is identified that there are certain groups at increased risk from malfunctions of lifting equipment. These groups are:

- children
- adults with learning difficulties
- oxygen users
- people taking certain medication
- those suffering the effects of drugs and alcohol
- adults aged 65 and older
- people with disabilities

10.3 This policy aims to reduce the risks to these groups of people through proactively identifying these risk factors, raising awareness and education and making Safe and Well referrals to Oxfordshire Fire and Rescue Service where appropriate. Keep safe and well | Oxfordshire County Council

10.4 We will assess the needs of residents who inform us they have a disability such as a hearing impairment, visual impairment, and mobility issue, and will provide appropriate equipment or support.

Communication of the policy

11.1 This policy will be communicated internally to Oxford City Council staff and key stakeholders.

Resident communication

12.1 We regularly share information with residents. This is done through our resident community strategy which includes sharing regular safety messages through resident emails, letters, leaflets, and social media.

12.2 Key content from this policy will be included in the Oxford City Council Welcome Pack and Oxford City Council webpage.

12.3 A full copy of this policy will be made available via the Oxford City Council website

Resident Engagement

13.1 Oxford City Council is committed to providing a high level of customer care and positive communication.

13.2 Further monitoring of feedback will take place through resident surveys and this intelligence will be used to inform future reviews of this policy.

13.3 Periodic engagement with residents will take place to ensure that this policy, along with other policies, remain customer facing.

13.4 Residents who are wanting to report a non-urgent safety concern can do so by using the link below: Report a Building Safety Concern with council housing | Instructions – Oxford City Council

13.5 All emergency and urgent safety reports should be made to 01865 249811.

Policy review

14.1 A full policy review will take place in response to any changes in legislation, significant events that may impact on the policy, or at periods not exceeding 2 years.

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Appendix 1: OCC Guidance, Procedures and Policies

- **Oxford City Council Safeguarding Policy**
- **Oxford City Council Equality, Diversity and Inclusion Strategy**

This Policy supports objectives detailed in the OCC Strategy 2024-2028*:*

Appx 2 OCC Objectives

This Policy supports objectives detailed in the OCC Corporate Strategy 2024-2028*:*

- Housing, Homelessness and Rough Sleeping Strategy 2023 to 2028
- Meet the Housing Needs of Vulnerable Groups
- Support Sustainable Communities
- Good Quality Homes For All
- Thriving Communities Strategy

Annex A

Standard Operating Procedure for After-Hours Lift Maintenance

Purpose

This Standard Operating Procedure (SOP) outlines the steps to be followed when carrying out lift maintenance outside regular operating hours. The objective is to ensure safety, compliance, and minimal disruption to building occupants.

Scope

This SOP applies to all maintenance personnel and contractors responsible for lift servicing in the premises during evenings, nights, weekends, and public holidays.

Procedure

1. **Pre-Maintenance Preparation**
2. Obtain written authorisation from building management for out-of-hours access.
3. Notify security and relevant stakeholders of scheduled maintenance, including estimated start and end times.
4. Ensure all required tools, PPE, and lift maintenance documentation are available.
5. **Site Access and Safety**
6. Sign in at security and collect access keys or passes.
7. Display warning signage at lift entrances and on the affected floors to inform occupants of maintenance work.
8. Ensure the lift is taken out of service and locked off before commencing work.
9. **Maintenance Activities**
10. Follow manufacturer's guidelines and safety protocols during all maintenance tasks.
11. Record all actions, parts replaced, and observations in the maintenance log.
12. Report any hazards or defects identified during maintenance to management immediately.
13. **Completion and Handover**
14. Test the lift thoroughly to confirm safe operation.
15. Remove signage and restore lift service for occupants.
16. Sign out with security and submit maintenance reports to building management.

Emergency Procedures

If an incident occurs during maintenance, immediately contact building security and emergency services. Follow established protocols for evacuation and reporting.

Documentation

All maintenance records should be completed and filed with the HRA Assets Team within 24 hours of the work being conducted.

Review

This SOP should be reviewed annually or following any major incident or regulatory change.

(TM 04 June 2026 81150)

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

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A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	6. **Race & Ethnicity**
2. **Disability**	7. **Religion or Belief**
3. **Gender Reassignment**	8. **Sex**
4. **Marriage & Civil Partnership**	9. **Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

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7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	Lifting Equipment and Lifting Operations Policy	**2.**	**The implementation date of the activity under consideration:**	May 2026
3.	**Directorate/Department(s):**	Housing	**4.**	**Service Area(s):**	Housing
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	James Watkins jwatkins@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	James Watkins jwatkins@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	New ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	No
9.	**Date this EqIA started:**	November 2025			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	Yes	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	May 2026

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐	☐ Decommissioning	☐ Commissioning	☐	
		X ☐	x Others. Please specify: HRA Policy			
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	X Good, affordable homes	☐ Strong, fair economy	☐ Thriving Communities	☐ Zero Carbon Oxford	☐ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	x Understanding and working with our communities.	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	The policy specifies how lifting equipment and lifting operations should operate and be maintained to ensure the health and safety of all residents, visitors, staff and contractors				
16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill	In 2018, the then Government published the Social Housing White Paper to ensure residents of social housing are safe, listened to, live in good quality homes and have access to help when things go wrong. Consequently, the Social Housing Regulation Act ("the Act") received Royal Assent in July 2023. The Act forms a new regulatory framework for the social housing sector, aiming to give residents greater powers and improve access to quick and fair solutions to				

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	Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	problems. This includes a full equalities and diversity assessment is undertaken to meet the needs of all tenants. Over the course of its 2025/26 financial year, the housing service has demonstrated a clear commitment to equalities and diversity across its services. Policies have been developed to ensure that all individuals, regardless of background, have fair and equitable access to housing opportunities. Service user data has been collected and reviewed to monitor representation and identify any potential gaps in service provision. This analysis has highlighted areas of strength, such as the successful accommodation of residents from a range of ethnic, age, and ability groups. However, it has also revealed opportunities for further improvement, particularly in reaching underrepresented communities and ensuring that all communication is accessible for people with disabilities or those for whom English is not a first language. Feedback from residents has been used to shape service delivery, with regular consultations helping to ensure that diverse voices are heard and acted upon. In summary, this policy has been drafted to meet the needs of all residents taking full account of all equalities provisions.

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Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—**	Yes – Residents Involvement Programme The Council recognises its equalities responsibilities as well as the critical need to listen and act on the lived in experiences of our residents.

	-when, -how many, and -the approach taken.	
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports, -briefs.	- Legislation - Risk assessment for vulnerable groups - Equalities assessment exercise - Engagement with residents
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	N/A

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Section 4: Impact analysis.

20.	**Who does the activity impact?**	**Service Users**	Yes x	**No**	Don't Know ☐
		Members of staff	**Yes** x	No ☐	Don't Know ☐

Check as needed. The impact may be positive, negative or unknown.				
	General public	**Yes** x	No ☐	Don't Know ☐
	Partner / Community Organisation	Yes ☐	**No** x	Don't Know ☐
	City Councillors	Yes x	**No** ☐	Don't Know ☐
	Council suppliers and contractors	Yes x	No	Don't Know ☐

21. **Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age		☐	x	☐		

Disability **(Visible and invisible)**		x		☐	The lack of a passenger lift provision has a severe impact for residents with mobility disabilities. Residents with disabilities are also reliant on the safe and reliable use of hoists, platform lifts and stair lifts. Consequently, the policy has been drafted to ensure the pressing needs of residents with disabilities are at the forefront of this policy with their needs being prioritised as a direct consequence of the impact of this policy. This is to ensure residents with disabilities are fully supported.	
Gender re-assignment		☐	x	☐		
Marriage & Civil Partnership	☐	☐	x	☐		
Race, Ethnicity and/or Citizenship		☐	X	☐		

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Pregnancy & Maternity	x	☐		☐	The need for passenger lifts to be reliable for women who are in advanced state of pregnancy is recognised in this policy. Consequently, there is a clear priority to ensure passenger lifts are maintained and action is taken to quickly and efficiently to ensure repairs are undertaken when required.	
Religion or Belief	OBJ	☐	X	☐		
Sex			x	☐		
Sexual Orientation	☐	☐	X	☐		

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☐	☐	X	☐		
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local	☐	☐		☐		

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authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.						
Other **For example:** - Unpaid carers - Prison population - Homeless population - Council suppliers & contractors -Cabinet Members	☐	☐		☐		

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
	☐	Stop and reconsider the activity.	x	Adjust activity before beginning the activity and continue to monitor.		No major change(s) or adjustments		No major change(s) or adjustments and continue with the activity. No

						and continue with activity but continue to monitor.		need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**		**Benefits of Implementation**: **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: **Improves Representation**:

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-** - team, -directorate, -service area,		Housing

	-Equalities Steering Group,etc.				
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	HRA Team			
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	Yearly	**27.**	**Date when the EqIA will be reviewed again.**	May 2027

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Section 7: Sign-off

Name: James Watkins	Name:	Name: Full Name
Job Title: Housing Policies and Projects Officer	Job Title:	Job Title: Type here
Signature:	Signature: ----------	Signature: ----------

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.
4) EDI Lead.
5) EDI Specialist.
6) For joint projects, please

Name:	Name: Full Name	Name: Full Name
Job Title:	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
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Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
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You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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Voids Policy

Purpose

1.1 This policy outlines our approach to managing empty properties ('voids'), to minimise the length of time a property stays empty. This will consequently reduce the loss of rental income and maximise income for the Housing Revenue Account (HRA), while ensuring that applicants in housing need are allocated a suitable property as soon as possible.

1.2 A property is defined 'void' when no tenancy exists following vacation by the previous occupant, and no rental income is being received. The 'void period' exists between a tenancy ending and a new tenancy beginning.

1.3 There are several reasons that lead to the initiation of the void process, which are outlined below:

- Termination: The resident supplies formal written notice.
- Death of resident: The resident dies and there is no successor to the tenancy.
- Transfer: The resident moves to another City Corporation owned property. Abandonment: The resident has vacated the property without proper notice.
- Eviction: The Council has completed court action and obtained authority to evict the resident/s
- Decants: Residents being re-housed following plans to redevelop, dispose of or demolish housing stock

1.4 This policy sets out the Council's approach to the effective management of void properties, ensuring that homes are brought back into use as quickly as possible whilst meeting required standards of quality, safety and compliance.

1.5 The policy aims to balance the need to minimise the length of time properties remain empty and the associated loss of rental income to the Housing Revenue Account (HRA), with the delivery of homes that are safe, decent, and fit for occupation at the start of a new tenancy.

1.6 It provides a clear framework for managing the void process from tenancy termination through to re-let, clarifying responsibilities, standards and decision-making to ensure a consistent, transparent and value-for-money approach.

1.7 A property is defined as 'void' when no tenancy exists following vacation by the previous occupant and no rental income is being received. The 'void period' is the period between a tenancy ending and a new tenancy beginning.

Duties of the Council as a Landlord

Homes (Fitness for Human Habitation) Act 2018

2.1 The Homes (Fitness for Human Habitation) Act 2018 states that landlords have a duty of care when it comes to meeting their existing responsibilities

relating to property standards and safety, and making sure their property is fit for human habitation at the beginning of the tenancy and throughout.

Regulator for Social Housing – Safety and Quality Standard

2.2 Registered providers must have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for residents.

Decent Homes Standard

2.3 Registered providers must ensure that residents homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard.

Health and safety

2.4 When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of residents in their homes and associated communal areas.

Repairs, maintenance and planned improvements

2.5 Registered providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.

2.6 During the void period we will ensure the Council will meet all our legal responsibilities under the relevant and current compliance legislation for the quality, health and safety of incoming occupants in their homes.

2.7 These include gas, water and in-situ electrical installations, including all smoke and fire alarms, will be tested and certified to say that they are in good working order and comply to current legislation. Fire doors and fire prevention mechanisms will be checked and if necessary, replaced to the current relevant legislative standard.

Fitness for Human Habitation

2.8 Under the Homes (Fitness for Human Habitation) Act 2018, the Council has a duty to ensure that its homes are fit for human habitation at the start of a tenancy and throughout its duration. This includes ensuring that properties are safe, in good repair, and free from serious hazards.

Regulatory Standards

2.9 The Council will comply with the Regulator of Social Housing's consumer standards, including requirements to maintain an accurate, up-to-date and evidenced understanding of the condition of its housing stock, which informs the delivery of safe, decent and well-maintained homes.

Decent Homes Standard

2.10 The Council will ensure that its properties meet the requirements of the Decent Homes Standard, as set out in the relevant government guidance, and will continue to maintain homes to at least this standard or any successor standard that may apply.

Health and Safety Compliance

2.11 When acting as a landlord, the Council will take all reasonable steps to ensure the health and safety of residents and occupants in its homes and associated communal areas. The void period represents a critical point at which compliance with health and safety requirements must be assured prior to re-let.

Repairs, Maintenance and Compliance During Voids

2.12 During the void period, the Council will ensure that all statutory safety checks and inspections are completed and that properties meet the Council's letting standard before a new tenancy begins. This includes, but is not limited to, compliance with gas safety, electrical safety, water safety, fire safety measures, alarms and other safety-critical systems, in line with current legislation and regulatory requirements.

Associated Policies and Procedures

2.13 This policy operates alongside the Council's wider suite of housing safety, compliance and asset management policies and procedures, including those relating to gas safety, electrical safety, asbestos management, fire safety, repairs and planned maintenance. These documents set out the detailed standards, processes and responsibilities that support delivery of this policy.

Objectives

3.1 The Council's objectives are to:

- To minimise void rental loss, void periods and void repair costs through effective coordination of repairs and maintenance operations to re-let properties within agreed target times.
- Ensure that properties are managed efficiently throughout the void process by supplying transparency of tasks and responsibilities.
- Ensure that residents are aware of their tenancy obligations in relation to ending the tenancy such as the requirement to give 4 weeks' notice, to return all keys promptly and to fully clear the property and leave it in a clean condition.
- Minimise the rechargeable repairs costs through clear and effective communication with residents

- Ensure that repairs to properties are undertaken to enable properties to be re-let and that where appropriate rechargeable repair costs are met by the outgoing resident or pursued post termination.
- Make effective use of void periods to carry out upgrades or major repairs as appropriate
- Make effective use of the void period to consider possible works which would improve the energy efficiency and thermal comfort of the property, to help meet the Council's net zero carbon targets.
- Prevent end of tenancy arrears wherever possible.
- Effectively meet housing need in the city through quick return of use of properties.
- Achieve high levels of resident satisfaction with the condition of properties at the beginning of the tenancy
- Minimise rental loss to the Housing Revenue Account by reducing void periods and managing void repair costs, through effective planning and coordination of repairs and maintenance to achieve re-let within agreed target timescales.
- Ensure that properties are managed efficiently and consistently throughout the void process, with clear accountability, defined responsibilities and appropriate oversight.
- Ensure that properties are brought back into use at an appropriate standard, meeting the Council's letting standard and all relevant safety and compliance requirements prior to re-let.
- Ensure that residents are aware of, and meet, their obligations at the end of a tenancy, including notice requirements, property clearance, key return and rent payments, supported by clear and timely communication.
- Minimise avoidable and rechargeable repair costs, and ensure that recharge processes are fair, transparent and proportionate, with costs recovered where appropriate.
- Make effective and proportionate use of void periods to carry out necessary repairs, planned works or upgrades where this represents value for money and supports the long-term sustainability of the housing stock.
- Make appropriate use of void periods to consider energy efficiency and thermal comfort improvements, in line with the Council's wider decarbonisation and net zero carbon objectives and associated policies.
- Prevent end-of-tenancy arrears wherever possible through early intervention and coordination between services.
- Achieve high levels of resident satisfaction with the condition and quality of properties at the start of a new tenancy.

Roles and Responsibilities

4.1 The Director of Housing will have overall responsibility for the implementation of the Voids policy.

4.2 The Head of HRA Assets, Landlord Services Lead and the Housing Needs and Strategy Manager will have responsibility to develop, implement, and monitor the effective management of Void management, including appropriate management of repairs contracts and service level agreements with

partnering contractors, to ensure the Council delivers an efficient and value-for-money service, by exceeding key performance indicators (KPI's) and financial targets.

4.3 This will be achieved by ensuring voids are re-let on time and that our stock is maintained to the highest possible standard to meet our residents' needs. The HRA Assets Lead will ensure all property related health and safety legislation and regulations are adhered to.

4.4 Council staff and Contractors will follow the Voids Policy and related associated procedures and have an awareness of property-related legislation and regulations to ensure the operational delivery is fair and consistently delivered across our services. Staff and contractors are aware of their roles and responsibilities and regularly carry out mandatory and personal development training offered to them.

Termination of Tenancy

5.1 A resident must give four weeks' written notice of their intention to end their tenure. On receipt of the written notice, the Council will send a letter to confirm the vacant possession date and remind the outgoing resident of their end of tenancy responsibilities, including:

- Confirming arrangements for a pre-void inspection of the property to be completed during the notice period.
- The property, including the garden (if any) is to be left in a clean, tidy condition, and clear of all resident belongings and items.
- The removal of improvements, fittings and fixtures must result in the property being left safe and not detrimental to the condition of the property. Improvements installed without permission or repairs being carried out due to resident neglect, will be subject to recharges
- Pay all rent owed up to the end of the tenancy.
- Return keys on or before the end of tenancy date.
- Provision of a forwarding address.

5.2 A resident must give at least four weeks written notice of their intention to end their tenancy unless a mutual agreement had been reached with a deed of surrender.

5.3 On receipt of written notice, the Council will confirm the vacant possession date and remind the outgoing resident of their end of tenancy responsibilities, including:

- Confirming arrangements for a pre-void inspection of the property to be carried out during the notice period. A Housing Officer and an HRA colleague would form the inspection team.
- Leaving the property, including any garden (where applicable), in a clean and tidy condition and clear of all personal belongings.
- Ensuring that any alterations, improvements, fittings or fixtures are managed in accordance with the Council's policies and the terms of any permissions

granted. Where improvements have been authorised and deemed suitable to remain, they should not be removed unnecessarily. Unauthorised alterations, or damage arising from neglect, may be subject to recharge in order to reinstate the property to an acceptable standard.

- Paying all rent and other charges owed up to the end of the tenancy.
- Returning all keys on or before the tenancy end date.
- Providing a forwarding address to support final account reconciliation and any post-tenancy correspondence.

Pre-Void Inspections

6.1 Carrying out a Pre-Void inspection is beneficial to minimise the void period of a property and to identify any problems that can be discussed with the resident and resolved prior to the tenancy end date.

6.2 The Pre-Void inspection will include the resident's home, and any sheds/garages licensed to the resident. When the inspection is carried out, a checklist is completed and any rechargeable repairs and required clearance of possessions will be discussed with the resident or their representative (should they be present).

6.3 If the resident is not present at the time of the inspection, the Council will write to the resident setting out what rechargeable repairs were identified during the inspection.

6.4 HRA Assets Team will order the necessary void works (which shall include any rechargeable repairs), and a letter will be sent to the resident confirming the amount to be charged and payment process and timescale.

6.5 If a resident leaves either prior to an inspection, or after the inspection but prior to us writing to the resident explaining the recharges, the rechargeable repairs will be ordered and a letter and invoice sent to the forwarding address advising that the repair work will be recharged and explaining how those charges will be recovered.

6.6 The Council considers the pre-void inspection to be a critical and essential step in the void management process. A robust pre-void inspection supports the timely re-letting of properties, minimises avoidable void repair and clearance costs, and provides outgoing residents with clear expectations of what is required to leave the property in an acceptable condition.

6.7 Where notice of tenancy termination is received, the Council will endeavour to carry out a pre-void inspection within the first two weeks of the notice period, wherever practicable. This allows sufficient time for the outgoing resident to address identified issues whilst the tenancy remains active.

6.8 The pre-void inspection will comprise a full walk-through of the property, including any gardens, sheds or garages licensed to the resident. The inspection will record the condition of the property and clearly identify:

- Repairs or remedial works required to bring the property to an acceptable standard for re-let.
- Any alterations or improvements and whether these are authorised in line with the Council's policies
- Any items, furniture or possessions that must be removed by the outgoing resident prior to the end of the tenancy.
- Any potential rechargeable repairs, clearance or remedial costs that may be incurred if actions are not completed.

6.9 Findings from the pre-void inspection will be clearly communicated to the outgoing resident or their representative, setting out the actions required before the tenancy ends and the potential consequences if these are not addressed.

6.10 The Council will provide outgoing residents with clear written guidance, including information on how to leave the property, expected standards at termination, and the circumstances in which charges may be applied. This may include the use of standard information leaflets or appendices to support consistent understanding and reduce avoidable disputes.

6.11 A record of the completed pre-void inspection, including any supporting photographs or documentation, must be saved against the property record within the Council's housing management system. A copy of the inspection outcomes will also be shared with the relevant Council officer or team responsible for coordinating and instructing void works, to support early planning and mobilisation of works in advance of keys being returned.

6.12 Where the resident is not present at the time of the inspection, the Council will write to the resident to confirm the outcomes of the inspection, including any actions required and any potential rechargeable items identified.

6.13 Where a resident vacates the property prior to a pre-void inspection or fails to complete required actions identified during the inspection, the Council may arrange for works, repairs or clearance to be undertaken. Any costs reasonably incurred as a result may be recharged to the outgoing resident in accordance with the Council's recharge processes, with details provided to the forwarding address.

Return of keys

7.. The keys should be returned by the resident or the resident's representative on or before the agreed vacant possession date.

7.2 The rent account for the outgoing resident will be terminated on the date that the keys are returned. This ends the outgoing resident's rent obligation and starts the void accrual period from the following day.

7.3 Should keys not be returned on, or before, the agreed termination date, rent will continue to be charged on the property until the keys are received.

Death of Resident

8.1 When a resident dies and there is no succession, it is compulsory that the tenancy is formally ended through a four-week notice being served on the next of kin or the Public Trustee once notified.

8.2 The Council will advise the deceased resident's next of kin or Public Trustee of the process to formally end the tenancy, supplying the end of tenancy and vacant date.

8.3 The Council recognise that the loss of a family member or friend is a difficult and sensitive period and therefore extra time will be provided, if required, to clear the property past the expiry date of the notice.

8.4 The property must be left empty and in good condition. The estate of the deceased is responsible for settling any outstanding charges in respect of the property. The estate should also ensure that all supplies are turned off.

Abandonment

9.1 Abandonment will be decided following an investigation when there has been evidence or information supplied that the registered resident has left the property with no intention to return, and no termination of the tenancy has been received.

9.2 The Council will make reasonable enquiries to prove whether a property has been abandoned and record their findings.

9.3 The Council will consider:

- If the property is secure
- If possessions have been left in the property
- Speaking to family and friends on contacts list
- Information neighbours can provided
- Unauthorised occupants
- Collaborating with the Fraud Investigation team.

9.4 Legal action should be taken to recover the property once adequate evidence has been gained to confirm the abandonment.

9.5 Images should be taken to also act as a record to any items left by the previous resident and utilised as an inventory.

Eviction

10.1 Following an eviction - when receiving the property back via the courts and execution of the warrant - pictures and/or videos will be taken to also act as a record to any items left by the previous resident and utilised as an inventory within 24/48 hours of the repossession date. The Council will arrange removal of any items that are left to be placed in storage. The items would be left in

storage for one month where the Council is aware where the owner is and can serve notice on the tenant(s) to collect the items. Where the Council is unaware where the tenant(s) is, the period would be six months storage. After these periods, the Council would dispose of the items. This is in line with s41 of the Local Government (Miscellaneous Provisions) Act 1982.

Repairs

11.1 After the property has been vacated by the outgoing resident, the Council will organise a property inspection which will be undertaken by Council surveyors and staff from Oxford Direct Services or any equivalent organisation. The inspection records the condition of the property, notes property characteristics and records any work to be completed before re-letting. Information and costs about any recharges will be sent to the outgoing resident by letter or email.

11.2 The Council will complete all repair works before the property is re-let and within a clearly specified timescale During this period, an Energy Performance Certificate (EPC) assessment and where required a landlord gas safety record (LGSR) will be completed.

11.3 Once a property has been vacated, the Council will arrange for a post-termination inspection to be carried out by appropriately qualified Council officers and/or representatives of the Council's contracted repairs service. The inspection will record the condition of the property, confirm key characteristics, and identify all works required prior to re-letting.

11.4 The outcome of the inspection will inform a specification of works, which will be prepared in line with the Council's approved void and letting standards. These standards may vary depending on property type, tenure, or intended use, and are set out in the Council's associated policies and technical documents. The specification will ensure that properties are returned to an appropriate, consistent and compliant standard prior to re-let.

11.5 Where applicable, information gathered during the pre-termination inspection will be used to support early planning of works, reduce avoidable delays, and minimise void periods.

11.6 Details of any rechargeable repairs identified during the inspection process will be communicated to the outgoing resident in accordance with the Council's recharge procedures, and with reference to the outcomes of the pre-termination inspection where applicable.

11.7 The Council will ensure that all required repair works are completed before the property is re-let and within clearly defined and monitored timescales. During the void period, the Council will also ensure that all relevant statutory safety checks and certifications are completed as a matter of course prior to re-occupation. This includes, but is not limited to:

- A valid Landlord Gas Safety Record (LGSR), where gas is present
- Electrical safety certification in line with current legislation

- An Energy Performance Certificate (EPC), where required

11.8 No property will be re-let unless it meets the Council's letting standard and all required safety and compliance obligations have been satisfied.

Major Voids

12.1 Where a void property requires major works, and therefore a high level of investment is needed in order to bring it up to an appropriate standard, then an options appraisal may be undertaken in order to assess whether the works should be completed, or if the property should be taken out of use.

12.2 Consideration will be given to:

- Level of rent loss if the property is not occupied and the impact on the Housing Revenue Account
- The level of demand for the property type and area
- The overall cost of the works required. If the assessment finds that the works are financially viable they will be completed.

12.3 Decisions on potential disposals will follow the process as stipulated in the Disposals Policy.

12.4 Where a void property requires significant or non-routine works, and a high level of investment is likely to be required in order to bring the property up to an appropriate letting standard, the Council will apply enhanced oversight and control to ensure that works are justified, properly specified, and aligned with approved budgets and asset investment priorities.

12.5 In such cases, the Council may undertake an options appraisal to determine the most appropriate course of action. This may include consideration of whether works should proceed, be phased, be incorporated into planned investment programmes, or whether the property should be taken out of use.

12.6 The options appraisal will consider, where relevant:

- The level of rental loss associated with the property remaining void and the impact on the Housing Revenue Account.
- Demand for the property type and location.
- The nature, scope and overall cost of the works required to achieve the required standard.
- Whether proposed works include replacement of major components (such as kitchens, bathrooms, heating systems, electrical installations or other lifecycle items) that may be more appropriately delivered through approved capital or planned investment programmes.

12.7 Where major works are approved, the Council will ensure that:

- The scope of works and associated costs are clearly defined and agreed in advance.

- Works are raised against the appropriate budget headings and cost codes, in line with the Council's financial controls and asset management arrangements.
- Replacement of key components is recorded accurately within the Council's asset and property systems to support lifecycle planning, compliance and future investment decisions.

12.8 This approach ensures that high-cost voids are managed in a controlled and transparent manner, supports value for money, and prevents unplanned or inappropriate expenditure being incurred without appropriate visibility and approval.

12.9 Where it is determined that the works required are not financially viable, or that the property is no longer suitable for its intended use, decisions on disposal or alternative use will be taken in accordance with the Council's Disposals Policy.

Adapted Properties

13.1 Properties which are already adapted when they become void will be considered in line with the Aids and Adaptations Policy with the priority being to ensure best use of the adaptations.

13.2 In some instances, where a property has major adaptations, the Council may choose to leave the property void for a longer period until a suitable resident, who requires the adaptations, can be identified. A property will be advertised with the appropriate adaptions listed in order for those on the housing register to identify a suitable tenant. A mobility report would be produced to show those individuals who have a need for adapted properties.

13.3 Decisions to remove major adaptions from properties will be made by the HRA Assets Lead based on all available information on the demand for the property and compliance with the Aids and Adaptations Policy.

13.4 Where a property contains adaptations, these will be considered in line with the Council's Aids and Adaptations Policy, with the primary objective of ensuring the best and most appropriate use of adapted housing stock to meet identified need.

13.5 In some cases, where a property has significant or specialist adaptations, the Council may choose to hold the property void for a longer period in order to identify a suitable incoming resident whose needs match the adaptations provided.

13.6 Information relating to adaptations within a property, including those identified during the pre-termination inspection process, will be used to inform decisions about re-let, suitability, and allocation. The Council will seek to maintain accurate records of adapted properties and the nature of adaptations provided, to support effective matching, asset management and strategic planning.

13.7 Decisions to remove, alter or replace adaptations will be made by the Council's HRA Assets team and Landlord Services taking into account demand, suitability, value for money, and compliance with the Aids and Adaptations Policy. Where adaptations have been authorised and are suitable to remain, they should not be removed unnecessarily.

13.8 This approach supports the effective use of adapted housing stock, reduces avoidable waste, and ensures that adaptations are managed in a coordinated and strategic manner.

Advertising Properties

14.1 Void properties will be advertised once the pre voids property inspection during the notice period or when the tenant has left the property unexpectedly has confirmed their condition, including any existing adaptations. The details of the inspection would be on a pro forma template before advertisement. All available properties will be marketed in line with the Council's established weekly advertising cycle. Shortlisting will be completed promptly, and nominations will be made within the agreed key performance indicators to ensure an efficient and transparent allocations process. All offers will be made in accordance with the Councils Allocations Scheme.

New Tenancies

15.1 New residents will be invited to sign the Tenancy Agreement. The terms of the Tenancy Agreement will be explained to ensure that the resident(s) is fully aware of the landlord and resident's responsibilities, and the consequences if conditions are breached. The new resident will also be provided with appropriate advice about:

- Paying their rent
- Applying for benefits, if required
- Setting up utilities
- Reporting any repairs
- Property information in the form of the property pack

15.2 All new residents will be given the opportunity to provide feedback relating to the voids and allocations process by completing a New Tenancy Survey at sign up. Feedback and satisfaction will be monitored and reported in accordance with the council's performance management framework.

Performance Management and Benchmarking

16.1 The Council is committed to ensuring its voids work offer excellent value for money and will therefore ensure that a range of mechanisms are in place to demonstrate value.

16.2 The mechanisms used will include:

- Benchmarking against peers. This is defined as local authority social housing providers and Registered Providers who have a housing stock of up to 10,000 dwellings
- Market testing against other providers
- Reviewing internal cost and performance data
- Internal business reviews

16.3 Operation of the Voids Policy and its procedures and subsequent data will be recorded monthly and reported on a quarterly basis. Details of procedures for gathering information and recording each stage of void processing and this information will be used to provide the following performance monitoring indicators:

- Average void time (standard voids) (days)
- Average void time (major voids) (days)
- Average void turnaround time (contractor only) (days)
- Total voids (number)
- Voids pre-handover inspections completed (%)
- Average void to advertising time (days)
- Voids meeting Letting Standard at handover
- Properties let after one offer (%) (YTD)
- Number of properties let
- Number of properties let (management transfer/direct offer)
- Properties offered within 10 days of handover (%) (YTD)
- Properties refused due to quality or condition (number - YTD)

16.4 Teams will work together within the Council and the Local Authority Trading Company (Oxford Direct Services) to ensure the efficient delivery of void properties to the market.

16.5 The following approach would be followed if targets are being missed to ensure void properties are not re-let in a timely period.

Stage	**Action**	**Responsible Party**	**Outcome / Next Step**
1. Ongoing Monitoring	Void performance will be reviewed through regular void meetings involving the Council, Oxford Direct Services (ODS), and Allocations. Progress against agreed target timescales will be monitored, including emerging risks, revised completion dates and barriers to re-let.	HRA Assets Team / Voids Manager	Live oversight of void performance and early identification of delay risks
2. Operational Management	Where a void is forecast to exceed target, the Voids Manager will review the	Voids Manager	Revised timescales and actions agreed

	reasons for delay, liaise with the relevant contractor or service area, and agree revised timescales and required actions to support delivery.		
3. Management Intervention	Where delays continue, or where specific issues are affecting delivery, the Voids Manager will work with the relevant contractor, service area or delivery partner to review progress, clarify expectations, and monitor the actions required to progress the void. This may include agreeing a recovery plan, revised timescales, and enhanced monitoring arrangements.	Voids Manager / HRA Assets Team	Recovery plan in place and progress monitored
4. Senior Escalation	Where delay presents a material risk to void performance, rental income, customer outcomes or reputation, the matter will be escalated by the Voids Manager to the HRA Operations Manager for review and direction. The Head of HRA Assets will be informed through reporting and escalation arrangements where delays are prolonged, high-risk, or otherwise significant.	Voids Manager / HRA Operations Manager	Senior management oversight applied, with Head of HRA Assets visibility where required
5. Reporting and Assurance	Void performance, including prolonged delays, emerging trends and high-risk cases, will be reported through the Council's management and governance arrangements. This will ensure appropriate oversight by the Head of HRA Assets and wider senior leadership as required.	HRA Operations Manager / Head of HRA Assets	Organisational oversight, reporting assurance and service improvement

16.6 Timely escalation helps minimise income loss and ensures properties are re-let efficiently.

16.7 Regular monitoring and communication between teams is essential throughout the process.

Key Targets

17.1 The Council recognises the importance of working to clear and measurable timescales in the management of void properties. For the purposes of this policy, a distinction is made between:

a) contractor works targets, which relate to the period from works commencement to completion of void works; and
b) end-to-end relet performance, which relates to the full void period from the previous tenancy end date to the start date of the new tenancy.

17.2 - The following contractor works targets apply once the void works have commenced, subject to property classification, specification, statutory compliance requirements, access, availability of materials and any approved exceptions:

- Minor void works: 5 working days
- Standard void works: 15 working days
- Major void works: 25 working days
- Exceptional voids: target timescale to be agreed on a case-by-case basis, with enhanced monitoring and review

17.3 These contractor works targets do not represent the full end-to-end void turnaround target. The overall end-to-end relet period includes all stages of the void process, including tenancy termination, key return, inspection, specification, compliance checks, works, advertising, allocation, viewing, acceptance and tenancy sign-up.

17.4 - The Council's indicative end-to-end standard void relet target is 35 calendar days, measured from the previous tenancy end date to the start of the new tenancy, excluding properties formally classified as major, exceptional, complex, or deliberately held for operational reasons. This target will be monitored alongside stage-based performance indicators to ensure that delays are identified and addressed across the full process.

17.5 - In respect of decant properties, adapted properties awaiting a suitable match, properties held for operational reasons, or properties requiring options appraisal, disposal consideration, structural works, fire / flood reinstatement or other complex intervention, the Council may classify these separately so that they do not distort standard void performance reporting. These properties will remain subject to management oversight, review and appropriate reporting.

17.6 - It is important to note that all targets are intended to support effective performance management and service improvement. Staff, contractors and partner teams should always seek to minimise avoidable delay, reduce rent loss and return homes to occupation as quickly as possible, while ensuring that homes are safe, compliant and meet the Council's letting standard.

17.7 A major void includes:

- Structural repairs – these are works that are essential to maintain stability and weather resistance in the main structural elements of a dwelling ie floors, walls and roofs as determined by the surveyor. Major works to these elements will involve replacement or substantial reconstruction of the component or element
- Site works – this is work around and specific to the dwellings involved and is essential to the safety, security and protection of tenants (eg the replacement or substantial reconstruction of unstable boundary walls, footpaths etc)
- Consequential and other works – these are works that are required as a consequence of major repairs such as reinstatement or making good finishes and fittings.
- Any works that significantly improve the dwellings (ie capitalised repairs) should only be classified as major repairs if they could not reasonably be carried out with a tenant in occupation
- Emergency repairs constitute any defect that puts the health, safety or security of the tenant or a third party at immediate risk; or that affects the structure of the building adversely. These would qualify as reasons for classifying the property as needing major repairs
- Asbestos removal – Notifiable asbestos works should be counted as major works. Non-notifiable asbestos works should be counted as standard void works.

17.8 An exceptional void refers to a property that is vacant but is excluded from standard re-letting performance targets due to specific, long-term, or non-routine circumstances. Unlike standard voids (short-term turnovers), these properties are often undergoing major, complex, or strategic work that prevents them from being occupied. This includes installation of components such as, for example, air source heat pumps.

17.9 If an extension is needed due to individual circumstances within a property, the contractor can seek permission from the Council in advance of these timescales being potentially breached.

Training

18.1 The Council will ensure that all staff involved in the void process will have the required skills, training and detailed understanding of this policy and related procedures.

Policy Review

19.1 This policy will be reviewed on a regular basis to ensure it remains current, effective and aligned with legislative, regulatory and organisational requirements.

19.2 The policy will normally be reviewed every three years, or sooner where there are significant changes to legislation, regulation, service delivery arrangements, or the Council's strategic priorities.

Equalities Assessment

20.1 An Equality Impact Assessment (EqIA) has been carried out to determine whether the policy would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010.

20.2 The EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by this policy.

Associated Policies and Documents

21.1 This policy should be read in conjunction with the Council's wider suite of housing, safety, compliance and asset management policies and procedures, including (but not limited to):

Gas Safety Policy
- Electrical Safety Policy
- Fire Safety Policy
- Asbestos Management Policy
- Aids and Adaptations Policy
- Disposals Policy

21.2 Associated operational documents and guidance may include:

- Pre-termination inspection procedures and templates
- Void and letting standards
- Resident guidance and information provided at end of tenancy, including expectations for property condition, clearance of possessions and potential recharges

21.3 These associated documents set out the detailed standards, processes and guidance that support delivery of this policy.

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

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A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	**6. Race & Ethnicity**
2. **Disability**	**7. Religion or Belief**
3. **Gender Reassignment**	**8. Sex**
4. **Marriage & Civil Partnership**	**9. Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

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Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	Voids Policy	**2.**	**The implementation date of the activity under consideration:**	May 2026
3.	**Directorate/Department(s):**	Housing	**4.**	**Service Area(s):**	Housing
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	James Watkins jwatkins@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	James Watkins jwatkins@oxford.gov.uk**Error! Bookmark not defined.**
7.	**Is this a new or ongoing EqIA?**	New ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	No
9.	**Date this EqIA started:**	May 2026			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	Yes	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	May 2026

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐	☐ Decommissioning	☐ Commissioning	☐	
		X ☐	x Others. Please specify: HRA Policy			
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	X Good, affordable homes	☐ Strong, fair economy	X☐ Thriving Communities	☐ Zero Carbon Oxford	☐ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	X☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	x Understanding and working with our communities.	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	This policy sets out Oxford City Council's (OCC) approach to dealing with voids (empty residential properties). The objectives of the policy are to: • Provide clear information relating to the voids process • Ensure that aids and adaptations are factored into the voids process • Process voids within published timescales				

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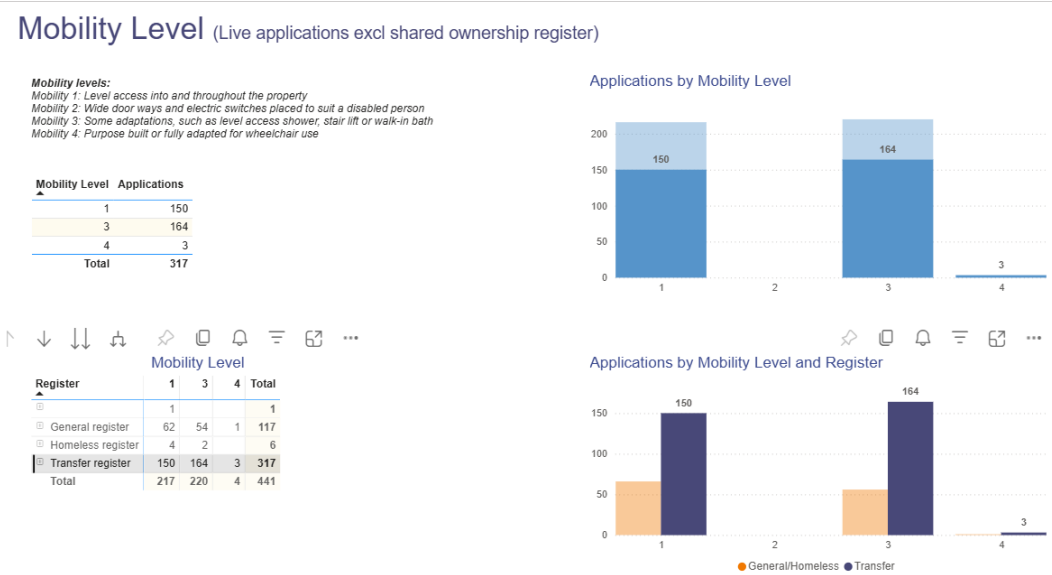
		• Support and facilitate residents in obtaining suitable alternative housing where a transfer through the Allocations Scheme is considered to be the best provision in line with Occupational Therapist (OT) recommendations.. • Ensure that appropriate servicing contracts are in place for any relevant equipment such as, but not exclusive to, track hoists, stair lifts and through floor lifts.
16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	In 2018, the then Government published the Social Housing White Paper to ensure residents of social housing are safe, listened to, live in good quality homes and have access to help when things go wrong. Consequently, the Social Housing Regulation Act ("the Act") received Royal Assent in July 2023. The Act forms a new regulatory framework for the social housing sector, aiming to give residents greater powers and improve access to quick and fair solutions to problems. This includes a full equalities and diversity assessment is undertaken to meet the needs of all tenants. The following is also in line with this policy: • The Chronically Sick and Disabled Persons Act 1970 • The Housing Grants Construction and Regeneration Act 1996 • Children Act 1996 • Equality Act 2010 • The Care Act 2014 • Mental Capacity Act 2005 • Regulatory Reform (Housing Assistance) Order 2002 • The Housing Act 1985 • The Housing Act 2004 - Housing Health and Safety Rating System (HHSRS) • Home Adaptations for Disabled People 2013 • Social Housing (Regulation) Act 2023 • Disabled Facilities Grant (DFG) delivery: Guidance for local authorities in England

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	Yes – Residents Involvement Programme The Council recognises its equalities responsibilities as well as the critical need to listen and act on the lived in experiences of our residents. The policy has the potential to affect the majority of tenants who, due to age related conditions, can endure disabilities with a significant proportion of tenants aged between 55 to 84.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports, -briefs.	- Legislation - Risk assessment for vulnerable groups - Equalities assessment exercise - Engagement with residents The statistics from the Council's *Know Your Tenant* data demonstrates that 36% of tenants, as of 2 April 2026, has disabilities. A further breakdown of figures from the Council's General, Homelessness and Transfer Registers are as follows:



This data demonstrates the consistent rise in demand for aids and adaptations.

Therefore this assessment has informed the development of the Voids Policy in ensuring the needs of all tenants are met to ensure independent living for all tenants while continuing to meet existing needs.

19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	N/A

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Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	Yes x	**No**	Don't Know ☐
		Members of staff	**Yes** x	No ☐	Don't Know ☐
		General public	**Yes** x	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☐	**No** x	Don't Know ☐
		City Councillors	Yes x	**No** ☐	Don't Know ☐
		Council suppliers and contractors	Yes x	No	Don't Know ☐

21.	**Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**					
Protected Characteristic	**Positive**	**Negative**	**Neutral**	**Don't know**	**Data/information/evidence supporting your assessment**	**Analysis & insight** **Mitigations**

Age	x	☐		☐	Age related disabilities have been identified with the *Know Your Tenant* data and consequently the equalities assessment has shaped the draft policy to meet the needs of older residents	An Equality Impact Assessment (EqIA) has been carried out in compliance with the Council's Public Sector Equality Duty under the Equality Act 2010 in order to determine whether the policy would have an adverse impact on persons with protected characteristics. Whilst the EqIA has identified that there are no adverse impacts anticipated by this policy on any person with protected characteristics, nevertheless, it is identified that there are certain groups who may be affected by this policy. These groups are: • children • adults with learning difficulties • oxygen users • people taking certain medication

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3562						• those suffering the effects of drugs and alcohol • adults aged 65 and older • people with disabilities • Individuals being supported by the Community Safety team and related support services The policy is designed as a proactive measure to assist the affected groups so that all tenants can be supported with independent living. This is also in line with the Regulator of Social Housing's Consumer Standard where the needs of tenants leads the prioritisation of housing service provision.
Disability **(Visible and invisible)**	x	☐		☐	The significant level of disabilities amongst tenants have been identified with the *Know Your Tenant* data and consequently the equalities assessment has shaped the draft policy to meet the needs of older residents	According to the Council's *Know Your Tenant* data that the Council has collated there are, as of 2 April 2026, 3909 household members who have disabilities who could benefit from this policy. If the figure is considered of direct tenants who have disabilities, as of 2 April 2026,

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3563						this relates to 2809 tenants. This, as of this date, is out of 7786 tenancies. Therefore, at the time of the production of this assessment, 36% of all tenants could benefit from this proactive policy. With the ageing profile of tenants within the housing estate, it has been assessed there would be an increase in age related disabilities in the near term thereby making this policy a key feature of the Council's housing service provision for its tenants.
Gender re-assignment		☐	X	☐		
Marriage & Civil Partnership	☐	☐	X	☐		
Race, Ethnicity and/or Citizenship		☐	X	☐		

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Pregnancy & Maternity	☐	☐		☐		
Religion or Belief	☐	☐	X	☐		
Sex			X	☐		
Sexual Orientation	☐	☐	X	☐		

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☐	☐	X	☐		
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person	☐	☐		☐		

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with insecure immigration status Oxford City Council became a local authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.						
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members	☐	☐		☐		

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**

[redacted]	☐	Stop and reconsider the activity.	☐	Adjust activity before beginning the activity and continue to monitor.	☒	Enhanced service delivery to be delivered by the implementation of this policy	X	Adjustments continue with the activity. Monitoring of performance in respect of the implementation of the policy is required.

23.	**Please explain how you have reached your conclusions above.**	**Benefits of Implementation**: Promotes healthy and independent living **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: **Improves Representation**:

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-**	HRA Assets Team

	- team, -directorate, -service area, -Equalities Steering Group,etc.				
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	HRA Assets Team			
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	Yearly	**27.**	**Date when the EqIA will be reviewed again.**	May 2027

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Section 7: Sign-off

Name: James Watkins	Name:	Name: Full Name
Job Title: Housing Projects and Policies Officer	Job Title:	Job Title: Type here
Signature:	Signature: ----------	Signature: ----------

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.
4) EDI Lead.

Name:	Name: Full Name	Name: Full Name
Job Title:	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
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Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
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You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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Risk Assessment:

HRA Complaints Policy, Lifting Equipment and Operations Policy, Voids Policy

This assessment considers the risks to Oxford City Council of not having a formal complaints policy, voids policy, and lifting equipment and lifting operations policy. The assessment is based on the legal requirements for social landlords, including the statutory Complaint Handling Code issued by the Housing Ombudsman, wider consumer standards for social housing, and health and safety duties under LOLER and PUWER for lifting equipment used.

This risk assessment presents a risk register in relation to three material policy gaps: complaints, voids, and lifting equipment. The purpose is to provide assurance on the nature of the risks, their current severity, and the actions required to reduce exposure.

Risk Register

Risk title	Risk description	Key controls in place	Further mitigation actions
No complaints policy	Absence of a formal complaints policy creates inconsistent complaint handling and increases the risk of non-compliance with complaint handling expectations for social landlords.	Informal complaint handling arrangements may exist, supported by case-by-case management oversight.	Draft, approve, and implement a complaints policy; establish a clear two-stage process; assign accountability; define timescales, accessibility requirements, remedies, learning, and board reporting.
No voids policy	Absence of a formal voids policy creates inconsistent management of empty homes, increases rent loss risk, and weakens assurance over lettable standards and turnaround performance.	Operational practices may exist within teams, but these are not supported by a formally approved policy framework.	Draft, approve, and implement a voids policy covering inspections, repairs, lettable standards, turnaround times, health and safety checks, contractor management, approvals, and performance reporting.

No lifting equipment policy	Absence of a formal lifting equipment policy creates material health and safety, legal, and operational risks in relation to inspection, maintenance, examination, and defect escalation.	Reactive servicing or contractor arrangements may be in place, but they do not provide sufficient formal assurance without a documented control framework.	Implement immediate interim safety controls; draft, approve, and implement a lifting equipment policy; confirm inspection regime, asset list, contractor competence, defect escalation, record-keeping, and assurance reporting.

Risk Appetite Statements

These statements set out the proposed tolerance for risk in each area using a formal appetite scale of **Very Low**, **Low**, **Moderate**, and **High**. They are intended to support decision-making, prioritisation, and oversight of mitigating actions, and should be read alongside the current and target risk scores in the register above.

Appetite level	**Practical meaning**
Very Low	Only minimal exposure is acceptable. Strong controls, close oversight, and prompt corrective action are expected, particularly where safety, legal, or regulatory compliance is involved.
Low	Limited exposure may be tolerated for a short period, but risks should be actively managed and reduced through defined controls, monitoring, and timely action.
Moderate	Some exposure can be accepted where it supports operational delivery or service objectives, provided risks are understood, monitored, and kept

	within agreed control limits.		
High	A greater level of exposure can be accepted where there is a clear strategic or operational benefit, provided the risk is deliberate, transparent, and subject to proportionate oversight.		
Complaints policy and complaint handling		Low	The organisation has a low appetite for risks arising from ineffective complaint handling. It is willing to tolerate only limited short-term exposure while a compliant policy and operating framework are put in place, because failures in this area can lead to regulatory criticism, loss of resident trust, and reputational damage.
Voids policy and void management		Moderate	The organisation has a moderate appetite for operational risks associated with void performance and delay, recognising that some short-term exposure may arise from repairs demand, market conditions, or resource constraints. However, it has a low tolerance for uncontrolled void loss, unsafe reletting, or the absence of clear standards, compliance checks, and accountability.
Lifting equipment and Lifting operations policy		Very Low	The organisation has a very low appetite for risks relating to lifting equipment safety and statutory compliance. It does not accept avoidable exposure that could result in injury, fatality, enforcement action, or serious service disruption, and therefore expects immediate controls, clear accountability, and full compliance arrangements to be in place.

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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	8 July 2026
Report of:	David Butler, Director of Planning and Regulation
Title of Report:	Private Sector Housing Enforcement Policy

Summary and recommendations	
Decision being taken:	To approve the Private Sector Housing Enforcement Policy for adoption
Key decision:	Yes
Cabinet Member:	Councillor Mike Rowley, Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness
Corporate Priority:	Good, Affordable Homes
Policy Framework:	Housing and Homeless Strategy 2023-28

Recommendation(s): That Cabinet resolves to:

1. **Approve** the Private Sector Housing Enforcement Policy (at Appendix 1) for adoption.
2. **Delegate authority** to the Director of Planning and Regulation, in consultation with the Director of Law and Governance and the Portfolio Holder, to approve future updates to the policy where such changes are consistent with the overall policy approach and reflect changes to legislation or relevant case law.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Private Sector Housing Enforcement Policy	No
Appendix 2	Risk Register	No
Appendix 3	Equality Impact Statement	No

Introduction and background

1. The Housing Act 2004 places a duty on local authorities to keep housing conditions in their district under review with a view to identifying any action that may need to be taken. The Renters' Rights Act 2025 (RRA) has significantly extended the Council's statutory enforcement responsibilities in the private rented sector. New duties under the RRA include a requirement under section 107 to enforce what the Act terms the "Landlord Legislation", a defined set of provisions covering tenancy reform, unlawful eviction and harassment, and landlord obligations under the Housing Act 1988. A further duty under section 110 requires the Council to report to the Secretary of State on the exercise of those functions.
2. The Council's Corporate Enforcement Policy sets out the broad principles underpinning the Council's approach to enforcement across all service areas. That policy remains in force and unchanged. However, private sector housing enforcement operates under a distinct and technically complex legislative framework, involving a wide range of specialist powers and obligations under the Housing Act 2004, the RRA and associated legislation. This requires a dedicated policy to guide officer decision-making and ensure enforcement action is taken in a consistent, transparent and legally defensible way.
3. The Council operates full property licensing across the city, including mandatory and additional HMO licensing and selective licensing. This gives it an established enforcement baseline and an experienced Residential Regulation Team. The introduction of a dedicated enforcement policy reflects the scale of the Council's regulatory responsibilities in this area and aligns Oxford's approach with sector best practice.

The Policy

4. The Private Sector Housing Enforcement Policy (Appendix 1) sets out the Council's approach to enforcing its duties under the relevant legislation. It covers the full range of enforcement tools available, including Improvement Notices, Prohibition Orders, Emergency Remedial Action, civil financial penalties, Rent Repayment Orders, Banning Orders and entry to the Rogue Landlord Database.

5. In practice, the policy sets out what landlords, letting agents and tenants can expect when the Council investigates a complaint, identifies a breach of housing law, or considers whether to take formal enforcement action.

6. Much of this policy reflects and formalises existing practice. The Council has operated an experienced enforcement function in the private rented sector for a number of years and the policy largely codifies the approach officers already take. The principal changes reflect the new duties and powers introduced by the RRA, including the duty to enforce the Landlord Legislation and the expanded investigatory powers available to officers.

7. The policy incorporates the investigatory and entry powers introduced by the RRA, including powers to require information and enter premises, and sets out the circumstances in which formal action will be taken in the first instance.

8. The policy has been developed in line with the model policy published by the Association of Chief Environmental Health Officers (ACEHO), the professional body

for housing enforcement authorities in England. Several local authorities have already adopted dedicated housing enforcement policies on this basis.

9. The Regulators' Code sets out principles of good regulation that public bodies are expected to follow when exercising certain enforcement functions, including acting proportionately and being transparent with those they regulate. The RRA and the Landlord Legislation as defined by section 107 sit outside the scope of the Code, meaning those enforcement functions are not subject to its principles. The policy makes this distinction explicit, as it affects how officers approach enforcement decisions under different parts of the legislative framework.

Alternative options considered

10. The alternative would be to continue relying solely on the Corporate Enforcement Policy as the framework for private sector housing enforcement. This was not considered appropriate given the technical complexity of the Council's housing enforcement responsibilities, the new statutory duties introduced by the RRA, and the increased risk of legal challenge to enforcement decisions in the absence of a specialist, publicly available framework.

Implications of Local Government Reorganisation

11. In preparing this report, regard has been given to Government guidance on financial decision-making in advance of Local Government Reorganisation.
12. The adoption of this policy does not involve capital expenditure, borrowing or long-term financial commitments. It is a framework document that enables the Council to carry out its existing statutory enforcement functions. Any successor authority would retain the ability to review, amend or replace the policy in accordance with prevailing legislation and guidance.
13. Adopting the policy at this stage ensures continuity and legal defensibility in enforcement decision-making during any transition period.

Financial implications

14. The adoption of this policy has no financial implications for the Council's General Fund. It does not require additional expenditure above that already committed to private sector housing enforcement.
15. Civil penalty income generated through enforcement activity is applied to fund enforcement work in the private rented sector, in accordance with Regulation 4 of the Rent Repayment Orders and Financial Penalties (Amounts Recovered) (England) Regulations 2017. A robust, legally defensible enforcement framework reduces the risk of successful appeals against civil penalty notices, which supports the sustainability of that income stream.
16. If our policies become outdated and do not reflect current best practice there is a risk that more challenges could be made and that more of those challenges would be successful, which would result in additional costs and a reduction in income from financial penalties.

Legal issues

17. Section 107 of the RRA imposes a duty on the Council to enforce the Landlord Legislation as defined in that section. Section 110 imposes a further duty to report

to the Secretary of State on the exercise of those functions. The policy provides the framework against which enforcement decisions can be made and scrutinised.

18. Officers are required to have regard to the policy when making enforcement decisions. This enables the Council to demonstrate that action has been taken in accordance with an approved, publicly available framework. Where the Council cannot demonstrate it has followed its own policy, defendants are entitled to cite that failure as part of any challenge or appeal. Having a clear, up to date policy therefore reduces both the number and success rate of appeals against enforcement action.

Level of risk

19. The updated risk register is attached at Appendix 2. The principal risk associated with this decision is the legal and reputational risk of enforcement decisions being successfully challenged in the absence of a formal framework. Adoption of the policy directly mitigates that risk.

Equalities impact

1. The Equality Impact Assessment is attached at Appendix 3. Private sector housing enforcement is primarily directed at improving property conditions and management standards. The Council's enforcement activity is largely focused on protecting vulnerable people and has a neutral or positive equality impact.

Carbon and Environmental Considerations

20. Many enforcement actions taken in the private rented sector result in improved property standards, which can contribute to improved energy efficiency and reduced carbon emissions. Adoption of this policy supports a consistent and proactive approach to enforcement, which is likely to have a positive environmental impact over time.

Conclusion

21. The Renters' Rights Act 2025 has significantly expanded the Council's statutory enforcement duties in the private rented sector. Adopting a dedicated Private Sector Housing Enforcement Policy ensures the Council has a specialist, publicly available framework that reflects those duties, aligns with sector best practice and supports legally defensible decision-making. Cabinet is therefore recommended to approve the policy for adoption.

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Private Sector Housing Enforcement Policy

Enforcement of the Renters' Rights Act 2025 and other housing legislation

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Background

This policy sets out the Council's principles for enforcing and executing its duties as a Housing Authority under the relevant statutes.

S3 Housing Act 2004 imposes a duty on Councils to keep housing conditions in their district under review with a view to identifying any action that may need to be taken by them.

S107 Renters' Rights Act 2025 imposes a duty on the Council to enforce the Landlord Legislation. The Landlord Legislation is comprised of the following:

- Chapters 3 and 6 of Part 1 of the Renters' Rights Act 2025,
- Part 2 of the Renters' Rights Act 2025,
- Sections 1 and 1A of the Protection from Eviction Act 1977, and
- Chapter 1 of Part 1 of the Housing Act 1988.

S110 Renters' Rights Act 2025 imposes a duty on the Council to report to the Secretary of State on the exercise of its functions under the Landlord Legislation.

In this policy, the term 'landlord' should be read as including letting agents, managing agents, licensors, property owners, directors of corporate landlords and any other person involved in the letting or management of privately rented accommodation.

In this policy, the terms 'House of Multiple Occupation' or 'HMO' are defined by the Housing Act 2004.

Aims of the Policy

The purpose of this enforcement policy is to provide guidance for Housing Authority officers to ensure enforcement action is taken in line with the provisions of Acts and regulations covered by this policy and mandatory guidance to local authorities.

Legislation within this policy

The Renters' Rights Act and the 'Landlord Legislation' (as defined by S107) sit outside of the Regulators' Code, and its provisions do not apply.

Part 1 of the Housing Act 2004 is also outside of the Regulators' Code's scope.

Notwithstanding this, the following legislation and its enforcement does come within the Legislative and Regulatory Reform (Regulatory Functions) Order 2007 and is therefore within the scope of the Regulators Code and the principles of good regulation:

- Parts 8, 9 and 10 of the Housing Act 1985
- Part 8 of the Housing Act 1996
- Parts 2 to 5 of the Housing Act 2004

This policy document sets out what owners, landlords, their agents or any other person involved in the letting or management of privately rented accommodation, and tenants of private rented sector properties, can expect from officers when dealing with non-compliance.

All enforcement action taken will be in accordance with relevant statutory Codes of Practice, Council procedures and protocols, and official guidance from central and local government bodies.

As a public body under the Human Rights Act 1998, the Council will apply the principles of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Legislation outside this policy

The legislation relating to letting or management of private rented properties is complex. All other legislation is covered by our Corporate Enforcement Policy and outside the scope of this policy, for example:

- Protection from Eviction Act 1977
- Part 2 Housing and Planning Act 2016
- Tenant Fees Act 2019,
- Smoke and Carbon Monoxide Regulations 2015,
- Efficiency (Private Rented Property) (England and Wales) Regulations 2015,
- Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014

Approach to Enforcement

The Council wants to support responsible landlords to raise housing standards. However, the Council expects landlords to have a good understanding of the housing standards and management issues that should be met in privately rented accommodation.

Council officers will often investigate and identify the need to take enforcement action through a range of routes, including (but not limited to): proactive inspections of dwellings through licensing provisions; in response to a complaint or request for assistance; and referrals from other public bodies. All investigations will be carried out in accordance with the relevant statutory requirements. The Council will ensure that appropriate governance is in place to ensure that action is taken in accordance with appropriate policies.

The Housing Act Section 5 2004 places a duty on Councils to take appropriate enforcement action where a Category 1 hazard exists.

The Housing Act Section 7 gives Councils a discretionary duty to take action where a Category 2 hazard exists. The Council will usually take action where a medium band Category 2 hazard exists.

The Council may commence enforcement with formal action instead of informal action in the first instance. In deciding whether to do so, the circumstances of the case will be taken into account. Relevant factors may include, but are not limited to:

- Where there is a risk to public health
- Where there is a blatant or deliberate contravention of the law
- Where there is history of non-compliance

The Council will usually take formal action in the first instance if there has been:

- Non-compliance with previous formal or informal action
- Offences in relation to the licensing of privately rented properties

The Council will take formal enforcement action in the first instance for breaches of the Landlord Legislation.

Investigatory Powers

In addition to the Council's informal and formal powers of enforcement, there are investigatory powers relating to the collection of information and relating to the entry of premises including, but not limited to, the powers detailed below.

Power to Investigate

S114 Renters' Rights Act 2025 gives the Council power to issue a notice to a relevant person to require the person to provide specified information to the Council.

This notice may be given to any person with an estate or interest in the land; the licensor; their agents; or a marketer of a property. It may be given in regard to any offence under the following Legislation:

- Sections 1 and 1A of the Protection from Eviction Act 1977;
- Chapter 1 of Part 1 of the Housing Act 1988;
- Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013;
- Sections 21 to 23 of the Housing and Planning Act 2016;
- Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.

Failure to comply with a S114 notice is an offence under S131 Renters' Rights Act 2025, as is being obstructive and intentionally or recklessly making false or misleading statements in response to a S113 notice.

S115 Renters' Rights Act 2025 permits the Council when it reasonably suspects a breach of the Rented Accommodation Legislation to issue a notice to any person requiring them to provide the information specified. This may only be done to investigate whether a breach has occurred under the Rented Accommodation Legislation, or to determine the amount of a penalty. For the purposes of this section, the Rented Accommodation Legislation means:

- Sections 1 and 1A of the Protection from Eviction Act 1977
- Chapter 1 of Part 1 of the Housing Act 1988
- Parts 1 to 4 and 7 of the Housing Act 2004
- Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013
- Sections 21 to 23 of the Housing and Planning Act 2016
- Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.

Where an individual has not complied with a S115 notice, S116 Renters' Rights Act 2025 enables the Council to make an application to the Court to enforce the provisions of the notice and seek reimbursement for the costs of the application.

S131 Renters' Rights Act provides that, in addition to the offence of non-compliance with a S114 notice, it is an offence for an individual without reasonable excuse to obstruct a Council officer seeking to exercise their powers. It is also an offence to fail without reasonable excuse to give an officer any additional assistance or information which they reasonably require.

S235 Housing Act 2004 allows the Council to issue a notice to relevant individuals, including occupiers, directing them to provide specified documents under their control for the purpose of exercising the Council's functions under Parts 1 to 4 of the Housing Act 2004, or investigating whether an offence has been committed under Parts 1 to 4 or 7 of the Housing Act 2004 in relation to qualifying residential premises.

S16 Local Government (Miscellaneous Provisions) Act 1976 also permits the Council to issue a notice to an occupier, manager, or individual with an interest in the land to compel them to provide the Council with information on the nature of their interest and the names and addresses of current occupiers and of any others with an interest in the land.

Entry to Premises

S118 Renters' Rights Act 2025 permits Council officers to enter business premises of relevant people (including landlords, letting agents, and marketers) if it is necessary for the production or seizure of documents under s122-s123 Renters' Rights Act 2025. This power will be exercised without a warrant.

S121 Renters' Rights Act 2025 allows a Council officer named in a warrant to enter premises used for a rental sector business which is not mainly accommodation if there are documents on the premises which the officer could require under S122 or seize under S123. In addition, for this power to be exercised, one of the following conditions must be met:

- That access to the premises has been or is likely to be refused, and the Council has provided notice of their intention to apply for a warrant to the occupier;
- Those documents on the premises would likely be concealed or interfered with if notice of entry were to be given; or
- That no occupier is present, and waiting for their return might defeat the purpose of the entry.

Following a S118 or S121 Renters' Rights Act 2025 entry, S122 allows an officer at any reasonable time to require a relevant person on the premises to produce any documents relating to the business and to take copies of them. This may only be exercised to ascertain whether there has been a breach of the Rented Accommodation Legislation where an officer reasonably suspects there has been a breach or an offence; or to ascertain whether the documents may be required in evidence for proceedings regarding a breach or offence.

Following a S118 or S121 Renters' Rights Act 2025 entry, S123 authorises Council officers to seize and detain documents that the officer reasonably suspects may be required as evidence in proceedings relating to a breach of, or an offence under, the Rented Accommodation Legislation. When doing so, the officer will provide evidence of the officer's identity and authority if reasonably practicable. The officer will take reasonable steps to inform the person from whom documents have been seized that they have been seized, and will provide that person with a written record of what has been taken.

S126 Renters' Rights Act 2025 permits the Council to enter residential premises used for a tenancy at a reasonable time if the officer considers it necessary as part of an investigation into potential offences specified in subsection 1(b). Where required, the Council will give at least 24 hours' notice of this entry to the occupier and individuals with an interest in the property as per subsection 1(c), detailing in writing why the entry is necessary and the suspected offences. Where there are occupiers found on the premises, the officer will provide evidence of the officer's identity and authority to at least one of the occupiers if reasonably practicable.

In addition, S239 Housing Act 2004 permits Council officers to enter, if necessary and at a reasonable time, a property in order to carry out a survey or examination. This may be done if any one of the following is met:

- to determine if any Part 1-4 or 7 enforcement functions should be exercised;
- the premises are part of an Improvement Notice or Prohibition Order;

- a management order is in force under Chapter 1 or 2 of Part 4 on the premises.

In certain circumstance the Council may obtain a warrant to enter, by force if necessary, under S240 Housing Act 2004.

No action

In certain, but limited, circumstances it may be appropriate to take no action. For example: when we decide that the health and safety risk is sufficiently low; where there are extenuating circumstances regarding the person against whom we would take action on; taking legal action would be disproportionate or inappropriate taking into account the circumstances of the case; where the tenant does not want us to take action and we consider it is appropriate not to take action in the circumstances.

We may however make recommendations which are above the legal minimum requirements, advise if there are legal avenues open to persons to resolve the issues themselves or refer to another appropriate regulator or advice service.

Informal action

Informal action taken by the Council may be written or verbal advice. Additionally, a visit may be made at the outset by Council Officers in cases where the initial complaint or contact indicates that an immediate investigation by a Council officer is warranted.

In cases where officers visit an address, whether this is a result of a landlord's failure to adequately resolve a highlighted issue or as part of an audit or other investigation, written or verbal advice may be deemed sufficient should the inspection highlight minor deficiencies.

Where written advice is deemed appropriate by the Council and is provided, timescales will normally be included to undertake any specified work or actions.

While the Council will use its discretion on whether to carry out informal action for a Category 2 hazard, it does not need to provide written or verbal advice before commencing formal action.

Formal action

If formal action is considered appropriate, the following options are available to the Council.

Housing Act 2004 Part 1

- Issue an Improvement Notice in respect of any Category 1 hazards and any Category 2 hazards on the property. This requires the person to whom it is served to undertake the remedial action specified on the Notice within a given timeframe. The mandated work and the timeframe will be determined by the Council depending on the nature and scale of the work.
- Issue a Prohibition Order in respect of any Category 1 hazards and any Category 2 hazards on the property. This prevents occupation of whole or part of the property, or can be used to limit occupant numbers, within a specified time frame.
- Issue a Hazard Awareness Notice in respect of any Category 1 hazards and any Category 2 hazards on the property. This makes the owner and occupiers aware of

the hazards identified; however, it does not require remedial action. As a result, and because it does not secure risk-reducing works within a specified timeframe, a Hazard Awareness Notice will not usually be the most appropriate course of action where remedial works are necessary to reduce the risk of harm to occupiers or potential occupiers.

- Make an Emergency Prohibition Order in respect of Category One hazards only. This immediately prohibits the use of all or part of a dwelling if there is an imminent risk of serious harm to the health or safety of the occupants or others.
- Undertake Emergency Remedial Action in respect of Category One hazards only without prior notice where there is an imminent risk of serious harm to the health or safety of the occupants or others.
- The Council also has the power to suspend action taken under Part 1 Housing Act 2004 in situations where it has the power or duty to take enforcement action through the service of an Improvement Notice or Prohibition Order. This will be at the Council's discretion and will normally be considered for the purpose of minimising inconvenience to the current occupiers. Evidence may be requested to demonstrate occupiers' wishes.
- Demolition and Clearance are options for both Category 1 or Category 2 hazards.
- S30 Housing Act 2004 provides that failure to comply with an Improvement Notice is a criminal offence, which will normally be followed by prosecution or the issuing of a civil penalty.
- S32 Housing Act 2004 provides that failure to comply with a Prohibition Order is a criminal offence, which will normally be followed by prosecution.
- Other formal notices served by the Council may not relate to the landlord undertaking remedial works but may cover a range of other matters including, but not limited to, exercising a right of entry under S239 of the Housing Act 2004 and a request to provide information or the need to abate or avoid overcrowding.

Work in default

The enforcement options for non-compliance with formal Notices include the carrying out of works specified in the Notice. This power may be exercised in addition to other enforcement proceedings taken for non-compliance. The Council has no duty to undertake works in default and it will be at its discretion.

HMO Licence Conditions

Conditions can be added to HMO licences to require work to meet specified standards or to address HMO Management Regulation requirements. This power may be exercised in addition to other enforcement proceedings taken for non-compliance.

In general, authorities should seek to identify, remove or reduce category 1 or category 2 hazards in the house by the exercise of Part 1 functions and not by means of licence conditions however this does not prevent the authority from imposing licence conditions relating to the installation or maintenance of facilities or equipment even if the same result could be achieved by the exercise of Part 1 functions.

Failure to comply with these conditions is a is a criminal offence, which may result in prosecution or the issuing of a civil penalty.

Prosecution

Where a Civil Financial Penalty is an available alternative to prosecution, the Council will only consider using its power to prosecute in more serious cases.

The decision to prosecute will be determined by the evidential strength of the Council's case and the relevant public interest factors set down by the Director of Public Prosecutions in the Code for Crown Prosecutors.

In many circumstances, where an offence is committed by a body corporate, legislation enables local authorities to pursue persons involved with the body corporate in addition to, or instead of, the body corporate. These include company officers and, where applicable, company members.

The Council will determine, on a case-by-case basis, whether to take enforcement action against any person or persons that they consider fall within the scope of this category in addition to prosecuting the body corporate.

Civil (Financial) Penalties for specified offences

The Council is empowered to discharge a wide range of housing law breaches and offences via the imposition of Civil (Financial) Penalties.

Imposition of Civil (Financial Penalties) is in accordance with the evidential strength of the Council's case.

The Council's approach to determining and issuing financial penalties operates according to the standalone Housing Civil Penalties Policy.

Rent Repayment Orders

Part 2 of the Housing and Planning Act 2016 permits the Council to seek a Rent Repayment Order (RRO) at the First-tier Tribunal (Property Chamber) to require the landlord of the property where the offence(s) has been committed to refund rent to the tenants or the Council. S48 of the Housing and Planning Act 2016 places a duty on the Council to consider applying for Rent Repayment Orders.

Where a landlord has been convicted or received a Civil Financial Penalty in respect of the offence, the Tribunal must award the maximum applicable amount, except in exceptional circumstances.

This power will be considered in response to all qualifying offences and where there is sufficient evidence for a successful application to the First Tier Tribunal.

The qualifying offences are:

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1997
- Failure to comply with an Improvement Notice [s30 Housing Act 2004]
- Offences in relation to unlicensed HMOs [s72(1) Housing Act 2004]
- Offences in relation to unlicensed houses [s95(1) Housing Act 2004]
- Failure to comply with an Improvement Notice [s30(1) Housing Act 2004]
- Failure to comply with a Prohibition Order [s32(1) Housing Act 2004]
- Breach of a Banning Order [s21 Housing and Planning Act 2016]
- Using Violence to secure entry [s6(1) Criminal Law Act 1977]
- Knowingly or recklessly misusing a possession ground [s16J(1) Housing Act 1988]

- Letting or marketing of a property within twelve months of using the ‘moving in’ or ‘selling’ ground of eviction [s16J(2) Housing Act 1988]
- Continuous breach of certain tenancy reform requirements [s16J(3) Housing Act 1988]

An application for an RRO may be in addition to other formal action, such as prosecution proceedings or the imposition of a Civil Penalty. Where the Council has issued a Civil Financial Penalty or pursued prosecution, it will usually apply for a Rent Repayment Order where public funds have been paid to a landlord who has committed a qualifying offence.

S49 of the Housing and Planning Act 2016 enables the Council to assist tenants in applying for Rent Repayment Orders. The Council will usually assist tenants by referring or signposting them to a relevant organisation. Where the offence relates to unlicensed properties, a statement can be provided confirming presence / absence of an application for a licence (or temporary exemption) and associated dates.

Banning Orders

Part 2, Chapter 2 of the Housing and Planning Act 2016 permits a Council to apply for a Banning Order against a person who has been convicted of one or more of the relevant offences. This would prevent the landlord from:

- Letting housing in England;
- Engaging in English letting agency work;
- Engaging in English property management work; or
- Doing two or more of those things.

The Council may consider a Banning Order for the more serious offenders. It will take into account the seriousness of the offence(s), whether the landlord has committed other offences (or received any Civil Penalty in relation to a Banning Order offence) and any history of failing to comply with their obligations or legal responsibilities. It will also take into account other relevant factors, including but not limited to:

- The harm, or potential harm, caused to the tenant;
- The need to punish the offender;
- The need to deter the offender from repeating the offence;
- The need to deter others from committing similar offences.

The Council’s approach to application for a Banning Order operates according to the standalone Banning Order and Rogue Landlord Database Policy. This forms an appendix to this Policy.

Rogue Landlord Database

Part 2, Chapter 3 of the Housing and Planning Act 2016 states:

- An Authority must make a database entry if a banning order is granted by the First-tier Tribunal;
- An Authority may make an entry if the person was convicted of a banning order offence or has received two financial penalties in respect of specified offences in the previous twelve (12) months.

The purpose of the Rogue Landlord Database is for the purpose of sharing information with other Housing Authorities and there is no current public access.

The Council's approach to application for entry to the Rogue Landlord Database operates according to the standalone Banning Order and Rogue Landlord Database Policy. This forms an appendix to this Policy.

Fit and Proper Person Policy

Under the Housing Act 2004, if the Council is to issue a Selective or an HMO licence ("licence"), it must be satisfied that the proposed licence holder is a fit and proper person and is the most appropriate person to hold the licence. The Council must also be satisfied that the proposed manager of the house is a fit and proper person to be the manager of the house.

An existing licence may also be revoked where the Council no longer considers that the licence holder is a fit and proper person to be the licence holder, or where the Council no longer considers that the management of the house is being carried out by persons who are (in each case), fit and proper persons to be involved in its management.

The Council's approach to determining Fit and Proper Person Status operates according to the standalone Fit and Proper Persons Policy. This forms an appendix to this Policy.

Costs and Charges

The Council incurs costs in carrying out its functions. Where legislation allows, the Council will seek to recover reasonable costs and expenses associated with its enforcement, licensing and wider regulatory activity. This may include (non-exhaustively) costs arising from inspections, investigation, evidence gathering, notices and other statutory documentation, follow-up action, compliance monitoring, and works or other interventions.

Recovery may be pursued using all available lawful routes, which may include civil action, local land charges, and enforcement against the property. The Councils' Debt Recovery Policy applies for this purpose.

Where permitted, interest may be applied to outstanding sums until paid.

Notices under other Legislative alternatives

There may be other legislative alternatives available to remedy problems which an authority may choose as a more appropriate enforcement approach. Other legislative alternatives include, but are not limited to, the Smoke and Carbon Monoxide Regulations 2015, Building Act 1984, Prevention of Damage by Pests Act 1949, Public Health Act 1936 and Environmental Protection Act 1990. These options fall under the Council's Corporate Enforcement Policy.

Delegation of Authority

The Council's Constitution and Scheme of Delegations specify the extent to which enforcement powers are delegated to officers.

Authorisation, training and appointment of officers

All enforcement officers will be appropriately authorised by the Director of Planning and Regulation.

All enforcement officers are required to carry identification in the form of an “Authority to Enter” card bearing their photograph. If an officer does not show their card, they may be asked to show it by anyone who is requested to allow entry. If no card is produced, entry may be legitimately refused and no punitive enforcement action will result. If a member of the public has any doubt about the officer’s identity, they may telephone the Council 01865 259811.

All enforcement officers will be suitably trained and qualified to ensure officers are fully competent to undertake their enforcement activities.

Publicising offences

Verdicts and sentences in criminal cases are given in open court and are a matter of public record. The Council will normally publicise sentences following a prosecution, however decision whether to publicise will be made on a case by case basis. Publicising guidance has a presumption in favour of publicising outcomes of criminal cases and personal information about convicted offenders.

Financial penalties are a civil matter. The Council will periodically publish a list of penalties, consisting of offence, date and fine.

Complaints

Contact may be made with the Council about any matters listed here by website form, telephone 01865 259811 or in person at one of our customer advice centres.

https://www.oxford.gov.uk/comments-compliments-complaints/make-comment-compliment-complaint

A service user can still make a complaint in cases where the Council has instigated legal proceedings. However, making a complaint will not stop any impending legal action.

Where statutory notices have been served, making a complaint does not replace the statutory rights of appeal or the right to make representations. It also does not allow extra time to comply with any notice or order.

If a service user disagrees with a statutory notice, they should take action as specified in the notice or order to make an appeal, if any exists. Reference should be made to any notes that may accompany the notice or order for more detail.

Policy review and updates

To ensure this policy stays up to date with changes in legislation and relevant caselaw, this policy authorises the Director of Planning and Regulation with the Director of Law and Governance, in consultation with the Portfolio Holder for Housing to approve updates to this policy where such changes are consistent with the overall policy approach.

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Risk Register

Private Sector Housing Enforcement Policy

01 June 2026

				Gross			Current			Target						
Ref	Description	Consequence	Name of Risk Owner	P	I	Score	P	I	Score	P	I	Score	Control/Mitigation Description	Control Date Due	Progress on Control/Mitigation	Action Owner
1	Without a clear standalone enforcement policy reflecting current legislation, enforcement decisions are vulnerable to legal challenge. Some RRA 2025 provisions remain legally uncertain pending tribunal and case law development.	Enforcement actions prolonged or unsuccessful. Increased legal costs and reputational damage.	Courtney Bennett	5	3	15	3	2	6	3	2	6	Standalone policy adopted, drafted from ACEHO model and reviewed by Legal Services. Director-level authorisation built in for policy updates. Officer training prior to implementation. Case law monitored and policy updated accordingly.	ongoing	70%	Courtney Bennett
2	The new policy is applied inconsisntently across the service	Enforcement decisions challenged or overturned	Courtney Bennett	4	3	12	3	2	6	3	2	6	Officer training prior to implementation. Final penalty and prosecution decisions approved at Area Manager level or above. Consistency exercises at team meetings.	ongoing	50%	Courtney Bennett
3	Enforcement activity impacts disproportionately on groups with protected characteristics	Legal challenge on equalities grounds. Enforcement decisions overturned. Reputational damage.	Courtney Bennett	4	3	12	3	2	6	3	2	6	Monitoring and scruitny of enforcement action to identify impacts.	ongoing	80%	Courtney Bennett

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

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A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	**6. Race & Ethnicity**
2. **Disability**	**7. Religion or Belief**
3. **Gender Reassignment**	**8. Sex**
4. **Marriage & Civil Partnership**	**9. Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

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7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	Private Sector Housing Enforcement Policy (new policy)	**2.**	**The implementation date of the activity under consideration:**	09/07/2026
3.	**Directorate/Department(s):**	Planning and Regulation	**4.**	**Service Area(s):**	Regulatory Services, Regulation Residential Team
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Courtney Bennett	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	cbennett@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	New ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	
9.	**Date this EqIA started:**	01/07/2026			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	No	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐	☐ Decommissioning	☐ Commissioning	☐
		X ☐ New Activity	☐ Others. Please specify:		
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	X ☐ Good, affordable homes	☐ Strong, fair economy	☐ Thriving Communities	☐ Zero Carbon Oxford	☐ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	X ☐ Understanding and working with our communities.
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	Aims: To set out the Council's principles and approach to enforcing housing legislation in the private rented sector, including new duties introduced by the Renters' Rights Act 2025. Objectives: To ensure enforcement action is taken consistently, fairly and transparently, and that landlords, agents and tenants understand what to expect from the Council. Priorities: To tackle poor housing conditions and management in the private rented sector, protect tenants from unlawful practices, and meet the Council's statutory enforcement duties.			

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16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	The Council would lack a clear standalone enforcement policy reflecting current legislation, leaving enforcement decisions vulnerable to legal challenge. Officers would have less clear guidance on the application of new statutory duties under the Renters' Rights Act 2025, increasing the risk of inconsistent decision-making.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	No formal consultation was undertaken for this policy. The primary audience is landlords, letting agents and managing agents operating in Oxford's private rented sector. The policy is based on the ACEHO model policy for local housing authorities and has been reviewed by Legal Services. It replaces an approach that sat within the Corporate Enforcement Policy rather than a standalone document.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports,	Renter's Rights Act ACEHO model policy Selective licensing and hmo licensing data Census data

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	-briefs.	
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	NA

Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	Yes ☐	**No**	Don't Know ☐
		Members of staff	**Yes**	No ☐	Don't Know ☐
		General public	**Yes**	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☐	**No** ☐	Don't Know ☐
		City Councillors	Yes ☐	**No** ☐	Don't Know ☐
		Council suppliers and contractors	Yes ☐	No	Don't Know ☐

21.	Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?					
Protected Characteristic	**Positive**	**Negative**	**Neutral**	**Don't know**	**Data/information/evidence supporting your assessment**	**Analysis & insight** **Mitigations**
Age 3603		☐	X	☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to age	The Council do not collect data in relation to age of landlords/property managers and is not considered to impact on the use of these policies.
Disability **(Visible and invisible)**		☐	x	☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to disability	The Council do not collect data in relation to disability of landlords/property managers and is not considered to impact on the use of these policies.
Gender re-assignment		☐	x	☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the	The Council do not collect data in relation to gender re-assignment of landlords/property managers and is

					rental market there is a neutral impact in relation to gender re-assignment	not considered to impact on the use of these policies.
Marriage & Civil Partnership	☐	☐	X	☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to marital status	The Council do not collect data in relation to marital status of landlords/property managers and is not considered to impact on the use of these policies.
Race, Ethnicity and/or Citizenship		☐	☐	☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to Race, Ethnicity and/or citizenship	The main groups affected are those who do not speak English as a first language (or at all) and those with limited or no ability to understand how the policy/law affects them day to day To mitigate for this, translation services are offered at formal interviews and where required in all interventions. Property reports will where necessary contain photographic evidence of defects for some areas of the enforcement work. Engagement with landlords of ethnic groups is encouraged through landlord forums, face to face meetings and newsletters where legal obligations of being a landlord/ property manager are highlighted and discussed
Pregnancy & Maternity	☐	☐		☐	As this policy is aimed to provide clarity and transparency to landlords and	The Council do not collect data in relation to pregnancy of landlords/property managers and is

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					other property managers operating in the rental market there is a neutral impact in relation to pregnancy	not considered to impact on the use of these policies.
Religion or Belief	OBJ	☐		☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to religion or belief	The Council do not collect data in relation to religion or beliefs of landlords/property managers and is not considered to impact on the use of these policies.
Sex				☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to sex	The Council do not collect data in relation to sex of landlords/property managers and is not considered to impact on the use of these policies.
Sexual Orientation	☐	☐		☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to sexual orientation.	The Council do not collect data in relation to Sexual Orientation of landlords/property managers and is not considered to impact on the use of these policies.

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by [Oxford City Council on the 13th of March 2024.]	☐	☐		☐	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to socio-economic inequalities.	Smaller and accidental landlords may have fewer resources to respond to enforcement action than larger portfolio landlords. The policy applies consistently regardless of portfolio size.
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local	☐	☐		☐		

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authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.							
Other **For example:** - Unpaid carers - Prison population - Homeless population - Council suppliers & contractors -Cabinet Members	☐	☐		☐			

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
	☐	Stop and reconsider the activity.	☐	Adjust activity before beginning the activity and continue to monitor.	☒	No major change(s) or adjustments and continue with activity but continue to monitor.	☐	No major change(s) or adjustments and continue

								with the activity. No need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**		**Benefits of Implementation**: **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: **Improves Representation**: The impact of this policy on protected characteristics is neutral. It applies consistently to all landlords and property managers regardless of protected characteristics. The service will monitor the application of the policy to identify any patterns of disproportionate impact, and senior manager sign-off on enforcement decisions provides a further check. The policy will be reviewed regularly to reflect changes in legislation and case law.

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for**		Regulatory Services, Residential Regulation Team

	monitoring equalities impact? **For example-** - team, -directorate, -service area, -Equalities Steering Group,etc.				
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	Regulatory Services Manager			
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	Annually	**27.**	**Date when the EqIA will be reviewed again.**	1/07/2026

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Section 7: Sign-off

Name: Courtney Bennett	Name: David Butler	Name: Full Name
Job Title: Regulatory Serivces Manager	Job Title: Director, Planning and Regulation	Job Title: Type here

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.

Signature:	Signature:	Signature:
---	---	---
Name: Gail Malkin	Name: Full Name	Name: Full Name
Job Title: Head of People	Job Title: Type here	Job Title: Type here
Signature: G Malkin	Signature:	Signature:
---	---	---
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
---	---	---

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You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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To:	**Cabinet**
Date:	8 July 2026
Report of:	Carolyn Ploszynski, Director of Regeneration, Economy and Sustainability
Title of Report:	Temporary reduction in advertised fees and charges at Park and Rides for combined parking and bus tickets

Summary and recommendations	
Decision being taken:	Introduce temporary discounted combined ticket charge funded by Oxfordshire County Council
Key decision:	Yes
Cabinet Member:	Councillor Ed Turner, Deputy Leader (Statutory) - Finance and Asset Management.
Corporate Priority:	Strong, fair economy, A well run council
Policy Framework:	Council Strategy 2024-2028

Recommendation(s): That Cabinet resolves to:

1. **Approve** amending the fees and charges schedule as it relates to the Park and Ride 16 hour combined bus and parking tickets as set out in Appendix 1 to be implemented as soon after this decision as practicable and to run until 31 March 2027.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Changes to the Fees and Charges for Park and Ride Combined Tickets	No

Introduction and background

1. In 2023 the City Council brought in a permanent combined ticket to its fees and charges for Park and Rides alongside the County Council. This followed a trial period and was aimed at increasing patronage at the park and rides, which had struggled to recover following the pandemic. The charge was set at:
    - £4 - 16 hours combined parking & bus ticket - car plus 1 adult
    - £5 - 16 hours combined parking & bus ticket - car plus 2 adults

2. The City Council retain circa 30% of the ticket income for parking under the combined ticket. The rest goes to the bus operators. It was made clear in the 2023 report that these charges would be reviewed and set through the budget process annually alongside other fees and charges.

3. The 2025/26 consultation budget report, set out that work was being undertaken between the City Council, County Council and bus companies to look at the impact on viability of the combined ticket price, taking account of the government's decision to increase the national bus fare cap from £2 to £3. As a result, the P&R combined bus and parking ticket needed to increase by up to £1. This increase was agreed to be covered by funding that the County Council had available as highway authority and so the County Council paid the City Council and bus operators the difference which meant the increase was never passed to the consumer. It therefore did not need to be reflected in the fees and charge schedule. This continued into the 2026/27 budget period.

4. In October 2025, Oxfordshire County Council brought in a temporary congestion charge. Using income generated from that, they introduced free return bus travel for up to two adults and three children with consumers only having to pay the existing £2.50 parking charge. This did not require a City Council Cabinet decision as parking charges reverted to the existing 16 hour parking only charge and the County Council made arrangements directly with the bus operators to pay for the bus tickets.

Proposal

5. At its May 2026 meeting, the County Council Cabinet agreed that the free bus travel will continue to be funded from congestion charge income until 15 August. After that a £3 combined ticket covering 16 hours parking and return bus travel for up to five people will be funded from their income from the temporary congestion charge until 31 March 2027. This is instead of reverting to the combined ticket charges within both councils' fees and charges schedule. Pricing from 1 April 2027 will then be set through the City and County Councils' 2027/28 budgets. Unless other funding becomes available beyond the end date of this offer, the price for the consumer will need to revert to a level that is financially sustainable for the City Council and that may mean increases beyond the permanent advertised fees of £4 and £5.

6. As set out in the County Council Cabinet report, they want this to apply to all park and ride sites, which requires a City Council Cabinet decision to make the amendments at City Council operated sites.

7. Officers are working with County Council officers to prepare for the new £3 combined ticket so that if the recommendation is approved the decision can be enacted as quickly as possible. There is an 8-10 week lead time for ticket machine, signage and parking app changes, so to meet the target date of mid-August preparations started at risk before the City Council decision. However, as made clear in the County Cabinet report if the City Council do not approve the recommendation the County Council will cover any abortive costs (expected to be under £10,000).

8. Notwithstanding the City Council's proposal in this paper to charge £3, with appropriate financial contribution from Oxfordshire County Council, this does not constitute an endorsement of the wider policy framework on bus fares. In particular, the City Council will continue to press for similar levels of discount for bus passengers within the city, as the £3 fare (which includes parking) contrasts unfavourably with the £9 price without parking for a group ticket within the city.

Alternative Options Considered

No alternative options were considered by the City Council as this is a request from Oxfordshire County Council who are seeking to use surplus income from their temporary congestion charge. The option is to accept or reject this at our sites. Given there are benefits from the base position for the City Council and customers the recommendation is to accept the proposal from the County Council.

Implications of Local Government Reorganisation

9. Local Government Reorganisation will mean the need to align decisions on park and rides within the Oxford ring road across different local government ownerships will no longer be necessary in future years as they will sit with a single unitary in all scenarios.

Financial implications

10. Although the temporary £3 combined parking and bus ticket charge being paid for by the consumer will be less than the current advertised charges the County Council will cover the cost of the temporary scheme. It will not leave the council financially worse off. Under this temporary scheme the City Council will retain the same amount as it does under its parking only tariff[1] from rather than 30% as under the existing parking and bus combined ticket charges (see paragraph 1 and 2 for the existing combined ticketing arrangements).

[1] The parking only tariff is £2.50, of which £0.42 is paid in VAT to HMRC leaving £2.08 income per ticket.

11. In summary, the City Council will receive £3 per ticket, the City Council will pay £0.50 VAT to HMRC[2] and £0.42 to the County Council. City Council will then have £2.08 income per ticket to retain. Since the County Council will take on all responsibility for bus operator payments under the temporary scheme, the City Council will therefore effectively be collecting the extra money towards bus travel on the County County's behalf at its sites, which is why the City Council will need to transfer £0.42 to the County Council per combined ticket sold at its three Park and Ride sites.

12. This is the same level it retains under its parking only tariff after VAT is paid, which is more than it retains under the existing combined tickets. This betterment will help offset some of the adverse impacts seen in the parking portfolio elsewhere since the introduction of the congestion charge in Oxford.

Legal issues

13. Although the fees and charges schedule will be amended the City Council parking order remains unamended, the parking fees apply as stated, however the decision is to set a combined fee for travel and parking, which is not a parking fee in terms of setting parking charges and the need to follow the statutory process under the Road Traffic Act 1984 and associated legislation.

14. Whilst the travel element of the combined ticket is zero rated for VAT, the parking element is, however, subject to the standard rate of VAT. In light of the judgment in the case of The Purple Parking C-117/11; [2012] STC 1680, HMRC takes the view that where the transport service is ancillary to the parking service, there is a single standard-rated supply.

15. Under 4.5 of the constitution the setting of fees and charges outside of the budget process is reserved to Cabinet.

Level of risk

16. The only identified risk is that there is a larger jump in price for consumers in April 2027 when the permanent arrangements revert with any inflation increases reflected as part of 2027/28 budget setting. If there is no other funding available to prevent passing the full increase onto consumers this may receive some negative feedback or affect patronage. This will all be considered as part of budget setting as it is each year and it is not considered that this risk outweighs the benefit of offering a reduction for the period proposed using funding that is available.

Equalities impact

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[2] HMRC's internal manual states that park and ride car parking is subject to VAT at the standard rate of 20%, and that combined tickets are also subject to the same (scenario 5 in the manual). For a £3 combined ticket, the VAT payable is £0.50

17. An Equalities Impact Assessment is not considered necessary. The implication of this decision is making the park and rides cheaper for a period of time, and this is considered beneficial and imposes no new barriers or discriminatory impacts.

Carbon and Environmental Considerations

Officers anticipate this promotion to have a positive impact on usage at Park and Rides. Officers understand this to be supported by bus operators and there has been no indication from them that it would have a negative impact on bus patronage from source. Therefore, this is anticipated to have some environmental benefits from getting private car users onto public transport at the city's edge. The benefit will be limited to the capacity of Redbridge Park and Ride, which we understand from enforcement officers to be busy most days already.

Report author	Carolyn Ploszynski
Job title	Director Regeneration, Economy and Sustainability
Service area or department	Regeneration, Economy and Sustainability
e-mail	cploszynski@oxford.gov.uk

Background Papers:	
1	Park and Ride Combined Parking-and-Bus Ticket Charges Oxford City Council Cabinet Report, 2023
2	Medium Term Financial Strategy 2026-27 to 2028-29 and 2025-26 Budget for Consultation
3	Oxford congestion charge investment plan, Oxfordshire County Council Cabinet Report, May 2026

Appendix 1 – Amendment to 2026/27 Fees and Charges

Status	Product title from Fees and Charge Schedule	Charge inc VAT 2026/27	Change
Existing	16 hours combined parking & bus ticket - car plus 1 adult	£4.00	Suspend until 31/03/27
Existing	16 hours combined parking & bus ticket - car plus 2 adults	£5.00	Suspend until 31/03/27
Proposed	16 hours combined parking & bus ticket - One car + up to five passengers	£3.00	Add until 31/03/27

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To:	**Cabinet**
Date:	08 July 2026
Report of:	Director Planning & Regulation
Title of Report:	Thames Valley Spatial Development Strategy (SDS) Development and Governance

	Summary and recommendations
Decision being taken:	To note the development of, and governance arrangements for, a Thames Valley SDS
Key decision:	No.
Cabinet Member:	Councillor Railton, Cabinet Member for Planning and Zero Carbon
Corporate Priority:	Good, affordable homes; Strong, fair economy; Thriving Communities; Zero Carbon Oxford.
Policy Framework:	The SDS is a new statutory planning document that sits above the Local Plan.

Recommendation(s): That Cabinet resolves to:

1 **Note** the governance and development of the Thames Valley Spatial Development Strategy

2 **Agree** to officer and member involvement in the early programme stages as outlined in this report, in particular with regards to the governance model and assisting in the development of the Thames Valley SDS.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Resourcing	No
Appendix 2	High level programme	No

Appendix 3	Governance and resources	No
Appendix 4	Risk Assessment	No

Introduction and background

1. This paper seeks Cabinet approval to participate in a joint Thames Valley partnership with councils covering Oxfordshire, Berkshire and Swindon to progress the pre-inception phase of work for a Thames Valley Spatial Development Strategy (SDS). The SDS is a new strategic planning statutory requirement and is intended to provide a high-level spatial framework setting the scale and distribution of growth, investment opportunities and supporting Place infrastructure across multiple local planning authority areas
2. Work to date has focused on establishing a shared understanding of the SDS requirement, engaging with Government on the emerging geography as in the consultation in February 2026 and legislative timetable and developing early programme outputs (including a pathway/statement of readiness and a strategic spatial baseline). Government grant funding has been made available to the Thames Valley area to support this early work, alongside defined expectations for transparency and quarterly monitoring and evaluation reporting.
3. As the statutory Strategic Planning Board (SPB) for the Thames Valley is expected to be established through secondary legislation due Autumn 2026, interim governance is required to provide clear decision-making, financial accountability and programme oversight during the pre-inception period. This paper proposes a joint partnership model with agreed monitoring, assurance and dispute resolution arrangements, with Bracknell Forest Council (on behalf of all authorities) as the accountable body and host authority for any dedicated staff resource.

Background

4. The Planning and Infrastructure Act 2025 introduces a duty on designated strategic planning authorities to prepare a Spatial Development Strategy (SDS). SDSs are intended to be high-level strategic plans which set out, amongst other matters, the scale and broad distribution of development and associated infrastructure across multiple local planning authority areas. The Government is targeting all areas of the country to have an examined SDS in place by mid-2029.
5. Government consultation on SDS geographies has indicated a preferred Thames Valley SDS area including Bracknell Forest, Reading, Oxfordshire, Slough, Swindon, West Berkshire, Windsor & Maidenhead, and Wokingham (with the final geography to be confirmed summer/Autumn 2026). Government has also indicated that bespoke secondary legislation will establish a statutory Strategic Planning Board for the Thames Valley, with consultation expected in Autumn 2026 and the board intended to take on formal functions once established.
6. Partner authorities include Bracknell Forest, Reading, Oxfordshire, Slough, Swindon, West Berkshire, Windsor & Maidenhead, and Wokingham. The option is there for Buckinghamshire to join but they have indicated they do not want to work

together at present. The partner authorities have progressed preparatory work to ensure the sub-region is ready to move quickly once the statutory framework is in place. Key activity has included:

- engagement with Government on the emerging Thames Valley SDS geography and the anticipated timetable for secondary legislation;
- submission of an expression of interest for SDS preparation funding and agreement in principle to quarterly monitoring and evaluation reporting;
- early development of draft governance and operational framework proposals for a shadow Strategic Planning Board, including work on a draft constitution and operating model;
- scoping of key pre-inception outputs, including a “Pathway to the Thames Valley SDS” (statement of readiness, programme plan and timetable) and a strategic spatial baseline (including mapping of planned growth, constraints and opportunities). Noting the programme plan and timetable is indicative pending clearer direction through further legislation and firming up governance arrangements, including the statutory Strategic Planning Board.

7. Undertaking pre-inception work ahead of the statutory SDS duty will ensure the Thames Valley partnership is ready to mobilise at pace once secondary legislation establishes the Strategic Planning Board. By agreeing the programme plan, workstreams, decision points and engagement approach in advance, partners can reduce lead-in time, make early commissioning decisions efficiently and avoid duplication of effort across authorities.
8. Early joint working will also create a shared baseline and narrative for the SDS, including a statement of readiness and an initial strategic spatial baseline (“spatial portrait”). This provides a common understanding of what the SDS is intended to do, how it relates to local plans, and the key issues, opportunities and constraints across the area, supporting alignment between partners and clearer communication with communities and stakeholders.
9. Finally, collaborative pre-inception activity enables proportionate interim governance, financial accountability and assurance arrangements to operate transparently during the grant-funded period, including quarterly monitoring and evaluation reporting. Establishing these working arrangements now will strengthen relationships, improve risk management and provide an auditable platform for transition to the statutory board when it is constituted.
10. The partnership is proposed to comprise the strategic planning authorities across Oxfordshire, the Berkshire authorities and Swindon Borough Council (together, “the Partner Authorities”). For the avoidance of doubt, the expectation is to co-opt district councils (where relevant) and other stakeholders may be engaged through co-opted or consultative arrangements as set out under the interim governance arrangements up until the Local Government Reorganisation in Oxfordshire has been completed. Moreover, other external stakeholders may also be engaged through co-opted or consultative arrangements.

Objectives and deliverables for the pre-inception period

11. The partnership will oversee delivery of the pre-inception programme, including (subject to further scoping and agreement with Government):

    - a programme plan and timetable for development of the SDS, including workstreams, decision points and engagement approach;
    - a “Pathway to the Thames Valley SDS” / statement of readiness describing what the SDS is, why it is needed, governance arrangements, how it relates to local plans, and how it will be prepared and kept under review;
    - A Thames Valley growth vision and strategic spatial baseline (“spatial portrait”), including mapping of planned growth, constraints, opportunities and relationships to other strategies (e.g. infrastructure, economy, nature recovery);
    - draft governance and operating model proposals to inform the statutory secondary legislation and to enable a shadow SPB to operate effectively in advance of the statutory board;
    - procurement and commissioning activity needed to support the above (e.g. baseline mapping, specialist technical support), in compliance with procurement law and each authority’s governance.

Governance, monitoring and assurance arrangements

Proposed governance model (interim period)

12. During the interim period (prior to establishment of the statutory Strategic Planning Board), it is proposed that governance is provided through a shadow partnership structure that mirrors the expected statutory arrangements as far as practicable, while remaining proportionate to the pre-inception scope. The model comprises:

    - Thames Valley SDS Partnership Board: with Leader representation from each Partner Authority, responsible for oversight of the direction, endorsing the work programme and budget, and making recommendations within the scope of the pre-inception interim arrangements.
    - The Chief Executive group made up of all constituent authorities along with the Place Directors of all councils to oversee the programme, delivery, manage risks and ensure alignment with each authority’s governance.
    - Programme Management Office / Strategic Planning Unit (hosted): the operational team responsible for day-to-day delivery, commissioning and coordination.
    - Workstreams: time-limited workstreams (e.g. governance/legislation, spatial baseline/evidence, engagement/communications, programme planning), each with a lead authority/officer.

13. Interim Accountable Body arrangements to hold regional funds granted by Ministry for Housing Communities and Local Government (MHCLG) to support this interim development phase and commission on behalf of the region.

14. Where decisions require formal authority (e.g. entering into contracts above delegated thresholds, committing expenditure, appointing staff, or approving material changes to scope), these will be agreed by the interim governance arrangements for the SDS prior to a formal Strategic Planning Board. The

accountable authority will ensure these decisions and procurement comply with the Accountable Authority's constitution and decision-making arrangements, supported by a clear recommendation and audit trail from the partnership bodies.

15. The interim arrangements will be in place until the formation of the statutory Strategic Planning Board. The Strategic Planning Board will become the Strategic Planning Authority for the Thames Valley area on a geography set out by central government.

16. If a Foundation Strategic Authority (FSA) is established, the Strategic Planning Board will be dissolved, and its legal responsibilities will pass to the FSA.

17. If the geography of the SDS area and FSA footprint are misaligned, joint working and governance arrangements will be put in place.

18. The partnership will operate on a transparent "open book" basis for the use of Government grant and partner contributions. Monitoring and reporting in the interim period and formal arrangements will include:

    - Quarterly reporting on progress against agreed milestones, key risks/issues, and a summary of expenditure;
    - Interim updates between quarters where required (e.g. where Government requests updates, or where material risks emerge);
    - Expenditure records maintained by the accountable body and made available to partner authorities for assurance purposes;
    - Evaluation returns as required by Government, including completion of any end-of-grant evaluation summarising outcomes and expenditure.

19. Funding has already been received from the MHCLG of £764,000 to fund the pre-inception work to develop governance and working arrangements for the next stage. Oxfordshire County Council is currently acting as the accountable body and holding the first tranche of funding outlined in table Appendix 1. MHCLG has indicated that there will be further tranches of funding and a 3-year settlement to fund the development and production of the SDS, which includes resources, evidence and studies.

20. Oxfordshire councils are subject to the current round of Local Government Reorganisation (LGR) and it is therefore recommended that a council not subject to these reforms takes on Accountable Body status for the next phase. Bracknell Forest Council has agreed to undertake this role if agreed by partners councils and will act as the Accountable Body for funds received/held on behalf of the partnership for the Thames Valley SDS programme. This will include responsibility for receiving grant and/or partner contributions, maintaining proper accounting records, administering payments in accordance with the agreed programme and budget, and providing the required financial and performance monitoring returns to Government and to partner authorities. This will be reviewed on an annual basis through the Strategic Planning Board.

21. Further funding sources are expected to include government SDS preparation grant funding and where required, partner authority contributions (monetary and/or in-kind). An outlined draft budget, including the proposed allocation by workstream and the basis for partner contributions is attached as Annex 1. It should be noted that this may be subject to change as the final SDS legislation and guidance has not yet been issued.

Programme resourcing and hosting of staff

22. To date Oxfordshire County Council has provided the majority of resource to develop the programme and fund strategic advisors with assistance from a core team of senior staff from Oxfordshire, Berkshire and Swindon authorities.

23. Going forward the partnership will require dedicated officer capacity to manage and deliver the pre-inception programme (including programme management, strategic planning and technical support). It is proposed that any dedicated staff funded through the programme will be hosted by Bracknell Forest Council as Accountable Body. Staffing may be delivered through direct recruitment, secondment, or inter-authority arrangements, subject to agreement by the partner authorities and compliance with each authority's HR, finance and governance requirements (see Annex 2 & 3).

Working arrangements and data sharing

24. The SDS pre-inception programme requires regular data sharing among authorities, including local plans, growth projections, constraints, opportunities, infrastructure, and demographic, economic, and environmental datasets. Data will be shared based on necessity and proportionality, with aggregation used where possible. The partnership aims to establish unified data and digital standards for a common evidence baseline and efficient updates.

25. Partner Authorities are asked to agree to the principle of data sharing and joint use of data. An inter-authority agreement will detail the use and management of data and compliance with Freedom of Information and Environmental Information Regulations. When processing personal data, partners will conduct Data Protection Impact Assessments and adhere to UK GDPR and the Data Protection Act 2018.

Alternative Options Considered

The Cabinet could choose not to engage in the SDS process. However, this will lead to the Council being unable to help shape the strategic growth of both Oxford and the wider area. Therefore this option has been discounted.

Implications of Local Government Reorganisation

The creation of SDSs is being led by central government, and the development of the Thames Valley SDS will become mandated by secondary legislation. There are no financial implications for the Council, albeit that human resource will need to be directed to help guide the emerging workstreams. The creation of a Thames Valley SDS will continue irrespective of LGR outcomes and programmes.

Engagement and consultation

Engagement with authorities has been integral to development of the SDS pre-inception programme and will continue once the partnership is formalised. There has been close working with Government on the emerging SDS geography, legislative timetable and grant expectations, and collaborative working between the Partner Authorities to agree the initial scope, deliverables, governance and resourcing proposals set out in this report. The Partner Authorities have already collaborated to respond to the SDS geography consultation and the response to the National Planning Policy Framework (NPPF) consultation. As the programme progresses, the partnership will develop and implement a proportionate engagement and communications plan, including early engagement with key stakeholders (such as infrastructure providers,

neighbouring authorities, statutory agencies and relevant sub-regional bodies) and arrangements for formal public consultation at the appropriate stages once the statutory SDS process is confirmed.

Sustainability implications

26. Sustainability considerations will be embedded through the SDS programme, including early agreement of sustainability objectives and the approach to assessment (including any statutory sustainability appraisal and related environmental assessment requirements), and through ongoing engagement with relevant partners and evidence holders. As the SDS content is developed, further detail will be provided on how proposed strategic approaches are expected to contribute to local and national climate and environmental commitments, and how potential adverse impacts will be avoided, mitigated or compensated.

27. The SDS is intended to provide the strategic framework to integrate housing and economic growth with the delivery of supporting infrastructure, climate mitigation and adaptation, and environmental enhancement across the Thames Valley. Developing and delivering the SDS therefore has positive sustainability implications by enabling partners to plan for sustainable patterns of development (including prioritising locations that support public transport, walking and cycling), set strategic expectations on energy efficiency and carbon reduction, and coordinate cross-boundary measures for green infrastructure, biodiversity and nature recovery.

Financial implications

28. The financial implications of participating in the partnership fall into three categories: (i) receipt and use of Government grant funding (where applicable), (ii) any partner authority contributions (cash and/or in-kind), and (iii) staffing and commissioning costs required to deliver the pre-inception outputs.

29. A detailed budget and resourcing plan will be maintained and reported through the partnership governance. Any financial commitments by the Council will be subject to approval through the Council's normal financial governance (including delegated authority limits) and will be captured within the formal inter-authority agreement(s) including provisions on payment schedules, treatment of underspends/overspends, liabilities, audit access and exit/termination arrangements.

Legal issues

30. Through the Local Government Acts 1972 and section 1 of the Localism Act 2011, local authorities have the power to enter into joint arrangements with other local authorities, delegate functions to other local authorities and do anything that individuals may generally do (the general power of competence).

31. This is reflected in Parts 3.8 (Joint Arrangement) and 3.9 (Delegation to and from other local authorities) of the Council's Constitution which set out that the Council or the Cabinet may establish joint arrangements with one or more local authorities to exercise functions that are not executive functions in any of the participating authorities. Such arrangements may involve the appointment of a joint committee with these other local authorities and the delegation of functions to the joint committee. The Council may delegate non-executive functions to another local authority or, in certain circumstances where these are local choice responsibilities, the executive of another local authority.

32. The Leader may establish joint arrangements with one or more local authorities to exercise functions which are executive functions. Such arrangements may involve the appointment of joint committees with these other local authorities and the delegation of functions to the joint committee. The Leader may delegate executive functions to the executive of another local authority or, in certain circumstances where these are local choice responsibilities, another local authority. The decision to accept a delegation of executive responsibilities from another local authority is reserved to Cabinet.

33. The interim partnership is intended to enable collaborative programme delivery and joint oversight during the pre-inception period. The legal mechanism(s) to give effect to this may include a memorandum of understanding, a collaboration agreement, and/or arrangements under the Local Government Act 1972/Local Government Act 2000 for the discharge of functions (including the establishment of a joint committee) where needed. The chosen mechanism will reflect (i) whether any functions are being formally delegated, (ii) the extent of decision-making powers required during the interim period, and (iii) the anticipated transition to a statutory Strategic Planning Board established by secondary legislation. Further reports will be prepared for consideration in the future as needed as the programme develops.

Level of risk

34. Risk Register is attached at Appendix 4.

Equalities impact

35. The pre-inception phase is primarily programme set-up and evidence development. Equalities considerations will be embedded in the design of the SDS programme and engagement approach, including ensuring inclusive consultation and assessing impacts as the SDS content develops. Further equality and inclusions assessments will be developed alongside the development of the SDS.

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Appendix 1 – Funding and Finance

TVSDS Projected Indicative Budget - Working Draft

Costs								
Operations		**2026/27**	**Work In-Kind (WiK)**	**2027/28**	**Work In-Kind (WiK)**	**2028/29**	**Work In-Kind (WiK)**	**Total**
	Resources and Technical support	£307,600	£100,000	£724,000	£100,000	£755,000	£100,000	**2,086,600**
Commissions	**Studies/Evidence/Support**	£225,000		£830,000		£400,000		**1,725,000**
	Sub-Total							**£3,811,600**
	Contingency	**@15%**						**£571,740**
	Total					Estimated funding required:		**£4,383,340**
Revenue	MHCLG Grant Funding	£764,000		unknown		unknown		**£764,000**
	Work -in-Kind (WIK) Contributions	£150,000	£100,000		£100,000		£100,000	**£450,000**
	Local Contributions (see note 2)			£500,000		£500,000		**£1,000,000**
	Sub-Total							**£2,214,000**
	Proposed additional MHCLG Funds required							**£2,169,340**
Notes								
1. Assumes 30 month delivery programme								
2. Local contribution divided per council pre and post LGR - est. £50k per partner authority from April 2027.Oxfordshire paying £150k until LGR. WiK is flexible and may be shared between FSA workstreams and SDS.								
3. Technical study costs need verifying and are draft indicative cost. Evidence needed is unknown until further Government guidance. Savings possible if joint commissioning between SDS and Local Plans and with other SDS areas.								

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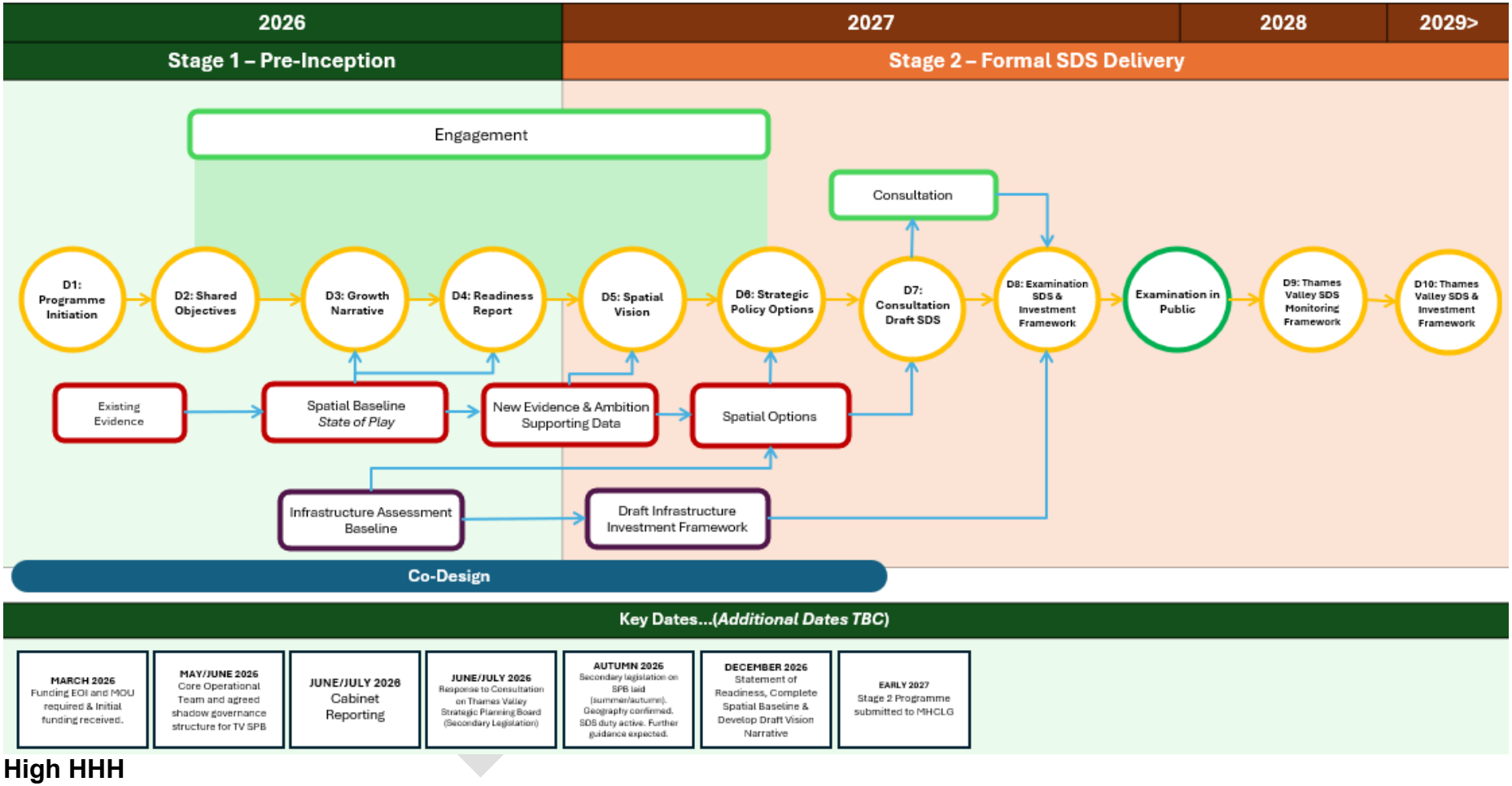
Appendix 2 – High Level Programme & indicative timeline (working draft)

CRITICAL PATH TO A THAMES VALLEY SDS



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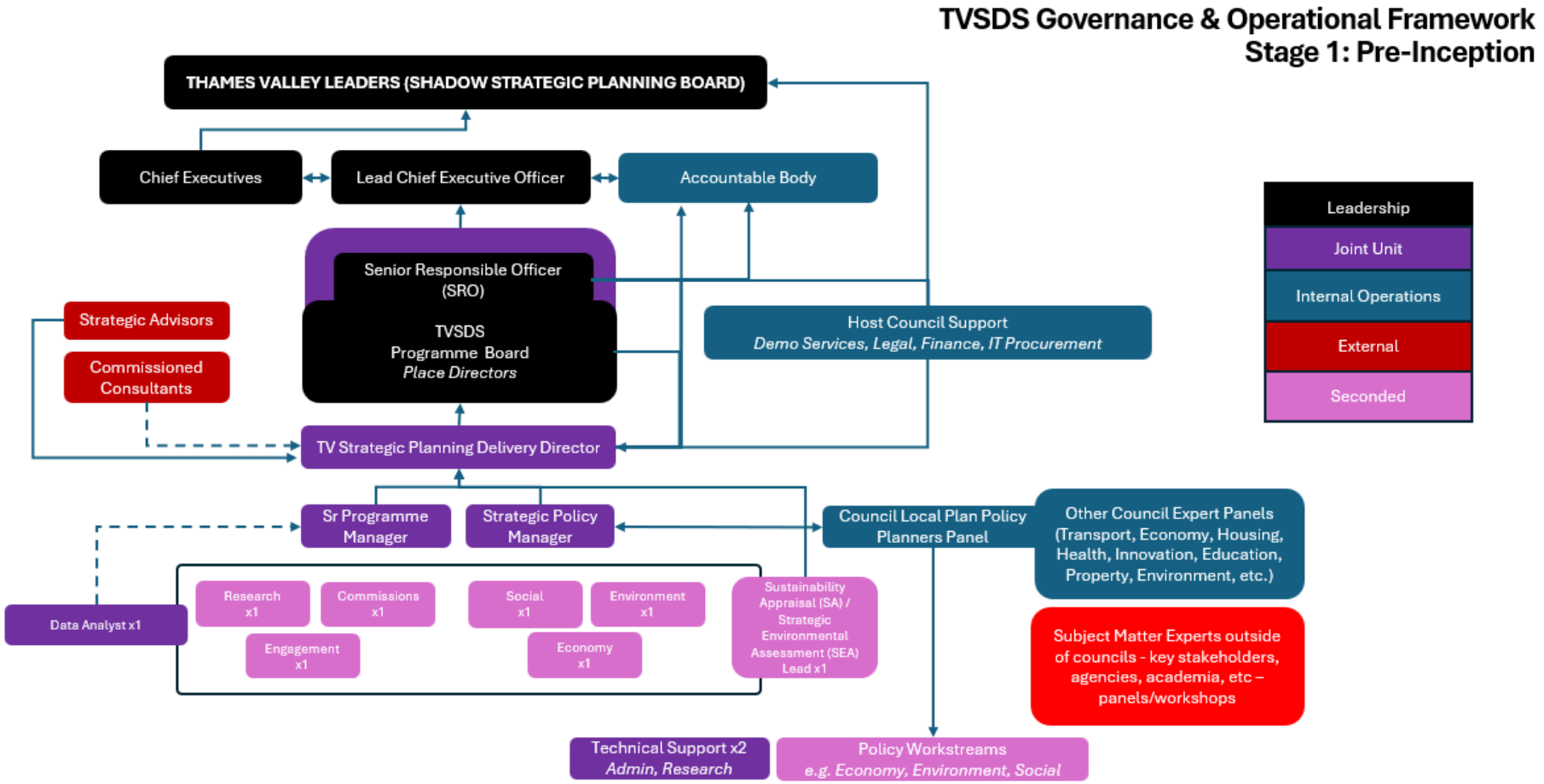
Appendix 3 - Governance and resources



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Risk Register

Thames Valley Spatial Development Strategy (SDS) Development and Governance

08 July 2026

				Gross			Current			Target						
Ref	Description	Consequence	Name of Risk Owner	P	I	Score	P	I	Score	P	I	Score	Control/Mitigation Description	Control Date Due	Progress on Control/Mitigation	Action Owner
sds1	Uncertainty in final SDS geography and statutory arrangements	Partnership is based on draft structure and partnership may change	David Butler	2	3	6	2	2	4	2	2	4	Maintaining flexibility in programme scope, continued engagement with Government, and ensuring interim governance can adapt.	01 September 2026		TBA - Recruitment required
sds2	Lack of off sign up to the partnership arrangements	Lack of joined up working, sight and information available for the development of the SDS	David Butler	3	3	9	2	2	4	2	2	4	Understanding the issues in each authority, sharing information and working with senior officers.	01 September 2026		TBA - Recruitment required
sds3	Delays in establishing interim governance / agreements	Delays in progress of programme and oversight	David Butler	3	2	6	2	2	4	2	2	4	Early legal/finance input, clear decision timetable, and use of standard inter-authority templates where possible.	01 September 2026		TBA - Recruitment required
sds4	Insufficient capacity or recruitment delays	Stretched resources, not being able to make progress on the programme	David Butler	3	3	9	2	2	4	2	2	4	Early scoping, use of secondments, and prioritisation of critical-path activities.	01 September 2026		TBA - Recruitment required
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THE RISK REGISTER IS FORMATTED AS A TABLE. PRESS TAB ON THE LAST TABLE CELL TO INSERT A NEW ROW.

Description of the headings within the risk log

Reference: A reference number to identify the risk.

Description: The situation or event that the recommendations to Cabinet, or the information in the report, expose the Council to.

Consequence: The likely outcomes or consequences if the risk materialises.

Name of the risk owner: The name of the person who is responsible for the risk

Control/mitigation: How the Council is choosing to respond to the risk. What is it doing to reduce probability and/or impact, or what will it do to reduce it, so that it is within the Council's risk appetite?

Control due date: The date by which the control/mitigation should be in place.

Progress on control/mitigation: A description of the progress that has been made in implementing the risk control/mitigation.

Action Owner: The person who is responsible for implementing the risk control/mitigation.

Risk Appetite

The Council's risk appetite is the amount of risk that it is willing to take to achieve its priorities, provide sevices as planned and deliver its statutory services. When considering risk staff must take into account the Council's appetite for risk which differs according to the type of risk. How low, medium and high are defined is shown at the bottom of the page.

- **Strategic**

3.2 Where the council needs to innovate to make transformative change happen so that it can achieve its 2024 to 2028 priorities, the council will accept a medium risk appetite. Examples of this might be housing development and climate change initiatives where projects might be supported that are innovative, have a degree of uncertainty but are aligned with the Council's priorities.

- **Economic, finance and markets**

3.3 It is a legal requirement for the Council to set a balanced budget. The Council operates against a challenging economic and financial backdrop in which it only knows what resources it will have for one year at a time. It has finite financial reserves and must be sustainable in the long term. These will be considered by the Group Finance Director on an annual basis, but in the context of a medium risk appetite. Where there is the possibility of investing to achieve a priority through development or economic growth, the risk appetite will tend towards medium risk, whilst maintaining rigorous oversight of delivery.

- **Customers and Citizens - Providing services as planned and delivering statutory duties**

3.4 For core services that are delivered to vulnerable people the Council will have a low-risk appetite to avoid a failure in service delivery that might harm vulnerable people.

- **Reputation**

3.5 The Council must maintain the trust of citizens and consequently has a low-risk appetite.

- **IT and information**

3.6 Information Technology plays a critical role in the delivery of Council services, including to the most vulnerable in the city and consequently the Council has a low-risk appetite to failure of systems. The Council will prioritise having the correct IT systems, which are dependable and will provide continuity of service, whilst at the same time are secure and provide data confidentiality in order that all GDPR requirements are met. The risk appetite may increase to medium if digital transformation projects are undertaken in line with Council priorities but only after rigorous risk assessment, with contingency plans for the continuity of service.

- **Legal, regulatory and compliance, both internal and external**

3.7 These risks are about ensuring the Council complies with its constitution, policies, regulatory requirements, legal obligations and statutory guidance

policies, regulatory requirements, legal obligations and statutory guidance. The Council will take a risk-based approach where there are decisions which, though they may be in compliance with these areas, could be open to challenge or subject to regulatory action. The Council has a low-risk appetite relating to compliance, ensuring all obligations and requirements upon it are met, whilst taking decisions and delivering its services and functions. However, in relation to the risk of legal challenge (both defending and taking), the Council will have a medium risk appetite. Decisions around regulatory and legal action will be taken in light of many considerations, including priorities, resources, commercial factors, timing, future impact and reputational impact.

- **Organisational, management and people (including health and safety and equalities)**

3.8 Organisational and management risk is about the structure, leadership, governance, processes, and culture of the Council. These can undermine the delivery of services, cause inefficiencies and damage the Council's reputation. The Council's risk appetite is low.

People risk concerns staff and includes recruitment and retention, staff engagement, training, health and safety and equalities. Risks include not being able to obtain the right staff or retain them, a lack of engagement and low morale. These can severely impact delivery of services. The risk appetite is low.

The Council is committed to the health and safety of its staff and members of the public, not only because it fulfils its legal responsibilities, but because it has a moral duty not to cause harm. The Council has a low-risk appetite and will have effective health and safety practices that help prevent death, injuries, and illness.

The Council is committed to building a fairer city by ensuring its services, investments, and policymaking addresses Oxford's social and financial inequalities. A medium risk appetite is appropriate when the Council is driving positive change.

- **Environmental and sustainability**

3.9 The Council will have a low-risk appetite for environmental and sustainability risks that might damage health and wellbeing in the community, and which might result in legal liabilities and fines. This includes areas such as long-term environmental damage like climate change impacts, pollution, and a loss of biodiversity. Laws and regulations must be adhered to. A medium risk appetite is acceptable when environmental and sustainability projects can result in long term benefits to the city through Zero Carbon Oxford.

- **Commercial**

3.10 The Council is responsible for spending public funds, providing efficient public services over the long term, and maintaining the trust of the community. Expenditure with some commercial aspects will be made that can provide a return on investment so that these resources can be used to help it achieve its priorities, deliver services as planned and meet its statutory duties. However, the investments should align with the priorities of the Council, be medium risk, and focus on stable returns.

and focus on stable returns.

- **Political**

3.11 Political risk is about change, instability or disagreements that can make the delivery of the Council's priorities more difficult. This may include changes in national leadership priorities and resource allocation, shifts in public opinion or outside pressures. Generally, the Council's risk appetite is low because unexpected change can impact service delivery, but it may be medium when the pursuit of priorities requires working within a changing political environment.

- **Partnerships**

3.12 Partnerships are important because they enable the Council to access additional resources and expertise that can drive change and innovation leading to the more efficient delivery of priorities and services. Due to the potential benefits, including improved service delivery, whilst delivering efficiencies and savings, the Council will have a medium risk appetite, but the risk must be underpinned by sound governance structures.

- **Technical, operational and infrastructure**

3.13 Technical risks are about the adoption of new ways of completing tasks and the reliability of existing methods. The risks include implementing a new way of working and it fails to deliver the expected results. Operational risks arise from the day-to-day activities of the Council and might include process inefficiencies or a failure in supply chains. Infrastructure risks concern the physical assets that the Council needs to deliver its services, such as buildings and utilities. In these areas the council has a low-risk appetite as it must reliably deliver services to citizens.

Low	The Council is unwilling to expose itself to risks, particularly if by doing so there could be significant negative consequences and the possibility of failure. It will minimise its exposure to risk and prioritise certainty, security, adherence to regulations, and prudence. Key aspects of a low-risk appetite are prioritising compliance with laws and regulations, safety, conservative decision making, financial prudence and minimising actions that could lead to adverse impacts on citizens.
Medium	The Council will take considered risks when they help it successfully deliver the Council Strategy 2024 to 2028, provide the services identified in its business plans and deliver its statutory duties, but it will only do so after it has given the matter careful consideration through risk assessment, and there are plans in place to implement risk controls. The Council is open to opportunities that could lead to improved public services, and it may allocate resources to higher risk projects if they align with 2024 to 2028 priorities. The Council is willing to take these risks when the potential rewards align with its priorities and risks can be managed.
High	The Council is willing to take significant risks to achieve ambitious goals, drive innovation or deliver transformative projects where there is uncertainty about the outcome, including the possibility of failure. It is characterised by bold decision making and innovative approaches to the delivery of public services with the goal of delivering significant improvement.

Risk Scoring

Once risks have been identified, the risk matrix serves as the primary tool for prioritisation. It enables the Council to determine which risks are most significant and therefore require greater attention and resources. The matrix also provides a consistent framework for comparing different types of risks across the organisation

Each risk should be analysed using a five by five matrix for (1) the probability it will happen and (2) the impact if it did occur. This assessment should be made on three different basis:
• Gross risk – risk level if existing key controls and mitigations were not in place or not effective.
• Current risk – risk level after existing controls and mitigations are taken into consideration.
• Target risk – anticipated risk level, within the Council's risk appetite, following the introduction of planned controls and mitigations.

Assessing gross risk helps the organisation understand its reliance on existing key controls and supports decisions on risk treatment and the appropriate target risk level. A useful approach is to first consider the current risk, then ask: what would the impact and likelihood be if those key controls were removed?

It is the risk owner's responsibility to ensure the controls they believe are reducing the risk are effective and are working in practice. Controls that are not yet in place should not be considered within the current risk.

Each identified risk should then be plotted onto the risk matrix.

Probability						
Highly likely	5	5	10	15	20	25
Likely	4	4	8	12	16	20
Possible	3	3	6	9	12	15
Probably not	2	2	4	6	8	10
Unlikely	1	1	2	3	4	5
		1	2	3	4	5
	Impact	Insignificant	Minor	Moderate	Major	Severe

When assessing the likelihood of a risk occurring, select a score from 1 to 5 on the risk matrix that best reflects what you think. This rating involves an element of professional judgement, so consider how probable the event is and take into account the following factors:
• Has this event happened before in the Council? (How frequently?) Has this event happened elsewhere? (How frequently?)
• How likely is it that one or more of the causes/ triggers of the event will occur?
• Has anything happened recently that makes the event more or less likely to occur?

The following tables provide some support in quantifying the risk in terms of probability and impact.

Risk Probability Assessment Criteria

Risk Probability Assessment Criteria

Scale	Description	Probability of Occurrence	Description
1	Unlikely	0 to 19%	The event may occur in certain circumstances
2	Probably not	20% to 39%	The event will probably not occur
3	Possible	40% to 59%	The event may occur
4	Likely	60% to 79%	The event is likely to happen
5	Highly likely	80% to 100%	The event is highly likely to happen

When you select the impact you should give consideration to the factors outlined in the risk matrix. For example, if the risk you are scoring has a low financial impact but a high impact on our reputation then you would select the most appropriate number between 1 and 5 that relates to the level of reputational impact. Once again, this score will have an element of judgement.

Risk Impact Assessment Criteria

Risk Impact Assessment Criteria

	Insignificant	Minor	Moderate	Major	Severe
[illegible]	Little or no impact on the delivery of the	May have a minor impact on the delivery of	Would impact the delivery	Would require a significant shift from	It would require a fundamental change in

Strategic	organisation's priorities	the organisation's priorities	of the organisation's priorities	current strategy to enable the Council to achieve its priorities	strategy and priorities. Failure to deliver a 2024 to 2028 priority
Economic, Financial & Markets	Minor financial impact <£50k per annum	Financial impact contained within the service area £50k - £250k per annum	Budget adjusted across service areas £250k - £500k per annum	Some corporate budget realignment £500k - £750k per annum	Significant corporate budget realignment >£750K per annum
Customers & Citizens	No impact on service quality, limited disruption to operations	Minor impact on service quality, minor service standards are not met, short term disruption to operations	Significant fall in service quality and standards	Major impact on service quality, multiple service standards are not met, long term disruption to operations	Catastrophic fall in service quality and key service standards are not met, long term catastrophic interruption to operations
Reputation	local complaints that do not attract adverse publicity	Adverse publicity locally and regionally on social media	Adverse publicity locally and regionally in mainstream media	Adverse UK wide publicity	Prolonged negative perception in the UK
IT & Information	Minimal impact on the Council's infrastructure, information management and service delivery	Brief disruptions and inconvenience, but no long-term consequences	Moderate IT and information risks that cause noticeable disruptions or delays in services. They may affect a specific group of users	Significant disruption to the delivery of services or financial loss, including fines. Large sections of the Council's operations impacted	Catastrophic IT risks that have widespread, severe consequences, that threaten the Council's ability to function

	Insignificant	Minor	Moderate	Major	Severe
Legal, Regulatory & Compliance	Breaches of local procedures or standards Unlikely to cause litigation	Breach of statutory regulations or standards Litigation possible	Breach of major statutory duty or internal regulations leading to disciplinary action Litigation to be expected	Significant breach of external regulations leading to intervention, sanctions, or fines Litigation almost certain and difficult to defend	Major breach leading to suspension or discontinuation of business and services or breaches of law punishable by imprisonment. Litigation is certain and impossible to defend
Organisational, Management and People, including Health and Safety and equalities	Minor issues within teams with no major impacts on service delivery Minor injury Minimal impact on the Council's ability to promote equality and diversity	Difficulties that cause short lived disruptions or inefficiencies. Less serious injury causing one-month recovery Minor equalities risks that cause brief disruptions or dissatisfaction, but no long-term harm to service delivery	Noticeable disruption and delays to operations requiring significant effort to resolve Serious injury to a person causing a six-month recovery An impact on certain groups or services, with operational inefficiencies and complaints	Significant disruption and inefficiencies that affect the Council's ability to deliver a service or priority Death or life changing injury to a person Equalities risks that significantly affect the delivery of services or reputation	Disruptions that threaten the Council's ability to operate. Long term consequences for service delivery. A failure to deliver a 2024 to 2028 priority. Death or life changing injury to more than one person A systemic breakdown in the Council's efforts to uphold equality and fairness particularly impacting those from a protected characteristic group.
Environmental & Sustainability	Environmental impact that disperses within a short time Minor delays in implementing sustainability initiatives	Environmental impact that is contained and rectified easily Small disruptions or inefficiencies but no long-term impact on sustainability strategy or service delivery	Environmental impact on a small area or a wider area with limited damage Noticeable delays or inefficiencies in the delivery of sustainability projects	Persistent environmental damage The Council's ability to meet its sustainability goals are undermined and key targets are missed leading to regulatory consequences	Large-scale irreversible environmental damage A complete failure to meet sustainability obligations and targets resulting in large fines, and legal action with long term damage to the Council's reputation

	Insignificant	Minor	Moderate	Major	Severe
Commercial	Negligible impact on the Council's operations, finances, or reputation	Small financial losses with manageable consequences. No critical services or strategic priorities are affected	May cause disruption but does not cause long term harm to the Council's reputation or ability to meet its budget	A significant disruption to the Council's operations, financial position and a long-term impact on reputation	Large scale financial loss, with the potential to result in the Council issuing a Section 114 notice
Political	Small scale political disagreements that do not affect decision making or lead to reputational damage	Minor disruption or reputational damage but can be managed without a significant impact on the Councils ability to perform its duties	Noticeable disruption or delays in Council decisions and reputational damage	A significant disruption to the Council's ability to operate effectively and deliver its priorities due to political conflict, public protest, or a shift in political power	A severe event that threatens the existence or legitimacy of the Council. Long term instability and irreparable damage to its reputation
Partnerships	Issues arising from the partnership are managed and have no significant impact	Some inconvenience but no long-term impact on the Council's priorities and services	More significant disruption to operations and financial position but they can be managed with appropriate resources. Active intervention required	Significantly disrupts Council services and financial stability. There are delays to the delivery of services and a loss of reputation	There is a threat to the Council's ability to function effectively, and core services cannot be delivered
Technical, Operational & Infrastructure	Little impact on the Council's functions. Any problems are minor and easily addressed	Minor issues that cause short disruptions or inconvenience. No long-term effects and resolved quickly	There are more significant disruptions or delays. Service delivery may be impacted but can be resolved with additional resource	A significant disruption to Council operations affecting key services and causing substantial delays, financial loss and inconvenience to the public	The Council's ability to continue functioning is threatened. Significant long-lasting disruption, financial losses, or public safety concerns

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To:	**Cabinet**
Date:	08.07.2026
Report of:	Carolyn Ploszynski, Director of Regeneration, Economy and Sustainability
Title of Report:	**Delegate authority to the Deputy Chief Executive - Place to Direct Award the Council's Water Supply and Wastewater Contract to Anglian Water Business (National) Limited t/a Wave Utilities on a 2+1+1 contract term.**

Summary and recommendations	
Decision being taken:	To give Delegate authority to the Deputy Chief Executive - Place to Direct Award the Council's Water Supply and Wastewater Contract to Anglian Water Business (National) Limited t/a Wave Utilities on a 2+1+1 contract term, subject to final contract price; and delegate authority to the Deputy Chief Executive - Place to make non-substantive changes to the framework should they become necessary.
Key decision:	Yes
Cabinet Member:	Cllr Anna Railton, Deputy Leader & Cabinet Member for Planning & Zero Carbon Oxford
Corporate Priority:	None
Policy Framework:	None

Recommendation(s): That Cabinet resolves to:

Approve Delegate authority to the Deputy Chief Executive - Place to Direct Award the Council's Water Supply and Wastewater Contract to Anglian Water Business (National) Limited t/a Wave Utilities on a 2+1+1 contract term, subject to final contract price; and delegate authority to the Deputy Chief Executive - Place to make non-substantive changes to the framework should they become necessary.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Exempt Appendix 1 – Not for publication	Yes This information is exempted from publication under Schedule 12A to the Local Government Act 1972 on the following basis: • Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings
Appendix 2	Appendix 2 -Risk Register	No Please note legal risks are held in Appendix 1 and are confidential
Appendix 3	Appendix 3 – Equality-Impact-Assessment-Water Supply & Wastewater Contract Cabinet	No
Appendix 4	Appendix 4 – Background Paper – Utilities Procurement 2024-2028	No
Appendix 5	Appendix 5 – LASER Framework	No

Introduction and background

1. The Council is required to secure ongoing provision of non-domestic water supply and wastewater treatment services for its corporate estate in which it pays the utility bill.
2. Since deregulation of the non-domestic water market in 2017, the Council has procured these services under Kent County Council t/a LASER Water Supply and Sewerage Services framework. Kent County Council /LASER is a recognised Public Buying Organisation, and the Council has used LASER established frameworks for utilities for over 20 years.
3. The Council's current water supply and wastewater contract with Anglian Water Business (National) Limited t/a Wave Utilities (WAVE) will expire on 14 September 2026. This report seeks approval to award the replacement contract to WAVE under Lot 1 of Kent County Council's framework for the Supply of Water and Sewerage Services, ensuring continuity of service and value for money during the period leading up to Local Government Reorganisation (LGR).

Reasons for Direct Award

4. The proposed contract has been procured through the framework via a direct call off process meaning no specific competition has been held by the Council to select the

recommended supplier. For this specific contract the direct approach represents the most robust and value for money procurement route available to the Council at this time.

5. The non-domestic water market is highly constrained with wholesale water prices set regionally and regulated nationally, meaning suppliers do not compete meaningfully on water tariffs. Most of the price organisations pay per unit is set by the wholesaler and only approximately 7% of the total cost goes to the retailer. The Council contracts with a retailer for its water provision and under the framework agreement, the retailer's prices are fixed for the duration of the contract and have already been market-tested and benchmarked through a competitive procurement exercise in order to be appointed to the framework.
6. Under the framework agreement there are two suppliers on Lot 1 eligible for Direct Award. Which supplier is selected depends on the criteria chosen. Within this exercise it LASER advised that any marginal difference of costs between the two suppliers would not amount to any substantial cost savings because of the retail costs are a very small percentage of the total water bill. For example, even if a retailer offers 'half' the price of another this likely constitutes a 1-2% price difference.
7. Any marginal difference in retailer fees would be far outweighed by the additional costs and risks associated with a supplier change. Switching supplier would require estate-wide closing meter reads, which cannot be undertaken with existing staff resources and would require short-term additional capacity at an estimated £25,000 revenue cost. Incomplete or delayed meter reads would result in estimated billing, increasing the risk of overcharging and generating avoidable disputes and additional officer time.
8. WAVE is the Council's current supplier and to award a new contract to them avoids the above costs and risks entirely. WAVE already hold validated consumption data, understands the Council's estate, and provides established billing accuracy. WAVE was independently ranked as the highest-scoring supplier for service quality when appointed to the framework. This combined with the cost savins identified above provides assurance that the appointment WAVE will secure best value service for the Council.
9. Additionally, the Council has been impressed with the level of service WAVE has delivered throughout the current contract period. A direct call off procurement to appoint also avoids a time and resource intensive competition which will likely deliver no service benefit and no or negligible price benefit given the environment of the water market.
10. The proposed contract term ensures stability while organisational responsibilities and assets are transitioning under LGR but also allows flexibility in term length while future arrangements are being determined.

Alternative Options Considered

11. **Mini competition via the LASER Framework:** The Council could opt for LASER to run a mini competition on the Council's behalf. This would involve LASER building a tender pack, based upon the Council's specified weighting requirements for service, social value and price, and any additional requirements. Within this option the tender would be made available to four suppliers. Running a mini competition under the LASER Framework, was rejected for the following reasons:

a) Undertaking a mini-competition or standalone procurement would duplicate work already completed at sector level, require additional LASER and internal resource and associated costs, and introduce timing risk, with the potential for exposure to deemed rates if award timelines slipped. This approach would cost more money with no benefit. For reference LASER charges 1.5% of annual water chargers under their management fee for the Direct Award route and 3% to run a mini competition

b) Resource burden – a mini competition would require more internal resource

c) Time constraint and risk of deemed rates – given Cabinet timelines if this option were to be taken the process would not be complete until after the date of the current contract end, meaning the Council would be subject to deemed rates with its current supplier whilst sorting out the new contract

d) Higher cost – LASER would require an increased rate to run this option when compared to the Direct Award option

e) Little value added – LASER has already undertaken a full competitive procurement exercise to refresh the framework, during which WAVE scored the highest on service. Running a separate Council-level competition would likely duplicate effort with minimal value due to the cost environment outlined above

f) Operational disruption - a Mini competition may have resulted in a change of supplier, which would trigger the need for closing meter reads across a large number of sites. Completing this manually would require substantial Council resource

g) Risk avoidance during LGR - introducing a supplier change immediately before LGR could cause avoidable billing and service continuity issues

12. **Running a full standalone procurement** (outside the framework): This was rejected for the following reasons:

    a) Excessive time and administrative cost compared with using an established public sector framework agreement

    b) LASER's framework agreement already provides market-tested, competitively tendered pricing, ensuring compliance and value for money

    c) A standalone procurement would be particularly impractical during the pre-LGR period and would duplicate work already undertaken at sector level by LASER

13. **Switching supplier through a direct call off to the alternative Supplier under the LASER Framework**: This was rejected for the following reasons:

    a) LASER’s recent full procurement ranked WAVE as providing the best service of all Lot 1 framework agreement suppliers

    b) Switching supplier would trigger significant operational workload relating to meter reads, onboarding, and data validation

    c) The risk of overcharging through estimated reads is higher if the Council switches supplier

    d) No evidence demonstrated that an alternative supplier would offer material financial or service improvements relative to WAVE.

Implications of Local Government Reorganisation

14. A limited 2+1+1-year contract has been selected specifically to avoid binding the successor authority to a long-term arrangement, allowing the new authority freedom to review and procure services strategically once established. The +1 options have been included to be flexible given the unknown timelines associated with LGR.

15. Awarding a contract to the incumbent supplier, WAVE, also prevents the significant operational burden that a competitive exercise or supplier change would create. Undertaking closing meter reads for a large number of sites immediately before LGR would require considerable resource and carries a substantial risk of incorrect estimated billing, which could introduce avoidable financial pressure.

16. To note, this is an essential service of which there is not an option not to enter a new contract.

Financial implications

17. Since the current contract was awarded, water industry costs have risen. Ofwat has approved a £104bn national investment programme (2025–2030), with early industry estimates indicating that water costs will increase from April 2026. These increases apply regardless of supplier, as wholesale costs are regulated regionally and make up the majority % of the unit fees.

18. Use of the LASER framework agreement provides financial benefit due to portfolio scale and aggregated buying power. Historically, the Council has secured water pricing below the national average through LASER. Importantly, the retail prices under the new contract will remain fixed for the full contract term, providing cost certainty during a period of rising market prices.

19. The Direct Award route avoids avoidable transition costs (estimated at c. £25,000) associated with a necessary extra resource to conduct meter reads and supplier change and therefore represents the lowest whole-life cost option available to the Council.

20. The water contract is an essential service required for the daily operation of Council buildings. Existing approved budgets are in place to meet these costs.

21. Until LASER have finalised the arrangement with WAVE on our behalf the exact water costs are unknown, however, it is understood that OCC annual water costs for the new contract will sit at £300k which is in line with our current annual chargers.

Legal issues

22. Under 4.5 (11) of the Council's Constitution Cabinet is the decision-making body for the award of contracts in excess of £750,000. The estimated value of the contract means the decision to award the contract is a key decision.

23. Additional legal comment is provided in Appendix 1.

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Level of risk

24. The main financial and operational risks relate to supplier change, billing accuracy, internal capacity and timing pressures. These risks are minimised through an award to the incumbent supplier, use of a framework, and a short, flexible contract structure aligned to LGR. A detailed Risk Register is attached as an appendix.

Equalities impact

25. Attached as an Appendix 2.

Carbon and Environmental Considerations

26. The proposed contract award supports the Council's environmental objectives by retaining a supplier that has clearly articulated and externally recognised sustainability credentials. WAVE operates under a comprehensive Social and Sustainability Framework, with a focus on water efficiency, environmental management and carbon reduction. During 2024–25, WAVE enabled customers to save over 10.4 million cubic metres of water, exceeding its stated targets and reducing associated emissions. WAVE also maintains ISO-accredited environmental management systems (ISO 14001) and has committed to achieving Net Zero carbon emissions by 2030, ahead of the national 2050 target and in line with the broader UK water industry. Its Carbon Reduction Plan, prepared in accordance with PPN 06/21 and the GHG Protocol, sets out a science-based pathway covering Scope 1, 2 and 3 emissions, with clear interim reduction targets and a hierarchy focused on reducing emissions before procuring or offsetting residual impacts.

27. Retaining Wave avoids the carbon impacts associated with supplier transition, including estate-wide meter reading activity and data re-validation, while maintaining continuity with a supplier that actively supports customers' own decarbonisation journeys through water efficiency, demand reduction and engagement on the role of water in achieving Net Zero.

Report author	Alice Jones
Job title	Carbon Reduction Project Manager
Service area or department	Regeneration, Economic Development, and Environmental Sustainability
e-mail	ajones@oxford.gov.uk

Background Papers:

List the background documents and, if possible, link to them.

All background papers must be listed in accordance with the Local Government (Access to Information) Act and The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. This includes, any material which discloses facts or matters on which the report or an important part of it is based and which have been relied on in the preparation of the report Each document must be listed and a copy of each document made available to members and the public on request, (or they should be directed where to find it if it is already published on the Council's website). All confidential, exempt, copyrighted and published works are EXCLUDED from this requirement.

1 Utilities Procurement 2024-28

OxCityCouncil Cabinet report

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By virtue of paragraph(s) 5 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Risk Register

Water Supply and Wastewater Contract

20.04.2026

				Gross			Current			Target						
Ref	Description	Consequence	Name of Risk Owner	P	I	Score	P	I	Score	P	I	Score	Control/Mitigation Description	Control Date Due	Progress on Control/Mitigation	Action Owner
1	Potential cost savings overstated if alternative supplier is selected	Minimal or no savings acheieved, e.g., business case is misleading	Alice Jones	2	4	8	2	4	8	1	4	4	Use of LASER compliant framework; evidence of market-tested, fixed pricing; confirmation of limited market competition; documentation of cost avoidance	September, 2026	Awaiting approval	Environmental Sustainability
2	Additional unbugeted cost from supplier change	Estimated £25k + from short-term staffing leading to pressure on revenue budgets	Alice Jones	3	3	9	3	3	9	2	3	6	Retain incumbent supplier; avoid change and meter read exercise altogether	September, 2026	Awaiting approval	Finance
3	Overcharging due to estimated billing	Financial loss, disputes and officer time	Alice Jones	4	3	12	4	3	12	3	3	9	Direct Award to incumbent ensures validated data and accurate billing	September, 2026	Awaiting approval	Environmental Sustainability
4	Disruption to essential water and wastewater services	Service disruption to Council buildings	Alice Jones	3	4	12	3	4	12	2	4	8	Timely Direct Award via framework; incumbent supplier continuity	September, 2026	Awaiting approval	Environmental Sustainability
5	Insufficient internal capacity to support competitive procurement	Staff pressure, reduced performance elsewhere	Alice Jones	2	5	10	2	5	10	1	5	5	Direct Award avoids tender preparation, evaluation and mobilisation workload	September, 2026	Awaiting approval	Environmental Sustainability
6	Poor service performance from supplier	Operational ineffciency, compliants	Alice Jones	4	3	12	4	3	12	3	3	9	Supplier independently ranked highest for service on LASER framework; known performance history	September, 2026	Awaiting approval	Environmental Sustainability
7	Procurement non-compliance	Legal challenge, reputational damage	Alice Jones	2	3	6	2	3	6	2	3	6	Use of legally compliant LASER framework; Direct Award permitted under framework terms	September, 2026	Awaiting approval	Procurement
8	Exposure to deemed rates	Uncontrolled costs	Alice Jones	1	5	5	1	5	5	1	5	5	Direct Award ensures timely award well in advance of contract end	September, 2026	Awaiting approval	Finance
9	Contractural inflexibility post LGR	Contraint on successor authority	Alice Jones	2	4	8	2	4	8	1	4	4	Short 2+1+1 contract term with break points	September, 2026	Awaiting approval	Finance / Law
10	Operational disruption during LGR transition	Errors in billing	Alice Jones	2	3	6	2	3	6	1	3	3	Maintain incumbent supplier through transition period	September, 2026	Awaiting approval	Environmental Sustainability
11	Perception of reduced competition or transparency	Political or public criticism	Alice Jones	3	4	12	3	4	12	2	4	8	Clear narrative explaining constrained market, benchmarking and compliance	September, 2026	Awaiting approval	Procurement
12						0			0			0				
13						0			0			0				
14						0			0			0				
15						0			0			0				
16						0			0			0				
17						0			0			0				
18						0			0			0				
19						0			0			0				
20						0			0			0				

THE RISK REGISTER IS FORMATTED AS A TABLE. PRESS TAB ON THE LAST TABLE CELL TO INSERT A NEW ROW.

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	6. **Race & Ethnicity**
2. **Disability**	7. **Religion or Belief**
3. **Gender Reassignment**	8. **Sex**
4. **Marriage & Civil Partnership**	9. **Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

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7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	Procurement of the Council's water supply and wastewater contract for its corporate estate.	**2.**	**The implementation date of the activity under consideration:**	08.07.2026
3.	**Directorate/Department(s):**	Regeneration, Economy & Sustainability	**4.**	**Service Area(s):**	Environmental Sustainability
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Alice Jones (Carbon Reduction Project Manager) - ajones@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	
7.	**Is this a new or ongoing EqIA?**	New ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	No
9.	**Date this EqIA started:**	14.05.2026			
10.	**Will this EqIA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?**	It will be attached to report going to Cabinet in July.	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	Going to Cabinet in July.

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐	☐ Decommissioning	☐ Commissioning	☐	
		X ☐	☐ Others. Please specify: Procurement of OCC's water supply and wastewater contract for its corporate estate.			
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	☐ Good, affordable homes	☐ Strong, fair economy X	☐ Thriving Communities	☐ Zero Carbon Oxford X	☐ Well run council X
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care. X	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	☐ Understanding and working with our communities.	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	The Council current water supply and wastewater contract for its corporate estate is due to expire in September 2026; the aim of this activity is to re-procure the Council's water contract. This is an essential Council Service. Due to the reasons outlined in the full Cabinet paper, Council officers recommend awarding the Contract on a Direct Award route to the incumbent supplier, WAVE Ltd.				

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16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	**Not undertaking the re-procurement of the Council's corporate water contract risks the Council going onto more costly deemed rates; securing a water contract for the Councils large corporate estate means the Council is able to lock in more attractive rates on a multi-year basis.** **The activity is an essential service and meet the Council's 'well run Council' priority.**

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	No. Internally Legal and Finance have been consulted and given advice.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports, -briefs.	N/a Water contract impacts the Council's corporate estate in which it pays the energy bill.

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19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	No, N/a.

Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	**Yes** ☐	No	Don't Know ☐
		Members of staff	**Yes**	No ☐	Don't Know ☐
		General public	Yes	**No** ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☐	**No** ☐	Don't Know ☐
		City Councillors	Yes ☐	**No** ☐	Don't Know ☐
		Council suppliers and contractors	Yes ☐	**No**	Don't Know ☐

21.	Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?					
Protected Characteristic	**Positive**	**Negative**	**Neutral**	**Don't know**	**Data/information/evidence supporting your assessment**	**Analysis & insight** **Mitigations**
Age		☐		☐	Procurement activity itself not expected to impact this characteristic.	
Disability **(Visible and invisible)**		☐	☐	☐	Procurement activity itself not expected to impact this characteristic.	
Gender		☐		☐	Procurement activity itself not expected to	

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re-assignment					impact this characteristic.	
Marriage & Civil Partnership	☐	☐		☐	Procurement activity itself not expected to impact this characteristic.	
Race, Ethnicity and/or Citizenship		☐	☐	☐	Procurement activity itself not expected to impact this characteristic.	
Pregnancy & Maternity	☐	☐		☐	Procurement activity itself not expected to impact this characteristic.	
Religion or Belief	OBJ	☐		☐	Procurement activity itself not	

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					expected to impact this characteristic.	
Sex				☐	Procurement activity itself not expected to impact this characteristic.	
Sexual Orientation	☐	☐		☐	Procurement activity itself not expected to impact this characteristic.	

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☐	☐	☐	Procurement activity itself not expected to impact this characteristic.	
Other (voluntary consideration) **Sanctuary seeking status leading to intersecting inequalities experienced by** **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a	☐	☐	☐	Procurement activity itself not expected to impact this characteristic.	

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culture of welcome and safety for all.						
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members	☐	☐		☐	Procurement activity itself not expected to impact this characteristic.	

Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
☐	Stop and reconsider the activity.	☐		Adjust activity before beginning the activity and continue to monitor.	☒	**No major change(s) or adjustments and continue with activity but continue to monitor.**	☐	No major change(s) or adjustments and continue with the activity. No need to

								monitor in the future.

23.	**Please explain how you have reached your conclusions above.**		Water supply and wastewater services is an essential service in which does not promote equity, diversity or representation but is does not jeopardise it either. Please note that is contract only deals with the supply, transport, distribution and removal of water at each site, it doesn't not relate to types, locations and accessibility of taps onsite across OCC's estate. **Benefits of Implementation**: **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: **Improves Representation**:

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-**		Regeneration, Economy and Sustainability

	- team, -directorate, -service area, -Equalities Steering Group,etc.				
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	Environmental Sustainability			
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	The contract is proposed to be 2+1+1 so when the Council is choosing whether to exercise the +1 options, the EIA should be revisited.	**27.**	**Date when the EqIA will be reviewed again.**	September 2028

Section 7: Sign-off

Name: Alice Jones
Job Title: Carbon Reduction Project Manager

Signature:

Name: Rose Dickinson

Job Title: Environmental Sustainability Team Manager

Signature:

Name: Full Name Martin Kerslake

Job Title: Type here Environmental Sustainability Lead

Signature:

Suggested list of people to include are:

- Project lead/manager.
- Head of service area or team.

Name:

Job Title:

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

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To:	**Cabinet**
Date:	**18 October 2023**
Report of:	**Head of Corporate Strategy**
Title of Report:	**Utilities Procurement 2024 - 2028**

Summary and recommendations	
Purpose of report:	To seek delegated authority for the Head of Corporate Strategy, in consultation with the Head of Financial Services / Section 151 Officer, to approve contracts for gas and electricity and agree to extend the current contract for water utilities.
Key decision:	Yes
Cabinet Member:	Cllr Anna Railton, Cabinet Member for Zero Carbon Oxford and Climate Justice
Corporate Priority:	Pursue a Zero Carbon Oxford
Policy Framework:	Corporate Strategy 2020 - 2024

Recommendations: That Cabinet resolves to:

1. **Delegate authority** to the Head of Corporate Strategy, in consultation with the Head of Financial Services / Section 151 Officer, to:
    - decide the procurement route for purchasing the supply of gas and electricity from October 2024
    - agree to enter into contracts for gas and electricity, subject to a maximum term of four years from October 2024;
2. **Approve** the extension of the Council's water contract with Wave for a further two years; and
3. **Note** the proposal to undertake an Energy Procurement Review to inform the Council's longer-term approach (from 2027 onwards).

Appendices	
Appendix 1	The LGA's list of Public Buying Organisations offering energy service frameworks
Appendix 2	Risk Register

Introduction and background

1. Since 2004, LASER (Local Authority South East Region), has provided energy procurement services for the Council. LASER is a Public Buying Organisation offering energy services and is part of Kent County Council. Since 2017 the Council has also accessed LASER's Water Framework to secure contracts for water and wastewater services.
2. The Council utilises LASER's services through a compliant framework via an access agreement. In the last financial year (22 – 23) the Council spent £2.8m on electricity, gas and water. Taking into account increases to unit rates in October 2022, it is estimated that this will increase to £3.7m in this financial year (2023 – 2024). Expenditure (for 23-24) is split approximately as follows:
    - Gas: £1.1m
    - Electricity: £2.4m
    - Water: £0.2m
3. The current energy framework agreement with LASER runs from 1 October 2020 until 30 September 2024. The Council's water contract runs from 15 September 2021 until 14 September 2024, with the option of a 2-year extension.
4. In order to benefit from a hedged approach involving forward purchasing to mitigate against high energy prices and volatile markets, the Council is considering using a new framework agreement with a Public Buying Organisation, to provide as long as possible a window for energy procurement prior to the contract delivery date (1 October 2024).

Energy procurement options

5. The energy market is a highly specialised field of procurement. The complexity of the procurement options can create a risk if not appropriately managed. The Pan Government Energy Project recommends that all public sector organisations adopt aggregated, flexible and risk-managed energy procurement.[1]
6. In seeking to review and renew the Council's energy contracts the following options are presented:
    a. Do nothing (which means do not re-procure and allow the current utilities contracts to run over at higher rates)
    b. Run a procurement process in-house
    c. Use a Public Buying Organisation (PBO) or Third Party Intermediary (TPI).

[1] https://www.gov.uk/guidance/buying-energy-options-for-public-sector-buyers

7. Doing nothing is problematic in terms of cost as this would mean that once the current contracts expire, the council would pay expensive and volatile deemed rates with its energy suppliers without an energy contract in place.
8. Running a procurement process in-house, with a collective procurement value of ca.£3.7m per annum, would be time-consuming and expensive, requiring specialist energy purchasing expertise to run a compliant tendered process. Further, the Council does not have sufficient volume or buying power itself to purchase in advance on the wholesale energy market and effectively negotiate supplier management fees.
9. Entering into contract with a TPI (i.e., an energy broker) would be time consuming and resource intensive. There are c.2000 brokers operating in the UK market primarily serving small- and medium-sized organisations and some councils. A procurement process would need to be run by the Council to select the broker, requiring significant resource and expertise.
10. Procuring energy through a PBO is currently considered best practice. A PBO is a distinct organisation or part of an existing public body set up to facilitate the procurement of items, goods or services commonly purchased by local authorities. Due to the potential aggregated volume of their users, PBOs are normally able to secure preferential rates. Use of a PBO for utilities procurement is regarded as a best practice approach to mitigate energy price risk in a volatile and complex energy market. PBOs often take delegated authority to purchase gas and electricity on behalf of public sector organisations, creating an aggregated committed volume to take to the wholesale market. By aggregating customers' energy volumes into procurement rounds, PBOs are able to purchase energy on the wholesale market. PBOs offer a low-risk procurement compliant route to market. For information, the LGA's list of PBOs offering energy service frameworks is provided in Appendix 1.

Statutory consultation with leaseholders and shared owners

11. Under Section 20 of the Landlord and Tenant Act 1985 (amended by section 151 of the Commonhold and Leasehold Reform Act 2002) the Council has an obligation to consult with leaseholders who pay a service charge where:
    a. The Council is looking to contract for the supply of services included in the service charge; and
    b. The contract will be for more than 12 months; and
    c. The cost to any one leaseholder is greater than £100 a year
12. The Council is currently in the consultation period and letters have been sent to the relevant leaseholders setting out the preferred option (see below) of using a PBO. The final decision taken on the procurement route will need to take account of any responses received from the consultation (the first phase closes on 21 October 2023).

Preferred option and procurement review

13. Currently the preferred option is to use a PBO for the reasons set out in paragraph 10.
14. Due to the ongoing S20 consultation and the need to review and prepare documentation for the chosen procurement route, it is recommended the decision

on how to procure and the subsequent contract award is delegated to the Head of Corporate Strategy in consultation with the Section 151 Officer.

15. Due to the volatility of the energy market and the need to have as long as possible a purchasing window to secure lower rates, decisions will need to be taken quickly following the conclusion of the S20 consultation, requiring delegation as set out above.

Renewable energy procurement

16. Following Cabinet decision in December 2021, the Council does not purchase green gas and directs this funding to the Net Zero Transition Fund, which funds additional decarbonisation projects. This decision was in line with advice from the Council's Scientific Advisor.

17. The Council is not currently purchasing green electricity due to high premiums and similarly this funding is best used to deliver projects that decarbonise the Council's operations.

Longer term energy procurement

18. It is proposed that the Council undertake an Energy Procurement Review to conclude by June 2025 - to enable the development of a longer-term procurement strategy.

19. As set out in the Carbon Management Plan the Council is currently exploring potential opportunities to secure Power Purchase Agreements (PPAs). PPAs are long term contracts between a generator and a buyer of that electricity.[2] Many organisations sign PPAs to benefit from price certainty over the long term and to purchase energy from a specific renewable energy project, which is regarded as a good practice approach to green electricity procurement. If it proves possible to negotiate a PPA on attractive terms for the Council, then this may provide a significant proportion of its energy needs, requiring adjustments to the contracts placed through a PBO

20. If the new provider of the Council's Leisure Services can demonstrate it can access energy at more competitive rates than the Council, then this may provide another procurement option for a significant proportion of the Council's energy needs and may also require adjustments to the contracts placed through a PBO.

21. Any such future decisions would look at overall value to the Council – including total cost and price certainty – and would be subject to further Cabinet approval.

Water procurement

22. Since April 2017, businesses, charities and public sector organisations in England have been able to switch suppliers for water services. Since 2017, the Council has accessed LASER's Water Framework to secure contracts for water and wastewater services

23. The Council's current Water and Wastewater Retail Services contract with Wave runs from 15 September 2021 to 14 September 2024, with the option to extend to 14 September 2026.

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[2] https://www.local.gov.uk/publications/national-energy-category-strategy-local-government-2022-energising-procurement

24. Wave were selected via a mini competition carried out by LASER for the Council in 2020, where they ranked highest overall. Wave's response showed a good level of customer service and they scored well in the added value section.

25. The options available to the Council are to:

    a. Extend the current contract for two years

    b. Sign a separate access agreement with LASER to:

        i. Run a mini competition, to assess all suppliers on LASER's framework to respond with quality service offerings and pricing to meet the Council's requirements. The process for a mini competition from initial draft of the tender pack to awarding the winning retailer will take around 3 months.

        ii. Direct award another supplier under LASER's LOT 1 route based upon the rationale of either Overall Top Scorer, Price, Quality of Services, Added Value Services and Social Value

26. It is recommended that the Council extend the current water contract for a further two years (total value ca.£416,000). This is because:

    a. The contract was only recently agreed via a mini-competition (2020), where Wave ranked highest overall.

    b. The current retail uplift applied by WAVE and LASER's fees would continue with the 2-year extension. If the Council did not extend and decided to run a mini competition or direct award to an alternative supplier, based on current market conditions this uplift would increase by ca.3% (inclusive of LASER fees), likely increasing overall costs to the Council.

    c. Re-procurement is a time and resource intensive process, for little likely benefit (due to the current market conditions).

Financial implications

27. Energy is a volatile market and energy prices have risen significantly in the last 18 months. Preferential rates are most likely to be secured by purchasing as far as possible in advance as part of an aggregated volume.

28. In the last financial year (22 – 23) the Council spent £2.8m on electricity, gas and water. Taking into account increases to unit rates in October 2022, it is estimated that this will increase to £3.7m in this financial year (23 – 24). Expenditure (for 23-24) is estimated to be split approximately as follows:

- Gas: £1.1m
- Electricity: £2.4m
- Water: £0.2m

29. If the Council decides to run a mini competition or direct award to an alternative water services supplier, based on current market conditions the retail uplift would increase by ca.3% (ca.10k) per annum.

Legal issues

30. Under Parts 4.5(10) 4.5 (11) and 19 (22) of the Constitution Cabinet is empowered to take the decisions set out in the recommendation. Under section 9E (3) (c) of the Local Government Act 2000 Cabinet is empowered to delegate its functions to officers.

31. The procurement of any contracts to be awarded under the officer delegations will need to be comply with the Council's Constitution and the Public Contract Regulations 2015. Following a procurement any decision to award a contract of £1 million or greater will be Key Decision and will need to comply with the procedure for taking Key Decision set out in the Council's Constitution.

32. The Council's current contract for water does provide for the recommended extension period and to agree the proposed extension is lawful.

Level of risk

33. A risk register is attached in Appendix 2. The main risk is that Cabinet decides not to delegate powers (as set out above) to the Head of Corporate Strategy, which would delay the Council entering into contracts by a month.

Equalities impact

34. There are no equalities impact issues with this decision.

Carbon and Environmental Considerations

35. The Council's Carbon Management Plan sets out how the Council will achieve net Zero by 2030 for scope 1 and scope 2 greenhouse gas emissions as well as scope 3 emissions associated with the transmission and distribution of standard grid electricity, business travel and water use.

36. The Council's procurement of electricity, gas and water will have minimal positive or negative impact on this target. In December 2021, Cabinet took a decision – advised by the Council's Scientific Advisor – to reverse the previous Council commitment to purchase "green" gas. The rationale was to prioritise expenditure according to the following hierarchy:

    a. 'Additional' emissions reduction by the Council from its own activities

    b. Insetting (i.e. support for emissions reduction by others in Oxford).

    c. Offsetting actions outside the City, including the purchase of green gas credits

37. As a result, a Net Zero Transition Fund was established, which receives funds annually that would otherwise be sent on offsetting, green gas (RGGOs) and green electricity (REGOs). These funds are used to support additional carbon reduction projects in the City.

38. The Council's approach to offsetting and renewable energy purchase is in line with best practice advice and supports the Council's 2040 and 2030 net zero goals.

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Background Papers: None

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User Guide for Water Supply and Sewerage Services Framework:

Contract Reference Y22013

Version 1.0

20 May 22

LASER ENERGY, 1 Abbey Wood Road, Kings Hill, West Malling, Kent ME19 4YT

LASER is a division of KCC Commercial Services

User Guide

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The Framework Agreement may be reviewed, and therefore subsequent versions of the guide may replace this version during the lifetime of the Framework.

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Section 1 - Using the Framework

1 Introduction

Kent County Council LASER has renewed their Framework agreement for the supply of water and sewerage and additional services. The Framework is available for use by local authorities and other public sector bodies nationally.

The Procurement Services Group of Kent County Council Commercial Services was commissioned to support LASER in designing and procuring the Framework.

The Framework is designed to provide a compliant procurement route to arranging water supply, sewerage and dealing with effluent as well as providing opportunities to investigate potential innovative approach to capital investment delivering efficiencies and savings.

An open tender process was conducted in accordance with the Public Contract Regulations 2015; inviting bids in relation to supply and additional services. The tender process assessed Quality of Service/Account Management, Added Value, Social Value and Pricing across 3 lots:

LOT 1 - Supply of Water and Sewerage via Mini Tender or Direct Award

LOT 2 - Supply of Water and Sewerage via Direct Award for Small Portfolios

LOT 3 - Supply of Water and Sewerage Innovation via Competitive Dialogue

The framework commenced on 1st February 2022 and is in place for a period of 4 years, with the option to extend for a further 2 years. Contracts put in place under the framework may extend beyond the end date of the Framework.

Contract Notice (2021/S 000-023169) and Award Notice (2022/S 000-008249) can be obtained by contacting psg@commercialservices.org.uk or by calling 01622 236767, quoting reference Y22013.

The formally awarded suppliers for each of the framework lots can be found in Section 2 of this document.

2 Establishing the Framework

2.1.General

The Framework Agreement provides compliant access to water and sewerage supplies in the newly opened market. There are three Lots to provide a range of options to customers wishing to access the water market.

LOT 1 provides customers with the ability to choose from a selection of suppliers who have met the specification of the Framework and are prepared to participate in further mini competitions. This allows the mini tender process to consider individual requirements of the Participating Authority by adjusting mini tender weightings. In addition, Direct Award is possible to the top scoring supplier, designated Primary Supplier, in each of the following categories or circumstances:

Top Overall Score

Top Quality of Service

Top Added Value

Top Social Value

Top Price

Continuity of Supply

There is a process to review Primary Supplier position during the framework term.

LOT 2 is designed for smaller water consumers (for example schools or District Councils) with simple water supply requirements. It provides a Primary Supplier selected by overall scores at framework tender. Supply contracts will be called off by Direct Award to the Primary Supplier.

LOT 3 provides customers with a flexible approach to arranging future water and sewerage supplies, with extra scope to work in partnership with the supplier towards innovative projects that may deliver efficiencies. This is suitable for a Participating Authority who has the ability to specify their requirements and also accommodate innovative suggestions from suppliers.

In establishing this framework, a standard set of terms, conditions and requirements was included (see Section 3) and these will apply to any work undertaken under this framework agreement. Successful suppliers have been advised that these conditions will be the default conditions accompanied by their conditions of contract for any additional services or innovative projects beyond supply of water and sewerage.

2.2 Evaluation of Tender Submissions

An evaluation was conducted in relation to each Lot, resulting in the Award to suppliers covering each Lot. All suppliers were evaluated against pass / fail evaluations, such as financial checks. The highest scoring organisations (as a result of the most economically advantageous tender) were awarded a position on the framework within the relevant category, and primary suppliers were identified for Direct Award.

Tenders submitted in response to this market engagement were evaluated by officers from Kent County Council LASER against a set of pre-determined evaluation criteria, as detailed below:

Quality of Service

Added Value

Social Value

Pricing

The highest scoring supplier in each category was awarded Primary Supplier status for the purposes of Direct Award.

3 Using the Framework

3.1 Benefits of Using the Framework

Using the framework can bring a number of benefits to clients:

1. The established Framework Y22013 is fully compliant with the Public Contracts Regulations 2015.
2. Terms and conditions are established to underpin the framework and are shown in Section 3.
3. The Framework will be managed and monitored by Kent County Council LASER. In managing this contract on behalf of our clients, your views and requirements will be taken into account when reviewing and developing the contract.
4. The Framework is designed to offer maximum flexibility and a choice of options to suit a variety of Participating Authorities.

3.2 Using the Framework

There are two primary routes for accessing the Framework:

- LASER Tender Analysis
- DIY Tender Analysis

LASER Tender Analysis

Under the LASER Tender Analysis route, Kent County Council LASER will act as the Contracting Authority assisting with Lots 1 and 3. LASER will manage the contract, supporting the end user to get maximum value from the Framework and deliver the best possible outcomes.

Responsibility of LASER:-

Lot 1

- To understand the customer's needs;
- Assist with compilation of schedules
- Assist with finalising requirement
- Submit mini tender to framework suppliers and manage returns
- Analyse tender returns, calculate scores and costs.
- Provide a Ranking and Recommendation Report to the Participating Authority
- Ensure Supply Contract is issued to Participating Authority.
- Schedule renewal

Lot 2

- Assist with compilation of schedules
- Submit portfolio data and service requirements to Primary Supplier for Pricing
- Update customer with pricing received
- Ensure Supply Contract is issued to Participating Authority
- Schedule renewal

Lot 3

- Assist with compilation of schedules
- Assist with finalising requirement
- Facilitate beginning of competitive dialogue
- Provide additional support on a consultancy basis if required.
- Monitor progress of negotiations

- Monitor innovations such as return on investment or efficiencies
- Schedule renewal

While the steps above are typical of the LASER customer support approach there is flexibility to create bespoke arrangements for differing levels of support from LASER dependent on customer requirements.

Contracts under this framework will be made between the Participating Authority and the Supplier, NOT Kent County Council LASER. The participating Authority shall be solely responsible for monitoring the supply under the individual contract.

Kent County Council LASER take no responsibility or liability for contracts placed under this Framework Agreement.

DIY Tender Analysis

Customers who wish to manage their own mini tender may choose to access the Framework directly. Under this option the customer is responsible for handling all stages of the procedure.

In order to access the agreement directly and prior to placing orders with the suppliers the customer must request an Access Agreement (Appendix 1).

Suppliers to the framework will be notified that access has been granted to the relevant Participating Authority and an Access reference number will be allocated by the Contracting Authority.

After access has been granted the organisation may access the framework to procure from Lot 1, Lot 2 or Lot 3.

Contracts under this framework will be made between the Participating Authority and the Supplier, NOT Kent County Council LASER. The participating Authority shall be solely responsible for monitoring the supply under the individual contract.

Kent County Council LASER take no responsibility or liability for contracts placed under this Framework Agreement.

3.3 Pricing Information

Lot 1 - Prices will be agreed via mini tender or Direct Award request to Primary Supplier.

Lot 2 – Prices will be agreed via Direct Award request to Primary Supplier

Lot 2 - Prices will be agreed via competitive dialogue

3.4 LASER Recovery

LASER's recovery for placing and operating the framework will be transparent and made available to the Participating Authority prior to commencing Mini Tender or competitive Dialogue. The recovery will be paid by the supplier to LASER.

4 Monitoring the Framework Agreement

LASER will monitor overall performance of suppliers under this framework and consider invoking Poor Performance Remedies if appropriate.

5 Additional Information

Kent County Council Commercial Services hold all the tenders submitted by suppliers. If there is a requirement to view any additional information provided by the Supplier during the tender process or subsequent updates e.g.: Policies, Insurance certificates, please contact the Procurement Services Group as follows:

E-mail: psg@commercialservices.org.uk

Tel: 01622 236767

Please quote the framework reference number on all enquiries:

Y22013

Section 2 - Awarded Suppliers for Each Lot

Lot 1 – Supply of Water and Sewerage (Mini Competition)

- Advanced Demand Side Management

  Direct Award Primary Supplier in category of Price

- Anglian Water Business (National) Limited

  Direct Award Primary Supplier in categories of Quality of Services and Added Value

- Business Stream

  Direct Award Primary Supplier in category of Social Value and Overall Top Scorer

- Water Plus Limited

Lot 3 – Supply of Water and Sewerage with Innovation (Competitive Dialogue)

- Advanced Demand Side Management
- Anglian Water Business (National) Limited

  Direct Award Primary Supplier in category of Quality of Service

- Business Stream

  Direct Award Primary Supplier in categories of Added Value and Social Value

- Water Plus Limited

  Direct Award Primary Supplier in category of Price

Section 3 – Conditions of Agreement

Below are the Terms and Conditions of the Framework Agreement to which suppliers listed in Section 2 are party.

Call off Terms and Conditions

This document sets out the terms and conditions of supply, applicable to all Call off Contracts under LASER Framework reference Y22013. It sets the obligations of the Retailer and Participating Authority and forms part of the overall Call Off Contract and Order. Any variation to the Call Off Contract and Order will be carried out in line with Clause 19 Variation Procedures and will be copied to the Contracting Authority. The other parts of the overall Agreement are:-

- **Call off Contract and Order**
- **Terms and Conditions of Supply**
- **Framework Agreement**

These Terms are agreed between:

(1) **the Participating Authority**, and

(2) The water Retailer

1. INTERPRETATION AND DEFINITIONS

1.1 Unless the context otherwise requires, the following words and expressions shall have the following meanings in these Terms and Conditions only and not in relation to any document that these Terms and Conditions may sit within or alongside:

Additional Charges	Services provided by the Retailer beyond the scope of the Participating Authority's Specification of this contract
Agreement	Means Framework Agreement
Authorised Representatives	means officers nominated by the Parties to manage and supervise the provision of the Goods, Works and/or Services.
Award Criteria	means the award criteria to be applied to tenders for Services to be procured under this Framework as set out in Clause 6.
Business Day	the period of 08:00 to 18:00 hours on any day other than a Saturday or Sunday, or Christmas Day, Good Friday or any day which is a bank holiday in England and Wales under the Banking and Financial Dealings Act 1971;
Call-off Contract	means the contract which sets out the Terms and Conditions of Supply these Terms, any other terms and conditions stated and obligations through which Goods, Works and/or Service are provided by the Supplier to the Participating Authority and is Ordered following a mini-competition or Direct Award under this Framework.
Call-off Contract and Order	Means the Call-off Contract
Call-off Terms and Conditions	means the Terms and Conditions of Supply and any special terms and conditions noted in the Call-off Order and Contract.
Chargeable Additional Services	Services provided by the Retailer beyond the scope of the Participating Authority's Specification of this contract.
Contracting Authority	means Kent County Council acting through Commercial Services Kent Ltd (Commercial Services AKA LASER).
CMOS	means the Central Market Operating System
Commercially Sensitive Information	means any Confidential Information comprised of information:- (a) which is provided in writing by the Supplier to the Contracting Authority in confidence and designated as Commercially Sensitive Information; and/or (b) that constitutes a trade secret.

Controller	means a person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Customer	Means the Participating Authority
Customer Detail Sheet	*means the document relating to the order form containing customer detail and specification requirements*
Data Loss Event	*means a breach in security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal or commercial data. This includes breaches that are the result of both accidental and deliberate causes.*
Data Protection Impact Assessment	*otherwise known as a "DPIA", this is a process that organisations use to identify data protection risks and put procedures in place to reduce them. A DPIA will; (note this list is not exhaustive) include information about the nature, scope, context and purposes of the processing; assess how necessary the processing is and what compliance measures are in place to keep data safe; identify and assess risks to individuals; identify measures that can be put in place to reduce those risks.*
Data Protection Legislation	means all applicable laws and regulations relating to processing of personal data and privacy, including Data Protection Act 2018
Data Subject	means the identified or identifiable living individual to whom personal data relates.
Data Subject Access Request	enables individuals to find out what personal data is held about them, why it is held and who it is disclosed to
Default Tariff	the maximum tariff that can be applied by the Retailer for the provision of the Services as set out in documentation issued by a Regulator from time to time;
FOIA	means the Freedom of Information Act 2000 and any subordinate legislation made under such Act from time to time together with
Framework	Refers to Framework Y22013 or Framework Agreement

GDPR	means the Regulation (EU) 2016/679 (General Data Protection Regulation) and any subordinate legislation made under such regulation from time to time together with any guidance and/or codes of practice issued by the Information Commissioner or relevant Government department in relation to such legislation.
Goods/ Works/Services	shall mean the goods/services/works to be provided by the Supplier in accordance with the terms of the individual Order/Individual Call-off Contract under this Framework.
Information	has the meaning given under Section 84 of the Freedom of Information Act 2000.
Information Commissioner's Office	means the UK's independent authority set up to uphold information rights in the public interest, promoting openness.
Insolvency Event	means: (a) a party is unable or is deemed unable or admits inability to pay its debts as they fall due; or (b) a party enters into a composition, compromise, assignment or arrangement with any of its creditors, being a substantial creditor, (whether by way of a voluntary arrangement, scheme of arrangement, deed of compromise or otherwise); or (c) a moratorium is sought or declared in respect of a party or any indebtedness of a party or an application is made to court for protection from the creditors of a party; or (d) an administrator, liquidator (compulsory or voluntary other than a liquidator appointed in a solvent winding up for the purposes of amalgamation or reconstruction), provisional liquidator, receiver, administrative receiver, receiver and manager, voluntary arrangement supervisor, compulsory manager or other similar officer is appointed to or in respect of a party or the whole or a substantial part of the property, assets or undertaking of a party; or

	(e) a petition or application is presented or documents are filed or faxed with a court for the appointment of an administrator, liquidator or receiver to a party provided that if a party is contesting the winding-up petition in good faith and with due diligence the notice shall not be treated as having being given until a period of twenty days has expired since the presentation of the petition or application without it having been either discharged or struck out; or (f) a meeting is convened, a resolution is passed or notice is given of the intention to appoint an administrator, liquidator or receiver (including an administrative receiver and a receiver and manager) to a party; or (g) an order is made for the winding-up, administration or dissolution of a party; or (h) possession is taken of the whole or any substantial part of the property, assets or undertaking of a party; or (i) any other analogous step, process or procedure is taken in relation to a party in any jurisdiction, or a party becomes subject to the laws relating to insolvency, bankruptcy or liquidation in any jurisdiction.
Margin	means the percentage margin referred to in Part 3 (Charges);
Market Arrangements Code	means the code of that name designated by the Ofwat ;
Ofwat	means the Water Services Regulation Authority
Operational Code	means the code named under the Water Services (Codes and Services) Directions 2007 (or any other direction which amends, replaces or adds to, or is made for the same subject matter as that direction), as in force from time to time;
Order	means an order for Goods, Works and/or Services served on the Retailer in accordance with the Ordering Procedures
Order Form	means a document setting out details of an Order to lead to Call-off Contract

Ordering Procedures	means the ordering and award procedures specified in Framework Schedule 6.
Participating Authority	means all public sector bodies permitted under the Public Contracts Regulations 2015 who access and use this Framework (including the Contracting Authority) via Contracting Authority and who shall take full responsibility for their own individual contracting processes. Those organisations who may wish to access this Framework Agreement include local authorities, the Police Service, the Fire Service, the NHS & NHS Trusts, port authorities, third sector organisations, academic centres (including Academies), publicly funded organisations and publicly owned private companies, operating within the geographic boundaries of the United Kingdom, Channel Islands and Northern Ireland (together referred to in this tender document as Participating Authorities or End Users)
Party or Parties	refer to the Retailer and/or the Participating Authority
Personal Data	means any information relating to a person (a 'data subject') who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
Processor	means a person, public authority, agency or other body which processes personal data on behalf of the controller.
Property	(a) the premises which are (or are to be) connected to the public water supply system; and (b) in terms of providing sewerage or sewage disposal, means the premises which are (or are to be) connected to the sewerage system, both as set out in the Property Schedule of the Call off Contract Order and as may be amended or supplemented by agreement between the Retailer and the Customer in writing from time to time (and "Properties" shall be construed accordingly);
Property Schedule	means the list of Properties set out in the Appendix to the Call off Order;
Protective Measures	means appropriate technical and organisational measures to ensure the security of any data processing.
Regulator	means Ofwat or other regulatory body

Request for Information	means a request for information or an apparent request under the FOIA or the Environmental Information Regulations.
Retailer	means the appointed retailer of water and wastewater services in respect of the Properties under this Call off Contract and Order.
Retailer's Charges	means the Retailer's Charges for Services will be as set out in the Retailer's mini tender offer.
Services	means the retail services for the supply of water and sewerage services and meter services to, or the removal of any associated waste including surface water and trade from any Properties that the Participating Authority own, lease or otherwise occupy and / or the provision of any services in respect of new connections to any Property;
Staff	means all persons employed by the Retailer together with the Retailer's servants, agents, contractors and sub-contractors used in the performance of its obligations under these terms and any Call-off Contracts
Sub processor	means when a processor sub-contracts all or some of the processing to another processor, that processor is referred to as a sub-processor.
Term	means the term of the Call off Contract and Order
Terms and Conditions	means these terms and conditions of supply;
Transfer Date	means the date on which the relevant supply points for the Properties are effectively transferred to the Retailer on CMOS (for properties in England).
Unplanned Event	means any of the following: (a) breakdown, blockage, defect, fault or failure of plant equipment, apparatus, pipes, structures, or facilities forming part of a Wholesale's network; (b) shortage of, or limitation on the use of, water arising from weather or environmental conditions; (c) deficiency in the quality of water available for supply; (d) a water quality incident; or (e) any pollution from sewage, any unplanned discharge or flooding; or any other emergency;
Variation Procedure	means the procedure set out to present and progress changes.

Wholesale	means any wholesale supplier of water and wastewater services in respect of the Properties.
Wholesale Chargeable Services	means one off charges levied by the wholesaler to the retailer related to the provision of water services and the metering of this.
Wholesale Charges	means the amount(s) charged by a Wholesaler to The Retailer
Wholesale Contract	means the contract between the Retailer and a Wholesaler;
Wholesale Retail Code	means the code of that name issued by the Authority under sections 66DA and 117F of the Water Industry Act 1991;
Working Days	means any day other than a Saturday, Sunday or public holiday in England and Wales.

2 Services

2.1 The Retailer shall provide the Services to the Participating Authority from the Transfer Date for the duration of the Term in accordance with the Call off Contract and Order.

2.2 The Retailer shall provide the Services with reasonable skill and care and in accordance with applicable law at all times.

2.3 The Retailer has the right to make changes to the Services subject to the provision of reasonable written notice to the Participating Authority which are necessary to comply with

2.3.1 any laws;

2.3.2 the Market Arrangements Code and the Wholesale Retail Code;

2.3.3 safety regulations and the directions of a Regulator.

2.4 The supply of Services may only be interrupted or suspended for the purposes of the relevant Wholesaler carrying out necessary maintenance, repair, replacement and inspection works. Where reasonably practicable the Retailer or Wholesaler will notify the Participating Authority in advance of such works.

2.5 The supply of Services may only be interrupted or suspended without notice if there is an Unplanned Event.

3 Charges

3.1 The Retailer's Charges for Services will be as set out in the Customer Detail Sheet, the Retailer's mini tender offer

3.2 Where the Retailer's Charges are based on the volume of water used:

3.2.1 if AMR services are provided, this will be used to calculate the volume of water used;

3.2.2 if AMR services are not provided:

3.2.2.1 the Retailer will read the water meter at the Participating Authority's site to calculate the volume of water used, or the Retailer will accept meter reads provided to them by the Participating Authority;

3.2.2.2 The Retailer will take at least one actual reading in each year of the Contract or more if required by either the Participating Authority's tender specification, or Relevant Laws;

3.2.2.3 If the Retailer does not obtain an actual meter reading, the retailer will be entitled to estimate the volume of water used and an estimated meter reading may be used as the basis for calculating charges;

3.2.3 where estimated meter readings are used to calculate charges, an adjustment should be made to charges when an actual meter reading is next used to calculate the charges;

3.2.4 where accurate meter readings are not available (e.g. due to a fault with the meter), the Retailer may calculate charges by reference to average daily consumption recorded at the relevant Site during periods that they reasonably believe to best reflect consumption over the affected period and during which accurate meter readings are available

3.3 Where the Retailer's Charges are based on the rateable value of a Site, the Participating Authority will inform them of any change in the assessment of the rateable value of the Site and the date the change came into effect. The Retailer should adjust charges to take into account any change of this assessment from the date the change came into effect.

3.4 Regional Wholesalers may from time to time impose one off charges or claim money from the Retailer for Wholesale Chargeable Services. For example, a Regional Wholesaler may charge if the Participating Authority requests a change of meter or it may claim money from Retailers if damage is caused to their meter. The Participating Authority agrees to reimburse the Retailer for any charges or claims that a Regional Wholesaler may rightfully impose in relation to the Services provided to the Sites. The Retailer may add the agreed retailer uplift to these pass through charges to cover their administrative costs.

3.5 The Participating Authority may wish to procure Chargeable Additional Services from the Retailer. These services are outside of the Participating Authority's specification of this contract, and the charging structure will thus be settled by a separate agreement.

3.6 The Retailer is required to revise erroneous historic invoices up to either the maximum of stipulated in the Limitation Act of 1980 or the maximum permitted by the Water Regulator, whichever is shorter. This should be in the form of crediting erroneous invoices before invoicing on a new invoice, with new unique reference numbers.

4 Changes to Pricing

4.1 The Retailer shall be permitted to vary Wholesale Charges in line with the market changes agreed by the Regulator having first served the Participating Authority with prior written notice of no less than 28 days of its intention to do so.

4.2 Where any Wholesale Charges which relate to a Property are varied as a consequence of any price review initiated or required by a Regulator, the Retail Charge should vary only in line with the fixed percentage of Wholesale charges set in the completed Customer Detail Sheet

4.3 Without prejudice to clauses 4.1 to 4.2, the Retailer may only alter the Charges to the minimum extent necessary to cover the increased costs if there shall have occurred a material adverse regulatory or HM Government mandated change which has resulted from circumstances outside the Retailer's control, but excluding any increases arising from any negligence or failure on their part, including but not limited to fines or penalties or remedial action. The Retailer will provide the Participating Authority with no less than 30 days' written notice of their intention to do so.

5 Payment

5.1 If the Participating Authority query part of an invoice the Participating Authority is still liable to pay the Retailer the undisputed amount. Save in respect of any amounts which are disputed, all other amounts due under the Call-off Contract and Order from the Participating Authority to the Retailer shall be paid in full without any set-off, counterclaim, deduction or withholding (other than any deduction or withholding of tax as required by law).

5.2 Without prejudice to clause 5.1, any payments that the Participating Authority make to the Retailer will be used to pay the oldest outstanding undisputed Charges first (if any).

5.3 Subject always to the provisions of clause 5.1, if the Participating Authority do not pay an invoice on time, the Retailer may contact the Participating Authority to inform the Participating Authority of the Participating Authority's payment default and ask the Participating Authority to make prompt payment of outstanding sums.

5.4 If the Participating Authority do not pay an invoice on time; the Retailer may elect to charge the Participating Authority interest at the rate of up to 8% per annum above the Bank of England's base interest rate, from the due date for such undisputed sum until the date of payment of such sum or otherwise in accordance with the Late Payment of Commercial Debts (Interest) Act 1998.

6 Meter Readings

6.1 If the Participating Authority think that the meter in any Property is not working correctly, the Participating Authority may ask the Retailer to arrange a test with the Wholesaler. If such test shows that the meter is working incorrectly (that is operating outside the prescribed limited of error) then the Retailer will request the Wholesaler adjust the Participating Authority's Charges in respect of any metered elements based on consumption in a comparable period where metering was believed to be accurate. Weekly reporting to the Participating Authority on progress between the Retailer and Wholesaler is expected to ensure contact to resolve is maintained.

7 Warranty

7.1 The Participating Authority warrants that they are (a) the owner of, (b) the occupier of or (c) a third party, who is otherwise entitled to be invoiced in respect of the Services at, each Property. The Participating Authority warrants they have the right and authority to enter into this Call Off Contract and Order in respect of the water utility bills, to the exclusion of all others.

7.2 In addition to Clause 7 of the Framework Terms and Conditions, The Retailer warrants it will supply the Services in a reliable and professional manner, will engage a sufficient number of competent personnel with appropriate skills, qualifications and experience and has, and will at all times have, the ability and capacity to meet such requirements to perform the Services in compliance with all applicable law and regulations.

8 Liability

8.1 Nothing in the Call Off Contract and Order shall limit or exclude a party's liability for:

8.1.1 death or personal injury caused by its negligence, or the negligence of its employees, agents or subcontractors;

8.1.2 fraud or fraudulent misrepresentation; or

8.1.3 any other liability which cannot be limited or excluded by applicable law.

8.2 Subject to clause 8.1 neither party shall have any liability to the other whether in contract tort, negligence, breach of statutory duty, or otherwise:

8.2.1 for any loss of revenue, loss of profit, loss of contract, business interruption or for any indirect or consequential loss arising under or in connection with the provision of Services to the Participating Authority, howsoever it is caused, even if it could have reasonably been foreseen, and whether it is caused by negligence or breach of contract or not.

8.3 The Retailer's total liability to the Participating Authority howsoever arising under or in connection with the Call Off Contract and Order shall be limited to the lower of (i) total amount of Charges paid by the Participating Authority to the Retailer in the previous 12 month period and (ii) the sum of £5,000,000.

8.4 Subject to clause 8.3 if any act or failure to act by a Wholesaler other than as a result of The Retailer's act or failure to act causes any loss or damage to the Participating Authority, The Retailer's liability to the Participating Authority (if any) is limited to the amount (if any) that the Retailer may claim from that Wholesaler.

8.5 This clause 8 continues to apply following termination of the Call off Contract and Order, and Framework Agreement.

9 Access to The Participating Authority's Premises

9.1 The Retailer (or any Wholesaler) may require access to the Property in relation to the provision of the Services or in relation to the metering equipment. The Retailer will provide the Participating Authority with reasonable notice when such access is required, with the exception of meter reading at non-sensitive sites when notice would not typically be provided. Sensitive sites, including but not limited to schools providing special needs learning and blue light properties such as police or ambulance stations, are likely to allow entrance by appointment only and this requirement must be accommodated for all access requests at these sites, including meter reading. The Participating Authority agree to take reasonable steps to allow the Retailer (or any Wholesaler) with such access required.

9.2 The Participating Authority shall allow a Regulator (or any other network operator) access to the Participating Authority's premises and the Participating Authority acknowledge that in an emergency the Participating Authority may be required to stop using water or disposing of waste.

10 Moving or Leaving

10.1 The Participating Authority may end this Call Off Contract and Order with the Retailer for individual supply points if the Participating Authority are leaving a property, by informing the Retailer in writing at least 14 days before the Participating Authority move. If the Participating Authority do not do so, this Call Off Contract and Order will continue in force for the property, and the Participating Authority will continue to be liable for the Charges until the date falling 14 days after either (i) the Participating Authority inform the Retailer in writing that the Participating Authority have left the property; or (ii) the Retailer become aware that another person has taken a supply at that property, whichever is earlier or when this Call Off Contract and Order terminates.

10.2 If reasonably requested and subject to clause 10.1 The Participating Authority should attempt to give the Retailer an accurate final meter reading, which the

Retailer will check. If the Participating Authority do not provide an accurate final reading the Participating Authority will be responsible for payment of Charges relating to any difference between the meter reading upon which the Retailer based the final invoice or estimated invoice and the next meter reading.

11 Data Protection (GDPR)

11.1 The Parties acknowledge that for the purposes of the Data Protection Legislation, the Customer and the Retailer are independent Controllers, whereby as Controllers they shall be responsible for complying with the data protection principles in the UK and take appropriate technical and organisation measures to ensure processing is carried out in line with UK Data Protection Legislation.

11.2 The Retailer shall notify the Customer without undue delay if it considers that any of Customer's instructions infringe the Data Protection Legislation.

11.3 The Retailer shall provide all reasonable assistance to the Customer in the preparation of any Data Protection Impact Assessment prior to commencing any processing. Such assistance may, at the discretion of the Customer include:

11.3.1 a systematic description of the envisaged processing operations and the purpose of the processing;

11.3.2 an assessment of the necessity and proportionality of the processing operations in relation to the Services;

11.3.3 an assessment of the risks to the rights and freedoms of Data Subjects; and

11.3.4 the measures envisaged to address the risks, including safeguards, security measures and mechanisms to ensure the protection of Personal Data.

11.4 The Retailer shall, in relation to any Personal Data processed in connection with its obligations under the Call off Contract and Order:

11.4.1 process that Personal Data only in accordance with such agreement as stated in Clause 11,1, unless the Retailer is required to do otherwise by Law. If it is so required the Retailer shall promptly notify the Customer before processing the Personal Data unless prohibited by Law;

11.4.2 ensure that it has in place Protective Measures, which have been reviewed and approved by the Customer as appropriate to protect against a Data Loss Event having taken account of the:

a) nature of the data to be protected;

b) harm that might result from a Data Loss Event;

c) state of technological development; and

d) cost of implementing any measures;

11.4.3 ensure that:

a) its Staff do not process Personal Data except in accordance with the Call of Contract and Order;

b) it takes all reasonable steps to ensure the reliability and integrity of any Staff who have access to the Personal Data and ensure that they:

I. are aware of and comply with the Retailer's duties under this Clause 11;

II. are subject to appropriate confidentiality undertakings with the Retailer or any Sub-Processor;

III. are informed of the confidential nature of the Personal Data and do not publish, disclose or divulge any of the Personal Data to any third party unless directed in writing to do so by the Customer or as otherwise permitted by the Call Off Contract and Order; and

IV. have undergone adequate training in the use, care, protection and handling of Personal Data; and

11.4.4 not transfer Personal Data outside of the EU unless the prior written consent of the Customer has been obtained and the following conditions are fulfilled:

a) the Customer or the Retailer has provided appropriate safeguards in relation to the transfer (whether in accordance with GDPR Article 46 or Article 37) as determined by the Customer;

b) the Data Subject has enforceable rights and effective legal remedies;

c) the Retailer complies with its obligations under the Data Protection Legislation by providing an adequate level of protection to any Personal Data that is transferred (or, if it is not so bound, uses its best endeavours to assist the Customer in meeting its obligations); and

d) the Retailer complies with any reasonable instructions notified to it in advance by the Customer with respect to the processing of the Personal Data;

11.4.5 at the written direction of the Customer delete or return Personal Data (and any copies of it) to the Customer on termination of the Call Off Contract and Order unless the Retailer is required by Law to retain the Personal Data.

11.5 Subject to Clause 11.4, the Retailer shall notify the Customer without undue delay if it:

11.5.1 receives a Data Subject Access Request (or purported Data Subject Access Request);

11.5.2 receives a request to rectify, block or erase any Personal Data;

11.5.3 receives any other request, complaint or communication relating to any Party's obligations under the Data Protection Legislation;

11.5.4 receives any communication from the Information Commissioner or any other Regulator in connection with Personal Data processed under the Call Off Contract and Order;

11.5.5 receives a request from any third party for disclosure of Personal Data where compliance with such request is required or purported to be required by Law; or

11.5.6 becomes aware of a Data Loss Event.

11.6 The Retailer's obligation to notify under Clause 11.5 shall include the provision of further information to the Customer in phases, as details become available.

11.7 Taking into account the nature of the processing, the Retailer shall provide the Customer with full assistance in relation to any Party's obligations under Data Protection Legislation and any complaint, communication or request made under Clause11.5 (and insofar as possible within the timescales reasonably required by the Customer) including by promptly providing:

11.7.1 the Customer with full details and copies of the complaint, communication or request;

11.7.2 such assistance as is reasonably requested by the Customer to enable the Customer to comply with a Data Subject Access Request within the relevant timescales set out in the Data Protection Legislation;

11.7.3 the Customer, at its request, with any Personal Data it holds in relation to a Data Subject;

11.7.4 assistance as requested by the Customer following any Data Loss Event;

11.7.5 assistance as requested by the Customer with respect to any request from the Information Commissioner's Office, or any consultation by the Customer with the Information Commissioner's Office.

11.8 The Retailer shall maintain complete and accurate records and information to demonstrate its compliance with this Clause 11. This requirement does not apply where the Retailer employs fewer than 250 staff, unless:

11.8.1 the Customer determines that the processing is not occasional;

11.8.2 the Customer determines the processing includes special categories of data as referred to in Article 9(1) of the GDPR or Personal Data relating to criminal convictions and offences referred to in Article 10 of the GDPR; and

11.8.3 the Customer determines that the processing is likely to result in a risk to the rights and freedoms of Data Subjects.

11.9 The Retailer shall allow for audits of its Data Processing activity by the Customer or the Customer's designated auditor.

11.10 The Retailer shall designate a data protection officer if required by the Data Protection Legislation.

11.11 Before allowing any Sub-Processor to process any Personal Data related to the Call Off Contract and Order, the Retailer must:

11.11.1 notify the Customer in writing of the intended Sub-Processor and processing;

11.11.2 obtain the written consent of the Customer;

11.11.3 enter into a written agreement with the Sub-Processor which give effect to the terms set out in this Clause 11 such that they apply to the Sub-Processor; and

11.11.4 provide the Customer with such information regarding the Sub-Processor as the Customer may reasonably require.

11.12 The Retailer shall remain fully liable for all acts or omissions of any Sub-Processor.

11.13 The Participating Authority may, at any time on not less than thirty (30) Working Days' notice, revise this Clause 11 by replacing it with any applicable Controller to Processor standard clauses or similar terms forming part of an applicable certification scheme (which shall apply when incorporated by attachment to this Call-off Contract and Order) or where there is a change in the Law necessitating such a change.

11.14 The Parties agree to take account of any guidance issued by the Information Commissioner's Office. The Customer may on not less than thirty (30) Working Days' notice to the Retailer amend this Call-off Contract and Order to ensure that it complies with any guidance issued by the Information Commissioner's Office.

12 FREEDOM OF INFORMATION

12.1 The Retailer acknowledges that the Participating Authority (where applicable) are subject to the requirements of the FOIA and the Environmental Information Regulations and shall assist and cooperate with the Participating Authority to enable the Participating Authority to comply with their Information disclosure obligations.

12.2 The Retailer shall and shall procure that its sub-contractors shall:

12.2.1 Transfer to the Participating Authority all Requests for Information that it receives as soon as practicable and in any event within two Working Days of receiving a Request for Information;

12.2.2 Provide the Participating Authority with a copy of all Information in its possession, or power in the form that the Participating Authority requires within five Working Days (or such other period as the Participating Authority may specify) of the Participating Authority request; and

12.2.3 Provide all necessary assistance, as reasonably requested by the Participating Authority, to enable the Participating Authority to respond to the Request for Information within the time for compliance set out in section 10 of the FOIA or regulation 5 of the Environmental Information Regulations.

12.3 The Participating Authority shall be responsible for determining in their absolute discretion and notwithstanding any other agreement whether the Commercially Sensitive Information and/or any other Information is exempt from disclosure in accordance with the provisions of the FOIA or the Environmental Information Regulations.

12.4 In no event shall the Retailer respond directly to a Request for Information unless expressly authorised to do so by the Participating Authority.

12.5 The Retailer acknowledges that (notwithstanding other provisions) the Participating Authority may, acting in accordance with the Secretary of State for Constitutional Affairs Code of Practice on the Discharge of the Functions of Public Authorities under Part 1 of the Freedom of Information Act 2000 ("the Code"), be obliged under the FOIA, or the Environmental Information Regulations to disclose information concerning the supplier or the Goods, Works and/or Services:

12.5.1 In certain circumstances without consulting the Retailer; or

12.5.2 Following consultation with the Retailer and having taken their views into account

13 Non-Discrimination and Modern Slavery

13.1 The Retailer shall not unlawfully discriminate within the meaning and scope of any law, enactment, order or regulation relating to discrimination (whether in race, gender, religion, disability, sexual orientation or otherwise).

13.2 The Retailer shall take all reasonable steps to secure the observance of Clause 13.1 by all servants employees or agents of the Retailer and all suppliers and sub-contractors employed in the execution of any Call Off Contract and Order.

13.3 The Retailer shall comply with the Modern Slavery Act 2015

13.4 The Retailer undertakes, warrants and represents that neither the Retailer nor any of its officers, employees, agents or subcontractors:

13.4.1 has committed an offence under the Modern Slavery Act 2015 (a "MSA Offence");

12.4.2 has been notified that it is subject to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015;

12.4.3 is aware of any circumstances within its supply chain that could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015;

13.5 The Retailer shall notify the Contracting Authority immediately in writing if it becomes aware or has reason to believe that it, or any of its officers, employees, agents or subcontractors have breached any requirement noted above.

14 Term and Termination

14.1 The Term of the Call Off Contract and Order is fixed. On expiry of the Term (or any agreed extension of this Call Off Contract and Order), if a new contract is **not** in place then supply will continue with the Retailer under a deemed contract, the preferential terms of this Call Off Contract and Order expire and the Retailer is entitled to charge on a Default Tariff.

14.2 On termination of the Call Off Contract and Order (however arising), the following clauses shall survive and continue in full force and effect:

14.2.1 Clause 4 (Charges);

14.2.2 Clause 10 (Liability);

14.2.3 Clause 13 (Data Protection);

14.2.4 clause 14 (Term and Termination); and

14.2.5 clause 16 (General).

14.3 If the Participating Authority is subject to an Insolvency Event, the Retailer may immediately end Call of Contract and Order with the Participating Authority without further liability by notice and from the day on which the Participating Authority underwent an Insolvency Event.

14.4 The contract may be terminated by either party if the other party is in material breach of their obligations under this Call Off Contract and Order contract.

14.5 The Retailer is permitted to terminate the contract 60 days following the issue of a final notice for payment of an outstanding charge, when payment is not received from the Participating Authority and the charge is not in query.

15 Notices

15.1 Any notice or communications between the parties about or pursuant to the Call Off Contract and Order shall be in writing and must be sent by pre-paid recorded first class post or by email :

15.1.1 to The Retailer's registered office or such other address as may be notified to the Participating Authority by the Retailer from time to time; or

15.1.2 (in the case of communications to the Participating Authority) to the address or email address set out in the Call off Contract .

15.2 If communications are delivered in accordance with this clause 15 they shall be deemed to have been delivered, if sent by first class post or recorded first class post, two days after posting and if delivered by email (in the case of the Retailer only), on the day of delivery.

16 General

16.1 By signing the Call Off Contract the Participating Authority warrant that the Participating Authority have capacity to enter into the Call Off Contract and Order and full power and authority, and has taken all action necessary (including obtaining all necessary consents or approvals) to enter into and perform the Call Off Contract and Order and any other deeds, agreements or documents to be entered into pursuant to the Call Off Contract and Order.

16.2 The Call Off Contract and Order and the documents referenced in the definition of Agreement constitutes the entire agreement between the Participating Authority and the Retailer and supersedes all previous agreements, understandings and arrangements between the Participating Authority and Retailer, whether in writing or oral, in respect of its subject matter. Each party acknowledges that it has not entered into this Call Off Contract and Order in reliance on, and shall have no remedies in respect of, any representation or warranty that is not expressly set

out in this Call Off Contract and Order except in the case of fraudulent misrepresentation. No party shall have any claim for innocent or negligent misrepresentation on the basis of any statement in this Call Off Contract and Order.

16.3 If any provision or part-provision of the Call Off Contract and Order is or becomes invalid, illegal or unenforceable, it shall be deemed modified to the minimum extent necessary to make it valid, legal and enforceable. If such modification is not possible, the relevant provision or part-provision shall be deemed deleted. Any modification to or deletion of a provision or part-provision under this clause shall not affect the validity and enforceability of the rest of the Call Off Contract and Order.

16.4 A person who is not a party to the Call Off Contract and Order shall not have any rights to enforce its terms.

16.5 Failure or delay by either party in enforcing or partially enforcing any provision of these conditions against the other shall not be construed as a waiver of any rights under these conditions.

16.6 Neither party shall assign or subcontract the Call Off Contract and Order to another person without written permission from the other party, not to be unreasonably refused.

16.7 In this Call Off Contract and Order:

16.7.1 references to any applicable laws (including to the Data Protection Laws and each of them) and to terms defined in such applicable laws shall be replaced with or incorporate (as the case may be) references to any applicable laws replacing, amending, extending, re-enacting or consolidating such applicable law (including the GDPR and any new Data Protection Laws from time to time) and the equivalent terms defined in such applicable laws, once in force and applicable; and

16.7.2 a reference to a law includes all subordinate legislation made under that law.

17 Jurisdiction

17.1 The Call Off Contract and Order and any dispute or claim arising out of or in connection with it or its subject matter or formation (including non-contractual disputes or claims) shall be governed by and construed in accordance with the laws of England and Wales and the parties submit to the exclusive jurisdiction of the English Courts.

18 DISCONNECTION

18.1. In the event that any of the scenarios in Clause 18.2 arise, the Retailer will contact the Participating Authority as soon as reasonably possible if it is intended that they intend to stop providing services and disconnect the water supply. An explanation will be provided of the reasons for doing so.

18.2. The retailer reserves the right to stop providing the Services and disconnect the Participating Authority's water supply at any, or all, of the Premises, if:

18.2.1 Requested because any, or all, of the premises no longer require any water and/or sewerage services (as appropriate).

18.2.2 The Participating Authority is in breach of any legislation, including the Water Industry Act 1991 and any regulations made pursuant to, or consents issued under, that legislation;

18.2.3 Payment of the Charges is not made following notice in line with 14.5;

18.2.4 Disconnection is required in order to perform works on the network; or

18.2.5 Disconnection is required in order to prevent contamination.

18.3. The Retailer shall not be entitled to disconnect your supply if your Premises are of a type set out at Schedule 4A of the Water Industry Act 1991, which includes for the avoidance of doubt, premises used for the provision of medical or dental services, hospitals, care homes, educational establishments and prisons.

19. Variation Procedure

19.1 INTRODUCTION

"Variation" shall mean any change (including revision of any dates or alterations or additions to the Call off Contract (or any part thereof) in the performance or delivery of the Goods, Works and/or Services (Original Call Off Contract and Orders) that does not arise consequent upon a failure by the Retailer properly to carry out the Goods, Works and/or Services in accordance with the original Call Off Contract and Order and shall be without prejudice to the generality of the Retailer's obligations under the original Call Off Contract and Order.

19.2 PROCEDURE FOR PROPOSING A VARIATION

Either party may in writing, request a Change setting out a detailed description of the Change sought ("Change Request Form.

Within ten Working Days (or sooner if the urgency of the situation so dictates) of sending the written Change Request, a response may be made confirming the effect such Change will have on the Goods, Works and/or Services and what adjustment, if any, will be required to the charges and any dates specified for performance or delivery of the Goods, Works and/or Services or any part or aspect of them.

Either party shall consider the Change Request at its own costs and without having any impact on the provision of the Goods, Works and/or Services.

In effecting the Change the Parties shall take the following into consideration:

(a) A description of any further impact analysis work to be undertaken together with anticipated time scales and costs, if any.

(b) A description of the impact of the Change or new requirement (as appropriate) quantified in terms of input required from each party, timescales, performance and cost.

No Change shall invalidate the Original Call Off Contract and Order. The Original Call Off Contract and Order shall continue in full force and effect (subject to any agreed Change).

Any Change involving an increase or decrease in the charges and/or any dates specified for delivery of the Services or any part of them shall be deemed to have been made with effect from the date of the relevant acceptance by all parties as aforesaid.

The form attached as Appendix i is to be completed whenever there is a modification, addition or amendment of the Goods, Works and/or Services set out under the original Call Off Contract and Order.

19.3 OBJECTIONS TO A VARIATION

In the event that one or more written objections to a variation are received, the relevant party may:

- Withdraw the proposed variation;
- Or propose an amendment to the variation.

`9.4 VARIATIONS WHICH ARE NOT PERMITTED

In addition to these provisions, the Participating Authority may not propose any variation which:

- May prevent one the Retailer from performing its obligations under the Call-off Contract.
- Is in contravention of regulation 72 of the Public Contracts Regulations 2015.

To:	**Cabinet**
Date:	8 July 2026
Report of:	Director of Housing
Title of Report:	Procurement of a high-support service for accommodation for single homeless individuals

Summary and recommendations	
Decision being taken:	To approve the commencement of a procurement exercise for accommodation with high support in Oxford from 1st April 2027.
Key decision:	Yes Forward plan - May 2026 - August 2026<,. | Oxford City Council
Cabinet Member:	Cllr Mike Rowley, Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness
Corporate Priority:	Good, affordable homes.
Policy Framework:	Housing, Homelessness & Rough Sleeping Strategy 2023-28

Recommendation(s): That Cabinet resolves to:

1. **Give** project approval for the commencement of a procurement of an accommodation support service for individuals with multiple and complex support needs who are experiencing homelessness;
2. **Delegate** to the Director of Housing (following conclusion of the procurement) in consultation with the Group Finance Director, Director of Law Strategy and Governance and the Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness), the authority to award a contract within the relevant budget.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Risk Register	No
Appendix 2	Equality Impact Assessment	No

Introduction and background

1. The current contract is provided from a 37-bed hostel located in Oxford with shared accommodation in small 'clusters', including bedrooms with ensuite showers and a shared kitchen, as well as a small number of self-contained units. The contract provides for support staff on-site 24 hours per day, 7 days a week (24/7).
2. The client group the support service works with are single adults who are, or are at risk of homelessness and rough sleeping, and who require a high level of support to meet their needs and to assist recovery from homelessness. Individuals using this service will often have multiple support needs which requires a multi-agency approach.
3. The current contract for provision of these support services expires 31st March 2027 and cannot be extended any further. The Council is now looking to start a procurement process for a high support accommodation support service for to ensure that such facilities and support continue to be delivered in the city.

Procurement of supported accommodation

4. There is a significant and sustained demand for supported accommodation services in Oxford. Existing services hold long waiting lists for assessment and have limited throughput due to the complexity of individuals' needs. The shortage is most acute within high support provision, where staff and support is available 24 hours per day. Continuing this type of provision is therefore critical to relieving system pressure, improving outcomes, and ensuring that individuals with the highest levels of need receive the right support at the right time.
5. The current service provision of 24 hour support located in accommodation with a 'cluster based' layout has worked well. This involves small groups of bedrooms arranged around shared kitchen and living spaces. This design is proven to be more effective than typical hostel accommodation, as it reduces issues such as noise and conflict between individuals while encouraging positive social interaction in a more manageable way. It also allows for a flexibility to create 'specialist clusters', such as female only. This model of support avoids the challenge associated with large tradition hostel setting by providing a more trauma informed environment that balances operational efficiency with dignity privacy and personalised support.
6. The intention for the procurement and new contract is to replicate the current arrangement and procure a high-support service for accommodation delivered from a single, well managed location to ensure individuals experiencing homelessness and who present with multiple and complex support needs can access timely, consistent support in a safe and stable environment.
7. The support services are to include support on site 24/7, and controlling access to the accommodation to enhance safety, enable continuous oversight, rapid response to incidents, and a consistent point of contact for service users.
8. Based on the current annual value of the current contract it is likely that a total contract value for a new contract including any proposed extension period, will exceed £750,000. As such, and in line with the Council's constitution, project approval is needed from Cabinet to start the procurement process for this service.
9. The intention is to contract for an initial period of 2 years (commencing on 1st April 2027), with an option for the Council to extend the contract for up to three further

periods of 12 months. The initial contract period will allow the much needed service to be in place through the period of reorganisation of local government in Oxfordshire, whilst the option to extend the contract, allows for any changes to need, demand, and available funding to be taken into account before committing for longer periods.

10. The funding for the proposed contract being procured, will be from the Homeless, Rough Sleeping and Domestic Abuse Grant (HRSDAG) from 1st April 2027 onwards.

11. The 2026/27 value for the current contract is at £319,823. A proportion of this cost, a total of £45,754, is met by District Councils in Oxfordshire. There is very limited provision of hostel or 24/7 staffed supported accommodation across the County, and to ensure that this important provision is available for individuals from across the County, Districts are contributing financially to the provision. The overall costs of the service to the City Council are therefore less than the full contract, releasing City funds to fund other homelessness services. The intention is for similar arrangements to be in place should this be needed and desired, for the service provision that is to be procured.

Procurement implications

12. Due to the estimated value of the contract any procurement is likely to be subject to the Procurement Act 2023, and as such needs sufficient time to complete a fully compliant procurement process.

Alternative Options Considered

13. Officers are requesting the approval from Cabinet to give project approval to commence a procurement for a high-support supported accommodation provision. Other options are as follows:

    a. Extension of the current contract to enable continuation of the current service. This is not an option as the current contract does not allow for further extensions;

    b. Discontinue the service when the current contract ends – this option is not advised for the following reasons:

        i. A total of 37 individuals are currently directly benefitting from the service. There would be a high risk of homelessness and possible rough sleeping if this provision was not in place. Residents would have to be assisted to move from the service, putting undue pressure on already stretched service and supply.

        ii. There is still high need for this type of provision, due to consistently long waiting lists for this kind of service.

Implications of Local Government Reorganisation

14. In line with guidance on financial decisions before local government reorganisation that has been produced by and is available at the time of writing this report, the Council is not in a position to defer the procurement of a new service provision, and in line with guidance does not have to do so as this decision is necessary to ensure service delivery continues. As described in ‘other options considered’ above, should

the procurement of this service not take place, this would cause a gap or cessation of a key service.

Other implications

15. The relevant implications, including those as a result of other options considered, the financial, legal and equalities, Local Government Reorganisation, and environmental, as well as risk are all included in the relevant sections of this report and in appendices of the report.

Financial implications

16. The Council needs to ensure sufficient funds are available for the initial 2 year contract period. Based on the current annual value of the current support service contract, it is estimated that a similar support service contract for the period 1st April 2027 to 31st March 2029, could be in the region of £800,000. The entire contract period, including three extension periods of 12 months each (with final end date 31st March 2031), could be in the region of £2,000,000, with an upper budget limit of £2,500,000.

17. The Council received the Homelessness, Rough Sleeping and Domestic Abuse Grant (HRSDAG) from the Ministry for Housing, Communities and Local Government, for a period of three years from 1st April 2026. The current government allocation of this funding ends 31st March 2029. It is intended that the Council use HRSDAG to fund the initial 2 years of a new contract – 1st April 2027 to 31st March 2029.

18. At the time the initial contract period ends, 31st March 2029, new local government structures will have been confirmed/in place following Local Government Reorganisation, and the decision whether or not to exercise the extension clauses to the contact, and agreeing a budget to fund such extension periods, will be done as part of the budget setting process for the new local government arrangements

19. HRSDAG is ring-fenced grant, intended for local authorities to deliver services based on local need, that prevent homelessness and reduce rough sleeping, as well as to increase the supply of good quality supported housing. The supported accommodation service that the Council intends to procure, falls within remit of the grant as it will provide supported accommodation for single adults who are, or are at risk of homelessness and rough sleeping, and who require a high level of support to meet their needs and to assist recovery from homelessness.

Legal issues

20. Under Parts 4.5 (10) 4.5 (11) 18.12 and 19 (17) of the Constitution Cabinet is responsible for the decisions set out in the recommendation. Under section 9E (3) (c) of the Local Government Act 2000 Cabinet is empowered to delegate its functions to officers.

21. Due to the estimated value of spend, including proposed extension periods, the procurement of the support service will need to be carried out in accordance with the Procurement Act 2023 and the Council's Constitution. The contract itself will be drafted to offer annual extension options but the decision to exercise them will be at the Council's sole discretion. If there is no funding following the initial contract period, the contract will naturally expire.

22. Any decision to award a contract of £750,000 or greater will be a Key Decision and will need to comply with the procedure for taking Key Decisions set out in the Council's Constitution.

Level of risk

23. The Risk Register is attached as Appendix 1.

Equalities impact

24. A detailed in the Equality Impacts Assessment attached as Appendix 2, there are limited impacts overall in relation to the procurement exercise in respect of this support service.

Carbon and Environmental Considerations

25. There are no environmental or carbon considerations arising directly from this report.

Report author	Francesca Barr
Job title	Senior Rough Sleeping Officer
Service area or department	Housing Service
Telephone	01865 252 582
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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

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An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	**6. Race & Ethnicity**
2. **Disability**	**7. Religion or Belief**
3. **Gender Reassignment**	**8. Sex**
4. **Marriage & Civil Partnership**	**9. Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

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7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.**	New contract and specification in place for a high support service for accommodation for single homeless individuals.	**2.**	**The implementation date of the activity under consideration:**	
3.	**Directorate/Department(s):**	People and Communities	**4.**	**Service Area(s):**	Housing Services
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Francesca Barr, fbarr@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	Francesca Barr, fbarr@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	Previous EqIA completed in September 2024. ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	Equality Impact Assessment MH 2027 DRAFT.docx
9.	**Date this EqIA started:**	13.05.26			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	No	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐	☐ Decommissioning	☐ Commissioning x	☐	
		OBJ	☐ Others. Please specify:			
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	☐ Good, affordable homes x	☐ Strong, fair economy	☐ Thriving Communities x	☐ Zero Carbon Oxford	☐ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	☐ Understanding and working with our communities. x	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	Aims: Continue to deliver supported accommodation provision for single adult households who are homeless/rough sleeping or at risk of becoming homeless. Objectives:				

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		Work with incumbent support provider at current provision, legal and procurement teams to ensure a good service is in place. <u>Priorities:</u> Ensure that there is a good service in place that is delivered in line with the key priorities in Oxfordshire's Homelessness and Rough Sleeping Strategy and the City Council's Housing, Homelessness and Rough Sleeping Strategy.
16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	If we did not continue to fund a 24/7 supported accommoation project like the current provision, it would mean that 37 bed spaces in supported accommodation would no longer be provided. There is established great need for this type of accommdodation provision, as the current provision is sees many referrals and has one of the longest waiting lists. If a service like this was not available, this would mean increased pressure on temporary accomodation and other supported accommodation, which may not be suitable to meet the needs of individuals. This EqIA is primarily being undertaken in relation to the launching of the re-procurement of the 24/7 supported accommodation service. Should there be significant changes to the service provision following the re-procurement process a comprehensive EqIA would be carried to assess the full impact of those changes and mitigations.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	-Regular monitoring of all services commissioned by the City Council and those commissioned in partnership through the Oxfordshire Homelessness Alliance takes place. -Monitoring data and information is provided by all services. These take place quarterly and provides commissioners with a good understanding of how services operate, if they meet the need, provide good and quality services. -Access panel data and waiting list- there is a high percentage of those waiting for accommodation that need 24/7 provision. A supported accommodation review which took place in September 2024 suggested a continuous need for higher supported accommodation settings as well as specialist accommodation provision.

18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports, -briefs.	• Services monitoring information • Homeless Case Level Information Collection (HCLIC) • Ending Rough Sleeping Data Framework • Oxfordshire's Homelessness and Rough Sleeping Strategy 2021-26 • Annual rough sleeping numbers for city, including age, gender, • Oxford City Council's Housing, Homelessness and Rough Sleeping Strategy 2023-28 and accompanying homelessness review and evidence base Our evidence shows that there is great and in some instances unmet need for supported accommodation for persons who have high support needs, and those with multiple and complex needs, and therefore there is a need to prioritise the financial resources we have available to fund such accommodation provision. A large number of individuals experiencing rough sleeping in the city are long-term rough sleepers or those who have returned to rough sleeping, sometimes due to being evicted from the supported accommodation they were living in.
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	Monitoring of services and all relevant data and trends takes place throughout the year in order to determine what kind of services are needed in Oxford. This information is used when we have to determine how funds available for services for single homeless persons and those experiencing rough sleeping will be used each financial year. Monitoring of services and collection of data will continue as is currently undertaken. We will work with services where possible and necessary to enhance and increase services users feedback. Data is collected throughout the year and will continue for the foreseeable future. We are also required to submit data to government of a monthly basis in relation to rough sleeping in the city. Monitoring of services will continue as long as services are commissioned. It is a requirement under the contracts/grant assistance agreements used that services provide monitoring on a quarterly basis, or more frequently if at the request of the commissioner. In addition, we continue to monitor the relevant actions in the strategy action plan that relates to single homelessness and rough sleeping in order to ensure that we and partners deliver and commission the support and services that are most needed in the city.

Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	Yes x☐	**No**	Don't Know ☐
		Members of staff	**Yes** x	No ☐	Don't Know ☐
		General public	**Yes**	No ☐	Don't Know x ☐
		Partner / Community Organisation	Yes x☐	**No** ☐	Don't Know ☐
		City Councillors	Yes ☐	**No** ☐	Don't Know x☐
		Council suppliers and contractors	Yes ☐	No	Don't Know x☐

21.	**Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**	

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age 3722	x	☐		☐	Homelessness review and Housing Homelessness and Rough Sleeping Strategy evidence base, as well as HCLIC data and locally held data in relation to rough sleeping and services for single homeless persons and those who are experiencing rough sleeping. The largest group of single homeless persons and those rough sleeping in the city are aged 35-44. This has been consistent in relation to those seen rough sleeping in the last 5+ years.	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general and will not take the age of the person in consideration as such. Persons under the age of 18 cannot access services however, as they are provided

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						services by the County Council.
Disability **(Visible and invisible)**	x	☐	☐	☐	Homelessness review and Housing Homelessness and Rough Sleeping Strategy evidence base, as well as HCLIC data and locally held data in relation to rough sleeping and services for single Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general. Where there is need for specialist support in relation to disability, homeless persons and those who are experiencing rough sleeping. A large proportion of single homeless people and those rough sleeping in the city have physical	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general. Where there is need for specialist support in relation to disability. a person might be referred to a more suited service, or services will work to provide the necessary support in partnership. The specification for the service will incorporate a

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					health needs and/or a disability. Please also see below section in relation to 'other groups'.	requirement for sufficient ground floor/accessible rooms.
Gender re-assignment 3724		☐	x	☐	There is not sufficient data collected in respect of gender reassignment in relation to the single homeless and rough sleeping 'population' in Oxford at present. This is data that can be captured if persons are willing to share this, but not everyone feels able to do so.	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general. The specification for the service will allow for certain parts of the accommodation to be designated to provide for gender specific provision. The needs and increase/decrease in these arrangements

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						can be reviewed and amended.
Marriage & Civil Partnership	☐	☐	x	☐	Due to the nature of the service and funding streams, commissioned services for single persons and those rough sleeping, have very few clients that are married or in civil partnerships access the services.	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general.
Race, Ethnicity and/or Citizenship	x	☐	☐	☐	The largest groups of single homeless persons and those rough sleeping in Oxford, where details are available, identify as white British, with EEA nationals the next largest group.	Anyone person who is in need of supported accomodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general. The specification for the service will allow for certain parts of the accommodation to be set up to

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						provide for certain individuals if needed. The needs and increase/decrease in these arrangements can be reviewed and amended.
Pregnancy & Maternity	☐	☐	x	☐	Due to the nature of this the services commissioned by this funding stream (which are non-statutory), this group is not highly represented. Those who are pregnant or have children, would be supported by statutory services.	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general.
Religion or Belief	OBJ			☐	There is not sufficient data collected in respect of religion of belief in relation to the single homeless and rough sleeping 'population' in Oxford at present. This is data that can be captured if persons are willing to share	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will

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3727					this, but not everyine feels able to do so.	depend on the need for support in general. The specification for the service will allow for certain parts of the accommodation to be designated to provide for certain individuals if needed. The needs and increase/decrease in these arrangements can be reviewed and amended.
Sex	x			☐	Homelessness review and Housing Homelessness and Rough Sleeping Strategy evidence base, as well as HCLIC data and	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such

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3728					locally held data in relation to rough sleeping and services for single homeless persons and those who are experiencing rough sleeping. The gender breakdown for those seen rough sleeping in the city has consistently been just over 80% male over the last 7 years. The gender breakdown for those accessing supported accommodation in the city roughly reflects this percentage, but has seen an increase in women accessing provision due in part to the commissioning of women only accommodation.	assessment will depend on the need for support in general. The specification for the service will allow for certain parts of the accommodation to be designated to provide for specific gender provision. The needs and increase/decrease in these arrangements can be reviewed and amended.
Sexual Orientation	☐ x	☐		☐	There is not sufficient data collected in respect of sexual orientation in relation to the single homeless and rough sleeping 'population' in Oxford at present.	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for

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3729					This is data that can be captured if persons are willing to share this, but not everyone feels able to do so.	relevant provision. Such assessment will depend on the need for support in general. The specification for the service will allow for certain parts of the accommodation to be designated to provide for certain individuals if needed. The needs and increase/decrease in these arrangements can be reviewed and amended.

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Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.		☐		☐	Many single individuals who are experiencing homelessness and rough sleeping will require support to access to education, training and employment opportunities. Barriers to accessing support to gain experience in these arears include as language and digital exclusion.	Potential for recruitment of staff team for supported accommodation provision for those with lived experience of homelessness. Contract stipulations for this provision around ensuring equality, diversity and inclusion within organisation and staff team. Individuals accessing the service will be supported to find education, training and employment opportunities as part of the support provision to recover from homelessness.
Other (voluntary consideration)	x ☐	☐		☐	Many individuals who are seeking asylum or are a refugee may need supported accommodation	Anyone person who is in need of supported accommodation

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Sanctuary seeking status leading to intersecting inequalities experienced by **For example:** asylum seeker, refugee, person with insecure immigration status Oxford City Council became a local authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.				provision to meet their individual needs.	in the city, including those who are asylum seekers, refugees etc. (if they have recourse to public funds) can be assessed and considered for relevant provision. Such assessment will depend on the need for support in general. There is alternative provision in the City who are able to house those with no recourse to public funds.
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members		☐		☐ Homeless population - in respect of the relevant 'homeless population' here, i.e. single persons who have a history of rough sleeping, may be at risk or homelessness/rough sleeping, or those experiencing rough	Anyone person who is in need of supported accommodation in the city, can be assessed and considered for relevant provision. Such assessment will

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3732					sleeping, there is evidence that a large number of people have a range of support needs, often multiple support needs that makes them particularly vulnerable. This includes, history of mental health problems, physical ill health and disability, at risk of or have experienced domestic abise, offending history, drug and/or alcohol dependency, care leavers, access to education training and eduction. This service is only available to individuals that have experienced multiple period of homelessness and rough sleeping.	depend on the need for support in general.

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.**						
	☐	Stop and reconsider the activity.	☐	Adjust activity before beginning the activity and continue to monitor.	**x** ☒	No major change(s) or adjustments and continue with activity but continue to monitor.	☐	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**		**Benefits of Implementation**: As discussed above, there is great and in some instances unmet need for supported accommodation for persons who have high support needs, and those with multiple and complex need. A large number of individuals experiencing rough sleeping in the city are long-term rough sleepers or those who have returned to rough sleeping, sometimes due to being evicted from

[redacted]			the supported accommodation they were living in. With this in mind, the continutation of 24/7 supported accommodation provision is a vital as part of the overall provision the city council commissions to provide accommodation for, and meet the support needs of this cohort. **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity/Improves Representation**: A range of people can become homeless, and people will have a range of characteristics, some will be protected. The provision of supported accommodation in the city and who can access the various kinds of suported accommodation we as a city council commission, depends on the support needs a person has and what kind of accommodation they need to live in. A person will work with support workers to ensure that they are assessed for and can access the appropriate accommodation. Where a person has particular support needs, support agencies will work together, both statutory and non-statutory to ensure that the person can access the appropriate support should they wish to do so.

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-**	Rough Sleeping and Single Homelessness Team

	- team, -directorate, -service area, -Equalities Steering Group,etc.				
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	Rough Sleeping and Single Homeless Manager and Senior Rough Sleeping Officers			
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	Yearly	**27.**	**Date when the EqIA will be reviewed again.**	May 2027

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Section 7: Sign-off

Name:	Name:	Name: Full Name
Job Title:	Job Title:	Job Title: Type here
Signature:	Signature:	Signature:
---	---	---
Name: Gail Malkin	Name: Full Name	Name: Full Name
Job Title: Head of People	Job Title: Type here	Job Title: Type here

Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.
4) EDI Lead.
5) EDI Specialist.

Signature: G Malkin ----------	Signature: ----------	Signature: ----------
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature: ----------	Signature: ----------	Signature: ----------

You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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Appendix 1: Risk Register

					Date Raised	Owner	Gross		Current		Residua		Comments	Controls				
Title	Risk description	Opp/ threat	Cause	Consequence			I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
Not procuring a service	Decision is made not to procure the service provision	Threat	Council decides other provision needs to be prioritised	Residents in the current provision need to be provided with alternative accommodation before contract ends, causing additional burden on other supported accommodation provision, as well as Council statutory homelessness services	12/05/26	Ossi Mosley	3	3	3	3	3	3		Needs assessments have been carried out over last few years (an ongoing) in relation to the need for the provision, which is demonstrated. Sufficient funding has been sourced for the provision for the contract length, including the extension periods that will only be exercised on the Council's discretion.	01/11/26	Started	10	Rough Sleeping & Single Homelessness Team
Delayed procurement	Procurement is delayed due to approvals to start procurement not made	Threat	Council decides to wait or delay decision to go to procurement	A rushed procurement exercise is conducted; service specifications not developed properly; not sufficient time for implementation of service should there be a change in provider/location; not sufficient time to introduce new requirements should the incumbent provider be the successful bidder	12/05/26	Ossi Mosley	2	2	3	3	2	2		Asking for permission to go to procurement at earliest opportunity, allowing time to develop tender documentation, using evidence and needs assessments.	01/11/26	No started	10	Rough Sleeping & Single Homelessness Team

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To:	**Cabinet**
Date:	8 July 2025
Report of:	Director of Law, Governance and Strategy (Monitoring Officer)
Title of Report:	Appointments to Outside Bodies 2026/2027

Summary and recommendations	
Decision being taken:	To agree appointments to Outside Bodies for the 2026/2027 Council Year
Key decision:	No
Cabinet Member:	Councillor Susan Brown, Leader, and Cabinet Member for Partnership Working, Inclusive Economic Growth and Culture
Corporate Priority:	Support Thriving Communities.
Policy Framework:	Council Strategy 2025-2029.

Recommendation(s): That Cabinet resolves to:

1. **Approve** appointments to charities, trusts, community associations and other organisations as set out in Appendices 1A – 1D; and note the appointments to partnerships as detailed in Appendix 1E;
2. **Note** the guidance for appointees in Appendix 2; and
3. **Delegate authority** to the Director of Law, Governance and Strategy, in consultation with the Leader of the Council, and where appropriate with other group leaders, to make any changes to appointments to Outside Bodies as required during the council year 2026/2027**.**

Information Exempt From Publication	
N/A	N/A

Appendix No.	**Appendix Title**	**Exempt from Publication**
Appendix 1A	Community Associations 2026	No

Appendix 1B	Other Organisations 2026	No
Appendix 1C	Trusts 2026	No
Appendix 1D	Charities 2026	No
Appendix 1E	Strategic Partnership 2026	No
Appendix 2	Guidance for Members (Updated 2026)	No

Introduction and background

1. The Council currently has representatives on a total of 50 outside bodies (15 community associations, 17 other organisations, 8 trusts and 10 charities). These are detailed in Appendices 1A – 1D. Many Council representatives sit on the committee of the organisation to which they have been appointed, with many acting in a non-voting advisory role or simply being invited to attend meetings as an observer. Councillors who have been appointed to charities and trusts generally serve as Trustees on those bodies.
2. Guidance for Council representatives on these organisations is provided upon appointment, to ensure that all appointees understand their role and responsibilities in representing the Council on the organisation. A copy of the guidance is attached at Appendix 2.
3. The list of outside bodies and the appointment of representatives to those organisations is determined by the Leader of the Council, who seeks Cabinet agreement on the nominations; this is reviewed annually in March.
4. Proposed changes to individual nominations or to the list of outside bodies will be reported to the Cabinet as required during the year. Since 2017, the authority to approve any in year change to the representation on an individual organisation has been delegated to the Director of Law, Governance and Strategy in consultation with the Leader of the Council, and where appropriate with other group leaders. This delegation is restated annually to ensure good governance and clear decision making.
5. In 2019, the Cabinet endorsed the Leader's preferred approach, based on custom and practice, that nominations for Council representatives to outside bodies should be drawn from the cohort of serving councillors; and that existing representatives who were no longer serving councillors should be permitted to serve out their terms of office should they wish to do so.
6. The Council also has representatives on 16 strategic partnerships (see Appendix 1E). These appointments are either made by the individual partnership or determined by virtue of a councillor's position as a portfolio holder on the Council's Cabinet.

Categories for Appointments to Outside Bodies

7. The list of organisations to which the Council makes appointments has evolved over time. The justification for the inclusion of many of the organisations on the list is self-evident, but in some cases the reasons for the Council to continue to appoint to an organisation is less obvious.

8. To address this, the following categories are used to provide some rigour to the decision-making underpinning the Council appointments to outside bodies:

A.	Appointments to organisations that have a significant impact on the achievement of the Council's corporate policy objectives and service priorities and/or organisations which receive funding from the Council
B.	Appointments to organisations with established historical links to the local community, the city of Oxford or the Council on which representation is desirable and should be maintained as a matter of local goodwill and for as long as nominations are forthcoming from members
C.	Appointments which will allow the Council to influence policy at a national or regional level
D.	Appointments which are a statutory requirement and/or to a partnership

Proposed Appointments and Changes to Representation in 2026/2027

9. Appendices 1A – 1D set out the proposed nominations to charities, trusts, community associations and other organisations for 2026/2027.

10. The Leader of the Council has proposed the following specific changes to the list of organisations for 2026/2027:

Outside Body	Decision
Appendix 1D • City of Oxford Charity	Charity has advised that they wish to only have three Councillors appointed, one appointment will be made this year.
Appendix 1D • St Aldates Parochial Charity	Charity is currently undergoing a governance review and has requested no Councillors are added to the board during this review.

Implications of Local Government Reorganisation

11. There are no direct implications arising from this report relating to Local Government Reorganisation. Any future appointments will be a matter for decision of the new unitary authority.

Financial Implications

12. The appointments proposed in this report have no direct financial implications for the Council.

Legal Issues

13. Representation on outside organisations presents legal implications for the Council if the roles and responsibilities of those involved are not clearly defined. Council representatives are provided with detailed written guidance on their roles and responsibilities (Appendix 2).

Level of Risk

14. Representation on outside organisations should benefit both the Council and the organisation concerned. There is a risk that such benefit may be lost to either or both parties if representation is withdrawn or inadequately resourced or briefed.

Equalities Impact

15. An Equalities Impact Assessment is not required. The Council seeks to appoint nominees that represent as far as possible the diverse nature of the outside bodies and the communities that they serve.

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Background Papers:	
1	Companies House - GOV.UK (www.gov.uk)
2	Being a company director - GOV.UK (www.gov.uk)
3	Directors' duties and responsibilities | Factsheets | IoD
4	7 duties of a company director – Companies House (blog.gov.uk)
5	The Charity Commission - GOV.UK (www.gov.uk)
6	The essential trustee: what you need to know, what you need to do - GOV.UK (www.gov.uk)
7	Charity trustee: what's involved (CC3a) - GOV.UK (www.gov.uk)
8	Charity types: how to choose a structure (CC22a) - GOV.UK (www.gov.uk)
9	Unincorporated associations - GOV.UK (www.gov.uk)

Appendix 1A: Community Association Nominations 2026-2027

These appointments are annual. The local ward councillors are usually appointed to Community Associations.

Names ~~struck through~~ are no longer councillors.

		2025-2026 Appointment(s)	2026-2027 Ward Councillor Nomination(s)
1.	Barton Community Association	Cllr Asima Qayyum	Cllr Mike Rowley
2.	Bullingdon Community Association	Cllr Mark Lygo Cllr Judith Harley	Cllr Mark Lygo Cllr Judith Harley
3.	Cutteslowe Community Association	Cllr Laurence Fouweather ~~Cllr Jo Sandelson~~	Cllr Laurence Fouweather Cllr Andrew Gant
4.	Donnington Community Association	Cllr Rosie Rawle Cllr Max Morris	Cllr Rosie Rawle Cllr Max Morris
5.	Donnington Doorstep Family Centre	Cllr Rosie Rawle Cllr Max Morris	Cllr Rosie Rawle Cllr Max Morris
6.	East Oxford Community Association	~~Cllr Jemima Hunt~~ Cllr Alex Powell	Cllr Ahalya Bala Cllr Alex Powell
7.	Florence Park Community Association	Cllr Ian Yeatman ~~Cllr Amar Latif~~	Cllr Ian Yeatman Cllr Ed Mundy
8.	Headington Community Association	Cllr Chewe Munkonge Cllr Chris Smowton	Cllr Chewe Munkonge Cllr Chris Smowton
9.	Jericho St Barnabas Community Association	Cllr Lizzy Diggins ~~Cllr Alex Hollingsworth~~	Cllr Lizzy Diggins Cllr Sushila Dhall
10.	Littlemore Community Association	Cllr Tiago Corais	Cllr Tiago Corais
11.	North Oxford Association	Cllr James Fry Cllr Katherine Miles	Cllr James Fry Cllr Katherine Miles
12.	Northway Community Association	Cllr Nigel Chapman Cllr James Taylor	Cllr Nigel Chapman Cllr James Taylor
13.	Risinghurst Community Centre	Cllr Chewe Munkonge Cllr Chris Smowton	Cllr Chewe Munkonge Cllr Chris Smowton
14.	South Oxford Community Association	Cllr Anna Railton ~~Cllr Naomi Waite~~	Cllr Anna Railton Cllr Siobhan Lancaster

15.	West Oxford Community Association	Cllr Lois Muddiman Cllr Susanna Pressel	Cllr Lois Muddiman Cllr Susanna Pressel

Appendix 1B: Nominations to Other Organisations 2026-2027

Names ~~struck through~~ are no longer councillors.

		2025-2026 Appointments	2026-2027 Nominations
1.	Fusion – Oxford's Community Arts Agency	Cllr Mark Lygo	Cllr Mark Lygo
2.	Historic England South East - Heritage Champion	Cllr Mary Clarkson	Cllr Mary Clarkson
3.	Homeless Oxfordshire	Cllr James Taylor Cllr Linda Smith	Cllr Mike Rowley Cllr Chris Smowton
4.	Modern Art Oxford	~~Cllr Alex Hollingsworth~~ ~~Cllr Jemima Hunt~~	Cllr Mark Lygo Cllr Louise Upton
5.	Mortimer Hall Management Committee	Cllr Louise Upton	Cllr Louise Upton
6.	Oxford and District Sports and Recreation Association for the Disabled (OXSRAD)	Cllr Louise Upton	Cllr Louise Upton
7.	Oxford Asian Cultural Association	Cllr Asima Qayyum Cllr Roz Smith	Cllr Asima Qayyum Cllr Trish Elphinstone
8.	Oxford Sports Council	Cllr Chewe Munkonge ~~Cllr Alex Hollingsworth~~	Cllr Simon Ottino Cllr Louise Upton
9.	Oxfordshire Community and Voluntary Action	Cllr Mark Lygo	Cllr Mark Lygo
10.	Oxfordshire Association of Local Councils	Cllr Susan Brown	Cllr Susan Brown
11.	Oxfordshire Museums Council	~~Cllr Alex Hollingsworth~~	Cllr Siobhan Lancaster
12.	Oxfordshire County Council School Organisation Stakeholder Group	Cllr Chewe Munkonge	Cllr Mark Lygo
13.	South East England Councils	Cllr Anna Railton	Cllr Anna Railton
14.	South Oxford Adventure Playground Executive Committee	~~Cllr Naomi Waite~~	Cllr Siobhan Lancaster
15.	The Porch	Cllr Linda Smith	Cllr Mike Rowley
16.	LGA General Assembly (appointment normally reserved for Leader of the Council)	Cllr Susan Brown	Cllr Susan Brown
17.	Local Government Information Unit	~~Cllr Alex Hollingsworth~~	Cllr Susan Brown

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Appendix 1C – Nominations to Trusts 2026-2027

OCC preference is to appoint serving councillors to vacancies on Trusts

Names ~~struck through~~ are no longer councillors.

		Current Appointment	Expiry	Status and length of appointment	Nominations 2026-2027
1.	Katherine Rawson Trust	Cllr Laurence Fouweather	2028	Trustee x 3 (with voting rights) 4-year term	
		~~Cllr Jo Sandelson~~	2026		Cllr Steven Goddard
		Cllr Steven Goddard	2026		Cllr Andrew Gant
2.	Old Marston Charities Trust	Cllr Kate Robinson	2028	Trustee x 2 (no voting rights) 4-year term 2 meetings per year	
		Cllr Mary Clarkson	2028		
3.	Oxford Leon Trust	Cllr Mike Rowley	2026	Trustee x 2 4-year term	Cllr Louise Upton
		Cllr James Fry	2027		
4.	Oxford Playhouse Trust	~~Cllr Alex Hollingsworth~~	2026	Observer Annual	Cllr Susan Brown
5.	Oxford Poverty Action Trust	Cllr Simon Ottino	2026	Trustee x 1	Cllr Simon Ottino
6.	Oxford Preservation Trust	Cllr Lizzy Diggins	2028	Trustee x 2 (with voting rights) 3-year term	
		Cllr Louise Upton	2028		
7.	Oxfordshire Building Trust	Cllr Mary Clarkson	2028	Trustee x 1 3-year term	
8.	Pegasus Theatre Trust	Cllr Simon Ottino	2026	Non-voting observer Annual x 1	Cllr Simon Ottino

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Appendix 1D – Nominations to Charities 2026-2027

Names ~~struck through~~ are no longer councillors.

		2025-2026 Appointment	Expiry	Status and length of appointment	2026-2027 Nominations
1.	Agnes Smith Advice Centre	Cllr Lubna Arshad	2026	Attends Management Committee Annual x 1	Cllr Lubna Arshad
2.	Alice Smith Trust and Sarah Nowell Educational Organisation	Cllr Simon Ottino	2026	Trustee x 1 4-year term	Cllr Simon Ottino
3.	City of Oxford Charity	Cllr James Fry	2027	Trustee x 6 3 from 2026 4-year term	
		Cllr Susanna Pressel	2029		
		Cllr Edward Mundy	2026		Cllr Dianne Regisford
		~~Cllr Alex Hollingsworth~~	2026		
		~~Cllr Barbara Coyne~~	2027		
		Cllr Chris Smowton	2026		
4.	Elder Stubbs	Cllr Judith Harley Cllr Ian Yeatman Cllr Mohammed Azad	2028	Trustee x 3 4-year term	
5.	The Gatehouse	Cllr Simon Ottino	2026	Member of Management Committee Annual x 1	Cllr Simon Ottino
6.	Headington Parish Charity	Cllr Mary Clarkson	2027	Trustee x 2 4-year term	
		Cllr Chris Smowton	2029		

7.	Non Ecclesiastical Charities of St Mary's Magdalen	Cllr Susan Brown	2029	Trustee x 1 4-year term	
8.	Parochial Charities of St Clement, Oxford	~~Cllr Jemima Hunt~~	2026	Trustee x 2 Cllr term of office *(Should be councillors for St Clements or St Mary's wards)*	Cllr Emily Kerr
		Cllr Chris Jarvis	2028		
9.	Rose Hill & Donnington Advice Centre	Cllr Tiago Corais	2026	Attend meetings of Board of Trustees Annual x 2	Cllr Tiago Corais
		Cllr Ed Turner	2026		Cllr Ed Turner
10.	Susan Kidd Charity	Cllr Louise Upton	2026	Trustee x 2 4-year term	Cllr Louise Upton
		Cllr James Fry	2026		Cllr James Fry

Appendix 1E – Strategic Partnership Appointments 2026-2027		
Partnership		**Cabinet Member and Portfolio**
1.	Oxford Strategic Partnership (OSP)	Cllr Susan Brown, Leader
2.	Economic Growth Steering Group	Cllr Susan Brown, Leader
3.	Low Carbon Oxford	Cllr Anna Railton, Deputy Leader
4.	Oxford Safer Communities Partnership	Cllr Lubna Arshad
5.	Stronger Communities Steering Group	
6.	The Oxfordshire Joint Leaders Committee	Cllr Susan Brown, Leader
7.	Fast Growth Cities	Cllr Susan Brown, Leader
8.	Safer Oxfordshire Partnership	Cllr Lubna Arshad
9.	Thames Valley Police and Crime Panel	
10.	Health & Well Being Board	Cllr Mark Lygo
11.	Health Improvement Board	
12.	Oxfordshire Resources and Waste Partnership	Cllr Nigel Chapman
13.	Youth Partnership Board	Cllr Mark Lygo
14.	Oxfordshire Sport Partnership	
15.	Oxford International Links Committee	Cllr Ed Turner
16.	Oxfordshire Children's Board	Cllr Mark Lygo

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OXFORD CITY COUNCIL

Guidance for Members who are appointed by the Council to serve on Outside Bodies

1. Introduction

1.1. This guidance is intended to help councillors understand their duties when appointed to outside bodies, and how to handle the conflicts of interest that can arise. The guidance relates only to nominations or appointments made of councillors by the Council to outside bodies or by the outside bodies themselves.

1.2. If a councillor is appointed to an external body in any other capacity, (i.e., not as a councillor) they do not owe the council any duties in relation to the way that they carry on their membership of the outside body. However, the councillor will need to record their role in the members' register of interests. The guidance does not attempt to provide a comprehensive guide. If you have any further queries, you can obtain advice from the Monitoring Officer. Councillors may be appointed to a wide range of outside bodies. Most appointments are made by the Cabinet.

1.3. The roles of Councillors on outside bodies will depend upon the legal nature of that organisation and the capacity in which they are appointed to act. Councillors must:

- act according to the framework set by the outside body
- take an informed role in the management of the outside body's affairs
- attend meetings on a regular basis
- carrying out their duties to the best of their abilities.

1.4. The fundamental principles of this guidance are as follows:

- Councillors will act according to the rules, constitutions and frameworks set by the relevant outside body and, where possible, with those of the Council
- Councillors will make independent and personal judgements based on their responsibilities to the outside body

1.5. The guidance addresses three specific circumstances which arise from time to time and as a result of which potential conflict can arise. These are:

- Where the Councillor is appointed Director of a Company
- Where the Councillor is appointed as a Trustee
- Where the Councillor is appointed to an Unincorporated Association

1.6. Councillors will report back on their involvement with the outside body – you will be asked to complete a feedback form each year about the organisation to which you are appointed for consideration by the Cabinet.

2. What might your appointment be?

2.1. If you are appointed by the Council to an Outside Body, this may be either:

- **as a member** e.g. of the management committee, board of directors, or committee of trustees of the outside body.

  If you serve in a decision-making capacity or have a position of general control or management on the outside body, whether company, trust or other association, you owe duties and responsibilities to that body which are separate and distinct from your duties owed to the council. It will be important for you to be clear what those duties are by referring to the constitution or relevant governing documents.

  On occasion, it is possible that duties owed to the outside body and to the council, will conflict e.g. if you are the treasurer of an outside body who has applied to the council for grant funding and the rest of this guidance gives more detail on this; or

- **as an 'observer'**, or an ordinary member, or undertaking a monitoring role, or facilitating exchanges of views or information as an extension of your council duties but taking no part in the outside body's management or governance, other than to attend and participate in meetings. Here, you will be mainly concerned with representing the council and will not have responsibilities for decision making or the governance of the body.

3. What sort of Roles does it apply to?

3.1. This guidance applies where you are a "member", which could be:

- a director of a company in which the Council has an interest; a member of another public body;
- a trustee of a charity;
- or a person appointed to the management board of an unincorporated body.

3.2. Your responsibilities will depend on the type of body you are appointed to. The main types are as follows (see further guidance later in this document):

- Companies
- Unincorporated Associations:
- Charities:
- Other statutory bodies:

4. The application of the council's Code of Conduct

4.1. These guidelines should be read in conjunction with the Members' Code of Conduct which has been adopted by Council. When Councillors are representing the Council on another body, they must follow the Code of Conduct unless it conflicts with a legal duty owed to the other body.

4.2. You should ensure that you enter any appointment to an Outside Body on to your Register of Interests (including those where you are appointed in a private capacity).

4.3. Where you are representing the Council on an Outside Body or where you are appointed to an outside body and a matter relating to that Outside Body is to be discussed at a meeting of the Council:

- If you have a Disclosable Pecuniary Interest (DPI) in a matter to be considered at the meeting you must declare as such, and you must leave the room during any discussion of, or vote on, any matter in which you have a DPI.
- if a matter arises at a meeting which directly relates to the financial interest or wellbeing of one of your Other Registerable Interests (ORI) you must disclose as such and you must leave the room during any discussion of, or vote on, any matter in which you have such an interest.

5. Bias and Predetermination

5.1. Even where your duties as a director, or trustee, or member of a management committee of an external body do not amount to a disclosable pecuniary interest, they may well be regarded, on an objective appraisal, as giving rise to a perception of bias, especially having regard to the desirability of maintaining public confidence.

5.2. Participation in the decision making at a Council meeting by a Councillor who is biased could potentially invalidate the decision of the Council where there is an issue of pre-determination and bias.

5.3. Examples may include where you have sat on an Outside Body and taken a decision to apply to the Council for funding. You should then not participate in the decision of the Council as to whether to award that funding or not.

5.4. Where the Council's wishes may conflict with the best interests of the outside body you must nevertheless, if taking decisions for that outside body, act in its best interests. If you consider that any such conflict prevents you from taking a decision for the outside body it is likely to be advisable not to participate in that decision.

5.5. Where membership of the outside body is on an advisory or consultative basis, bias will not be assumed from mere membership. However, once the outside body has a line which is being advocated by you, this could potentially be viewed as bias, and the Council's decision on the issue could be vulnerable to challenge if you participate in those circumstances. It will depend on the facts, and in such circumstances, advice should be sought from the monitoring officer

6. Insurance & Indemnities

6.1. Councillors who participate in external bodies may be indemnified in relation to liabilities they incur in that capacity, though this is subject to certain limitations.

6.2. Indemnity by the outside body:

a) <u>Directors:</u>

Directors cannot be indemnified by the company against liability for negligence, default, breach of duty and trust. Companies can however purchase insurance to protect directors against claims of negligence, default, breach of duty and trust. Those appointed as directors should ensure that appropriate insurance is in place. Companies can, if their Articles of Association allow, provide for directors to be indemnified for the costs of defending such a claim if they are granted relief by the court or acquitted.

b) Trustees:

Provided a charitable trustee act properly, and within his/her powers, indemnity can be given from the trust fund. Trustees can take out insurance to protect themselves from personal liabilities, but not for criminal acts such as fraud. If the premiums are to be paid out of the charitable funds, the consent of the Charity Commissioners will be needed.

c) Unincorporated Associations:

Members may be entitled to an indemnity if they act in accordance with the Constitution of the association and are not exceeding their powers. However, regard must be had to the terms of the constitution. The constitution will determine whether insurance can be paid for by the organisation.

d) Other statutory bodies:

Members may be entitled to an indemnity if they act in accordance with the terms of reference of the body and are not exceeding their powers. However, regard must be had to the terms of the constitution.

6.3. You should establish as soon as you are appointed what, if any, insurance is held by the Outside Body that covers you in your role including what insurance the organisation itself holds for other purposes, for example third party liability insurance and employers liability insurance (the second of which is a legal obligation for all organisations which employ staff)

6.4. The Council may provide an indemnity where Councillors are acting on an outside body at the request of the Council.

6.5. The indemnity the Council can provide is subject to limitations. In general terms, if a Councillor is acting properly, within their powers and in good faith, the power to indemnify will usually apply. However, the Council cannot, for example, provide an indemnity in relation to any action or failure by any Member which constitutes a criminal offence, or for any action or failure by any Member which is the result of fraud, or other deliberate wrongdoing or recklessness on the part of the Member.

6.6. When you are serving on an outside body, the Council's indemnity will only apply after any indemnity or insurance from the body itself. There are further limitations and it is advisable to be clear about the scope of the Council indemnity that may be available to you. You can seek further advice on any indemnity from the monitoring officer.

7. Appointment as a Director of a Company

7.1. Companies are separate legal entities. The company is distinct from its members, who may be either shareholders or guarantors. The Council itself may be a member of the company, either a shareholder or guarantor

7.2. If the body is a limited company, and you are asked to be involved, it is likely that you will be appointed as a company director. The duties of a company director are now set out in the Companies Act 2006.

7.3. The management of a company is usually the responsibility of the Board of Directors. Directors' powers are usually set out in the company's Articles of Association. Another important document is the Memorandum of Association, which sets out the Company's objectives and powers.

7.4. The duties of a company director are not the same as your responsibilities as a Councillor. Basically, when involved in company business, the company must come first. Directors must act in the interests of the company, and not in the interests of other parties, including shareholders. You cannot vote simply in accordance with the Council mandate, to do so would be a breach of duty as a Director.

7.5. A general duty of care and skill to the company is imposed, but a Director requires no greater skill than might reasonably be expected of someone of that individual's particular knowledge and experience. A Director is not deemed to be an expert, but is expected to use due diligence and to obtain expert advice if necessary

7.6. If a director fails to carry out his/her duties, action can be brought for breach of duty, either by the company itself, or by a liquidator if the company goes into liquidation, or with the consent of the court, by a shareholder. Such actions are unlikely where the company is properly controlled by the directors.

7.7. Some important considerations are:

- It is not always easy to reconcile the various factors which must be taken into account when reaching a major decision. The important thing as a director is to show that you are aware of and have taken account of the relevant factors, and have exercised due care and diligence in giving them all fair consideration.
- It may be difficult to be certain whether benefits may be regarded as giving rise to a conflict of interest. If you are unsure take advice from the company's advisers.
- Make sure you are aware of the company's constitution; its Memorandum and Articles of Association, so that you know what it can and cannot do. You must take this into account when making decisions, as well as any shareholder decisions that are relevant.
- Be diligent, and make sure you are well informed about the company's affairs. Make sure you are well briefed when taking up the role, and that you receive regular briefings throughout your term of office.
- Attend training and briefing sessions
- Ensure insurance is in place.
- Some Board decisions may be reviewed on a future occasion. Make sure detailed minutes show that all necessary factors have been considered

when major decisions are being taken. Obtain expert advice where necessary e.g. regarding impact of a decision on the environment.

- Take legal advice where there are doubts about a director's duty in relation to a particular matter

7.8. There may be actual or potential conflicts between the interests of the Council and the interests of the company. In such circumstances it would be inappropriate for the Councillor to take part in discussions upon such topics both as a Councillor and as a Director. You should decide in which role you are to act on the matter. If in doubt, Councillors should seek advice from the Monitoring Officer about any potential conflicts of interest

8. Where the Councillor is appointed as a Trustee of a Charity

8.1. Some companies and unincorporated associations are established for charitable purposes. Councillors should note that you can be both a Trustee and a Director, where the charity operates both models and you are appointed as such. Ensure you understand what role you are appointed to at the outset.

8.2. A charity is an organisation which:

- is established for charitable purposes only, and
- falls to be subject to the control of the High Court in the exercise of its jurisdiction with respect to charities.

8.3. Those who are responsible for the control and administration of a charity are referred to as trustees, even where the organisation is a company limited by guarantee where they are not strictly trustees.

8.4. Trustees of a charity retain personal liability and can only delegate to the extent that the constitution authorises them so to do. Generally, a trustee may incur personal liability if they:

- act outside the scope of the trust deed
- act in a way that falls below the required standard of care
- act otherwise than in the best interests of the charity, in a way which causes loss to the charity fund
- makes a personal profit from the trust assets

8.5. Trustees must take care to act in accordance with the Trust deed and to protect the charity's assets. They are also responsible for compliance with the Charities Acts and the Trustee Act 2000.

8.6. Trustees have a number of trustee duties which they must comply with.

8.7. If in doubt, always consult the Charity Commission. You may avoid personal liability for breach of trust if you act in accordance with their advice

9. Where the Councillor is appointed to an Unincorporated Association

9.1. Unincorporated associations are informal organisations / groups which are neither limited companies nor charitable trusts may be "unincorporated associations" which have no separate legal identity from their members.

9.2. The rules governing the members' duties and liabilities will (or should) be set out in the organisation's constitution, which is simply an agreement between members as to how the organisation will operate.

9.3. Usually the organisation's constitution will provide for a management committee to be responsible for the everyday running of the organisation. Management Committee members must act within the organisation's constitution and must take reasonable care when exercising their powers.

9.4. Because the association has no legal existence separate from its members, the liability of the members is not limited. Each member can incur personal responsibility for liabilities incurred on behalf of the association and relies on the membership agreement to be able to recover his/her costs from the other members. Councillors appointed to such bodies should familiarise themselves with the Constitution to understand the nature of their role, responsibilities and liabilities, and should assess the risk of personal liability, and the extent to which it has been covered by insurance.

10. Other Statutory Bodies

10.1. These are public bodies established by statutory provisions which will set out their functions, the parameters of their jurisdiction and the way in which they are governed.

10.2. This includes bodies such as the Police and Crime Commissioner Panel.

10.3. The details of representation of the council on such bodies may be set out in statute or regulations, or in terms of reference or constitutions established in accordance with the statutory provisions.

10.4. You should be clear about whether you are sitting on such bodies to make delegated decisions on behalf of the council, or purely as members of a board or committee of that body.

10.5. You will need to be clear about how decisions are made, any parameters relating to these, and how you declare your interests and how any potential conflicts are managed.

10.6. Much will depend upon whether the body is exercising its own statutory functions or whether you are exercising council functions whilst sitting on the body.

Emma Jackman
Director of Law, Governance and Strategy
May 2026

Useful Links

Directorships:
Companies House - GOV.UK (www.gov.uk)
Being a company director - GOV.UK (www.gov.uk)
Directors' duties and responsibilities | Factsheets | IoD
7 duties of a company director – Companies House (blog.gov.uk)

Trustees / Charities:
The Charity Commission - GOV.UK (www.gov.uk)
The essential trustee: what you need to know, what you need to do - GOV.UK (www.gov.uk)
Charity trustee: what's involved (CC3a) - GOV.UK (www.gov.uk)
Charity types: how to choose a structure (CC22a) - GOV.UK (www.gov.uk)

Unincorporated Organisations:
Unincorporated associations - GOV.UK (www.gov.uk)